

Attachment B

TAJIGUAS RESOURCE RECOVERY PROJECT
FINDINGS PURSUANT TO PUBLIC RESOURCES CODE SECTION 21081 AND
THE CALIFORNIA ENVIRONMENTAL QUALITY ACT GUIDELINES SECTIONS
15090 AND 15091

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I. OVERVIEW

A. Project Description

1. Project Summary

The Tajiguas Landfill is a Class III non-hazardous solid waste disposal facility located in Santa Barbara County, California approximately 26 miles west of the City of Santa Barbara. The Santa Barbara County Public Works Department, Resource Recovery and Waste Management Division (RRWMD) is the owner and permitted operator of the landfill. The total landfill project site area is 497 acres, with a permitted operational area of 357 acres, a total permitted waste footprint of 118 acres, and a permitted capacity of 22.3 million cubic yards. The landfill has been in operation since 1967. The southern portion of the landfill property is located within the Coastal Zone and the remainder is the inland area of Santa Barbara County. The landfill is zoned Unlimited Agriculture (inland) and AG-II-320 (coastal) and has a Comprehensive Plan Designation of A-II-100 with a Waste Disposal Facility Overlay (inland) and A-II-320 (coastal).

The County has modified landfill operations in the past to respond to updated requirements for solid waste disposal and to incorporate advancements in technology. The Resource Recovery Project would further modify current waste management operations at the Tajiguas Landfill by the addition of a Materials Recovery Facility (MRF) and Dry Fermentation Anaerobic Digestion (AD) Facility.

The MRF processing area would be comprised of an approximate 56,500 square foot (sf) facility (66,500 sf with the Commingled Source Separated Recyclables [CSSR] as described below) that would sort MSW into three streams:

- Recyclables (i.e., glass, metal, paper, plastic, wood) - recovered and processed for sale;
- Organics – recovered for processing in the Anaerobic Digestion Facility; and
- Residue – materials left over after all recyclables and organics are recovered that would be disposed of at the existing landfill.

The AD Facility would be housed within an approximate 63,600 sf building, and would include an associated energy facility, percolate storage tanks and flare, that would convert all organics recovered from the MSW and SSOW into:

- Bio-gas (primarily composed of methane and CO₂) – that would be used to power two (2) 1,573 horsepower onsite combined heat and power (CHP) engines driving electric power generators that would generate approximately 1+ net megawatts (MW) of renewable power continuously. The Energy Facility would be located on the south side of the AD Facility; and
- Digestate - that can then be cured into compost and/or soil amendments. The curing would require an approximately 5 acre area (located on the landfill top

deck). The compost and/or soil amendments would be marketed for agricultural or landscape use or used for reclamation projects.

The MRF would have a design capacity of up to 800 tons/day of MSW or up to approximately 250,000 tons/per year (up to 311 operating days per year). Up to 90,000 tons/year (290 tons/day) of recyclable material would be recovered and sold for reuse. The AD facility would have a design capacity of up to 73,600 tons/year, made up of organics recovered from the MRF and/or brought to the project site as source separated organic waste (SSOW).

Up to 100,000 tons/year (320 tons/day) of residue from the MRF and residue from the AD Facility which is not suitable for composting would be landfilled at the Tajiguas Landfill. Residue ineligible for disposal in the landfill (i.e., hazardous waste or e-waste), would be transported to an appropriate recycling or disposal facility

With the CSSR optional element, the project could also process up to 130 tons/day of CSSR or 40,000 tons/year. With the inclusion of this optional element, the total maximum processing capacity of the MRF would be approximately 290,000 tons/year (250,000 tons/year MSW + 40,000 tons/year CSSR). Processing of CSSR would increase the production of marketable recyclables by up to 36,000 tons/year (126,000 tons/year overall), producing up to an additional 4,000 tons/year (13 tons/day) of residue which would be disposed of in the landfill.

Based on current waste disposal rates the Tajiguas Landfill may reach its permitted disposal capacity (23.3 million cubic yards) in approximately year 2026. With the additional diversion provided by the proposed Tajiguas Landfill Project modification (operation of the Resource Recovery Project), the permitted disposal capacity (which would not be modified as a part of the project) would not be expected to be reached until approximately year 2036, extending the landfill life by approximately 10 years.

2. Project Objectives

1. Reduce landfill dependence by diverting MSW that is not currently recycled from landfill disposal to:
 - a. Meet or exceed the requirements of Assembly Bill 341 which requires all jurisdictions to recycle 75 percent of their waste by 2020;
 - b. Provide a long term solution (minimum operational life of 20 years) to the region's solid waste management needs to meet or exceed CalRecycle's 15-year disposal capacity requirement; and
 - c. Substantially extend the life of the Tajiguas Landfill.
2. Locate the proposed project elements in reasonable proximity to existing developed solid waste facilities to:
 - a. Ensure that the project elements can function together effectively and efficiently; and

- b. Ensure that the facility is reasonably accessible to all communities currently served by the Tajiguas Landfill while minimizing environmental and community impacts.
3. Provide long-term financial stability to limit impacts to the affected rate payers.

Additional Project Objectives include:

- A. Process MSW currently disposed of at the Tajiguas Landfill with a diversion rate goal of 60 percent.
 - B. Maximize the reduction of future greenhouse gas emissions associated with the transportation, processing and disposal of MSW consistent with CalRecycle's Anaerobic Digestive Initiative and Assembly Bill 32.
 - C. Provide green energy to the region by specifically producing energy that is certified as "Renewable Portfolio Standard" eligible as defined by the California Energy Commission.
 - D. Provide a cost effective tipping fee for solid waste management services compared to alternative disposal methods.
 - E. Construct and operate a project that can adapt to the changing waste management needs of the region.
 - F. Provide a safe and humane work environment for all employees.
3. Entitlements

No new land use entitlements or land use permits are required as the proposed Tajiguas Resource Recovery Project is within the inland area of the County and pursuant to the Santa Barbara County Land Use Development Code (Chapter 35, Article 35.1 of the Santa Barbara County Code, Section 35.10.040G.I.b.), the Land Use Development Code is not applicable to "development by the County or any district of which the Board is the governing body." However, the following permits and/or approvals may be needed from the following agencies or municipalities:

- Santa Barbara County: project approval, approval of waste service agreement and disposal agreement, approval of material delivery agreements, approval of possible amendment to the County's Non-Disposal Facility Element;
- Cities of Santa Barbara, Goleta, Solvang and Buellton: approval of waste delivery agreements.
- Santa Barbara County Air Pollution Control District: authority to construct, permit to operate;
- Central Coast Regional Water Quality Control Board: waste discharge requirements for wastewater treatment system, new industrial storm water permit or amended Landfill industrial storm water permit, new construction storm water permit;

- State of California Department of Resources Recycling and Recovery (CalRecycle): new solid waste facility permit or revised Landfill solid waste facility permit, approval of a potential amendment to the County's Non-Disposal Facility Element;
- Santa Barbara County Public Health Department, Environmental Health Services (Local Enforcement Agency): new solid waste facility permit or amended Landfill solid waste facility permit;
- Santa Barbara County Public Health Department, Environmental Health Services Domestic Water Supply Permit and Onsite Sewage Treatment System Permit; and
- California Public Utilities Commission (PUC): approvals related to energy generated by combustion of bio-gas.

B. Environmental Review History for the Tajiguas Landfill

The Tajiguas Landfill site has been in operation since 1967 for the disposal of municipal solid waste. The initial siting, design and operation of the landfill predates adoption of the California Environmental Quality Act (1970) and the Coastal Act, which designated Coastal Zones in California in 1976.

In 1987, an Environmental Impact Report (EIR) was prepared and certified for a proposed lateral expansion of the landfill into the northern portions of Cañada de la Pila (87-EIR-08). An addendum to 87-EIR-08 was prepared in 1988 and adopted on July 21, 1988 for a vertical expansion of the existing waste footprint to an elevation of 500 feet above mean sea level (msl). The lateral expansion reviewed under the 1987 EIR was never implemented.

On August 3, 1999, the Board of Supervisors directed the RRWMD to proceed with the Tajiguas Landfill Bench Plan. The Bench Plan increased the permitted disposal design capacity of the landfill from 12.0 million cubic yards to 15.1 million cubic yards by re-grading and filling the outside faces of the landfill. The Bench Plan project was determined to be within the scope of the analysis of 87-EIR-08 and the July 21, 1988 addendum.

On August 13, 2002, the Board of Supervisors certified an EIR (01-EIR-05) for, and approved, the Tajiguas Landfill Expansion Project (Front Canyon Expansion). This project consists of the horizontal and vertical expansion of the landfill outside of the Coastal Zone, providing 8.2 million cubic yards of additional waste disposal capacity for a total capacity of 23.3 million cubic yards.

On December 5, 2006, the Board of Supervisors approved minor changes to the approved Tajiguas Landfill Expansion Project. These changes included elimination of the Coastal Zone Southeast Corner Modification and reconfiguration of the North Slope borrow/stockpile area. These project changes were analyzed in a November 8, 2006 Addendum to 01-EIR-05.

On April 18, 2007, Pursuant to State CEQA Guidelines Section 15162, the County Environmental Review Officer determined that 01-EIR-05 adequately addressed a proposed change in the location of the Green Waste Processing Area.

On May 5, 2009, the Board of Supervisors certified a Subsequent EIR (08EIR-00000-00007) for, and approved, the Tajiguas Landfill Reconfiguration and Baron Ranch Restoration Project. The project involved the reconfiguration of the waste footprint approved as a part of the Tajiguas Landfill Expansion Project which provided a number of engineering and environmental benefits and the comprehensive restoration of native habitats on the County-owned Baron Ranch to benefit the federally threatened California red-legged frog. The reconfiguration did not modify any of the operational parameters (e.g., refuse capacity, operating hours, environmental protection systems) reviewed in 01-EIR-05.

On March 18, 2014, pursuant to State CEQA Guidelines Section 15162 (Planning and Development 15162 determination letter dated December 18, 2013), the Board of Supervisors found that no substantial changes were proposed in the project, no substantial changes occurred with respect to the circumstances under which the project was undertaken, and no new information of substantial importance was received with respect to the project or the mitigation measures, and therefore, no new Environmental Impact Report was required for the approval the Tajiguas Landfill Phase 3B Groundwater Protection System including a proposed change in the location of temporary soil stockpiles for the project.

The Tajiguas Landfill Expansion Project EIR (01-EIR-05) certified by the Board of Supervisors on August 13, 2002, the November 8, 2006 Addendum accepted by the Board of Supervisors on December 5, 2006, and the Tajiguas Landfill Reconfiguration and Baron Ranch Restoration Project Subsequent EIR (08EIR-00000-00007) certified by the Board of Supervisors on May 5, 2009 are herein after referred to as the "Tajiguas Landfill Environmental Documents".

II. INTRODUCTION TO CEQA FINDINGS

RRWMD prepared a Draft and Final Subsequent Environmental Impact Report for the Tajiguas Resource Recovery Project (collectively, the "Subsequent EIR"). The Subsequent EIR addresses the potential environmental effects associated with the project, and seven alternatives. The Findings and Statement of Overriding Considerations are provided below and are recommended for adoption by the Santa Barbara County Board of Supervisors (Board) as the County's findings under the CEQA (Public Resources Code, Sec. 21000 et seq.) and the State CEQA Guidelines (Cal. Code Regs., Title 14, Sec. 15000 et seq.). The Findings provide a written analysis and conclusions regarding the project's environmental impacts, mitigation measures, other alternatives to the project, and overriding considerations, which outweigh the unavoidable adverse environmental impacts and thus those impacts may be considered acceptable.

A. Procedural Background

Notice of Preparation

A Notice of Preparation (NOP) was prepared according to the State and Santa Barbara County California Environmental Quality Act (CEQA) Guidelines and distributed with a Subsequent EIR Scoping Document to responsible and trustee agencies and members of the public on April 19, 2012. A copy of the NOP was also posted electronically on the RRWMD website and a display ad was published in the Daily Sound and the Santa Ynez Valley News on April 19th, 2012.

A public scoping meeting was held on May 14, 2012 at the County Planning Commission hearing room in Santa Barbara to accept input on the scope and content of this Subsequent EIR. Public testimony was provided by Mike Lunsford and Anna Citron (Law Offices of Marc Chytilo representing the Gaviota Coast Conservancy), Bob Keats and James Smallwood (Surfrider Foundation) and Bob Hart (local property owner). Concerns expressed focused on extension of the life of the landfill, assessing alternative urban locations, visual impacts, 24-hour operations, and reliability of the proposed AD facility.

Draft Subsequent EIR

As noted in Section I.B. (above) The Santa Barbara County Board of Supervisors certified an EIR (01-EIR-05) for, and approved, the Tajiguas Landfill Expansion Project (Front Canyon Expansion) on August 13, 2002. All applicable permits to construct and operate the expansion were received in 2003 and waste disposal is currently occurring in the permitted area (as modified by the Tajiguas Landfill Reconfiguration and Baron Ranch Restoration Project).

The Tajiguas Resource Recovery Project EIR (12EIR-00000-00002) was prepared as a Subsequent EIR to 01-EIR-05 and 08EIR-00000-00007 because the proposed project would substantially modify waste disposal operations at the landfill, with resultant changes to the types and severity of impacts identified in the previously certified EIR.

A Draft Subsequent EIR was prepared and circulated for review by public agencies and interested members of the public for an initial 45-day period (August 11, 2014 to September 24, 2104). In response to requests made by the public, the public comment period was extended to October 9, 2014. A public hearing was held at the County Public Health Department auditorium on September 4, 2014 to accept oral and written testimony regarding the adequacy of the Draft Subsequent EIR. In total, eighteen oral comments and 73 comment letters/emails were received during the public comment period and written responses have been prepared and incorporated into the Final Subsequent EIR (Section 9.0).

The Notice of Availability of the Draft Subsequent EIR was filed with the State Office of Planning and Research under State Clearinghouse no. 2012041068. A Notice of Availability of the Draft Subsequent EIR and Notice of Public Hearing was also published in two newspapers of general circulation (Santa Barbara News Press and Santa Maria

Times). The Notice was posted on-line at the RRWMD website, posted at the Planning and Development Department and at the Clerk of the Board of Supervisors.

Notice was also direct mailed to properties within 1,000 feet of the Tajiguas Landfill property boundary, 1,000 feet of the outer boundary of the parcel (APN 059-140-023) on which the South Coast Recycling and Transfer Station is located, properties and other interested parties surrounding APN 017-113-025 to -028 (MarBorg Industries property) based on a list provided by the City of Santa Barbara, regulatory agencies, area jurisdictions, and other interested community groups and individuals who requested to be noticed. Copies of the Draft Subsequent EIR were also made available at the following public libraries: Buellton Library; Carpinteria Public Library, Goleta Branch Library, Montecito Public Library, Santa Barbara Public Library, Solvang Public Library, and UCSB Library Reference Department, University of California, Santa Barbara. A notice of the extension of the public comment period was published and displayed and distributed in the same method as the original notice and to additional individuals who requested notice at the public hearing on September 4, 2014.

Proposed Final Subsequent EIR

The Proposed Final Subsequent EIR was transmitted on December 15, 2015. A Transmittal Notice was mailed or emailed directly to all individuals on the RRWMD's mailing list, published in the New Press (a newspaper of general circulation) on December 15, 2015 and posted at the Clerk of the Board of Supervisors and at Planning and Development. Copies of the document were provided to the same libraries that received the Draft Subsequent EIR. The Proposed Final Subsequent EIR, which includes the response to comments on the Draft Subsequent EIR, was transmitted to public agencies that commented on the Draft Subsequent EIR Pursuant to Public Resource Code 21092.

III. CEQA FINDINGS

FINDINGS PURSUANT TO PUBLIC RESOURCES CODE SECTION 21081 AND THE CALIFORNIA ENVIRONMENTAL QUALITY ACT GUIDELINES SECTIONS 15090 AND 15091:

A. Consideration of the Subsequent EIR

The Final Subsequent EIR (12EIR-00000-00002) and Revision Letter and Errata dated May 27, 2016 was presented to the Board of Supervisors which has reviewed and considered the information contained in the Final Subsequent EIR and its appendices prior to approving the project. In addition, the Board of Supervisors have reviewed and considered testimony and additional information presented at or prior to public hearing on May 27, 2016. The Final Subsequent EIR as modified by the Revision Letter and Errata dated May 27, 2016 reflects the independent judgment and analysis of the Board of Supervisors together with the Tajiguas Landfill Expansion Project (01-EIR-05) the November 8, 2006 Addendum, and the Tajiguas Landfill Reconfiguration and Baron

Ranch Restoration Project Subsequent EIR (08EIR-0000-00007), is adequate for this proposal.

B. Full Disclosure

The Board of Supervisors finds and certifies that the Final Subsequent EIR (12EIR-00000-00002), as modified by the Revision Letter and Errata dated May 27, 2016 constitutes a complete, accurate, adequate and good faith effort at full disclosure under CEQA. The Board of Supervisors further finds and certifies that the Final Subsequent EIR and Revision Letter and Errata dated May 27, 2016 have been completed in compliance with CEQA.

C. Location of Record of Proceedings

The documents and other materials which constitute the record of proceedings upon which this decision is based are in the custody of the Project Manager: Ms. Joddi Leipner at Santa Barbara County Public Works Department, Resource Recovery and Waste Management Division, 130 E. Victoria Street, Suite 100, Santa Barbara, CA 93101.

D. Findings that Certain Unavoidable Impacts are Mitigated to the Maximum Extent Feasible

The Final Subsequent EIR (12EIR-00000-00002) and Revision Letter and Errata dated May 27, 2016 for the Tajiguas Resource Recovery project identified two environmental impacts associated with extending the life of the Tajiguas Landfill which cannot be fully mitigated and are therefore considered unavoidable (Class I). Those impact areas are air quality and biology. To the extent the impacts remain significant and unavoidable, such impacts are acceptable when weighed against the overriding social, economic, legal, technical, and other considerations set forth in the Statement of Overriding Considerations included herein. For each of these Class I impacts identified by the Final Subsequent EIR (12EIR-00000-00002), feasible changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect, as discussed below. In addition, the Board of Supervisors finds that the mitigation measures applied to the project mitigate these impacts to the maximum extent feasible.

Impact TRRP AQ-11: Project-related extension of life of the Tajiguas Landfill would extend the duration of air pollutant emissions associated with landfill operations and associated NO_x, NO₂ and 24-hour PM₁₀ air quality impacts – Class I Impact (Final Subsequent EIR Volume 1 (Section 4.2, page 4.2-69).

Mitigation Measures

AQ-1 Mobile source emissions shall be reduced through implementation of the following:

- a. Engines shall be turned off when the idling period will exceed 10 minutes.
- b. All vehicles and equipment shall be regularly maintained.

- c. Heavy-duty diesel-powered equipment purchased for the project shall comply with federal and California diesel standards that are in force at the time of purchase.
- d. Scrapers and compactors shall be retrofitted with diesel particulate filters (DPFs) where applicable.
- e. The maximum number of scrapers operating simultaneously shall be limited to four.
- f. Transfer trucks shall be used to haul waste from the transfer stations to the Tajiguas Landfill, thereby reducing the number of trips to the landfill (FEIR, p 4-17).

AQ-2 Operation of the tub grinder and scrapers shall be coordinated to reduce peak daily air emissions. The following measures shall be implemented to reduce emissions:

- a. The tub grinder or other grinder shall be used a maximum of 4 hours per day when scrapers are in use.
- b. When no scrapers are in use, the tub grinder may be used up to a maximum of 8 hours per day.

AQ-3 Dust generated by landfill activities shall be controlled through implementation of the following dust control measures:

- a. During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site.
- b. Traffic speed shall be limited to 15 mph on all roads.
- c. Soil stockpiled for more than two days shall be covered, moistened, or treated with soil binders to prevent dust generation.
- d. In areas not in active use, exposed soil shall be moistened or shall be revegetated by seeding and watering, or soil binders shall be applied.
- e. All permanent access roads shall be paved. Temporary access roads shall be provided with a crushed rock base (or similar material) or treated with a soil binder.
- f. Paved roads shall be vacuum swept as needed.
- g. Monitoring wind speed.
- h. Monitoring PM10 at the landfill boundary

AQ-5 The landfill cover material shall be routinely inspected for adequacy, and for cracks and fissures. The cover shall be repaired as necessary to control landfill gas.

Discussion: The project-related extension of the life of the landfill operations would extend the duration of time that significant and unavoidable NO_x, NO₂ and PM₁₀ air quality impacts as identified in the Final EIR (01-EIR-05, Section 3.11.3.3) for the Tajiguas Landfill Expansion Project would occur. NO_x impacts would continue to be reduced through maintenance, scheduling and upgrading of equipment, and using transfer trucks to efficiently transport waste from transfer stations to the Tajiguas Landfill (01-EIR-05, pp. 3.11-29 -30) In addition, the grinder operation would continue to be coordinated and scheduled with other mobile equipment working at the Tajiguas Landfill (01-EIR-05, p. 3.11-30) to reduce emissions. Final partial closure of portions of the landfill along with ongoing inspection of the landfill cover for cracks, and filling fissures and repairing the landfill cover material as needed will continue to control landfill gas emissions (01-EIR-05, p. 3.11-31). PM₁₀ impacts will continue to be controlled through implementation of dust control measures. In addition the reduced landfilling activity associated with the TRRP, would reduce mobile equipment emissions.

With implementation of the mitigation measures from 01-EIR-05 listed above, air quality impacts due to the extension of the landfill life would continue to be reduced to the maximum extent feasible, however the residual impact would be significant and unavoidable.

Impact TRRP BIO-16: Project-related extension of life of the Tajiguas Landfill would extend biological impacts further in time – Class I Impact (delay in the landfill cover revegetation and for continued abandonment and avoidance of foraging and breeding habitat by sensitive wildlife). This impact is described in the Final Subsequent EIR Volume 1 (Section 4.3, page 4.3-47).

Mitigation Measures

BIO-7 To compensate for native habitats disturbed by the expansion, a County approved biologist shall prepare and implement a revegetation/restoration plan (e.g., a ratio of not less than 3:1 for each disturbed acre). The plan shall utilize native plants and seed stock from locally obtained sources to the maximum extent feasible and also shall take into account requirements for maintaining the integrity of the landfill and cover system. Species selection shall be dependent upon the nature of the habitat.

BIO-9 To minimize wildlife disturbance, night lighting used on the landfill site shall be of low-intensity, low-glare design, and shall be hooded to direct light downward onto the work area and prevent spill-over onto adjacent habitats. Except on an emergency basis, artificial lighting shall not be employed prior to 6:00 a.m. or after 8:00 p.m.

BIO-10 To reduce hazards to wildlife that may ingest or become trapped by debris, portable fences shall continue to be used to limit the spread of litter on the working face of the landfill. Litter shall be collected on a regular basis

Discussion: The project-related increase in diversion of MSW would result in extending the active life of the landfill by approximately 10 years and delaying full

closure and revegetation of the landfill. Although phased closure activities including restoration of areas to native habitat would occur during this time, landfill operational activities would continue to occur in areas analyzed in the prior Environmental Documents. No new disturbance or direct biological impacts (i.e., vegetation, habitat or sensitive plant species removal) would occur due to the potential extension of the landfill life and operations. However, indirect biological impacts associated with ongoing landfill operations (noise, dust, equipment operations and human activity) and the delayed revegetation would result in continued loss of habitat and abandonment or avoidance of foraging and breeding habitat by sensitive birds and mammals that occur in the adjacent foothill habitats (01-EIR-05, page 3.4-42). The phased closure and resulting revegetation as part of the proposed project would reestablish limited wildlife values at the project site but the values would be reduced as compared to their predisturbance condition (01-EIR-05, page 3.4-28). On-site and off-site mitigation efforts aimed at replacing chaparral and coastal sage scrub habitats would not recreate wildlife habitat values to existing levels for many years, if at all. This impact would continue to be reduced through implementation of Mitigation Measure BIO-7, BIO-9 and BIO-10 from 01-EIR-05; however even with mitigation, the loss of these mature plant communities and the associated impacts to sensitive wildlife cannot be mitigated to their previous habitat values (01-EIR-05, page 3.4-42-43).

E. With implementation of the mitigation measures from 01-EIR-05 listed above, biological resource impacts due to the extension of the landfill life would be reduced to the maximum extent feasible, however the residual impact would be significant and unavoidable. Findings that Certain Impacts are Mitigated to Insignificance by Conditions of Approval

The Final Subsequent EIR (12EIR-00000-00002) and Revision Letter and Errata dated May 27, 2016 identified several subject areas for which the project is considered to cause or contribute to significant, but mitigable environmental impacts (Class II). For each of these Class II impacts identified by the Final Subsequent EIR (12EIR-00000-00002), feasible changes or alterations have been required in, or incorporated into, the project which avoid or reduce the environmental impact to a less than significant level as discussed below:

1. Visual Resources/Aesthetics

The Final Subsequent EIR Volume 1 identified two potentially significant impacts to visual resources/aesthetics that would result from implementation of the project:

- Impact TRRP VIS-2: Project implementation would significantly alter the visual setting as seen from U.S. Highway 101, (View 6), an eligible scenic highway – Class II Impact; and
- Impact TRRP VIS-CUM-1: Project implementation, combined with other related cumulative projects, could degrade the visual character/quality of scenic vistas

from U.S. Highway 101 along the Gaviota Coast – Class I Cumulative Impact; Project Contribution – Not Considerable with Mitigation (Class II).

These impacts are discussed in the Final Subsequent EIR (Sections 4.1.2.4 and 4.1.2.7, pages 4.1-12 to -13, 4.1-18). The Board of Supervisors finds that the following mitigation measures would reduce such impacts to a less than significant level.

- Impact TRRP VIS-2: mitigation measures (*MM TRRP VIS-1a*, Building Exterior Color and *MM TRRP VIS-1b*, Landscape Screening) have been provided to reduce visual impacts of the project TRRP by blending the facilities into the surrounding landscape using visually compatible colors (earth tone) and landscaping to screen and break up the building/structural massing.
- Impact TRRP VIS-CUM-1: the project contribution to the cumulative impact would not be considerable with implementation of project-specific mitigation measures (*MM TRRP VIS-1a* and *MM TRRP VIS-1b*) identified for Impact TRRP VIS-2.

2. Biological Resources

The Final Subsequent EIR Volume 1 identified 12 potentially significant impacts to biological resources that would result from implementation of the project:

- Impact TRRP BIO-2: Construction activities may adversely affect sensitive vegetation located adjacent to the direct impact area – Class II Impact;
- Impact TRRP BIO-4: Construction activity may significantly affect nesting migratory birds and/or raptors – Class II Impact;
- Impact TRRP BIO-8: Project-related habitat loss could adversely affect American Badger and Ringtail – Class II Impact;
- Impact TRRP BIO-9: Project-related habitat loss could significantly impact the San Diego desert woodrat – Class II;
- Impact TRRP BIO-10: Project-related removal of trees and rock outcrops may eliminate and/or disturb habitat for sensitive bat species – Class II Impact;
- Impact TRRP BIO-12: Operation of the proposed project may significantly impact transient California red-legged frogs – Class II Impact;
- Impact TRRP BIO-13: Operation of the proposed project may significantly impact ringtail, San Diego desert woodrat and American badger – Class II Impact;
- Impact TRRP BIO-CUM-1: Implementation of the project combined with other cumulative projects could result in significant impacts to transient California red-legged frogs – Class I Cumulative Impact; Project Contribution – Not Considerable with Mitigation (Class II);
- Impact TRRP BIO-CUM-2: Implementation of the project combined with other cumulative projects could result in significant direct and indirect cumulative loss

of native plant communities, sensitive habitats and sensitive plants – Class II Cumulative Impact; Project Contribution – Not Considerable with Mitigation (Class II);

- Impact TRRP BIO-CUM-4: Implementation of the project combined with other cumulative projects could result in a significant impacts to American badger and ringtail – Class II Cumulative Impact; Project Contribution – Not Considerable with Mitigation (Class II);
- Impact TRRP BIO-CUM-5: Implementation of the project combined with other cumulative projects could result in a permanent loss and significant degradation of San Diego desert woodrat habitat – Class II Cumulative Impact; Project Contribution – Not Considerable with Mitigation (Class II); and
- Impact TRRP BIO-CUM-6: Implementation of the project combined with other cumulative projects could result in a significant loss and/or disturbance of roosting habitat for sensitive bat species – Class II Cumulative Impact; Project Contribution – Not Considerable with Mitigation (Class II).

These impacts are discussed in the Final Subsequent EIR (Sections 4.3.2.4 – 4.3.2.6, pages 4.3-33 to 4.3-53). The Board of Supervisors finds that the following mitigation measures would reduce such impacts to a less than significant level.

- Impact TRRP BIO-2: mitigation measure (*MM TRRP BIO-1: Construction Requirements*) has been provided to reduce impacts of construction to sensitive vegetation to a less than significant level by requiring field delineation of work areas, monitoring and control of invasive plants, dust control and soil stabilization.
- Impact TRRP BIO-4: mitigation measure (*MM TRRP BIO-2: Breeding Bird Protection*) has been provided to reduce impacts of construction to nesting migratory birds and/or raptors to a less than significant level by requiring that construction work be scheduled to avoid the bird breeding season, or if avoidance of the nesting season is not possible conducting bird breeding surveys, providing construction buffers, and monitoring of active nests to avoid adverse effects.
- Impact TRRP BIO-8: mitigation measure (*MM TRRP BIO-3: American Badger and Ringtail Surveys*) has been provided to reduce impacts of construction to American Badger and Ringtail to a less than significant level by requiring construction work to avoid the badger and ringtail denning period, or if avoidance is not possible, dismantling inactive dens and monitoring of active dens to avoid adverse effects.
- Impact TRRP BIO-9: mitigation measure (*MM TRRP BIO-4: San Diego Desert Woodrat Relocation*) has been provided to reduce impacts of construction to San Diego desert woodrat to a less than significant level by conducting surveys

for nests prior to construction, and dismantling active nests during the non-breeding period to entice occupants to leave the work area.

- Impact TRRP BIO-10: mitigation measures (*MM TRRP BIO-5: Avoidance of Bat Maternity Colonies*) has been provided to reduce impacts to bat habitat to a less than significant level by requiring construction to avoid the peak breeding season (May 1 to August 15), or if avoidance is not possible, conducting bat surveys, and avoiding bat maternal colonies during the breeding season.
- Impact TRRP BIO-12: mitigation measure (*MM TRRP BIO-6: Avoidance and Minimization Measures for California Red-legged Frog and Sensitive Mammal Species*) has been provided to reduce conflicts with and mortality of transient California red-legged frogs during construction and operation to a less than significant level by requiring night lighting to be minimized, litter control, reduced vehicle speed limits, restrictions on nighttime vehicle use and operations in the back canyon area of the landfill, worker awareness training, biological surveys prior to vegetation removal and biological monitoring during initial ground disturbance in previously undisturbed native plant communities.
- Impact TRRP BIO-13: the mitigation measure listed under Impact TRRP BIO-12 (*MM TRRP BIO-6*) would also reduce impacts to ringtail, badger and San Diego desert woodrat to a less than significant level.
- Impact TRRP BIO-CUM-1: the mitigation measure listed under Impact TRRP BIO-12 (*MM TRRP BIO-6*) would also ensure the project's contribution to cumulative impacts to transient California red-legged frogs associated with other projects in the region would not be cumulatively considerable.
- Impact TRRP BIO-CUM-2: the mitigation measure listed under Impact TRRP BIO-2 (*MM TRRP BIO-1*) would also ensure the project's contribution to cumulative construction impacts to native plant communities, sensitive habitats and sensitive plants associated with other projects in the region would not be cumulatively considerable.
- Impact TRRP BIO-CUM-4: mitigation measures listed under Impacts TRRP BIO-8 and BIO-12 (*MM TRRP BIO-3 and BIO-6*) would also ensure the project's contribution to cumulative impacts to badger and ringtail associated with other projects in the region would not be cumulatively considerable.
- Impact TRRP BIO-CUM-5: mitigation measures listed under Impacts TRRP BIO-9 and BIO-12 (*MM TRRP BIO-4 and BIO-6*) would also ensure the project's contribution to cumulative impacts to San Diego desert woodrat associated with other projects in the region would not be cumulatively considerable.
- Impact TRRP BIO-CUM-6: mitigation measures listed under Impact TRRP BIO-10 (*MM TRRP BIO-5*) would also ensure the project's contribution to cumulative impacts to bats associated with other projects in the region would not be cumulatively considerable.

3. Hazards & Hazardous Materials

The Final Subsequent EIR Volume 1 (Sections 4.4.2.4 - 4.4.2.6, pages 4.4-13 to 4.4-22) identified five potentially significant impacts related to hazards and hazardous materials that would result from implementation of the project:

- Impact TRRP HAZ-5: Hazardous materials may be encountered during construction and released to the environment – Class II Impact;
- Impact TRRP HAZ-7: The project would increase site structural development, introduce new fuel sources, new ignition sources and increase the number of personnel at the landfill site in a high fire hazard area, which could significantly increase fire risk – Class II Impact;
- Impact TRRP HAZ-8: Project-related extension of the life of the Tajiguas Landfill would extend landfill-related hazards (e.g., storage and use of hazardous materials, subsurface landfill fire, risk of fire due to petroleum product storage and unauthorized dumping) further in time – Class II Impact;
- Impact TRRP HAZ-CUM-1: Hazardous materials use, storage and disposal associated with the project combined with the cumulative projects would contribute to potentially significant hazards – Class II Cumulative Impact; Project Contribution - Not Considerable with Mitigation (Class II); and
- Impact TRRP HAZ-CUM-2: The project combined with the cumulative projects could contribute to a significant increase in fire hazard in the region – Class II Cumulative Impact; Project Contribution - Not Considerable with Mitigation (Class II).

The Board of Supervisors finds that the following mitigation measures would reduce such impacts to a less than significant level:

- Impact TRRP HAZ-5: mitigation measure (*MM TRRP HAZ-1: Hazardous Materials Assessment and Remediation*) has been provided to reduce impacts associated with public exposure to contaminated soils (if found) during construction to a less than significant level through the preparation and implementation of a Soil Management Plan.
- Impact TRRP HAZ-7: mitigation measure (*MM TRRP HAZ-2: Fire Protection and Prevention Plan*) has been provided to reduce fire hazards associated with implementation of the project to a less than significant level, by defining staff responsibilities, fire response procedures, fire protection equipment and facilities, system and equipment maintenance, inspections, firefighting demonstrations, housekeeping practices and training.
- Impact TRRP HAZ-8: current hazard mitigation measures in place at the landfill (mitigation measures HS-1, HS-2, HS-3 from 01-EIR-5) including fire prevention and suppression practices, improved site security to minimize illegal dumping,

and landfill gas collection and treatment would continue to be implemented to reduce landfill related hazards to a less than significant level.

- Impact TRRP HAZ-CUM-1: the mitigation measure listed under Impact TRRP HAZ-5 (*MM TRRP HAZ-1*) would also ensure the project's contribution to cumulative hazardous materials impacts associated with other projects in the region would not be cumulatively considerable.
- Impact TRRP HAZ-CUM-2: the mitigation measure listed under Impact TRRP HAZ-7 (*MM TRRP HAZ-2*) would also ensure the project's contribution to cumulative fire hazard impacts associated with other projects in the region would not be cumulatively considerable.

4. Geologic Processes

The Final Subsequent EIR Volume 1 (Sections 4.5.2.4 - 4.5.2.6, pages 4.5-10 to 4.5-20) identified four potentially significant impacts related to geologic processes that would result from implementation of the project:

- Impact TRRP G-1: Earthwork associated with project construction and application of reclaimed water on graded slopes may result in unstable slopes that may generate landslides – Class II Impact;
- Impact TRRP G-6: The use of expansive soils for fill may result in significant damage to the MRF, AD Facility and maintenance building – Class II Impact;
- Impact TRRP G-7: Differential settlement, associated with previously buried MSW and as a result of the differing soil types across the proposed building area, could significantly impact the MRF and AD Facility structures – Class II Impact; and
- Impact TRRP G-8: Settlement associated with existing and planned MSW disposal in the Tajiguas Landfill top deck area could significantly impact the operation of the composting area – Class II.

The Board of Supervisors finds that the following mitigation measures would reduce such impacts to a less than significant level:

- Impact TRRP G-1: mitigation measure (*MM TRRP G-1: Slope Stability Control*) has been provided to reduce the geologic impacts associated with the stability of manufactured slopes to a less than significant level by preventing ponding of water, preventing concentrated over-slope drainage, monitoring and verification of subsurface conditions, and establishment and maintenance of vegetation on cut and fill slopes.
- Impact TRRP G-6: mitigation measure (*MM TRRP G-2: Expansive Soils*) has been provided to reduce the geologic impacts associated with expansive soils to a less than significant level by requiring that the placement of fill at the operations deck be conducted as recommended by the Soils Engineering Report, and requiring the use of non-expansive soils or a foundation system designed for

expansive soils. The maintenance building pad would be over-excavated, scarified, moisture-conditioned and compacted to 90 percent relative density.

- Impact TRRP G-7: mitigation measure (*MM TRRP G-3: Differential Settlement Control – MRF/AD Facility Site*) has been provided to reduce geologic impacts associated with differential settlement by requiring the use of a building foundation system as recommended in the Soils Engineering Report, such as drilled cast-in-place caissons with grade beams or a system of end-bearing helical pier anchors.
- Impact TRRP G-8: mitigation measure (*MM TRRP G-4: Settlement Control – Composting Area*) has been provided to reduce the geologic impacts associated with settlement at the composting area by requiring that the composting area pad not be developed for a minimum of 6 months after final waste placement is complete in this section of the landfill to allow for primary settlement to occur, and implementation of the proposed structural pavement system.

5. Cultural Resources

The Final Subsequent EIR Volume 1 (Sections 4.6.2.4 - 4.6.2.7, pages 4.6-10 to 4.6-13) identified three potentially significant cultural resources impacts that would result from implementation of the project:

- Impact TRRP CR-1: Ground disturbance associated with implementation of the proposed project may result in damage to unknown archeological resources at the landfill site – Class II Impact;
- Impact TRRP CR-2: Project-related extension of the life of the Tajiguas Landfill would extend indirect impacts to archeological sites further in time – Class II Impact; and
- Impact TRRP CR-CUM-1: Ground disturbance associated with the proposed project combined with disturbance associated with the cumulative projects could result in significant disturbance of unreported cultural resources – Class II Cumulative Impact; Project Contribution – Not Considerable with Mitigation (Class II).

The Board of Supervisors finds that the following mitigation measures would reduce such impacts to a less than significant level.

- Impact TRRP CR-1: mitigation measure (*MM TRRP CR-1: Evaluation and Protection of Discovered Resources*) has been provided to reduce impacts to cultural resources during by construction to a less than significant level by requiring that any archeological resources discovered during construction be evaluated to determine their importance, and to document and/or protect such resources as necessary. Any found human remains would remain in place until the County Coroner has determined the origin and appropriate disposition of the remains.

- Impact TRRP CR-2: current cultural resource mitigation measures in place at the landfill (mitigation measures CR-1, CR-2 and CR-3 from 01-EIR-5) would continue to be implemented to reduce impacts to recorded cultural resource sites to a less than significant level by requiring Phase 1 and/or 2 studies and Phase 3 (data recovery if required) prior to any ground disturbance that would affect these sites, stopping or redirecting work if cultural resources are found and through staff cultural resource sensitivity training.
- Impact TRRP CR-CUM-1: the measure listed under Impact TRRP CR-1 (*MM TRRP CR-1*) would also ensure that the project's contribution to cumulative disturbance of unreported cultural resources associated with other projects in the region would not be cumulatively considerable.

6. Land Use

The Final Subsequent EIR Volume 1 (Section 4.8.2.4, pages 4.8-9 to 4.8-11) identified one potentially significant land use impact that would result from implementation of the project:

- Impact TRRP LU-1: The project could result in land use conflicts with adjacent and nearby residential, agricultural and recreational uses – Class II Impact..

The Board of Supervisors finds that the following mitigation measures would reduce this impact to a less than significant level.

- Impact TRRP LU-1: implementation of mitigation measures identified for other issue areas (visual [MM TRRP VIS-1a, 1b], biology [MM TRRP BIO-1, 2, 3, 4, 5, 6, hazards [MM TRRP HAZ-1]) would reduce land use conflicts to a less than significant level.

7. Water Resources

The Final Subsequent EIR Volume 1 (Sections 4.10.2.4 - 4.10.2.7, pages 4.10-28 to 4.10-44) identified five potentially significant water resources impacts that would result from implementation of the project:

- Impact TRRP WR-6: Construction and operation of proposed Well no. 6 may enable landfill gas migration into groundwater which could significantly degrade groundwater quality – Class II Impact;
- Impact TRRP WR-7: Storm run-off from proposed facility sites during the construction period may significantly degrade surface water quality - Class II impact;
- Impact TRRP WR-8: Operation of the proposed project may significantly impact surface water quality through discharge of contaminated storm water, inadvertent discharge of AD Facility percolate, wastewater disposal, and leaks or spills from fueling activities - Class II Impact;

- Impact TRRP WR-9: Run-off from the composting area could significantly impact surface water quality - Class II Impact; and
- Impact TRRP WR-CUM-3: Project-related construction activities and post-construction use of the proposed project combined with other cumulative projects may result in significant surface water quality impacts in the Pila Creek watershed – Class II Cumulative Impact; Project Contribution – Not Considerable with Mitigation (Class II).

The Board of Supervisors finds that the following mitigation measures would reduce such impacts to a less than significant level:

- Impact TRRP WR-6: mitigation measure (*MM TRRP WR-1*: Compliance with Well Construction Standards) has been provided to reduce impacts associated degradation of ground water quality associated with construction and operation of Well 6 to a less than significant level by ensuring compliance with well construction standards, including the well screen and sanitary seal location.
- Impact TRRP WR-7: mitigation measure (*MM TRRP WR-2*: Construction Storm Water Quality BMPs) has been provided to reduce impacts to storm water quality due to construction activities to a less than significant level through the development and implementation of a construction Storm Water Pollution Prevention Plan and Erosion and Sediment Control Plan.
- Impact TRRP WR-8: mitigation measures (*MM TRRP WR-3*: Industrial Storm Water Permit Compliance and Spill Prevention) has been provided to reduce impacts to storm water quality from operation of the TRRP facilities to a less than significant level by development and implementation of an industrial Storm Water Pollution Prevention Plan and Spill Prevention, Control and Countermeasure Plan to minimize contamination of storm water and accidental spills that may degrade surface waters.
- Impact TRRP WR-9: mitigation measure (*MM TRRP WR-4*: Water Quality Monitoring and Corrective Action Plan) has been provided to reduce storm water quality impacts associated with operation of the composting area to a less than significant level through the development and implementation of a Water Quality Monitoring and Corrective Action Plan to ensure discharges from the composting area comply with waste discharge requirements and water quality objectives.
- Impact TRRP WR-CUM-3: mitigation measures listed under Impacts TRRP WR-6 through WR-9 (*MM TRRP WR-1* through *WR-4*) would also ensure that the project's contribution to cumulative water quality degradation in the Pila Creek watershed would not be cumulatively considerable.

8. Public Health/Nuisance

The Final Subsequent EIR Volume 1 (Section 4.11.2.6, page 4.11-7) identified one potentially significant public health/nuisance impact that would result from implementation of the project:

Impact TRRP NUI-4: Project-related extension of life of the Tajiguas Landfill would extend significant public health/nuisance impacts (potential for illegal dumping and dust) further in time – Class II Impact. The Board of Supervisors finds that the following mitigation measures would reduce this impact to a less than significant level.

- Impact TRRP NUI-4: : current nuisance mitigation measures in place at the landfill (mitigation measures AQ-3, NUI-3 and HS-2 from 01-EIR-5) would continue to reduce public health and nuisance impacts due to the extension of the landfill life to a less than significant level through implementation of dust control measures and security fencing to prevent illegal dumping.

F. Findings that Identified Project Alternatives are not Feasible

The Final Subsequent EIR (12EIR-00000-00002) Revision Letter and Errata dated May 27, 2016, prepared for the project evaluated seven alternatives in detail including a no project alternative, two urban area MRF alternatives, an off-site aerobic composting alternative, a landfill expansion alternative and two waste export alternatives as methods of reducing or eliminating potentially significant environmental impacts. Nine other alternative locations for the MRF or AD Facility (Subsequent EIR Volume 2 Appendix Q) were initially identified, but not carried forward for detailed review because the sites were not determined to be a feasible location of the MRF or AD Facility and/or were not expected to reduce environmental impacts as compared to the proposed location of the facilities at the Tajiguas Landfill. The Board of Supervisors makes the following findings regarding the feasibility of the project alternatives analyzed in detail in the Subsequent EIR:

1. Alternative A: No Project Alternative

This Alternative assumes that Tajiguas Landfill operations would continue under the operational parameters and design approved and permitted in 2002/2003 (Tajiguas Landfill Expansion Project) and modified in 2009 (Tajiguas Landfill Reconfiguration). Based on current operating practices and waste disposal rates, the landfill is estimated to reach full permitted capacity in approximately the year 2026. Since waste would still be generated and require disposal, this alternative would require either an expansion of the existing Tajiguas Landfill or waste exportation to another approved landfill.

The No Project Alternative is not considered feasible because it would not meet most basic project objectives. Additionally, continued management of the waste from the Public Participants would be required to protect public health and safety

and the environment. Therefore, the Board of Supervisors finds that Alternative A is not feasible.

2. Alternative B: Urban Area MRF Alternative 1 (MarBorg Industries MRF)

This Alternative would involve the construction and operation of the proposed MRF component of the Resource Recovery Project by MarBorg Industries at a site owned by MarBorg Industries at 620 Quinientos Street in the City of Santa Barbara. All other project components would be located at the Tajiguas Landfill. Preliminary engineering design work indicates that construction of a MRF at the MarBorg Industries property is technically feasible, the site is reasonably suitable for development of a MRF and, adequate infrastructure and services are available at the proposed site.

However, other factors affect the overall feasibility of this Alternative. Since MarBorg Industries is now part of the proposed vendor's (Mustang) team, and has formally withdrawn their proposal to construct and operate a MRF at their privately owned site (see Appendix R of the Subsequent EIR), the Public Participants cannot reasonably acquire, control or have access to this alternative site within a reasonable period of time to allow the project to be successfully completed.

Alternative B would not meet Project Objective 2a, based on experience in other communities with similar projects (personal communications with Jeff Krump Organics Manager and Michele Young, former Organics Manager, City of San Jose, Environmental Services Department, Integrated Waste Management Division, 2013-2015), there have been significant issues with two different entities owning and operating different components of the waste management system (i.e., the MRF which preprocesses material and a composting facility which will be responsible for processing organic material received from the MRF). Due to performance issues and lack of coordination between the two facility owners/operators, there have been additional operational issues for both facilities, as well as added administrative costs for the communities managing the contracts for the facilities which could affect the project being accomplished in a successful manner. Alternative B would also not meet Project Objective 3 and Additional Objective D. Although they have since withdrawn their proposal and have partnered with Mustang, MarBorg requested that their site be considered as an alternative location for the MRF component of the project at the time of the NOP. In response to MarBorg's request, the Public Participants required MarBorg to submit a proposal to the standards of the original RFP, which MarBorg did. Based on a preliminary review of MarBorg's proposal, Alternative B would not meet Primary Objective 3 and Additional Objective D. The proposal failed to meet two of the terms listed in the RFP: 1) a minimum evaluation criterion that the tipping fee be less than \$100 per ton and; 2) conformance with a key term and condition that the facility, including the site, be available to the public participants for \$1.00 at the end of the 20-year contract term. Since these criteria were not achieved, it can be concluded that the

proposal would not meet the project objective of long-term rate stability (Final Subsequent EIR Volume 1, pages 5-51 and 5-52).

Alternative B would not avoid or substantially lessen the significant and unavoidable impacts associated with extending the life of the existing, permitted Tajiguas Landfill, and has greater impacts than the proposed project including the following significant and unavoidable (Class I) impacts:

- Impact ALT B VIS-1: degradation of the coastal view from U.S. Highway 101 in Santa Barbara;
- Impact ALT B VIS-2: degradation of the view from South Calle Cesar Chavez;
- Impact ALT B VIS-3: degradation of the view from Chase Palm Park;
- Impact ALT B VIS-4: degradation of private views;
- Impact ALT B AQ-3: exceedance of the 1-hour NO₂ National ambient air quality standard;
- Impact ALT B AQ-5: exceedance of the SBCAPCD's non-cancer acute health risk threshold;
- Impact ALT B T-CUM-2: incrementally contribute to a Class I cumulative impact at the southbound U.S. Highway 101 ramp at Garden Street; and
- Impact ALT B EJ-1: the minority population surrounding the MRF site would be disproportionately affected by the above impacts.

In summary, Alternative B: 1) would not meet several project objectives; 2) would not avoid or substantially lessen any of the significant and unavoidable impacts of the project and would result in several significant and unavoidable impacts that would not result from implementation of the proposed project and; 3) is not feasible because it would not be able to be acquired in a reasonable time period to allow the project to be successfully completed. Therefore, the Board of Supervisors finds that Alternative B is not feasible.

3. Alternative C: Urban Area MRF Alternative 2 (SCRTS MRF)

This Alternative would involve construction and operation of the MRF component of the Resource Recovery Project at the existing County-owned and operated South Coast Recycling and Transfer Station (SCRTS) site located at 4430 Calle Real in Santa Barbara, California. The Anaerobic Digestion Facility and the Composting Area would be located at the Tajiguas Landfill.

Alternative C would meet the underlying purpose and all of the project objectives, however, as compared to the proposed project, the Alternative C MRF would not be located adjacent to the AD Facility, the Composting Area and the landfill site itself, so the alternative would not be as effective at meeting Objective 2a (Ensure that the project elements can function together effectively and efficiently) due to the approximate 26 mile distance between the two sites and the need to handle and

transport organics and residual waste multiple times to complete the waste processing. In addition, while the MRF at the Alternative C site would be accessible to all communities currently served by the Tajiguas Landfill, due to the more densely populated residential area surrounding the SCRTS site, this alternative would not be as effective at meeting Objective 2.b. (ensure that the facility is reasonably accessible to all communities currently served by the Tajiguas Landfill while minimizing environmental and community impacts). Placing the MRF at the SCRTS would result in additional adverse and significant but mitigable impacts that would impact a substantially larger number of residents than the proposed project and would not fully minimize community impacts.

Preliminary engineering design work indicates that Alternative C is technically feasible, the MRF site selected is suitable for the proposed MRF, the site is owned by the County, adequate infrastructure is available, and it is economically viable. However, Alternative C would not avoid or substantially lessen any of the significant and unavoidable impacts associated with extending the life of the existing, permitted Tajiguas Landfill, and has greater impacts than the proposed project including several Class II impacts at the MRF site including:

- Impact ALT C BIO-3: disturbance of nesting migratory birds and/or raptors during MRF construction;
- Impact ALT C HAZ-1: exposure of hazardous waste or hazardous material during construction of the MRF;
- Impact ALT C G-4: potential damage of the MRF by differential settlement;
- Impact ALT C CR-1: disturbance of unknown archeological resources during MRF construction;
- Impact ALT C T-2: temporary traffic congestion due to redirection of solid waste to the MarBorg C&D RTF during the MRF construction period;
- Impact ALT C WR-3: storm run-off during demolition and construction activities may adversely affect surface water quality; and
- Impact ALT C WR-4: storm run-off during MRF operation may adversely affect surface water quality.

In summary, Alternative C would not fully meet Objectives 2.a. and b. and would result in seven additional Class II impacts that would not result from implementation of the proposed project. Therefore, the Board of Supervisors finds that Alternative C is not feasible because it does not avoid or substantially lessen any of the significant effects of the project.

4. Alternative D: Aerobic Composting at the Engel & Gray Facility

This Alternative would involve processing organic waste recovered in the MRF using aerobic (outdoor) composting methods at Engel & Gray's existing aerobic composting facility in the City of Santa Maria, instead of enclosed dry fermentation anaerobic digestion at the Tajiguas Landfill. Similar to the proposed project, the MRF would be located at the Tajiguas Landfill, with disposal of residual waste also at the Tajiguas Landfill. This Alternative is technically feasible, the aerobic composting facility is permitted, and adequate infrastructure is available. The facility operator (Bob Engel) has stated that organic waste from the Tajiguas Landfill washed (up to 73,600 tons per year) could be received and processed without violating the limits or conditions of the facility's existing Solid Waste Facilities Permit or Waste Discharge Requirements.

The Engel & Gray facility is currently located on land leased from the City of Santa Maria, and use of the land for aerobic composting could be terminated before reaching the 20-year operating period of the project. Therefore, Alternative D would not meet Project Objective 1b.

This Alternative would not meet Project Objective 2a, based on experience in other communities with similar projects (personal communications with Jeff Krump Organics Manager and Michele Young, former Organics Manager, City of San Jose, Environmental Services Department, Integrated Waste Management Division, 2013-2015), there have been significant issues with two different entities owning and operating different components of the waste management system (i.e., the MRF which preprocesses material and a composting facility which will be responsible for processing organic material received from the MRF). Due to performance issues and lack of coordination between the two facility owners/operators, there have been additional operational issues for both facilities, as well as added administrative costs for the communities managing the contracts for the facilities which could affect the project being accomplished in a successful manner. Additionally, the Alternative D composting facility is not located in proximity to the proposed MRF at the landfill, which increases wet organics transportation requirements and costs.

Alternative D would not meet Project Objective 3 (provide long-term financial stability to the affected rate payers) because the site lease could be terminated before reaching the 20-year operating period of the project. Alternative D would not provide green energy, as the aerobic composting would not produce electricity from the collected bio-gas. Therefore, Alternative D would not meet Additional Objective C.

It is unknown what modifications would need to be made to the facility to accommodate the organics recovered from the sorting of mixed solid waste and the costs associated with those changes which may affect the financial feasibility of the Alternative. Alternative D would reduce some impacts at the landfill site as compared to the proposed project, but would not avoid or substantially lessen any

of the significant and unavoidable impacts associated with extending the life of the existing, permitted Tajiguas Landfill and would contribute to previously disclosed impacts at the aerobic composting site. Alternative D would also result in new significant and unavoidable (Class I) and significant but mitigable (Class II) impacts including Impact ALT D AQ-1: significant ROC emissions from compost windrows (Class I); and Impact ALT D AQ-2: significant NO_x emissions from transportation of organic waste to the composting facility (Class II) that do not occur as a result of the project. Therefore, the Board of Supervisors finds that Alternative D is not feasible because it does not avoid or substantially lessen any of the significant effects of the project.

5. Alternative E: No Project Alternative (Scenario 1) - Landfill Expansion

This Alternative consists of continued disposal of MSW at the Tajiguas Landfill until the currently permitted capacity is reached and then expansion of the existing landfill to provide additional waste disposal capacity to approximately year 2036 (equivalent to the proposed project). Alternative E is a potential outcome of the No Project Alternative, as waste disposal services would need to be provided if project-related extension of the life of the landfill does not occur.

Alternative E is technically feasible, as the existing landfill site is suitable for expansion and adequate infrastructure is available. However, Alternative E would not meet the underlying purpose as it does not reduce landfill dependence or Project Objective 1a as diversion of organic waste would not occur, and the alternative would not provide the flexibility to meet the 75 percent diversion requirements of Assembly Bill 341. Alternative E would not meet Additional Objectives A, B, C, and E, as it would:

- Not achieve the diversion goal of 60 percent;
- Not reduce greenhouse gases consistent with CalRecycle's Anaerobic Digestive Initiative and Assembly Bill 32;
- Not provide green energy (except for landfill gas extracted from the waste cells);
- Not provide a cost effective tipping fee, as additional recyclables would not be recovered and sold; and
- Not adapt to the changing waste management needs of the region.

Alternative E would not avoid or substantially lessen any of the significant and unavoidable impacts associated with extending the life of the existing Tajiguas Landfill, but would further expand and extend landfilling activities. Alternative E would also result in new significant and unavoidable (Class I) impacts including:

- Impact ALT E VIS-1: degrade public views from the Upper Outlaw Trail;
- Impact ALT E VIS-CUM-1: cumulative visual degradation from U.S. Highway 101;

- Impact ALT E AQ-1: ozone precursor emissions associated with increasing landfill disposal capacity;
- Impact ALT E AQ-2: exceedances of the 1-hour NO₂ and 24-hour PM₁₀ air quality standards;
- Impact ALT E AQ-3: exceedance of the Santa Barbara County APCD cancer health risk threshold;
- Impact ALT E AQ-5: increase the magnitude and the duration of greenhouse gas emissions from landfill operations;
- Impact ALT E BIO-1: loss of oak trees, coast live oak woodland and chaparral;
- Impact ALT E BIO-4: loss of sensitive plant species;
- Impact ALT E BIO-5: indirect impacts to special-status species in the back canyon area of the landfill; and
- Impact ALT E LU-1: land use conflicts with adjacent open space and recreational uses.

In summary, Alternative E would not meet most of the basic project objectives, would not avoid or substantially lessen any of the significant effects of the project and would result in additional significant and unavoidable impacts that would not result from implementation of the proposed project. Therefore, the Board of Supervisors finds that Alternative E is not feasible.

6. Alternative F: No Project Alternative (Scenario 2) – Waste Export to the Simi Valley Landfill and Recycling Center (SVLRC)

This Alternative would involve continued waste disposal at the Tajiguas Landfill under the currently permitted capacity and parameters to approximately 2026 and then transportation of all MSW generated in the Tajiguas Landfill watershed to the SVLRC, when the Tajiguas Landfill reaches its permitted capacity. Alternative F is a potential outcome of the No Project Alternative, as waste disposal services would need to be provided if project-related extension of the life of the landfill does not occur.

Alternative F is technically feasible as the SVLRC is fully permitted and operational, and has available capacity, at least in the short-term. However, MSW export may not be feasible in the future (after 2036), as regional landfills close and landfill space becomes limiting.

Alternative F would not meet the project's underlying purpose because the alternative would not reduce landfill dependence. Project Objective 1a would not be met as diversion of organic waste would not occur, and the alternative would not provide the flexibility to meet the 75 percent diversion requirements of Assembly Bill 341.

Alternative F would not meet Project Objective 1b, as MSW export may not provide a long term solution (minimum operational life of 20 years) to the region's solid waste management needs because landfill space would become limiting as other regional landfills close. Alternative F would not meet Project Objective 1c, as it would not extend the life of the Tajiguas Landfill.

MSW export under Alternative F would not meet Project Objectives 2a and 2b because the distance between the landfill and the wasteshed would limit functionality and would not be readily accessible to the communities served by the Tajiguas Landfill.

MSW export under Alternative F would not meet Project Objective 3 because the facility would be owned and operated by another entity decreasing the Public Participant's ability to provide long-term financial stability. Additionally, the SVLRC services a large wasteshed making disposal costs potentially less stable as landfill space becomes limiting.

Alternative F would not meet Additional Objectives A, B, D and E, as it would:

- Not achieve the diversion goal of 60 percent;
- Not reduce greenhouse gases consistent with CalRecycle's Anaerobic Digestive Initiative and Assembly Bill 32;
- Not provide a cost effective tipping fee, as MSW export would increase costs; and
- Not adapt to the changing waste management needs of the region.

Waste export under Alternative F would avoid significant unavoidable impacts of the proposed project associated with extending the life of the landfill (see Section III.D). However, disposal of MSW from the Tajiguas wasteshed would contribute to numerous Class I and Class II impacts at the SVLRC, as well as new impacts associated with MSW consolidation at the SCRTS and the MarBorg Industries transfer station and MSW transportation to the SVLRC. New significant impacts would include Impact ALT F T-CUM-2: cumulative traffic congestion associated with MSW consolidation at the MarBorg Industries transfer station.

In summary, Alternative F would not meet most of the basic project objectives, may not be feasible in the future as regional landfills close and landfill space becomes more limiting and would result in new impacts, including significant and unavoidable cumulative traffic congestion. Therefore, the Board of Supervisors finds that Alternative F is not feasible.

7. Alternative G: No Project Alternative (Scenario 3) – Waste Export to the Santa Maria Integrated Waste Management Facility (Santa Maria IWMF)

This Alternative would involve continued waste disposal at the Tajiguas Landfill under the currently permitted capacity and parameters to approximately 2026 and then transportation of all MSW generated in the Tajiguas Landfill wasteshed to the

planned Santa Maria IWMF, when the Tajiguas Landfill reaches its permitted capacity. Alternative G is a potential outcome of the No Project Alternative, as waste disposal services would need to be provided if project-related extension of the life of the landfill does not occur.

Alternative G is technically feasible as the planned Santa Maria IWMF would provide sufficient capacity and is anticipated to be operating prior to the Tajiguas Landfill reaching capacity in approximately 2026.

Alternative G would not meet the project's underlying purpose because landfill disposal would not be reduced. The alternative would not meet Project Objective 1a as diversion of organic waste would not occur, and the alternative would not provide the flexibility to meet the 75 percent diversion requirements of Assembly Bill 341.

Alternative G would not meet Project Objective 1c, as it would not extend the life of the Tajiguas Landfill. MSW export under Alternative G would not meet Project Objectives 2a and 2b because the distance between the landfill and the wasteshed would limit functionality and would not be accessible to the communities served by the Tajiguas Landfill.

MSW export under Alternative G is less likely to meet Project Objective 3 because the facility would be owned and operated by another entity decreasing the Public Participant's ability to provide long-term financial stability.

Alternative G would not meet Additional Objectives A, B, C, D and E, as it would:

- Not achieve the diversion goal of 60 percent;
- Not reduce greenhouse gases consistent with CalRecycle's Anaerobic Digestive Initiative and Assembly Bill 32;
- Not produce green energy from landfill gas or bio-gas;
- Not provide a cost effective tipping fee, as MSW export would increase costs; and
- Not adapt to the changing waste management needs of the region.

Waste export under Alternative G would avoid significant unavoidable impacts of the proposed project associated with extending the life of the landfill (see Section III.D). However, disposal of MSW from the Tajiguas wasteshed would contribute to numerous Class I and Class II impacts at the Santa Maria IWMF, as well as new impacts associated with MSW consolidation at the SCRTS and the MarBorg Industries transfer station and MSW transportation to the Santa Maria IWMF. New significant impacts would include Impact ALT G T-CUM-2: cumulative traffic congestion associated with MSW consolidation at the MarBorg Industries transfer station.

In summary, Alternative G would not meet most of the basic project objectives and would result in new impacts, including significant and unavoidable cumulative traffic congestion. Therefore, the Board of Supervisors finds that Alternative G is not feasible.

IV. STATEMENT OF OVERRIDING CONSIDERATIONS

A. Project Impacts

As summarized in Section III.A of these findings and as disclosed in the Final Subsequent EIR (12EIR-00000-00002) for the Tajiguas Resource Recovery Project, two environmental impacts would result from implementation of the project which cannot be fully mitigated and are therefore considered significant and unavoidable. These two impacts are:

1. Extension of Air Pollutant Emissions associated with Landfill Operations (Impact TRRP AQ-11); and
2. Extension of Biological Impacts associated with Landfill Operations (Impact TRRP BIO-16).

B. Overriding Considerations

Tajiguas Resource Recovery Project

The Final EIR (12EIR-00000-00002) and Revision Letter and Errata dated May 27, 2016 for the Tajiguas Resource Recovery Project identifies project extension of life impacts to air quality and biological resources (see Section IV.A above) as significant environmental effects which are considered unavoidable. The Board of Supervisors therefore makes the following Statement of Overriding Considerations which warrants approval of the project notwithstanding the two Class I impacts identified in Section IV.A are not fully mitigated.

With respect to the two Class I impacts identified in Section IV.A, each of the environmental effects of the project listed above, the Board of Supervisors finds that the stated overriding benefits of the project outweigh the significant effects on the environment and that there is no feasible way to lessen or avoid the significant effects. Pursuant to Public Resources Code Section 21081(b) and CEQA Guidelines Sections 15043, 15092 and 15093, remaining significant effects on the environment are considered acceptable due to the following economic, public health, and region-wide and statewide environmental benefits which the Board of Supervisors has determined outweigh the unavoidable adverse effects of the project. :

1. Provides a Long-Term (20-year) Waste Management Plan

The Resource Recovery Project's waste processing activity is anticipated to result in the recovery and beneficial reuse of 60 percent or more (by weight) of the waste stream by diverting such amount from disposal at the landfill which would extend the life of the Tajiguas landfill (based on permitted capacity) by ~10 years (to ~2036), thereby providing over 20 years of disposal capacity .

2. Provides a Cost-effective Solution to Waste Management

Based on analysis by RRWMD staff, projected rates for the construction and operation of the facility are anticipated to be comparable to projected costs to export waste to other landfills not located in the South Coast area and less than costs to export waste and comply with new solid waste management regulations related to the processing of organics.

3. Supports the Region's Recycling Goals

As discussed in the Final Subsequent EIR, Section 4.8.2.5, the project would be consistent with the County of Santa Barbara and the Cities of Santa Barbara, Goleta, Solvang and Buellton General Plan goals regarding waste management and recycling by providing the infrastructure necessary to support existing and future waste diversion/management programs, including recyclable materials and organic waste.

4. Assists the Region in Meeting CalRecycle's 15-year Disposal Capacity Requirement

The California Public Resources Code Div. 30, Part 2, Chap. 4, Sec. 41701 and 41703, as administered and enforced by CalRecycle, requires all jurisdictions in the State to plan for 15 years of disposal capacity for waste "that cannot be reduced, recycled or composted." The proposed Resource Recovery Project not only provides the jurisdictions currently served by the Tajiguas Landfill with a 20-year plan for the safe handling and disposal of its solid waste, but also expands the amount of materials that are recycled and composted through the proposed MRF and AD Facility to achieve a total projected diversion rate above 80 percent. Assuming the project is operational in 2017, the region would have enough disposal capacity until at least 2036 at current disposal rates (see Benefit 1).

5. Provides the infrastructure necessary to meet/increase the Region's Landfill Diversion Rate

Signed into law by Governor Brown on October 5th, 2011, AB 341 amends sections of the Public Resources Code relating to solid waste and sets a goal for the state to recycle 75 percent of waste by 2020. The bill specifically calls out composting of organics currently disposed of in landfills as a method of achieving this goal. The proposed project would allow the County to continue to meet/exceed the AB 341 goal of 75 percent diversion by 2020 without any changes to current programs.

6. Reduce Greenhouse Gas Emissions

Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, an act which added Division 25.5 (commencing with Section 38500) to the California Health and Safety Code, set a goal of the reduction of all greenhouse gases (GHGs) generated in the State to 1990 levels by the year 2020. The California Air Resources Board (CARB) has adopted a Scoping Plan detailing the various state-wide GHG reduction actions that will be required to achieve this unfunded State mandate. CARB approved the Scoping Plan on December 12, 2008. In August 2011, the Scoping Plan was re-approved by CARB.

AB 32's "Scoping Plan" as well as the CARB-adopted plan of January 2009, includes increased recycling and landfill methane capture as key components of achieving this significant reduction in GHGs. More recently, guidelines and recommendations were completed in March 2014 for the Waste Management Sector element of the 2013 Scoping Plan Update that identified the need to divert an additional 22,000,000 tons of material from landfills in order to achieve the necessary GHG reductions. The report indicates that in order to meet these GHG emission and waste reduction goals, "we must maximize recycling and diversion from landfills and build the necessary infrastructure to support a sustainable, low-carbon waste management system within California". A Working Paper specifically for Composting and Anaerobic Digestion was completed as an attachment to the Update further supporting the need to expand the state's ability to compost organics and generate renewable energy through anaerobic digestion.

In compliance with AB 32, the proposed project would reduce greenhouse gas emissions and create green energy through increased recycling and through the increased removal of organics from landfill disposal and anaerobic digestion of the organics. Through the diversion of organics from the landfill, the proposed project would reduce greenhouse gas emissions by 1,042,000 MT CO₂e over the period of 2015 through 2066 (20,030 MT CO₂e reduction annually or equivalent to 4,217 vehicles/year). In addition, the benefits of recycling materials recovered at the proposed MRF would reduce greenhouse gas emissions by 67,675 MT CO₂e (equivalent to approximately 13,270 vehicles/year) over the life-cycle of waste diverted. Therefore, the proposed project represents the most significant greenhouse gas emission reduction project in Santa Barbara County.

7. Produce Green Energy

The project would generate a net of approximately 1 megawatt of renewable electrical energy and is eligible for renewable energy credits.

8. Protect Public Health and Safety

The proposed project allows the County to continue to protect the public health and environment of our community by efficiently managing the community's waste products.

9. Provide Economic Benefits

The project would generate economic development approximately 70 construction jobs and 66 permanent jobs (86 with the CSSR) related to operations of the facilities.

C. Summary

In summary, the project would allow the County to: 1) continue to provide safe, cost effective and environmentally sound waste disposal capabilities; 2) improve recycling and materials recovery, extend the life of the landfill (thereby avoiding/postponing impacts and capital costs associated with a new or expanded landfill or costs and impacts of sending waste to more distant landfills), 3) reduce greenhouse gas emissions

and; 3) produce green energy. However, by the increased diversion of recyclable materials and organics, implementation of the proposed project would extend the operating life of the landfill and delay final landfill closure, thereby extending existing significant and unavoidable air quality and biological resources impacts by approximately 10 years. These impacts were identified as significant and unavoidable when the Tajiguas Landfill Expansion Project was approved in 2002 and as noted above a Statement of Overriding Considerations was made at that time.

The Board finds that the proposed project mitigates environmental effects to the maximum extent feasible when weighed against legal, technical, social, and economic mandates relative to the protection of public health and safety and the environment through the provision of cost effective and environmentally sound community solid waste management and disposal services. The Board therefore finds that the extension of the unavoidable significant effects associated with extending the life of the Tajiguas Landfill are acceptable.

V. ENVIRONMENTAL REPORTING AND MONITORING PROGRAM

Public Resources Code §21081.6 requires the County to adopt a reporting or monitoring program for measures it has adopted or made a condition of approval to mitigate or avoid significant effects on the environment. The project description and mitigation measures described in the Final Subsequent EIR, with the corresponding monitoring requirements entitled "Mitigation, Monitoring and Reporting Program" (see June 12, 2016 Board Letter, Attachment G) by this reference, is incorporated herein. As a part of this approval, the Board of Supervisors adopts the Mitigation Monitoring and Reporting Program.