

MEMORANDUM

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To: Elena Lee, Planning Manager
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Re: Qualification of Residential Project at 717 Donohoe Street for CEQA Categorical Exemption

INTRODUCTION TO CATEGORICAL EXEMPTIONS

The California Environmental Quality Act (CEQA) Guidelines contain classes (or categories) of projects that have been determined not to have a significant effect on the environment and, therefore, are exempt from the provisions of CEQA. CEQA Guidelines Sections 15301 – 15333 constitute the list of categorically exempt projects and contain specific criteria that must be met in order for a project to be found exempt. Additionally, CEQA Guidelines Section 15300.2 includes a list of exceptions to exemptions, none of which may apply to a project in order for it to qualify for a categorical exemption (i.e., if an exception applies, a project is precluded from being found categorically exempt).

CEQA Guidelines Section 15332 – In-Fill Development Projects sets forth criteria for projects characterized as in-fill development that may be found categorically exempt. The analysis below shows that: a) none of the exceptions contained in Section 15300.2 apply to the project and, b) the project is consistent with the in-fill criteria in Section 15332. For these reasons, the residential project proposed at 717 Donohoe Street can be found categorically exempt from CEQA under Section 15332 of the CEQA Guidelines.

PROJECT DESCRIPTION

The project site is located at 717 Donohoe Street in the City of East Palo Alto (Accessor's Parcel Number [APN] 063-374-350). The project site is bounded by Donohoe Street to the south, residences to the west and north, and a church to the east. The vacant project site is approximately 0.66 acres in size and is rectangular in shape. Regional, vicinity, aerial maps of the project site are shown on Figures 1, 2, and 3, respectively. The project site's General Plan Land Use Designation and Zoning are Medium Density Residential and R-MD-2. The project proposes to develop the site with 14 multi-family residential units consistent with the site's existing General Plan Land Use Designation and Zoning. The project does not require a General Plan amendment or rezoning. The site plan for the proposed project is shown on Figure 4.

Figure 1: Regional Map

Figure 2: Vicinity Map

Figure 3: Aerial Map with Surrounding Land Uses

Figure 4: Proposed Site Plan

I. EXCEPTIONS TO CATEGORICAL EXEMPTIONS

This section documents that none of the exceptions in CEQA Guidelines Section 15300.2 would disqualify the project from being found categorically exempt.

CEQA Guidelines Section 15300.2 – Exceptions

(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 all instances, except where the project may impact on 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 only applies to Class 3, 4, 5, 6, and 11 exemptions. The proposed project is categorically exempt under Class 32; therefore, the exception under CEQA Guidelines Section 15300.2(a) is not applicable to the project.

(b) Cumulative Impact: All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

There are no other projects of the same type and in the same place currently under construction or anticipated to be under construction at the same time as the proposed residential project. While most of the project's impacts would be limited to the project site, greenhouse gas (GHG) emissions and regional criteria air pollutants have potential to have a broader impact. The cumulative impacts of these emissions are discussed below.

Greenhouse Gas Emissions

Global climate change is by its very nature a cumulative impact. In its CEQA Air Quality Guidelines, the Bay Area Air Quality Management District (BAAQMD) developed screening criteria to provide lead agencies and project applicants with a conservative indication of whether a project could result in significant GHG emission impacts. If the size of the project is below the BAAQMD screening criteria, then the lead agency does not need to perform a detailed air quality assessment to compare the project's emissions to the BAAQMD significance thresholds and the project would not result in a significant contribution to cumulative GHG impacts. According to Table 3-1 of the BAAQMD CEQA Air Quality Guidelines, the screening level size for multi-family residential projects is 78 residences for 2020 GHG reduction targets. Given the project will be occupied after 2020, the screening level was adjusted to 2030 statewide GHG reduction targets, which are 40 percent below those identified for 2020. The adjusted 2030 screening level is, therefore, 47 residences. The project proposes 14 residences. Therefore, the project would not result in a significant contribution to cumulative GHG impacts.

Regional Criteria Air Pollutants

Project construction and operation would generate criteria air pollutants (e.g., Nitrogen Oxides [NO_x] and Reactive Organic Gases [ROG]) that would contribute to cumulative regional air quality impacts. In its CEQA Air Quality Guidelines, BAAQMD developed screening criteria to provide lead agencies and project applicants with a conservative indication of whether a proposed project could result in potentially significant air quality impacts. If the size of the project is below the BAAQMD screening criteria, then the project would not result in a significant criteria pollutant impact and lead agency does not need to perform a detailed air quality assessment to compare the project's emissions to the BAAQMD significance thresholds. The project would not exceed the operational criteria pollutant screening threshold of 451 residences for NO_x or the construction-related screening size threshold of 240 condominium units for ROG. Therefore, project contribution to regional criteria air pollutants is less than significant.

(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.

The proposed project and project site do not include any features that are unique or that would constitute 'unusual' circumstances for a residential project in the City of East Palo Alto. The proposed residential project is located in an urban area within an existing residential neighborhood on a site that was previously developed with a residence. The proposed project is consistent with the site's existing medium density residential General Plan and zoning designations including but not limited to density, height, and setbacks. Other environmental resources are discussed further in this memo, none of which present unusual circumstances for the project site or proposed residential development. Standard measures that are required by local, State, and Federal law would be implemented as part of the project to minimize and avoid typical construction and operation-related air quality, biology, water quality, geology, and hazardous material issues as applicable. For these reasons, there are no unusual circumstances related to the project or the project site that might cause significant effects.

(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 does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

Interstate-280 (I-280) is the nearest officially designated state scenic highway.¹ The project site is over four miles northeast of I-280. The proposed residences would not be visible from I-280 at this

¹ California Department of Transportation. List of Eligible and Officially Designated State Scenic Highways. Accessed October 28, 2021. <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>

distance. Therefore, the project would not damage scenic resources within an officially designated state scenic highway.

(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.

The project site is not included on any lists compiled pursuant to Section 65962.5 of the Government Code.² Therefore, no exceptions to the exemption apply under 15300.2(e).

(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.

There are no structures on the project site. The project site is vacant. There are no features of the proposed project that would affect off-site structures. Therefore, the project would not cause an adverse change in the significance of a historical resource.

Conclusion

Based on the analysis above, none of the exceptions to categorical exemptions detailed in CEQA Guidelines Section 15300.2 apply to the proposed project.

II. INFILL CRITERIA

This section documents that the proposed project qualifies for a Class 32 In-Fill Development exemption because it meets the criteria set forth in CEQA Guidelines Section 15332(a) – 15332(e).

CEQA Guidelines Section 15332 – In-Fill Development Projects

Class 32 consists of projects characterized as in-fill development meeting the conditions described in this section.

(a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

The project site's General Plan Land Use Designation and Zoning are Medium Density Residential (MDR) and R-MD-2. The MDR land use designation provides for the development of a wide range of living accommodations, including but not limited to multi-family residences, at a density of up to 22 units/acre and a maximum height of three stories and 36 feet. The proposed project is consistent with the site's existing medium density residential General Plan and zoning designations including but not limited to density, height, and setbacks.

(b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

² <https://calepa.ca.gov/sitecleanup/corteselist/> Accessed October 2, 2021.

The approximately 0.66-acre project site is located within the East Palo Alto city limits and is less than five acres in size. As shown on Figure 3, the project site is surrounded by urban uses on all sides.

(c) The project site has no value as habitat for endangered, rare, or threatened species.

Developed with residential uses until approximately 2015, the project site is currently a vacant lot located in an urban area. There are no serpentine soils, riparian, wetland, or other aquatic areas on or adjacent to the site. Habitats in developed areas are extremely low in species diversity. Species using developed habitat are predominately urban-adapted birds and animals, such as doves, squirrels, and domestic cats. Rare, threatened, endangered and sensitive plants, animals and natural communities are not expected or likely to occur on the project site. This conclusion is based upon the fact that the site does not contain suitable habitat for any of these species (e.g., marsh, wetland, riparian or serpentine soils).

(d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

Traffic

Vehicle Miles Traveled Screening

Senate Bill (SB) 743 establishes criteria for determining the significance of transportation impacts using a vehicle miles traveled (VMT) metric intended to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. Specifically, SB 743 requires analysis of VMT in determining the significance of transportation impacts. Local jurisdictions were required by Governor's Office of Planning and Research (OPR) to implement a VMT policy by July 1, 2020.

Per the City of East Palo Alto's adopted VMT policy, various types of developments such as infill developments, small projects, and/or projects near major transit corridors may be presumed to have a less than significant impact on VMT.³ This includes, but is not limited to, small infill residential projects proposing fewer than 20 multi-family residences. Therefore, the proposed project (i.e., 14 multi-family residences) would have a less than significant VMT and transportation impact.

Noise

The project construction activities would temporarily increase, and project operation would incrementally increase ambient noise levels in the project area.

³ Hexagon Transportation Consultants. City of East Palo Alto Vehicle Miles Traveled (VMT) Policy Framework for Common Land Uses. June 18, 2021

Construction Noise

Construction activities associated with implementation of the proposed project would temporarily increase noise levels in the project area. Construction is anticipated to take approximately 16 months to complete. Project construction would involve site preparation, grading and excavation, trenching, building erection, and paving. Hauling construction materials would generate truck trips on local roadways, as well. Typical maximum instantaneous noise levels during project construction would range from 70 to 90 dBA L_{\max} ⁴ at a distance of 50 feet. Section 15.04.125 of the City's Municipal Code limits construction activity to the hours of 7:00 AM to 6:00 PM Monday through Friday and 9:00 AM to 5:00 PM on Saturdays. No construction activity is allowed on Sundays or national holidays. Noise from construction activities during these allowed hours and days is exempt from the City's noise standards. Project construction activities would occur during the days and times allowed under the City's Municipal Code and, consistent with the General Plan, the project would implement standard construction noise control measures as a condition of project approval. For these reasons, project construction activities would not result in a noise impact.

Standard Conditions of Approval

The applicant shall implement the following standard noise control measures during project construction:

- Limit construction activity to weekdays between 7:00 AM and 6:00 PM and Saturdays between 9:00 AM and 5:00 PM, with no construction on Sundays or holidays;
- Utilize "quiet" models of air compressors and other stationary noise sources where such technology exists;
- Equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment;
- Locate all stationary noise-generating equipment, such as air compressors and portable power generators, as far away as possible from adjacent land uses;
- Locate staging areas and construction material areas as far away as possible from adjacent land uses;
- Prohibit all unnecessary idling of internal combustion engines;
- Designate a "disturbance coordinator" who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and will require that reasonable measures warranted to correct the problem are implemented.
- Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction.

⁴ L_{\max} = The maximum A-weighted noise level during the measurement period.

Construction Vibration

Project construction may generate perceptible vibration when heavy equipment or impact tools (e.g., jackhammers, hoe rams) are used. Pile-driving, often one of the largest sources of construction vibration, is not proposed for this project.

Policy 6.4 of the City's General Plan limits vibration levels to 0.08 in/sec PPV at sensitive historic structures and to 0.30 in/sec PPV at buildings of normal conventional construction to minimize the potential for cosmetic damage. There are no sensitive historic structures located on or adjacent to the site. Therefore, groundborne vibration levels exceeding 0.3 in/sec PPV would have the potential to result in a significant vibration impact on the surrounding buildings.

The nearest residential buildings are located within approximately 15 feet of the project site. When heavy vibration-generating equipment, such as clam shovel drops and vibratory rollers, are used along the shared property lines, vibration levels could potentially exceed 0.3 in/sec PPV and could cause cosmetic damage to the surrounding buildings. However, the following standard conditions of approval would ensure the levels of construction vibration generated by the project are minimized.

Standard Conditions of Approval

The project would implement the following control measures:

- Operating equipment on the construction site shall be placed as far as possible from vibration-sensitive receptors.
- Smaller equipment shall be used along shared property boundaries to minimize vibration levels below the limits.
- The use of vibratory rollers or tampers shall be avoided within 20 feet of sensitive uses.
- Dropping heavy objects or materials within 20 feet of sensitive uses shall be avoided.

Implementation of these measures would ensure the project's construction vibration impacts are less than significant.

Operational Noise

Heating, ventilating, and air conditioning (HVAC) system operation generates noise. As outlined in the City's Municipal Code, the exterior noise thresholds at the property line of adjoining residential property lines would be 55 dBA L50 between 7:00 AM and 10:00 PM and 50 dBA L50 between 10:00 PM and 7:00 AM. Depending on the specific type, location, and operation of the HVAC equipment, noise levels generated by the HVAC equipment could potentially exceed the City's thresholds. Therefore, in accordance with the Municipal Code, the following standard conditions of approval would be implemented.

Standard Condition of Approval

- Prior to issuance of building permits, project mechanical equipment shall be selected and designed to reduce impacts on surrounding uses and meet the City's exterior and interior noise level requirements. A qualified acoustical consultant shall be retained by the project applicant to review mechanical noise as the equipment systems are selected in order to determine specific noise reduction measures necessary to reduce noise to comply with the City's 55 dBA L50 daytime exterior limit and 50 dBA L50 nighttime exterior limit at the nearest residential property lines.

Air Quality

As previously discussed, the project is considered to have a less than significant impact due to criteria air pollutant and GHG emissions because the project is below the applicable BAAQMD Screening Thresholds. Another air quality concern would be the temporary emissions of toxic air contaminants (TACs) during project construction in proximity to existing sensitive receptors in the vicinity.

Project construction would generate diesel particulate matter (DPM), a known TAC, from construction equipment and increased traffic due to worker and vendor trips. The primary community risk impact issues associated with construction emissions are cancer risk and exposure to fine particulate matter (PM_{2.5}).⁵ Sensitive receptors within the project vicinity include residences to the west and north. The project would be required to include the following dust abatement measures and BAAQMD's best management practices during construction as a condition of project approval.

Standard Conditions of Approval

The project shall implement the following best management practices:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and

⁵ PM_{2.5} = fine particulate matter or particulates with an aerodynamic diameter of 2.5µm or less.

determined to be running in proper condition prior to operation.

- Post a publicly visible sign with the telephone number and person to contact at the City of East Palo Alto regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

The project shall implement the following standard control measure to ensure potential impacts from increased cancer risk and annual PM_{2.5} concentrations from project construction are minimized. The use of TAC emission controls is a standard measure for urban development throughout the Bay Area that is located in close proximity to sensitive receptors.

- All construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall meet U.S. EPA Tier 4 emission standards for particulate matter (PM₁₀ and PM_{2.5}).

With implementation of the standard measures described above, the cancer risk from project construction would be below the BAAQMD single-source threshold and project contributions to a cumulative health risk impact would not be cumulatively considerable. Therefore, the project would have a less than significant impact on air quality.

Hydrology and Water Quality

Construction

Project construction would require excavation, paving, and grading of the project site, which can result in temporary impacts to surface water quality. Grading and construction activities would expose soil to the erosive forces of wind and water, increasing the potential for sedimentation downstream of the site, including San Francisco Bay.

Standard Condition of Approval

The following erosion and sediment control measures, based upon Best Management recommendations by the RWQCB, shall be implemented by the project to reduce potential construction-related water quality impacts:

- Stormwater inlet protection consisting of burlap bags filled with drain rock shall be installed around storm drain inlets to keep sediment and other debris out of the storm drainage system.
- All exposed or disturbed soil surfaces shall be watered at least twice daily to control dust, as necessary.
- Earthmoving or other dust-producing activities shall be suspended during periods of high winds.
- Stockpiles of soil or other materials subject to wind erosion shall be watered or covered.
- All trucks hauling soil, sand, and other loose materials shall be watered or covered, and all trucks will be required to maintain at least two feet of freeboard.

- All paved access roads, parking areas and staging areas adjacent to the construction site shall be swept daily with water sweepers.
- Vegetation in disturbed areas shall be replanted as quickly as possible.

Operation

The proposed project would create or replace more than 10,000 square feet of impervious surfaces; therefore, the project would be subject to the requirements of the Municipal Regional Stormwater Permit (MRP) for the San Francisco Bay Area. Under Provision C.3 of the MRP, new and redevelopment projects that create or replace 10,000 square feet or more of impervious surface area are required to implement site design, source control, and Low Impact Development (LID)-based stormwater treatment controls to treat post-construction stormwater runoff. LID-based treatment controls are intended to maintain or restore the site's natural hydrologic functions, maximizing opportunities for infiltration and evapotranspiration, and using stormwater as a resource (e.g., rainwater harvesting for non-potable uses). The MRP also requires that stormwater treatment measures be properly installed, operated, and maintained. The project, designed and constructed in compliance with the MRP, would not result in significant post-construction water quality impacts.

(e) The site can be adequately served by all required utilities and public services.

Public Services

New residents generated by the project would result in a nominal increase in calls for police and fire and other public services. The use of public services by future residents would not be substantial enough to warrant modification of existing or construction of new public service facilities. Local school districts would have capacity to accommodate new students and existing park facilities would be adequate to provide recreational facilities to new residents. The project, therefore, would have a less than significant impact on public services.

Utilities and Service Systems

Water

The municipal water supply to the project area is provided by the Veola, under contract with the City of East Palo Alto. The source of the water supply comes from the SFPUC Hetch Hetchy water supply and distribution system. The Hetch Hetchy Aqueduct carries water from Yosemite National Park to San Francisco and other cities on the peninsula, including East Palo Alto. Recently, the City acquired permanent water transfers from adjacent municipalities served by the SFPUC Hetch Hetchy water supply. The City acquired 1,000,0000 gpd from the City of Mountain View in July 2017 and 500,000 gallons from the City of Palo Alto in May 2018.

There is currently no storage within the City of East Palo Alto's managed water system. The City is reliant upon the SFPUC supply system for the necessary storage equalization, fire flows, and emergency use. The City of East Palo Alto is required by the California Urban Water Management Planning Act to prepare and adopt an Urban Water Management Plan (UWMP) and an associated

Water Shortage Contingency Plan (WSCP) every five years. The purpose of the UWMP is for long term water resource planning; it ensures that sufficient water supplies meet existing and future water needs. The City recently updated their UWMP in June 2021. According to the City's UWMP, the City is expected to have adequate potable water supplies during normal years to meet its projected demands up to approximately 2045. While the City is projected to have supply shortfalls beyond 2045 and during single and multiple dry years, the City has been and is implementing demand management measures to conserve potable water. The City has a WSCP in place to meet water demand during single and multiple dry years. The proposed 14 multi-family residences would result in a relatively small incremental increase in water demand and is consistent with the City's projected growth. The project would connect to the existing water main in Donohoe Street. Therefore, existing water supply can adequately serve the project.

Sanitary Sewer

Wastewater services are provided to the City of East Palo Alto by the East Palo Alto Sanitary District (EPASD) and the West Bay Sanitary District. Wastewater services are provided to the project site by the EPASD. EPASD infrastructure includes approximately 30 miles of sewer lines and 560 manholes. According to the General Plan EIR, the average dry weather flow for the EPASD is 1.5 million gallons per day (mgd). Wastewater from the EPASD is treated at the Palo Alto Regional Water Quality Control Plant (PARWQCP). The City of Palo Alto owns, maintains, and upgrades the PARWQCP, and the contributing jurisdictions purchase capacity rights. The PARWQCP operates under the conditions of a RWQCB discharge permit that regulates discharge limits. The PARWQCP has a dry weather capacity of 39 mgd and a wet weather capacity of 80 mgd. Of this total, the EPASD is allocated a total treatment capacity of 3.06 mgd for dry weather flow. Peak dry weather flows into the plant are currently 35 mgd and peak wet weather flows typically do not exceed 70 mgd. The proposed 14 multi-family residences would result in a relatively small incremental increase in sanitary sewer demand and is consistent with the City's projected growth. The project would connect to the existing sewer main in Donohoe Street. For these reasons, the existing sanitary sewer system serving the project area can adequately serve the proposed project.

Storm Drainage

The proposed project would increase the amount of impervious surface area on the project site. This would result in an increase in stormwater runoff from the project site. As discussed above under Hydrology and Water Quality, the proposed project would create or replace more than 10,000 square feet of impervious surfaces; therefore, the project would be subject to the requirements of the Municipal Regional Stormwater Permit (MRP) for the San Francisco Bay Area. Under Provision C.3 of the MRP, new and redevelopment projects that create or replace 10,000 square feet or more of impervious surface area are required to implement site design, source control, and Low Impact Development (LID)-based stormwater treatment controls to treat post-construction stormwater runoff. LID-based treatment controls are intended to maintain or restore the site's natural hydrologic functions, maximizing opportunities for infiltration and evapotranspiration, and using stormwater as a resource (e.g., rainwater harvesting for non-potable uses). The MRP also requires that stormwater treatment measures be properly installed, operated, and maintained. The project, designed and

constructed in compliance with the MRP, would not substantially increase demand and would be adequately served by the City's existing storm drainage system.

Solid Waste

Operation of the proposed 14 residences would increase of solid waste generation. Ox Mountain Landfill is the landfill used for final disposal of solid waste generated by the City. As of 2015, Ox Mountain Landfill had 22,180,000 cubic yards of capacity remaining and is expected to continue operating until 2034.⁶ Solid waste generated by the proposed 14 residences would be an incremental increase in the City's solid waste generation. Consistent with General Plan Policy ISF-4.4 Construction Waste, the project would divert 80 percent of its construction waste away from landfills. For these reasons, the proposed project would be adequately served by existing solid waste services.

CONCLUSION

With incorporation of the standard development measures detailed in this memorandum into the project, the proposed project meets the criteria for a Class 32 In-fill Development exemption and none of the exceptions to the exemptions set forth in CEQA Guidelines Section 15300.2 apply to the project.

⁶ CalRecycle. SWIS Facility/Site Activity Details - Corinda Los Trancos Landfill (Ox Mtn) (41-AA-0002). Accessed October 26, 2021. <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223>