

Executive Summary

ES.1 Background

Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006 (AB 32, Chapter 488, Statutes of 2006), declares that global warming poses a serious threat to the economic well-being, public health, natural resources, and environment of California and charges the California Air Resources Board (CARB) with “monitoring and regulating sources of emissions of greenhouse gases that cause global warming in order to reduce emissions of greenhouse gases (GHGs).” AB 32 provided initial direction on creating a comprehensive multi-year program to limit California’s GHG emissions to 1990 levels by 2020 and initiated the transformations required to achieve the state’s long-range climate objectives. Since then, Senate Bill (SB) 32 (Pavley, Chapter 249, Statutes of 2016) was enacted, which set a statewide GHG emission target of 40 percent below the 1990 level by 2030.

One specific requirement of AB 32 is to prepare a “scoping plan” for achieving the maximum technologically feasible and cost-effective GHG emission reductions by 2020. CARB has prepared and adopted the Scoping Plan with multiple updates. Developing a Short-Lived Climate Pollutant (SLCP) Reduction Strategy is identified in the First Update to the Climate Change Scoping Plan as one of the recommended actions to achieve required GHG emission reductions. The SLCP Reduction Strategy addresses black carbon, methane, and hydrofluorocarbons, which are powerful climate forcers and harmful air pollutants with an abbreviated atmospheric lifespan compared to other known climate pollutants (e.g., carbon dioxide). GHG reductions are important to achieving the GHG targets called for by AB 32 and SB 32.

Senate Bill 605 (Lara, Chapter 523, Statutes of 2014) directed CARB to develop a comprehensive SLCP Reduction Strategy, in coordination with other state agencies and local air quality management and air pollution control districts to reduce emissions of GHGs. SB 1383 (Lara, Chapter 395, Statutes of 2016) directed CARB to approve and begin implementing the plan by January 1, 2018, and set statewide 2030 emission reduction targets for methane, hydrofluorocarbons (HFCs), and anthropogenic black carbon. The SLCP Reduction Strategy, approved in March 2017, includes directives for addressing landfill methane emissions via reductions in organic material disposal. The SLCP: Organic Waste Reductions Regulation (proposed regulation) implements these directives.

As required by SB 1383, the California Department of Resources Recycling and Recovery (CalRecycle), in consultation with CARB, is charged with developing regulations to reduce disposal of organic waste by 50 percent of 2014 levels by 2020 and 75 percent by 2025. In addition, at least 20 percent of the edible food in the organic waste stream must be recovered to feed people by 2025. Materials that cannot be effectively recovered for human consumption would be directed to organic waste recovery facilities to make useful products, including compost, fertilizer, fuel, or energy. These facilities may be developed at existing landfills, other waste management sites, or at new stand-alone sites. These regulations must take effect on or after January 1, 2022.

ES.2 Overview of the Proposed Regulation

The proposed regulation directs actions to achieve the statewide organic waste disposal reduction and edible food recovery targets. CalRecycle, in consultation with CARB, has developed a regulatory approach that requires jurisdictions and other regulated entities to implement a suite of programs to achieve the statute's statewide mandates. The proposed regulation includes provisions related to the following types of activities:

- collection, with a focus on mandatory source-separated collection of organic waste;
- edible food recovery, with a focus on commercial edible food generators, such as wholesale food vendors, supermarkets, grocery stores, and restaurants with 250 or more seats or a total facility size equal to or greater than 5,000 square feet;
- recovery standards at facilities processing organic waste and methods for reducing contamination and the presence of organic waste in disposal streams;
- infrastructure planning, with a focus on regional coordination to plan for future organic waste recovery capacity and edible food recovery operations;
- procurement at the local level of compost; renewable gas used for fuel for transportation, electricity, heating applications, or pipeline injection; electricity from biomass conversion; and recyclable paper products;
- reporting requirements, which are built on existing systems for reporting to CalRecycle; and
- enforcement, with the primary requirements for mandatory enforcement being placed at the local level, but with CalRecycle also having an expanded enforcement role.

The proposed regulation applies to approximately 540 jurisdictions in California; millions of households; thousands of businesses; hundreds of haulers and food recovery organizations; hundreds of material recovery facilities (MRFs), processors, recyclers, and landfills; dozens of local government environmental enforcement agencies; and all schools, federal agencies, and State agencies. The proposed regulation broadly defines organic waste as follows (Section 18982[a][46]):

Organic waste includes solid waste containing material originating from living organisms and their metabolic waste products, including but not limited to food, green material (i.e., yard trimmings and yard waste), landscape and pruning waste, organic textiles and carpets, lumber, wood, paper products, printing and white paper, manure, biosolids and sludges (solid, semi-solid, or liquid residue generated during the treatment of domestic sewage in a treatment works), and digestate (solid, semi-solid, or liquid residue produced in digesters).

Organic wastes make up approximately 67 percent of the total waste stream (CalRecycle 2015, 2019). This total includes organic waste currently sent to landfills for uses considered “diversion” or “beneficial reuse under previous statutes. These activities include alternative daily cover (ADC), alternative intermediate cover (AIC), and other beneficial reuse (material used for buttressing, fill or other uses).

ES.3 Project Objectives

The major implementation objectives of the proposed regulation are as follows:

1. Reduce the level of statewide disposal of organic waste to 50 percent of the 2014 levels by 2020 and 75 percent by 2025.
2. By 2025, recover 20 percent of the amount of edible food currently disposed of so it can be used for human consumption.

Achieving these targets is essential to achieving the GHG emission reductions identified in the SLCP Reduction Strategy, as well as the State’s larger 2030 climate change goals.

ES.4 Intended Uses of This EIR

This document is a program environmental impact report (EIR), prepared in accordance with State California Environmental Quality Act (CEQA) Guidelines Section 15168. A program EIR may be prepared on a series of actions that can be characterized as one large project and that are related to, among other things, the issuance of general criteria to govern the conduct of a continuing program or to individual activities carried out under the same authorizing statutory or regulatory authority, and having generally similar environmental effects that can be mitigated in similar ways.

Preparing a program EIR allows for a more comprehensive consideration of effects than would be practical in separate EIRs on individual actions and allows for consideration of cumulative impacts that might be missed on a case-by-case basis. As noted in Section 15168(c) of the State CEQA Guidelines, later proposed activities that are consistent with the proposed regulation would be examined in light of the information in this EIR to determine whether an additional environmental document must be prepared. If the decision-making agency finds that, pursuant to Section 15162 of the State CEQA Guidelines, that a project related to the proposed regulation is within the scope of this EIR and no new or substantially more severe significant impacts would occur and no new mitigation measures would be required, no additional CEQA documentation would be needed. Under this circumstance, a notice of determination would be filed that indicates that this EIR adequately covers the environmental effects of the proposed project. Under this CEQA compliance approach, the lead agency must adopt all feasible mitigation measures from this EIR to address significant or potentially significant effects on the environment. If the lead agency on a future and related project finds that it is not entirely within the scope of the proposed regulation, additional CEQA analysis, including preparation of a project-specific mitigated negative declaration or EIR may be required.

It is important within the context of this EIR to understand the extent of the relevant authority of CalRecycle. It provides technical assistance to Local Enforcement Agencies (LEA) that enforce state solid waste law in local jurisdictions pursuant to CalRecycle certification. CalRecycle also promulgates the state regulations governing the issuance of solid waste facility permits by LEAs, with the concurrence of CalRecycle, for new or expanded solid waste facilities. Unlike local entitlements issued under broad police power, state solid waste facility permits are limited to controlling the design and operation of solid waste facilities through the enforcement of state minimum standards for solid waste handling, transfer, composting, transformation and disposal in accordance with Division 30 of the Public Resources Code (PRC) and associated regulations. The conditions that may be enforced through such permits are restricted in scope. For example, PRC Sections 43020 and 43021 prohibit the enforcement of permit conditions related to air quality or water quality. In addition, PRC Section 43101 expands such restrictions to prohibit CalRecycle authority from overlapping with the authority of any other state agency, which further curtails the types of permit conditions that may be enforced. Under PRC Section 44012, CalRecycle and LEAs are limited to imposing operational conditions on solid waste facilities rather than pre-operational conditions, such as those that might govern facility construction. Furthermore, operational conditions must be limited to those that protect public health, safety, and the environment within the authority of CalRecycle and LEAs to enforce state minimum standards. As such, solid waste facility permit operating conditions may not extend to regulating issues such as tribal cultural resources.

CalRecycle does not have general land use authority to approve facilities or other structures that are developed in response to adoption of the proposed regulation. Such authority is vested, instead, with local jurisdictions under their land use powers (such as police power) and exercised through the issuance of local entitlements such as conditional use permits. The conditions that are curtailed by law from being included in state solid waste facility permits may be more appropriately included in local entitlements. Like any proposed development project, organic waste and food waste recovery facilities would be reviewed individually by local jurisdictions, in response to applications submitted by project proponents. The goal of this Draft EIR is to consider the types of potential environmental effects of the reasonably foreseeable compliance responses that would be anticipated to meet the requirements included in the proposed SB 1383 regulation.

ES.5 Summary of Alternatives

The alternatives identified below are addressed in more detail in Chapter 5, "Alternatives."

The following alternatives were considered by CalRecycle but are not evaluated further in this Draft EIR:

- Undersink Disposer Alternative
- Landfill Gas Collection Efficiency Alternative

- Co-Locate Organic Waste Recovery Facilities Only at Existing Solid Waste Handling Facilities and WWTPs Alternative
- Prohibit Mixed (Single- and Two-Container) Organic Waste Collection Programs Alternative

The following alternatives are evaluated in this Draft EIR:

- **Alternative 1: No Project Alternative** assumes that the proposed regulation would not be adopted.
- **Alternative 2: Limit the Types of Facilities, Operations, and Activities that Process or Use Organic Waste in a Way that Constitutes a Reduction of Landfill Disposal Alternative.** This alternative would limit Article 2 (14 CCR Section 18983.1[b]) of the proposed regulation to include only compost facilities, AD facilities, and recycling centers as the types of facilities, operations, and activities that would constitute a reduction in landfill disposal or recovery.
- **Alternative 3: Expand List of Targeted Commercial Edible Food Generators Alternative.** This alternative would expand the list of targeted commercial edible food generators in Article 10 (14 CCR 18991.3) of the proposed regulation with the intent of increasing the volume of edible food recovered (potentially reducing the overall food insecurity rate in California) and reducing the amount of material that needs to be managed as waste.

ES.6 Areas of Controversy and Issues to Be Resolved

According to Section 15143 of the State CEQA Guidelines, a lead agency must focus the EIR's analysis on the significant environmental effects on the environment. CalRecycle used several information sources to determine the environmental resources that could experience significant impacts. These sources included but were not limited to peer-reviewed literature, agency information databases, agency consultation, and consideration of scoping comments received on the Notice of Preparation (NOP) of the Draft EIR and during the public scoping meetings. The following issues and areas of concern are known and/or were raised by agencies or interested parties during the NOP review periods:

- air quality emissions;
- GHG emissions, especially methane;
- existing gas recovery systems in landfills;
- changes to traffic and transportation patterns, including vehicle miles traveled;
- conversion of agricultural lands to other uses;
- potential for pathogens in compostable materials and the effects of this contamination on land application;

- the ability for markets to handle organic materials; and
- the State's ability to achieve the mandated goals of SB 1383.

Issues to be resolved include whether the Director will approve the proposed regulation.

ES.7 Environmental Impacts of the Proposed Regulation

Table ES-1, presented at the end of this executive summary, provides a summary of the environmental impacts of the proposed regulation. The table identifies the level of significance of the impact before mitigation, recommended mitigation measures, and the level of significance of the impact after implementation of the mitigation measures.

Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Mitigation Measure	Impact Significance
LTS = less than significant, PSU = potentially significant and unavoidable after mitigation		
3.1 Aesthetics		
Impact 3.1-1: Short-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Construction of Facilities in Response to the Proposed Regulation	Mitigation Measure 3.1-1: Implement Aesthetic Resource Protection Measures during Construction of New or Modified Facilities in Response to the Proposed Regulation	PSU
Impact 3.1-2: Long-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Operation of Facilities in Response to the Proposed Regulation	Mitigation Measure 3.1-2: Implement Aesthetic Resource Protection Measures during Operation of New or Modified Facilities in Response to the Proposed Regulation	PSU
Impact 3.1-3: Conflicts with Applicable Zoning and Other Regulations Governing Scenic Quality	No mitigation is required for this impact.	LTS
Impact 3.1-4: Temporary or Permanent New Sources of Substantial Light or Glare That Would Adversely Affect Day or Nighttime Views in Areas near Project Sites	Mitigation Measure 3.1-4: Implement Light and Glare Reduction Measures during Operation of New or Modified Facilities in Response to the Proposed Regulation	PSU
3.2 Agricultural and Forestry Resources		
Impact 3.2-1: Conversion of Farmland to Nonagricultural Use or Conflict with a Williamson Act Contract or Zoning for Agricultural Use	Mitigation Measure 3.2-1: Implement Agricultural Resource Protection Measures during Construction and Operation of New or Modified Facilities Built in Response to the Proposed Regulation	PSU

Impacts	Mitigation Measure	Impact Significance
LTS = less than significant, PSU = potentially significant and unavoidable after mitigation		
Impact 3.2-2: Conflict with Existing Zoning for Forestland, Timberland, or Timberland Zoned Timberland Production or Loss of Forestland from Conversion to Nonforest Use	Mitigation Measure 3.2-2: Implement Forest Resource Protection Measures during Construction and Operation of New or Modified Facilities Built in Response to the Proposed Regulation	PSU
Impact 3.2-3: Changes in the Existing Environment That, Because of Their Location or Nature, Indirectly Result in Conversion of Farmland to Nonagricultural Use or Conversion of Forestland to Nonforest Use	Mitigation Measure 3.2-3: Implement Agricultural and Forest Resource Protection Measures during Construction and Operation of New or Modified Facilities Built in Response to the Proposed Regulation	PSU
3.3 Air Quality		
Impact 3.3-1: Short-Term Construction-Related Emissions of ROG, NO _x , PM ₁₀ , and PM _{2.5}	Mitigation Measure 3.3-1: Implement All Feasible On- and Off-Site Mitigation Measures to Reduce Construction-Generated Air Pollutants to Below a Lead Agency-Approved Threshold of Significance	PSU
Impact 3.3-2: Long-Term Operational Emissions of ROG, NO _x , PM ₁₀ , and PM _{2.5}	Mitigation Measure 3.3-2: Implement All Feasible On- and Off-Site Mitigation Measures to Reduce Operation-Related Air Pollutants to Below a Lead Agency-Approved Threshold of Significance	PSU
Impact 3.3-3: Compliance with Air Quality Management Plans	No mitigation is required for this impact.	LTS
Impact 3.3-4: Exposure of Sensitive Receptors to TAC Emissions	Mitigation Measure 3.3-4: Conduct a Health Risk Assessment and Implement On-Site TAC-Reducing Mitigation Measures	PSU

Impacts	Mitigation Measure	Impact Significance
LTS = less than significant, PSU = potentially significant and unavoidable after mitigation		
Impact 3.3-5: Exposure of Sensitive Receptors to Odors	Mitigation Measure 3.3-5a: Comply with Appropriate Local Land Use Plans, Policies, and Regulations Mitigation Measure 3.3-5b: Prepare an Odor Impact Minimization Plan or Odor Management Plan	PSU
Impact 3.3-6: Exposure of Sensitive Receptors to Mobile-Source CO Concentrations	No mitigation is required for this impact.	LTS
3.4 Archaeological, Historical, and Tribal Cultural Resources		
Impact 3.4-1: Substantial Adverse Change in the Significance of Built Historical Resources	Mitigation Measure 3.4-1: Survey and Redesign or Avoid Significant Historical Resources	PSU
Impact 3.4-2: Disturbance to Unique Archaeological Resources	Mitigation Measure 3.4-2: Avoid Potential Effects on Archaeological Resources	PSU
Impact 3.4-3: Substantial Adverse Change to Tribal Cultural Resources	No mitigation is required for this impact.	LTS
Impact 3.4-4: Disturbance to Human Remains	No mitigation is required for this impact.	LTS
3.5 Biological Resources		
Impact 3.5-1: Adverse Effect on Special-Status Species, Either Directly or through Habitat Modifications	Mitigation Measure 3.5-1: Incorporate Avoidance and Minimization Measures Consistent with Resource Agency Regulatory Requirements	PSU

Impacts	Mitigation Measure	Impact Significance
LTS = less than significant, PSU = potentially significant and unavoidable after mitigation		
Impact 3.5-2: Substantial Adverse Effects on Riparian Habitat, Federally Protected Wetlands, or Other Sensitive Natural Communities through Direct Removal, Filling, Hydrological Interruption, or Other Means	Mitigation Measure 3.5-2: Avoid or Minimize Impacts, or Compensate for Unavoidable Loss of Sensitive Habitat	PSU
Impact 3.5-3: Substantial Interference with the Movement of Any Native Resident or Migratory Fish or Wildlife Species or with Established Native Resident or Migratory Wildlife Corridors	No mitigation is required for this impact.	LTS
Impact 3.5-4: Conflict with Adopted Local or Regional Conservation Plans	No mitigation is required for this impact.	LTS
3.6 Energy		
Impact 3.6-1: Wasteful, Inefficient, or Unnecessary Consumption of Energy during Project Construction or Operation	No mitigation is required for this impact.	LTS
Impact 3.6-2: Conflict with or Obstruction of a State Plan for Renewable Energy or Energy Efficiency	No mitigation is required for this impact.	LTS
3.7 Geology and Soils		
Impact 3.7-1: Substantial Erosion or Loss of Topsoil	No mitigation is required for this impact.	LTS
Impact 3.7-2: Placement of Organic Water Recovery Facilities in Areas of Expansive or	No mitigation is required for this impact.	LTS

Impacts	Mitigation Measure	Impact Significance
LTS = less than significant, PSU = potentially significant and unavoidable after mitigation		
Unstable Soils, or Creation of Instability as a Result of Implementation		
Impact 3.7-3: Potential Substantial Adverse Effects Involving Rupture of a Known Earthquake Fault, Strong Seismic Ground Shaking, or Other Seismic Effects	No mitigation is required for this impact.	LTS
Impact 3.7-4: Soils Incapable of Adequately Supporting the Use of Septic Tanks or Alternative Wastewater Disposal Systems	No mitigation is required for this impact.	LTS
Impact 3.7-5: Loss of Availability of a Known Valuable Mineral Resource or a Locally Important Mineral Resource Recovery Site	No mitigation is required for this impact.	LTS
Impact 3.7-6: Destruction of a Unique Paleontological Resource or Site	Mitigation Measure 3.7-6: Survey and Redesign or Avoid Significant Paleontological Resources	PSU
3.8 Greenhouse Gas Emissions and Climate Change		
Impact 3.8-1: Conflict with Applicable Plans, Policies, or Regulations of an Agency Adopted for the Purpose of Reducing Emissions of GHGs	No mitigation is required for this impact.	LTS
Impact 3.8-2: Short-Term Construction-Generated GHG Emissions	Mitigation Measure 3.8-2: Implement All Feasible On- and Off-Site Mitigation Measures to Reduce Greenhouse Gas Emissions to below a Lead Agency-Approved Threshold of Significance	PSU

Impacts	Mitigation Measure		Impact Significance
LTS = less than significant, PSU = potentially significant and unavoidable after mitigation			
Impact 3.8-3: Long-Term Operation-Related GHG Emissions	No mitigation is required for this impact.		LTS
3.9 Hazards and Hazardous Materials			
Impact 3.9-1: Significant Health Hazard from the Use of Hazardous Materials	No mitigation is required for this impact.		LTS
Impact 3.9-2: Significant Hazards to the Public or Environment from Disturbance to Known Hazardous Material Sites	Mitigation Measure 3.9-2: Identify and Avoid Known Hazardous Waste Sites during Construction of New or Modified Facilities Built in Response to the Proposed Regulation		PSU
Impact 3.9-3: Generation of Vectors and Pathogens That Would Exceed Regulatory Thresholds and Create a Significant Health or Environmental Hazard	No mitigation is required for this impact.		LTS
Impact 3.9-4: Potential Hazards Associated with the Release of Hazardous Materials from the Siting of Organic Waste Recovery Facilities within One-Quarter Mile of a School	No mitigation is required for this impact.		LTS
Impact 3.9-5: Safety Hazard from Siting an Organic Waste-Handling Facility within 5 Miles of an Airport	Mitigation Measure 3.9-5: Reduce Safety Hazards from Siting an Organic Waste-Handling Facility within 5 Miles of an Airport		PSU
Impact 3.9-6: Impaired Implementation of or Physical Interference with an Adopted Emergency Response Plan or Emergency Evacuation Plan	Mitigation Measure 3.9-6: Implement Measures during Construction Activities to Avoid Impairment of an Emergency Response Plan or Emergency Evacuation Plan		PSU

Impacts	Mitigation Measure	Impact Significance
LTS = less than significant, PSU = potentially significant and unavoidable after mitigation		
3.10 Hydrology and Water Quality		
Impact 3.10-1: Violation of Any Water Quality Standards or Waste Discharge Requirements or Conflict with the Implementation of a Water Management Plan through Construction of New Organic Waste Recovery Facilities	No mitigation is required for this impact.	LTS
Impact 3.10-2: Violation of Any Water Quality Standards or Waste Discharge Requirements or Conflict with the Implementation of a Water Management Plan through Operation of New Organic Waste Recovery Facilities	No mitigation is required for this impact.	LTS
Impact 3.10-3: Violation of Any Water Quality Standards or Waste Discharge Requirements or Conflict with the Implementation of a Water Management Plan through Land Application of Uncomposted Organic Materials	Mitigation Measure 3.10-3: Develop Land Application Enforcement Strategy	PSU
Impact 3.10-4: Substantial Decrease in Groundwater Supplies or Substantial Interference with Groundwater Recharge Such That the Project May Impede Sustainable Groundwater Management of the Basin	No mitigation is required for this impact.	LTS
Impact 3.10-5: Substantial Alteration of the Existing Drainage Pattern of the Site or Area	No mitigation is required for this impact.	LTS
Impact 3.10-6: Release of Pollutants as a Result of Project Inundation	No mitigation is required for this impact.	LTS

Impacts	Mitigation Measure	Impact Significance
LTS = less than significant, PSU = potentially significant and unavoidable after mitigation		
3.11 Land Use and Planning		
Impact 3.11-1: Significant Environmental Impact from a Conflict with a Land Use Plan, Policy, or Regulation Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect	No mitigation is required for this impact.	LTS
3.12 Noise		
Impact 3.12-1: Short-Term Construction-Related Noise Effects	Mitigation Measure 3.12-1: Implement Noise-Reduction Measures during Project Construction	PSU
Impact 3.12-2: Long-Term Operation Effects on Noise	Mitigation Measure 3.12-2: Implement Noise-Reduction Measures during Project Operation	PSU
Impact 3.12-3: Expose People Residing or Working Within Two Miles of an Airport to Excessive Noise	No mitigation is required for this impact.	LTS
3.13 Transportation		
Impact 3.13-1: Construction-Related Traffic Impacts	Mitigation Measure 3.13-1: Prepare a Transportation Construction Plan	PSU
Impact 3.13-2: Substantial Increase in Hazards from a Geometric Design Feature (e.g., Sharp Curves or Dangerous Intersection) or Incompatible Uses	No mitigation is required for this impact.	LTS
Impact 3.13-3: Inadequate Emergency Access	No mitigation is required for this impact.	LTS
Impact 3.13-4: Reasonably Anticipated Increase in VMT	No feasible mitigation is available.	PSU

Impacts	Mitigation Measure	Impact Significance
LTS = less than significant, PSU = potentially significant and unavoidable after mitigation		
3.14 Utilities and Service Systems		
Impact 3.14-1: Increased Demand for Water Supplies	No mitigation is required for this impact.	LTS
Impact 3.14-2: Increased Demand for Wastewater Treatment	No mitigation is required for this impact.	LTS
Impact 3.14-3: Expansion of Existing or Construction of New Water, Wastewater Treatment, Stormwater Drainage, Electric Power, Natural Gas, or Telecommunications Facilities	No mitigation is required for this impact.	LTS
3.15 Wildfire		
Impact 3.15-1: Impaired Wildfire Emergency Response Plan or Evacuation Plan	No mitigation is required for this impact.	LTS
Impact 3.15-2: Substantially Worsened Wildfire Risk Related to Infrastructure Development	No mitigation is required for this impact.	LTS
Impact 3.15-3: Substantial Risks Related to Postfire Flooding or Landslides	No mitigation is required for this impact.	LTS