

# FINAL ENVIRONMENTAL IMPACT REPORT

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## TAJIGUAS LANDFILL EXPANSION PROJECT

*Prepared for*

**Santa Barbara County Department of Public Works  
Solid Waste and Utilities Division**

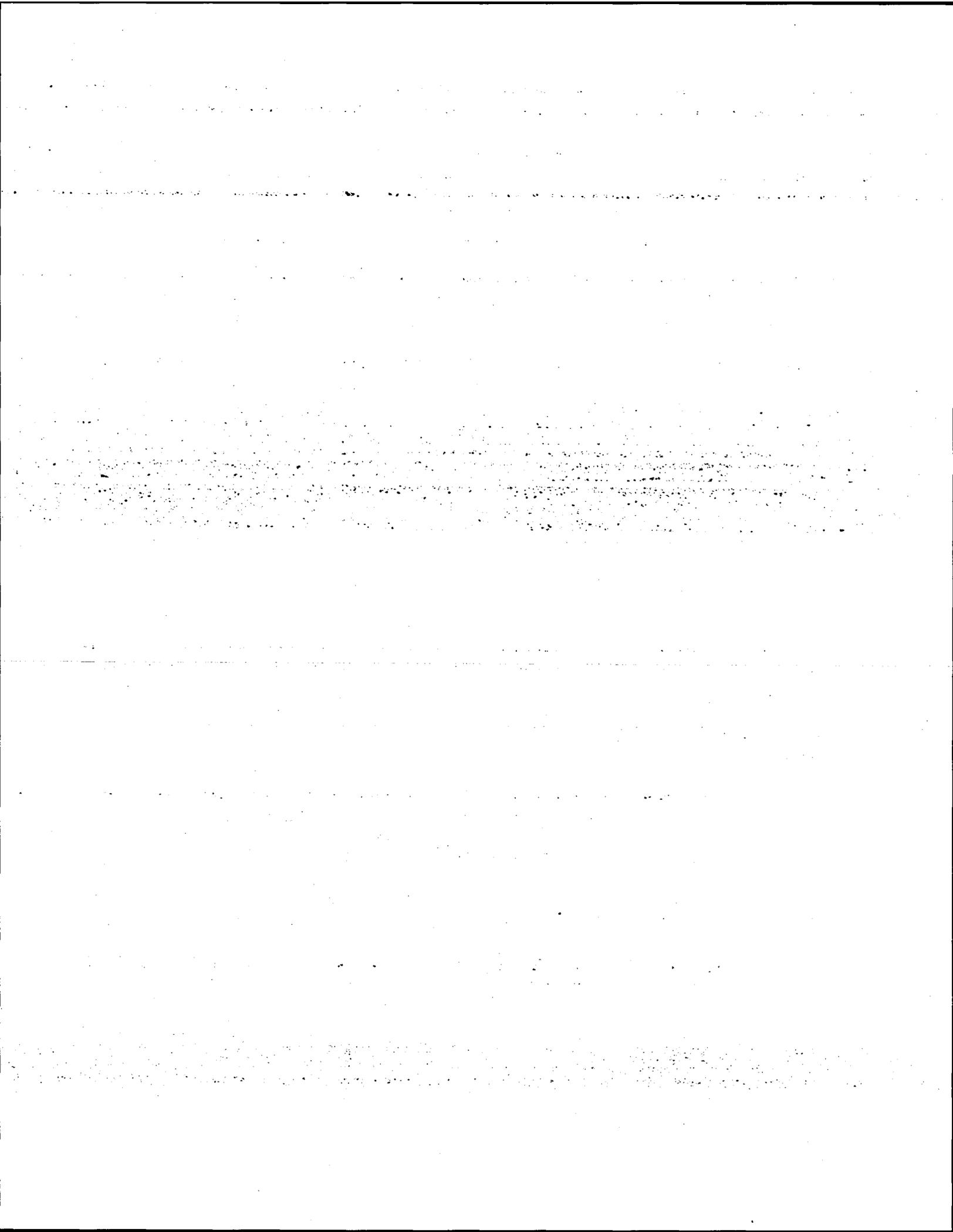
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## 1.0 INTRODUCTION

This Final Environmental Impact Report (Final EIR) is for the proposed expansion of the Tajiguas Landfill (Tajiguas). This Final EIR has been prepared in accordance with the California Environmental Quality Act (CEQA) and its implementing guidelines, California Code of Regulations (CCR) Title 14, Section 15000 et seq. The County of Santa Barbara Public Works Department (County Public Works) is the designated lead agency on behalf of the County of Santa Barbara.

The October 2001 Draft EIR and this Final EIR **together** comprise the EIR in its entirety in accordance with California Public Resources Code (PRC), Section 21000 et seq. The EIR will be used by the County of Santa Barbara (County) in its consideration of the proposed expansion of the Tajiguas Landfill. The primary purpose of this EIR is to:

- Present a detailed description of the proposed landfill expansion project.
- Identify and evaluate potential environmental consequences of the proposed project.
- Indicate the manner in which those environmental consequences can be mitigated or avoided.
- Identify and analyze alternatives that may reduce or eliminate potentially significant environmental impacts associated with the proposed project.
- Identify any impacts that, even with the implementation of the mitigation measures, would be unavoidable and adverse.

Tajiguas is an existing Class III municipal solid waste landfill permitted to receive up to 1,500 tons per day (tpd) of municipal solid waste. It has a current permitted capacity of 15.1-million cubic yards (cy), or approximately 9.1-million tons of solid waste. If the proposed project is approved, Tajiguas would have the capacity for an additional 8.2-million cy or about 4.9-million tons of solid waste. This would bring the total disposal capacity of Tajiguas to 23.3 million cy (approximately 13.6 million tons) of waste (see Final EIR Section 4.1). With the expansion, Tajiguas would have approximately 15 years of waste disposal capacity in addition to the currently remaining approximately 5 years of capacity. Under existing permits, if the proposed expansion is not approved, Tajiguas is expected to be able to operate until approximately 2005 or 2006. At that time, its existing permitted capacity is expected to be exhausted.

Over the life of the proposed project, it is anticipated that the average daily disposal rate and the peak daily disposal rate at Tajiguas both will increase by approximately 0.62 percent per year, in response to population increases projected by the Santa Barbara County Association of Governments (based on the average increase of 0.6 percent per year for the Santa Barbara South Coast area and 0.8 percent per year for the Santa Ynez Valley). These anticipated increases are shown in Final EIR Table 1-1.

## 1.1 PROJECT BACKGROUND

### 1.1.1 LOCATION AND PROJECT SETTING

The Tajiguas Landfill is an existing Class III municipal solid waste landfill owned and operated by the County since 1967. Tajiguas Landfill is located in a coastal canyon known as Cañada de la Pila, approximately 26 miles west of the City of Santa Barbara (see Figure 1-1). Immediately south of the landfill site are the U.S. Highway 101, the Union Pacific Railroad tracks and the Pacific Ocean.

The southern portion of the site is within the California Coastal Zone. Most properties adjacent to the landfill site are used primarily for agriculture or open space. The northern site boundary abuts the Los Padres National Forest. The western site boundary abuts the Arroyo Hondo Preserve, which is owned by the Land Trust for Santa Barbara County. Property to the east is the Baron Ranch, owned by the County and also used primarily for agricultural purposes. The ranch was purchased by the County in January 1991 specifically to provide a buffer for the landfill operation at Tajiguas. Property adjacent to the south of the site is owned or leased by the County and used for the access road and open space. The small residential community of Arroyo Quemada is located along the coast, between the railroad tracks and the ocean, approximately 2,000 feet southeast of the landfill.

### 1.1.2 OBJECTIVES OF THE PROPOSED PROJECT

The proposed expansion of Tajiguas is intended to increase the solid waste disposal capacity of this existing County-owned and operated facility to meet the waste disposal needs of southern Santa Barbara County, and the Santa Ynez and Cuyama Valleys for 15 years, or approximately until the Year 2020. The proposed project would have the capacity for an additional 8.2-million cy or about 4.9-million tons of solid waste, and would be permitted to receive a maximum tonnage of 1,500 tpd, the same as with the current permit. Under the proposed project, the capacity of the landfill would be a total of 23.3-million cy, or approximately 13.6-million tons of solid waste. With the expansion, Tajiguas would have approximately 15 years of waste disposal capacity in addition to the currently remaining approximately 5 years of capacity.

The objectives of the Tajiguas expansion are as follows:

- Provide approximately 15 years of additional reliable and cost-effective municipal solid waste disposal services for the residents of southern Santa Barbara County and the Santa Ynez and Cuyama Valleys.
- Meet the minimum 15-year County disposal capacity requirements of the California Integrated Waste Management Act (Assembly Bill [AB] 939) and goals of the County Integrated Waste Management Plan.

- Provide a well-managed municipal solid waste disposal facility to maximize the control necessary to assure the safe disposal of solid waste generated in southern Santa Barbara County, and the Santa Ynez and Cuyama Valleys until the Year 2020.
- Meet the Board of Supervisors' policy directive of August 3, 1999, to provide adequate disposal capacity at the Tajiguas Landfill to allow for siting and development of a new in-County regional landfill, a process to be completed as soon as possible, a process that may take up to 15 years to complete.

### 1.1.3 NEED FOR THE PROPOSED PROJECT

Various Southern California communities, including Santa Barbara County, are evaluating alternative methods of assuring long-term solid waste disposal capacity as their current landfills reach capacity. In recognition of the importance of long-term management of landfill capacity and to reduce the volume of solid waste requiring disposal, the state legislature passed the California Integrated Waste Management Act of 1989 (also known as AB 939). AB 939 requires counties to prepare integrated solid waste managements plans, establishes mandatory reductions in the volume of solid waste being landfilled, and requires counties to demonstrate 15 years of landfill capacity.

Draft EIR Sections 1.5.1 through 1.5.3 provide information on waste generation trends and existing disposal capacity for Southern California in general, as the framework for understanding the objectives and need for the proposed project. In addition, the requirements of AB 939 are reviewed. The review provides a framework for how communities may meet these requirements. The information demonstrates that, even with meeting the source reduction and recycling requirements of AB 939, additional disposal capacity will be required in Southern California in general, and in Santa Barbara County in particular, to support current and future populations.

## 1.2 PROJECT SUMMARY

### 1.2.1 THE PROPOSED PROJECT

The proposed Tajiguas Landfill expansion project is described in detail in Draft EIR Chapter 2.0 – Project Description. The project consists of horizontal and vertical expansion of the existing Landfill, utilizing one of two potential configurations contiguous to and north of the existing landfill. The two configurations are referred to as the Front Canyon configuration and Back Canyon configuration. Each configuration provides an additional 8.2-million cy of capacity (4.9-million tons of waste disposal capacity) at the Tajiguas Landfill, and meets the project objectives. Under the proposed project, the County Board of Supervisors can select either the Front Canyon configuration or the Back Canyon configuration, but not both configurations.

## 1.2.2 PROJECT ELEMENTS

### 1.2.2.1 Front Canyon Configuration

With the Front Canyon configuration, approximately 27 acres on the existing landfill and an additional 56 acres of lateral expansion would comprise the 83-acre expansion footprint to be utilized for solid waste disposal. Vertical expansion would involve an increase in the final elevation from the currently permitted maximum of 500 feet to a maximum 660 feet above mean sea level (msl). Soil borrow material would be obtained from the east, west and north borrow areas.

### 1.2.2.2 Back Canyon Configuration

With the Back Canyon configuration, approximately 27 acres on the existing landfill and an additional 81 acres of lateral expansion would comprise the 108-acre expansion footprint to be utilized for solid waste disposal. Vertical expansion would involve an increase in the final elevation from the currently permitted maximum of 500 feet to a maximum 700 feet msl. Soil borrow material would be obtained from the east and west borrow areas.

### 1.2.2.3 Appurtenant Facilities

The project includes the following: construction of a composite liner for areas of the expansion that will not be placed over the existing landfill waste footprint, modification of the existing stormwater drainage system, modification or relocation of the existing out-of-channel sedimentation basin, and installation of additional landfill gas collection system components. In addition, a new scalehouse and new maintenance shop may be constructed. If specific permits are required for elements of the project, such permits would be obtained prior to the time of construction.

### 1.2.2.4 Southeast Corner Modification

The project also includes modification of the southeast corner of the existing Landfill. This activity involves excavation and relocation of waste and cover soil that are within and adjacent to the Coastal Zone above an elevation of 400 feet above msl. This waste would be relocated from the southeast corner of the landfill to an area that is within the proposed landfill expansion area. This activity would occur concurrent with development of either the Front Canyon configuration or Back Canyon configuration.

### 1.2.2.5 Closure

As part of the project, the entire landfill would undergo phased closure as operations proceed. Closure of the existing landfill and excavation of soil borrow material would occur in the east and west borrow areas with or without the proposed project. In compliance with state and federal requirements, closure and postclosure monitoring and maintenance plans will be prepared to assure that: (1) the landfill will be closed in a manner that protects public health and the environment, and (2) adequate financial resources will be available to fund the closure and to fund postclosure monitoring and maintenance.

### 1.2.3 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Anticipated environmental effects of the proposed Tajiguas Landfill expansion are evaluated in Draft EIR Chapter 3.0. Mitigation measures are identified to eliminate or reduce potential significant impacts. These potential impacts and mitigation measures are summarized for each environmental topic in Final EIR Table 1-2.

Implementation of the mitigation measures on Final EIR Table 1-2 is required to make the findings and conclusions included in the EIR. The EIR concludes that the potential environmental impacts of the proposed project will be reduced to below a level of significance with implementation of the mitigation measures with the exception of biological resources, cultural resources, visual resources and air quality. Further information is provided in Final EIR Table 1-2 and Draft EIR Sections 3.4, 3.5, 3.8 and 3.11.

The project-related impacts to biological resources, cultural resources, visual resources and air quality are considered to be significant and unavoidable, even after implementation of feasible mitigation measures included in this EIR (see Table 1-2).

### 1.2.4 COMPARISON OF IMPACTS – PROPOSED PROJECT AND ALTERNATIVES

Environmental evaluations included in this EIR address two potential landfill configurations (Front Canyon and Back Canyon). Either of these configurations, but not both, is considered to be the proposed project at Tajiguas. Pursuant to Section 15126.6 of the CEQA Guidelines, a reasonable range of alternatives was evaluated to determine the potential to eliminate or reduce potentially significant environmental impacts, while still meeting the basic project objectives described in Draft EIR Section 1.4. Feasible alternatives to the proposed Project are described below and are evaluated in detail in Draft EIR Chapter 4.0.

- **Diversion to Other In-County Landfills.** This alternative considers the potential for waste to be diverted to the Foxen Canyon, City of Lompoc, City of Santa Maria and/or Vandenberg Air Force Base Landfills.
- **New In-County Landfill Sites.** Under this alternative, one or more new landfills would be sited and developed in the County. This alternative considers nine potential sites located in the North County.
- **Larger Project Alternative.** Under this alternative, a 25-year expansion of Tajiguas would be constructed and operated. This would be either the Front Canyon configuration or Back Canyon configuration, plus an additional 10 years of air space. The disposal capacity of the larger landfill expansion would be 11.5-million cy.
- **Reduced Project Alternative.** Under this alternative, the proposed expansion of Tajiguas would involve a smaller waste footprint and/or less vertical expansion than the proposed project. The capacity of the

expansion would be reduced from 8.2-million cy to 5.0-million cy, and would provide approximately 10 years of disposal capacity.

- **Diversion to Out-of-County Landfills.** Under this alternative, waste would be transported to the existing Santa Barbara Transfer Station or a new in-County transfer station and/or to an existing out-of-County transfer station, then redirected to an out-of-County landfill via transfer truck and/or rail.
- **Rail Haul.** Under this alternative, waste generation in southern Santa Barbara County and the Santa Ynez and Cuyama Valleys would be transported via rail to remote landfills. The evaluation considers rail haul to the permitted but not currently operational Mesquite Regional or Eagle Mountain Landfill in the deserts of Southern California, and to the existing Carbon Canyon Landfill in Utah.
- **New South Coast Transfer Station.** Under this alternative, a new transfer station would be constructed. Potential locations include the Baron Ranch, back canyon of the Tajiguas Landfill site, Cañada de la Huerta along the South Coast, or an undetermined location in the Goleta/Santa Barbara area. Waste that now goes to Tajiguas would be collected at the new transfer station, then transported to an out-of-County disposal facility.
- **Offsite Disposal for Southeast Corner Modification.** Under this alternative, the excavated waste material would be transported offsite for disposal. The waste would be diverted either to another in-County landfill or to an out-of-County landfill.
- **Alternative Waste Management Technologies.** This section reviews the potential for solid waste technologies to further reduce the volume of waste requiring landfill disposal. These include: increased source reduction, recycling, composting and waste-to-energy. Under these alternatives, unprocessed residual waste or by-products of waste processing would still require landfill disposal.
- **No Project.** Under this alternative, the proposed expansion of Tajiguas would not occur. Since waste would still be generated and require disposal, this alternative would require one or more of the in-County and out-of-County disposal alternatives listed above to be implemented. Waste generated in southern Santa Barbara County would be diverted to an out-of-County landfill, while waste from the Santa Ynez and Cuyama Valleys would be diverted to an existing in-County landfill.

A comprehensive evaluation of these alternatives, their ability to meet the objectives of the proposed project, and their ability to eliminate or reduce significant environmental impacts associated with the proposed Project is provided in Draft EIR Chapter 4.0.

#### 1.2.4.1 Impact Comparison

As discussed in Draft EIR Chapter 4.0, the proposed expansion of Tajiguas landfill would meet the objectives of the proposed project. However, none of the alternatives would eliminate or reduce project-related significant impacts. In fact, as discussed in Draft EIR Chapter 4.0, the alternatives would have similar or greater environmental impacts than the proposed project at Tajiguas.

#### 1.2.4.2 Environmentally Superior Alternative

Section 15126.6 of the CEQA Guidelines requires the environmentally superior alternative to be identified even if it is the No Project alternative. If the environmentally superior alternative is the No Project alternative, CEQA requires that the environmentally superior alternative be identified among the remaining alternatives. As discussed in Draft EIR Chapter 4.0, based on the review of alternatives to the proposed project, it was determined that the No Project alternative is not environmentally superior. Further, none of the other alternatives evaluated resulted in the reduction or elimination of significant project-related environmental impacts. Therefore, none of the other alternatives was determined to be environmentally superior to the proposed project.

### 1.3 ENVIRONMENTAL REVIEW PROCESS

CEQA requires state and local government agencies to consider the environmental consequences of projects over which they have discretionary authority, prior to taking action on those projects. Additionally, a public agency is required to prepare an EIR if it determines that a proposed project has the potential to adversely affect the environment. As the agency with primary responsibility for carrying out the proposed project, the County Public Works Department is the lead agency and has determined that an EIR is required.

This EIR has been prepared in accordance with CEQA. Guidance for preparation of this document was obtained from the County of Santa Barbara Environmental Thresholds and Guidelines Manual, CEQA Guidelines and, as necessary, criteria of specific resource agencies and federal and state regulations. This EIR will be used by various local and state agencies in their consideration of actions required to: (1) approve, (2) approve with conditions and modifications or (3) deny the proposed project. This EIR is intended to provide the public, agencies and decision makers with a comprehensive analysis of:

- Components of the proposed project.
- Potential environmental consequences of the proposed project.
- Potential mitigation measures to avoid or reduce impacts.
- Feasible alternatives.

CEQA encourages incorporation of information by reference as a means of shortening EIRs. Therefore, this EIR incorporates by reference information from relevant studies and from other EIRs, as appropriate. The level of technical detail, evaluation and analysis provided in the EIR is consistent with CEQA and is sufficient to provide an understanding of potential impacts.

The EIR is the initial phase of the process for issuance of various permits or approvals for the proposed projects. The second phase, portions of which may occur concurrently with the EIR, involves preparation of appropriate applications for permits or approvals. Requirements that are anticipated for these permits are considered in the EIR. The third and final phase is public review of permit applications, development of specific permit conditions, and issuance of permits by the agencies. This phase may result in modification to the proposed project to meet various regulatory requirements or permit conditions. If the proposed project is modified, such modifications are reviewed to assure consistency with the EIR.

### 1.3.1 FINAL EIR REQUIREMENTS

This document is a continuation of the environmental process that began with the preparation of a Notice of Preparation (NOP) and Revised NOP (see Appendix A of the Draft EIR). The Draft EIR was distributed on October 12, 2001, for a 45-day public review and comment period. Subsequently, the review and comment period was extended to December 14, 2001. Notices of the extension were provided on November 13, 2001, in the *Lompoc Record*, *Santa Maria Times* and *Santa Barbara News-Press*, and on November 15, 2001, in *The Independent*. In addition, notices were mailed to those on the Draft EIR mailing list (see Draft EIR Chapter 8.0).

Section 15132 of the CEQA Guidelines requires that a Final EIR consist of:

- The Draft EIR or a revision of the draft.
- Comments and recommendations received on the Draft EIR, either verbatim or in summary.
- A list of persons, organizations, and public agencies commenting on the Draft EIR.
- The response of the lead agency to significant environmental points raised during the review and consultation process.
- Other information added by the lead agency.

The contents of the EIR for the proposed expansion of the Tajiguas Landfill are briefly summarized as follows:

- **Draft EIR.** The Draft EIR provides a detailed description of the proposed project and a comprehensive analysis of the potential environmental consequences of the proposed project. The existing environment was described, and environmental issues of concern, as identified in the NOP, Revised NOP, and public scoping process, were

analyzed. Mitigation measures developed for each identified adverse effect were specified. Alternatives to the proposed project were evaluated for feasibility and environmental effect. Potential cumulative effects of the proposed project were evaluated.

- **Final EIR.** This document includes public and agency comments on the Draft EIR and specific responses to those comments (see Chapters 2.0 and 3.0). This Final EIR describes how the environmental documentation will be used in the decision making process and provides a record of the public review process for this project.

**For a complete understanding of the proposed project, its potential effects, mitigation measures and alternatives, the reader is encouraged to review both the Draft EIR and this Final EIR in their entirety.**

### 1.3.2 EIR PROCESS

The following summarizes the EIR process as it relates to the proposed Project:

- **Notice of Preparation.** A Revised NOP was distributed to potentially interested agencies and individuals on October 8, 1999, for a 30-day review (see Appendix A of the Draft EIR).
- **Public Forums.** Informal public forums were held October 14 and October 16, 1999, to provide an opportunity for interested persons to discuss and ask questions regarding the proposed project. These meetings provided an opportunity for questions and answers. Notification of the public forums was provided in the Revised NOP and in local newspapers.
- **Public Scoping Meetings.** Public scoping meetings were held on November 1 and 2, 1999, to provide an opportunity for the public and agencies to submit verbal and written statements on issues to be addressed in the EIR. Notification of the meetings was provided in the Revised NOP, and in notices through local and regional media sources. Those not able to attend the scoping meetings were invited to submit written comments.

As a result of the scoping process, the primary issues of public and agency concern were identified, based on comments received by letter and at the public meetings. These are summarized in Tables 1-3 and 1-4 in the Draft EIR.

- **Preparation of the Draft EIR.** The Draft EIR was released for a 45-day review period to the public, including interested individuals, groups, government representatives and agencies. The availability of the Draft EIR was noticed by the County Department of Public Works

through a Notice of Completion dated October 12, 2001, sent to the California Office of Planning and Research. Notification of the Draft EIR's availability was made to those on the Draft EIR mailing list (see Chapter 8.0 of the Draft EIR).

- **Public Meetings.** Public meetings were held on November 7, 2001, in Santa Barbara, California; November 8, 2001, in Santa Maria; November 13, 2001, in Buellton; November 19, 2001, in Goleta, and November 28, 2001, in Lompoc. These meetings provided the public with an opportunity to comment on this document.
- **Preparation of the Final EIR.** This Final EIR incorporates and responds to comments received as a result of the public review of the Draft EIR.
- **County Board of Supervisors Hearing on the Final EIR/Notice of Determination.** The County Board of Supervisors will hold a public hearing on the Final EIR to consider information in the Draft EIR, Final EIR, public comment, and other information provided by County staff. Based on its independent evaluation of the information presented, the County Board of Supervisors will make its decision regarding the proposed project, prepare and publish a record of decision, and file a Notice of Determination.

#### 1.4 FINAL EIR FORMAT

The remainder of this Final EIR is organized as follows:

- **2.0 – Responses to Comments on the Draft EIR.** This chapter includes public and agency comments on the Draft EIR as well as responses to those comments.
- **3.0 – Response to Comments on Draft EIR Regarding Waste Processing Technologies.** A number of comments addressed concerns about waste processing technologies. This response to comments provides an overview of the County history of waste diversion and ongoing efforts to increase diversion through implementation of waste processing technologies. The information provided is responsive to the concerns raised in the comments.
- **4.0 – Revised and Additional Materials.** This chapter includes revised text, additional and revised mitigation measures, and revised tables and figures. These materials are provided in response to specific comments on the Draft EIR.

- **5.0 – Persons and Organizations Consulted.** This chapter provides a list of the persons or organizations who contributed to preparation of the Final EIR.
- **6.0 – References and Resources.** A list of the references used to prepare this Final EIR is included in this chapter. References are called out in an abbreviated format throughout the document.
- **7.0 – List of Abbreviations.** This chapter provides a list of abbreviations as they are used in this Final EIR.
- **8.0 – Final EIR Mailing List.** This chapter provides a list of agencies, groups, and interested individuals who received a copy of this Final EIR or were notified of the availability of the document.
- **Appendices.** The following appendices to this Final EIR are included:  
Appendix A: Notice of Completion and State Clearinghouse Response  
Appendix B: Public Notices of Availability of Draft EIR and Public Meetings and Extension of Comment Period  
Appendix C: Mitigation Monitoring and Reporting Program

Copies of this Final EIR are available for public review at the following locations:

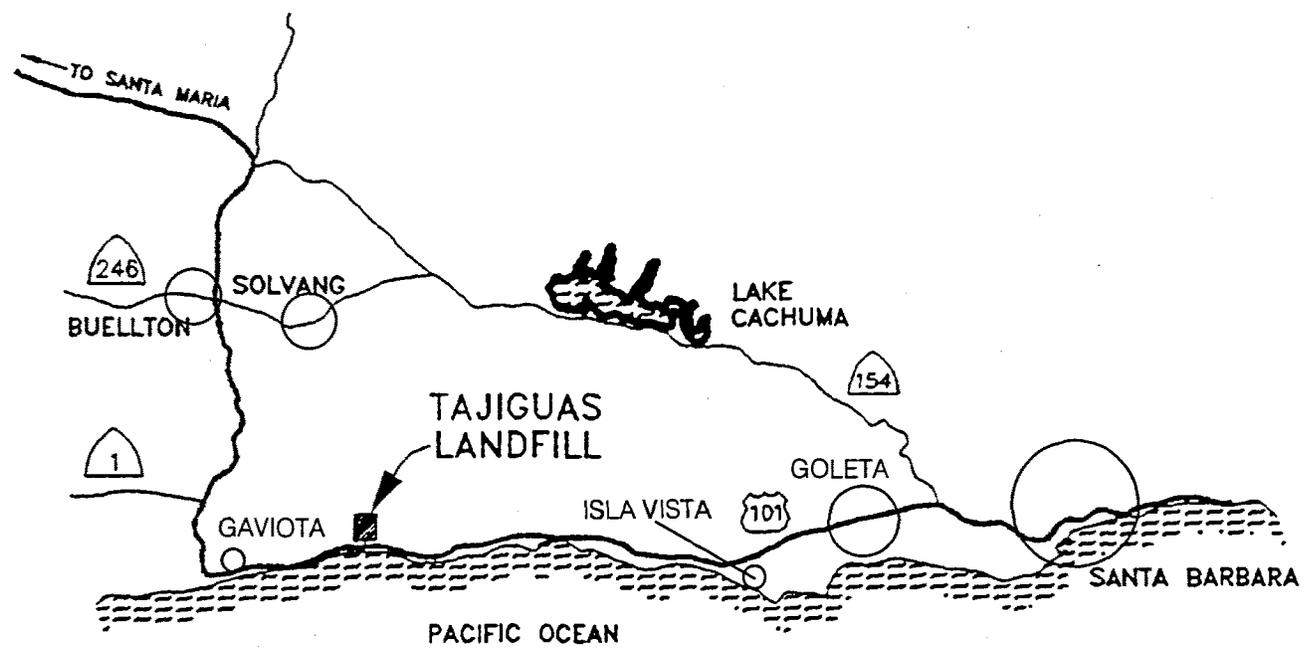
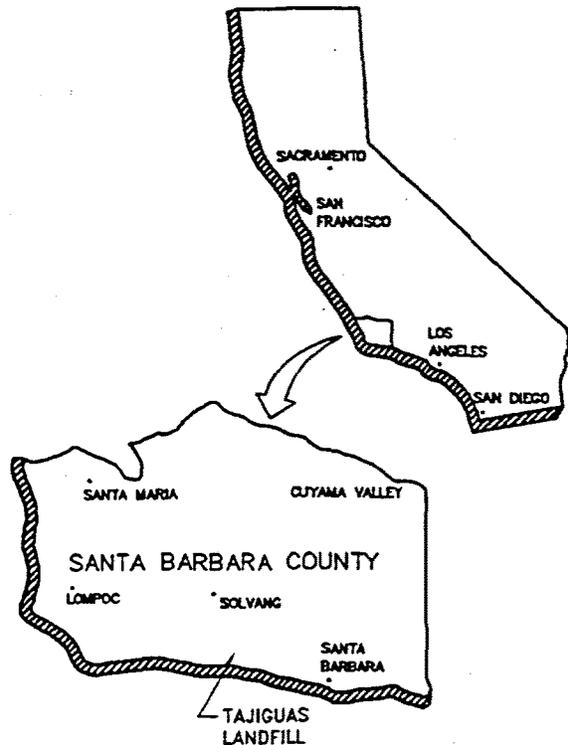
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NOT TO SCALE

**REGIONAL PROJECT LOCATION MAP**

TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA

<b>TRC</b>	<b>FIGURE 1-1</b>
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**TABLE 1-1**

**PROJECTED AVERAGE AND PEAK  
MUNICIPAL SOLID WASTE TONNAGES AND HAUL TRUCKS<sup>(1,2)</sup>  
TAJIGUAS LANDFILL**

YEAR	ACTIVITY	WASTE DISPOSAL RATE (TONS PER DAY)		NUMBER OF HAUL TRUCKS <sup>(3)</sup>	
		Average Daily	Peak Day	Average Daily	Peak Day
1998 - 1999	Baseline (July 1998-December 1999)	738	1,161 <sup>(4)</sup>	87	115 <sup>(4)</sup>
2001	Prior to Closure of Foxen Canyon Landfill	746	1,175	92	127
2002	Tajiguas Begins Receiving Foxen Canyon Waste	955	1,444	117	162
2005	Benchfill Permit Expires; Begin Receipt of MSW Under Proposed Project	979	1,479	120	170
2010	5 Years Into Proposed Expansion	1,011	1,525 <sup>(5)</sup>	122	175
2015	10 Years Into Proposed Expansion	1,042	1,573 <sup>(5)</sup>	126	179
2020	Proposed Project <sup>(6)</sup>	1,074	1,623 <sup>(5)</sup>	130	184

30757/Final EIR/Tbls&Figs (5/23/02/rm)

- (1) For the purpose of this table, municipal solid waste (MSW) includes green waste. It excludes dirt, alternative daily cover (ADC) and outgoing materials.
- (2) Details for the data in this table are in Table 3.11-9 (Air Quality). Projections are based on increase in waste generation of 0.62 percent (an average of 0.6 percent per year for the Santa Barbara South Coast area and 0.8 percent per year for the Santa Ynez Valley), the same as the projected increase in the population for these areas (SBCAG, 1994).
- (3) Includes solid waste, green waste, dirt, ADC and outgoing materials. Does not include other vehicles (50) for employees, deliveries, contractors, visitors.
- (4) The 1-day baseline peak disposal is a calculated day. It is the arithmetic mean of the 5 days corresponding to the highest disposal days in the baseline period of July 1998 through December 1999 (462 days).
- (5) Peak disposal at Tajiguas will not exceed 1,500 tpd. If the tonnages of solid waste and green waste exceed 1,500 tpd, the excess will be managed at the Foxen Canyon and South Coast transfer stations.
- (6) The proposed project expires after 15 years.



TABLE 1-2

SUMMARY OF IMPACTS AND MITIGATION MEASURES

DESCRIPTION	FRONT CANYON/ BACK CANYON (FC/BC)	MITIGATION MEASURES	RESIDUAL IMPACT
<b>GEOLOGY (Section 3.2)</b>			
CLASS I: SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS.			
There are no Class I impacts for the proposed project relative to Geology.			
CLASS II: SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED.			
Slope failure could damage environmental control systems, disrupt operations and pose a threat to onsite personnel. Portions of cut slopes within moderately to extremely weathered materials may become unstable if inclined steeper than 2:1. However, studies conducted at the landfill site indicate that cut slopes in the Gaviota Formation bedrock have adequate stability under both static and seismic conditions.	FC/BC	GEO-1	Less than significant.
There is the potential for the underlying expansive soils to damage the overlying facilities. However, expansive soils would be removed prior to placement of landfill liner, waste, roads or other facilities.	FC/BC	GEO-2	Less than significant.
CLASS III: ENVIRONMENTAL IMPACTS THAT ARE POTENTIALLY ADVERSE BUT NOT SIGNIFICANT.			
Fault rupture of ground surface directly underlying landfill facilities could damage environmental controls (liner systems, LCRS, landfill gas controls), structures and access roads. Faults mapped within the proposed landfill footprint are considered inactive and are not a constraint on landfill shallow landslides.	FC/BC	None necessary.	Less than significant.
Liquefaction could result in slope failure or foundation failure. However, the subsurface materials of Tertiary sedimentary rocks and dense soils are not typically susceptible to liquefaction.	FC/BC	None necessary.	Less than significant.
Shallow landslides in natural slopes could affect access or other landfill operations if they result in blocking roadways. Onsite procedures that include limiting the size of exposed cut areas, diversion of storm water runoff and early identification of problem areas for remediation will minimize the impact of shallow landslides.	FC/BC	GEO-3	Less than significant.
There is the potential for failure of waste fill slopes or landfill liner systems related to an earthquake. This is reduced when landfill design incorporates an engineered buttress fill along the west refuse toe.	FC/BC	None necessary.	Less than significant.

In response to comments on the Draft EIR, some of the mitigation measures in Table 1-2 are revised, and some are new. A complete version of each new and revised mitigation measure is provided in Final EIR Section 4.2.

TABLE 1-2

SUMMARY OF IMPACTS AND MITIGATION MEASURES

DESCRIPTION	FRONT CANYON/ BACK CANYON (FC/BC)	MITIGATION MEASURES	RESIDUAL IMPACT
<b>GEOLOGY (continued)</b>			
Erosion could result in soil loss, with adverse slope stability effects, clogging of drainage systems and/or downstream sedimentation. However, stormwater management systems, interim erosion protection during construction and operations, and permanent drainage and erosion control structures will reduce discharges of stormwater and occurrence of erosion.	FC/BC	None necessary.	Less than significant.
Differential settlement of the landfill could create sags and depressions in the final cover system and create ponding or cracks, impede drainage, and impair the function of surface structures such as roads, pipelines, landfill gas controls and drainage facilities. However, ongoing monitoring and maintenance during closure and postclosure would find and repair such potential early on.	FC/BC	None necessary.	Less than significant.
Settlement of landfill foundation materials could result in other landfill settlement. This is negligible, as foundation materials are primarily Tertiary sedimentary rocks, which are not susceptible to seismically-induced settlement.	FC/BC	None necessary.	Less than significant.
Differential settlement of the landfill foundation could affect the leachate collection and removal system. However, this system will be placed on soil that overlies bedrock and is not subject to settlement.	FC/BC	None necessary.	Less than significant.
There is the potential for impacts related to excavation and relocation of waste during the Southeast Corner Modification. However, an excavation plan would be prepared to maintain stability, and run-on/runoff controls would prevent excessive rainfall from entering the area.	FC/BC	None necessary.	Less than significant.
<b>CLASS IV: BENEFICIAL IMPACTS.</b> There are no Class IV impacts for the proposed project relative to Geology.			
<b>MITIGATION MEASURES</b>			
<p>GEO-1 The landfill design shall include the following:</p> <ul style="list-style-type: none"> <li>• Detailed slope stability report prepared by a geologist/soils engineer to determine maximum cut-slopes, based on in-field observations of bedrock conditions. Cut-slopes shall not exceed 2:1 unless the slope-stability report concludes that steeper slopes will be stable. In that case, slopes may exceed 2:1, provided the slopes adhere to the design standards identified in the report.</li> <li>• Detailed geological and/or soils engineering study shall be prepared to determine landfill structural design criteria, as required by CCR Title 27, when the final landfill excavation and fill plans are being developed.</li> </ul>			
<p>GEO-2 Expansive soils shall be excavated prior to placement of waste fill. In the event expansive soils are used as fill under sensitive structures or pavements, geotechnical engineering practices (i.e., compaction, drainage and watering controls) shall be implemented.</p>			
<p>GEO-3 Grading and drainage improvements of natural slopes adjacent to the Landfill components shall include construction methods to control shallow landslides. The construction methods shall include limiting the size of exposed cut area, diversion of storm water runoff away from potential landslides and identification of area for drainage.</p>			

In response to comments on the Draft EIR, some of the mitigation measures in Table 1-2 are revised, and some are new. A complete version of each new and revised mitigation measure is provided in Final EIR Section 4.2.

TABLE 1-2

SUMMARY OF IMPACTS AND MITIGATION MEASURES

DESCRIPTION	FRONT CANYON/ BACK CANYON (FC/BC)	MITIGATION MEASURES	RESIDUAL IMPACT
<b>WATER RESOURCES (Section 3.3)</b>			
<b>CLASS I: SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS.</b>			
There are no Class I impacts for the proposed project relative to Water Resources.			
<b>CLASS II: SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED.</b>			
There are no Class II impacts for the proposed project relative to Water Resources.			
<b>CLASS III: ENVIRONMENTAL IMPACTS THAT ARE POTENTIALLY ADVERSE BUT NOT SIGNIFICANT.</b>			
Surface water quantity could be adversely affected, but would not be significant, as runoff would be slightly less with the proposed project than under natural conditions. Further, surface runoff from the landfill and water from offsite flow and surface seeps would be conveyed to perimeter ditches and conveyed away from the landfill.	FC/BC	None necessary.	Less than significant.
Surface water quality could be adversely affected. This would not be significant, as drainage control measures at the landfill reduce soil loss compared to natural conditions. Also, surface water would be directed away from the working face, and precipitation that infiltrates would be collected by the leachate collection and recovery system and used for dust control.	FC/BC	None necessary.	Less than significant.
Groundwater quality could be affected by abandonment of monitoring wells, seepage of leachate, landfill gas migration, or spillage of liquids and subsequent migration of surface fluids into groundwater. This impact will be minimized through continued implementation of ongoing procedures that include limiting the depth of excavation, maintenance and monitoring of the landfill gas and leachate collection and recovery systems, sealing of abandoned wells, and secondary containment of stored fuels and oils.	FC/BC	None necessary.	Less than significant.
Groundwater quantity has the potential to be affected if proposed project resulted in a substantial depletion of groundwater resources. However, existing sources of water will continue to be utilized and new sources are being investigated, and overall water use will be substantially the same as under existing conditions.	FC/BC	None necessary.	Less than significant.
The proposed project would not utilize groundwater or surface water resources beyond the Safe Yield of the supply formations. Water use would be substantially the same as for existing operations.	FC/BC	None necessary.	Less than significant.

In response to comments on the Draft EIR, some of the mitigation measures in Table 1-2 are revised, and some are new. A complete version of each new and revised mitigation measure is provided in Final EIR Section 4.2.

**TABLE 1-2**

**SUMMARY OF IMPACTS AND MITIGATION MEASURES**

DESCRIPTION	FRONT CANYON/ BACK CANYON (FC/BC)	MITIGATION MEASURES	RESIDUAL IMPACT
<b>WATER RESOURCES (Continued)</b>			
Activities associated with the Southeast Corner Modification could affect water requirements or drainage. Temporary run-on/runoff controls will be established to control drainage, and water use will be within existing requirements for overall project activities.	FC/BC	None necessary.	Less than significant.
Landfill closure/postclosure could result in excessive sediment transport or runoff from the drainage basins. However, procedures will include routine inspection of cover and drainage systems and water quality monitoring programs.	FC/BC	None necessary.	Less than significant.
Potential impacts to groundwater during closure/postclosure would be avoided by installation of final cover and ongoing operation of the GLCRS and LFG systems, as well as groundwater monitoring.	FC/BC	None necessary.	Less than significant.
<b>CLASS IV: BENEFICIAL IMPACTS.</b>			
There are no Class IV impacts for the proposed project relative to Water Resources.			
<b>MITIGATION MEASURES (to be implemented as part of project design and operations)</b>			
WR-1 Known or suspected perched or stratigraphically isolated groundwater zones shall be further delineated and dewatered prior to landfill construction. Design shall consider the location of these zones, as well as other zones identified during construction.			
WR-2 A final cover system or mono cover shall be used to close the landfill.			
WR-3 Low-flow plumbing fixtures shall be installed in all onsite facilities.			
WR-4 Well No. 3 in the Monterey Formation will be used if the water level in the Vaqueros water supply well drops regularly from pumping activities.			

In response to comments on the Draft EIR, some of the mitigation measures in Table 1-2 are revised, and some are new. A complete version of each new and revised mitigation measure is provided in Final EIR Section 4.2.

TABLE 1-2

SUMMARY OF IMPACTS AND MITIGATION MEASURES

DESCRIPTION	FRONT CANYON/ BACK CANYON (FC/BC)	MITIGATION MEASURES	RESIDUAL IMPACT
<b>BIOLOGICAL RESOURCES (Section 3.4)</b>			
<b>CLASS I: SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS.</b>			
Maintenance of the in-channel sedimentation basins would result in residual impacts to the red-legged frogs that inhabit the basins.	FC/BC	BIO-8	Significant.
Approximately 71 acres of habitat, including 38 acres of mature chaparral and 5 acres of degraded coastal sage scrub, would be removed.	FC/BC	BIO-7	Significant.
Landfill operations in the northern portion of project site would encroach on the buffer area between the landfill and undisturbed native habitats along north site boundary.	FC/BC	BIO-7, BIO-9, BIO-10	Significant.
Seeps and rock outcrops, habitat for sensitive plant species, and chaparral and oak woodland, habitat for Plummer's baccharis, Hoffmann's nightshade and Santa Barbara honeysuckle, would be eliminated.	FC/BC	BIO-1, BIO-7	Significant.
Loss of an estimated 100 to 150 mature coast live oak trees.	FC/BC	BIO-3, BIO-4, BIO-7	Significant.
Increased human presence and activity could lead some sensitive bird and mammal species to avoid or abandon foraging/breeding habitat in adjacent foothill areas.	FC/BC	BIO-7, BIO-9, BIO-10	Significant.
The red-legged frog would be disturbed by management of the in-channel sedimentation basins.	FC/BC	BIO-8	Significant.
The San Diego woodrat would be affected by the loss of mature chaparral, which provides nesting and foraging habitat for this species.	FC/BC	BIO-5, BIO-7	Significant.
<b>CLASS II: SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED.</b>			
Habitat quality along the northerly reach of Pila Creek may be affected due to increased human presence and the potential for introduction and expansion of invasive, non-native plants.	FC/BC	BIO-2, BIO-7	Less than significant.
The number of individuals and species may be reduced because of limited resources at the landfill and competition for limited habitat areas. Birds may exert predatory pressure on other species, such as the California red-legged frog.	FC/BC	NUI-2	Less than significant.
The red-legged frog population in the in-channel sedimentation basins could experience predation by gulls and crows that are attracted to the landfill.	FC/BC	NUI-2	Less than significant.
Mountain lions in the project area would be affected through the loss of foraging and denning habitat and increased human presence during landfill operations.	FC/BC	BIO-2, BIO-7, BIO-9, BIO-10	Less than significant.
Ringtails could be affected through loss of foraging and breeding habitat and increased human presence.	FC/BC	BIO-2, BIO-7, BIO-9, BIO-10	Less than significant.
California horned lark, loggerhead shrike, Cooper's hawk and white-tailed kite would be affected by disturbance to grassland, chaparral and coastal sage scrub habitats.	FC/BC	BIO-7	Less than significant.
During the landfill closure/postclosure period, subsequent to the period of operation, human use and disturbance in the area will gradually diminish. The area will be revegetated and established as open	FC/BC	BIO-3, BIO-4, BIO-7	Less than significant.

In response to comments on the Draft EIR, some of the mitigation measures in Table 1-2 are revised, and some are new. A complete version of each new and revised mitigation measure is provided in Final EIR Section 4.2.

TABLE 1-2

## SUMMARY OF IMPACTS AND MITIGATION MEASURES

Page 6 of 19

DESCRIPTION	FRONT CANYON/ BACK CANYON (FC/BC)	MITIGATION MEASURES	RESIDUAL IMPACT
space.			
<b>BIOLOGICAL RESOURCES (continued)</b>			
The American peregrine falcon would be affected by disturbance to grassland and scrub habitat, which is foraging habitat for this species.	FC/BC	BIO-7	Less than significant.
Gulls and crows at the landfill could affect falcons through nest predation and harassment of adults and, indirectly, through a decrease in available shorebird prey.	FC/BC	NUI-2	Less than significant.
Tidewater gobies could be indirectly affected through predation by gulls that congregate around the terminal lagoons on surrounding drainages and at the landfill.	FC/BC	NUI-2	Less than significant.
Tidewater gobies could be indirectly affected by increased sedimentation and adverse effects to water quality in nearshore waters.	FC/BC	BIO-6	Less than significant.
Removal of nectar sources and larval food plants, such as milkweed, could affect the Monarch butterfly.	FC/BC	BIO-11	Less than significant.
Landfill expansion would result in intensive human use of the northern portion of the project site, but such use will diminish at closure.	FC/BC	BIO-3, BIO-4, BIO-7	Less than significant.
<b>CLASS III: ENVIRONMENTAL IMPACTS THAT ARE POTENTIALLY ADVERSE BUT NOT SIGNIFICANT.</b>			
Some birds (gulls, crows) are expected to be taken as a result of bird management measures.	FC/BC	None required.	Less than significant.
Seagull populations could be affected by bird management measures.	FC/BC	None required.	Less than significant.
Swainson's hawk and bank swallows could be affected by disturbance to habitat.	FC/BC	BIO-7	Less than significant.
Activities associated with the Southeast Corner Modification could affect species that utilize that area of the landfill for habitat.	FC/BC	None required.	Less than significant.
<b>CLASS IV: BENEFICIAL IMPACTS.</b>			
There are no Class IV impacts for the proposed project relative to Biological Resources.			
<b>MITIGATION MEASURES</b>			
BIO-1 A survey shall be conducted to identify sensitive plant species in areas to be cleared of native vegetation. The survey for the Gaviota tarplant ( <i>Hemizonia increscens ssp. villosa</i> ) shall be conducted during the month of May through late summer. In the event sensitive plant species (i.e., Santa Barbara honeysuckle, Gaviota tarplant, etc.) are identified, the plants shall be salvaged and/or propagules relocated. Transplanted or propagated plants shall be maintained for a minimum of 5 years, or until the biologist determines that the plants have been successfully established.			
BIO-2 To protect oak/riparian habitat in the northern portion of the project site, all ground disturbance upstream of the back canyon sediment basins shall be prohibited within a 50-foot setback from either side of the top-of-bank (e.g., excluding existing road crossings) or oak/riparian vegetation canopy, whichever is greater, along Pila Creek.			
BIO-3 An oak tree replacement plan shall be prepared to replace oak trees identified for removal. Any oak trees that are removed and/or damaged (more than 25% of root zone disturbed) shall be replaced on a 10:1 basis with 1-gallon size saplings grown from locally obtained acorns. Trees shall be planted prior to winter rains, irrigated and maintained until established (5 years). The plantings shall be protected from predation by wild and domestic animals and from human interference by the use of staked fencing and gopher fencing during the maintenance period. In the event that an oak tree(s) does not survive for 5 years, it shall be replaced.			

In response to comments on the Draft EIR, some of the mitigation measures in Table 1-2 are revised, and some are new. A complete version of each new and revised mitigation measure is provided in Final EIR Section 4.2.

TABLE 1-2

SUMMARY OF IMPACTS AND MITIGATION MEASURES

DESCRIPTION	FRONT CANYON/ BACK CANYON (FC/BC)	MITIGATION MEASURES	RESIDUAL IMPACT
<b>BIOLOGICAL RESOURCES</b> (continued)			
BIO-4		An oak tree protection program, prepared by a County-approved biologist, shall be implemented.	
BIO-5		A survey for desert woodrat shall be conducted in mature chaparral prior to vegetation removal. In the event desert woodrat is found on the project site, a capture and relocation effort shall be conducted to move woodrats to suitable adjacent habitat.	
BIO-6		Erosion control measures shall continue to be implemented. Erosion control methods could include silt fencing, straw bales, hydroseeding with appropriate native plant species from the project vicinity, or use of sandbags in conjunction with other methods. Hydroseeding, if used, shall be applied prior to the rainy season.	
BIO-7		To compensate for native habitats disturbed by the expansion, a County-approved biologist shall prepare and implement a revegetation plan (e.g., a ratio of not less than 1:1 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-8		To reduce impacts to the California red-legged frogs (CLRF) that reside in the in-channel sedimentation basins, an extensive CLRF Management Plan shall be implemented. Measures shall include, but not be limited to: scheduled maintenance of the basins, limitations on use, preservation of native riparian and upland vegetation on the upper banks of the basins, access requirements and erosion-control measures.	
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.	
BIO-11		To reduce impacts to Monarch butterflies that may roost in nearby eucalyptus trees along Highway 101, revegetation plantings shall include adult nectar sources and larval food plants, such as milkweed.	

In response to comments on the Draft EIR, some of the mitigation measures in Table 1-2 are revised, and some are new. A complete version of each new and revised mitigation measure is provided in Final EIR Section 4.2.

**TABLE 1-2**

**SUMMARY OF IMPACTS AND MITIGATION MEASURES**

DESCRIPTION	FRONT CANYON/ BACK CANYON (FC/BC)	MITIGATION MEASURES	RESIDUAL IMPACT
<b>CULTURAL RESOURCES (Section 3.5)</b>			
<b>CLASS I: SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS.</b>			
Site CA-SBA-3494 would be directly disturbed, as it is within the footprint of the proposed project.	FC/BC	CR-1, CR-2, CR-3	Significant.
<b>CLASS II: SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED.</b>			
Site SBA-iso-645 could be indirectly impacted by the continuation of human activities at the landfill.	FC/BC	CR-2, CR-3	Less than significant.
Unknown surface and/or subsurface cultural resources could be discovered during ground disturbing activities.	FC/BC	CR-1, CR-2, CR-3	Less than significant.
Sites CA-SBA-92 and CA-SBA-1990 could be indirectly impacted by the continuation of human activities in the area related to operation of the landfill.	FC/BC	CR-2, CR-3	Less than significant.
Closure and postclosure activities could indirectly impact sites SBA-iso-645, CA-SBA-92 and/or CA-SBA-1990 by the continuation of human activities in the area.	FC/BC	CR-1, CR-2, CR-3	Less than significant.
<b>CLASS III: ENVIRONMENTAL IMPACTS THAT ARE POTENTIALLY ADVERSE BUT NOT SIGNIFICANT.</b>			
There are no Class III impacts for the proposed project relative to Cultural Resources.			
<b>CLASS IV: BENEFICIAL IMPACTS.</b>			
There are no Class IV impacts for the proposed project relative to Cultural Resources.			
<b>MITIGATION MEASURES</b>			
CR-1	All known or potential cultural sites that are subject to ground disturbances shall be subject to a Phase 1 archaeological survey pursuant to County Archaeological guidelines. If required, a Phase 2 subsurface investigation and Phase 3 data recovery program shall be performed if significant resources are encountered and potential impacts are unavoidable. Surveys will take place as far in advance of landfill expansion activities as feasible to avoid delaying landfill operations.		
CR-2	In the event cultural remains are encountered during grading, work shall be stopped immediately or redirected until a County-qualified archaeologist and Native American representative are retained by the applicant to evaluate the significance of the find pursuant to Phase 2 investigations of the County Archaeological Guidelines. If remains are found to be significant, they shall be subject to a Phase 3 mitigation program, consistent with County Archaeological Guidelines.		
CR-3	SWUD shall develop and conduct a training program for all landfill personnel. Personnel shall be made aware of cultural resources at the landfill. These areas will be designated as "off-limits," and personnel shall be instructed to avoid them.		

In response to comments on the Draft EIR, some of the mitigation measures in Table 1-2 are revised, and some are new. A complete version of each new and revised mitigation measure is provided in Final EIR Section 4.2.

TABLE 1-2

SUMMARY OF IMPACTS AND MITIGATION MEASURES

DESCRIPTION	FRONT CANYON/ BACK CANYON (FC/BC)	MITIGATION MEASURES	RESIDUAL IMPACT
<b>NUISANCES (Section 3.6)</b>			
<b>CLASS I: SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS.</b>			
There are no Class I impacts for the proposed project relative to Nuisances.			
<b>CLASS II: SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED.</b>			
During landfill operations, resident and displaced rodents have the potential to inhabit or get lodged in landfill equipment and structures and could expose onsite personnel to disease.	FC/BC	NUI-1	Less than significant.
Insects such as flies and mosquitoes could be attracted by ponded water or uncovered solid waste.	FC/BC	NUI-1	Less than significant.
Birds are attracted to the solid waste at the landfill. When in large concentrations, they have the potential to affect the health and safety of humans and other animals.	FC/BC	NUI-2	Less than significant.
There is the potential for odors from the transport of waste to the landfill to be a nuisance along the roadways leading to the landfill (i.e., Highway 101).	FC/BC	NUI-3, NUI-4	Less than significant.
Odors generated by the exposed waste at the landfill working face have the potential to be detected offsite.	FC/BC	NUI-4	Less than significant.
Odors associated with landfill gas during landfill operations and closure/postclosure activities have the potential to be detected offsite.	FC/BC	NUI-4	Less than significant.
Odors associated with landfill gas have the potential to be detected after the placement of final cover.	FC/BC	NUI-4	Less than significant.
Litter from uncovered waste loads, could become a nuisance along County roads and highways.	FC/BC	NUI-3	Less than significant.
There is the potential for litter from illegal dumping in the vicinity of the landfill. This has not occurred previously and is not expected to become a problem.	FC/BC	NUI-3	Less than significant.
Litter from the landfill working face could blow offsite and become a nuisance.	FC/BC	NUI-3	Less than significant.
The Southeast Corner Modification could result in nuisance impacts, including odors, litter and dust, and attraction of vectors and birds.	FC/BC	NUI-1, NUI-2, NUI-3, NUI-4	Less than significant.
Potential dust impacts are addressed under Section 3.11 – Air Quality.	FC/BC	AQ-3	Less than significant.
During closure activities, there is the potential for resident and displaced rodents to inhabit or get lodged in landfill equipment or structures.	FC/BC	NUI-1	Less than significant.
There is the potential for odors from landfill gas to occur during the closure/postclosure period. However, the generation of landfill gas would diminish over time, and the landfill gas collection system is expected to reach an efficiency of 95 percent.	FC/BC	NUI-4	Less than significant.
Dust may occur during closure during transport and compaction of soil to construct the final cover and subsequent revegetation.	FC/BC	AQ-3	Less than significant.
<b>CLASS III: ENVIRONMENTAL IMPACTS THAT ARE POTENTIALLY ADVERSE BUT NOT SIGNIFICANT.</b>			
There are no Class III impacts for the proposed project relative to nuisances.			

In response to comments on the Draft EIR, some of the mitigation measures in Table 1-2 are revised, and some are new. A complete version of each new and revised mitigation measure is provided in Final EIR Section 4.2.

TABLE 1-2

SUMMARY OF IMPACTS AND MITIGATION MEASURES

DESCRIPTION	FRONT CANYON/ BACK CANYON (FC/BC)	MITIGATION MEASURES	RESIDUAL IMPACT
<b>NUISANCES (continued)</b>			
<b>CLASS IV: BENEFICIAL IMPACTS.</b>			
There are no Class IV impacts for the proposed project relative to Nuisances.			
<p>NUI-1 To reduce potential vector habitat or harborage, good housekeeping practices shall be implemented at the landfill. These shall include, but not be limited to:</p> <ul style="list-style-type: none"> <li>• Maintenance of the working face as small as safely practicable.</li> <li>• Burial of extremely odiferous waste as soon as possible, compaction of waste at the landfill working face.</li> <li>• Regular inspection of landfill to identify areas of substandard soil cover.</li> </ul>			
<p>NUI-2 To reduce nuisance birds at the landfill, a Bird Management Plan shall be developed. The plan shall include, but not be limited to,</p> <ul style="list-style-type: none"> <li>• Landfill personnel shall be assigned to bird management from dawn until all waste has been buried and the landfill has been closed for the day.</li> <li>• Maintenance of the working face as small as safely practicable.</li> <li>• Use of deterrents, such as propane cannons, distress calls, overhead lines or wires, kites, raptors and dogs and, if necessary, depredation.</li> </ul>			
<p>NUI-3 Measures to reduce litter at the landfill and surrounding areas shall be implemented. These shall include, but not be limited to:</p> <ul style="list-style-type: none"> <li>• Signs in English and Spanish at the landfill entrance and scalehouse requiring load covers and notice of fines for noncompliance.</li> <li>• Requirement for all waste trucks to be covered from the point of origin.</li> <li>• Installation of litter fences downwind of the landfill working face.</li> <li>• Inspection of roads to the landfill within 1/4-mile of the entrance.</li> <li>• Use of litter crews.</li> <li>• Clearance of onsite drainage channels.</li> </ul>			
<p>NUI-4 Odors generated by the landfill shall be kept to a minimum, with a goal of retaining odors on the site. The following odor control measures shall be implemented:</p> <ul style="list-style-type: none"> <li>• Extremely odiferous waste shall be buried as soon as possible after unloading.</li> <li>• The landfill shall be inspected regularly for cracks or fissures. Repairs shall be implemented as necessary.</li> </ul>			

In response to comments on the Draft EIR, some of the mitigation measures in Table 1-2 are revised, and some are new. A complete version of each new and revised mitigation measure is provided in Final EIR Section 4.2.

TABLE 1-2

SUMMARY OF IMPACTS AND MITIGATION MEASURES

DESCRIPTION	FRONT CANYON/ BACK CANYON (FC/BC)	MITIGATION MEASURES	RESIDUAL IMPACT
<b>LAND USE (Section 3.7)</b>			
<b>CLASS I: SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS.</b>			
There are no Class I impacts for the proposed project relative to Land Use.			
<b>CLASS II: SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED.</b>			
There is the potential for the proposed project to impact residential use in the vicinity, including the Arroyo Quemada community.	FC/BC	See Mitigation Measures for Geology, Water Resources, Nuisances, Visual Resources, Noise, Air Quality, and Health and Safety.	Less than significant.
The Southeast Corner Modification has the potential to impact future use of the landfill site, after the completion of landfill operations. Based on requirements for closure, such impact would not be significant.	FC/BC	See Mitigation Measures for Nuisances, Noise and Air Quality.	Less than significant.
There is the potential for the proposed project to result in impacts to other land uses in the vicinity.	FC/BC	See Mitigation Measures for Geology, Water Resources, Nuisances, Visual Resources, Noise and Air Quality.	Less than significant.
<b>CLASS III: ENVIRONMENTAL IMPACTS THAT ARE POTENTIALLY ADVERSE BUT NOT SIGNIFICANT.</b>			
The proposed expansion of the landfill could impact nearby recreational uses, primarily coastal recreational resources and uses within the Los Padres National Forest.	FC/BC	None required.	Less than significant.
The proposed project could affect agriculture in the site vicinity. Based on topography and site considerations such impact would not be significant.	FC/BC	See Mitigation Measures for Nuisances and Air Quality.	Less than significant.
<b>CLASS IV: BENEFICIAL IMPACTS.</b>			
There are no Class IV impacts for the proposed project relative to Land Use.			
<b>MITIGATION MEASURES</b>			
No mitigation measures are required.			

In response to comments on the Draft EIR, some of the mitigation measures in Table 1-2 are revised, and some are new. A complete version of each new and revised mitigation measure is provided in Final EIR Section 4.2.

TABLE 1-2

SUMMARY OF IMPACTS AND MITIGATION MEASURES

DESCRIPTION	FRONT CANYON/ BACK CANYON (FC/BC)	MITIGATION MEASURES	RESIDUAL IMPACT
<b>VISUAL RESOURCES (Section 3.8)</b>			
<b>CLASS I: SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS.</b>			
During the operations period of the proposed landfill expansion, the project would be visible from the landfill access road, Highway 101 in the immediate vicinity of the landfill and from the Pacific Ocean.	FC/BC	VIS-1, VIS-2, BIO-3	Significant.
In the scenic and visually sensitive area of the project site, the visual characteristics of the completed project would result in significant visual effects.	FC/BC	VIS-1, VIS-2, VIS-3, BIO-3	Significant.
At project completion, the landfill would be visible from Viewpoints 4 and 5. This is considered a significant and unavoidable impact.	FC/BC	VIS-1, VIS-2, VIS-3, BIO-3	Significant.
<b>CLASS II: SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED.</b>			
Security lighting from the scalehouse would be visible from Viewpoint 4 and may be visible from Viewpoint 5.	FC/BC	BIO-9	Less than significant.
From Viewpoint 3, a portion of the top of the landfill would be visible in the distance, in front of the cut slope, but will be indistinguishable after revegetation.	FC	VIS-1, VIS-2, VIS-3	Less than significant.
<b>CLASS III: ENVIRONMENTAL IMPACTS THAT ARE POTENTIALLY ADVERSE BUT NOT SIGNIFICANT.</b>			
The Southeast Corner Modification would result in lowering the southeast corner of the landfill from its present elevation to 400 feet above mean sea level, or less.	FC/BC	None required.	Less than significant.
<b>CLASS IV: BENEFICIAL IMPACTS.</b>			
There are no Class IV impacts for the proposed project relative to Visual Resources.			
<b>MITIGATION MEASURES</b>			
VIS-1 At final closure, the landfill shall be contoured to be consistent with the surrounding terrain. It shall be vegetated with species that include appropriate local native plant species.			
VIS-2 Native sycamore trees from local seed or cutting stock shall be planted in Pila Creek downstream of the landfill, in sufficient quantity to vegetate the area.			

In response to comments on the Draft EIR, some of the mitigation measures in Table 1-2 are revised, and some are new. A complete version of each new and revised mitigation measure is provided in Final EIR Section 4.2.

TABLE 1-2

SUMMARY OF IMPACTS AND MITIGATION MEASURES

DESCRIPTION	FRONT CANYON/ BACK CANYON (FC/BC)	MITIGATION MEASURES	RESIDUAL IMPACT
<b>NOISE (Section 3.9)</b>			
<b>CLASS I: SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS.</b>			
There are no Class I impacts for the proposed project relative to Noise.			
<b>CLASS II: SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED.</b>			
There are no Class II impacts for the proposed project relative to Noise.			
<b>CLASS III: ENVIRONMENTAL IMPACTS THAT ARE POTENTIALLY ADVERSE BUT NOT SIGNIFICANT.</b>			
Noise from landfill construction and operations activities could affect identified sensitive receptors (residences) in the vicinity of the landfill.	FC/BC	N-1	Less than significant.
There is the potential for noise associated with the Southeast Corner Modification to affect identified sensitive receptors (residences) in the vicinity of the landfill.	FC/BC	N-1	Less than significant.
Noise from excavation and blasting of the north and west borrow areas could affect nearby sensitive receptors.	FC/BC	N-1	Less than significant.
Noise associated with closure/postclosure activities could affect identified sensitive receptors (residences) in the vicinity of the landfill. However, noise levels during closure/postclosure would be much less than during landfill operations.	FC/BC	N-1	Less than significant.
<b>CLASS IV: BENEFICIAL IMPACTS.</b>			
There are no Class IV impacts for the proposed project relative to Noise.			
<b>MITIGATION MEASURES</b>			
N-1 Landfill equipment, including mufflers, shall be maintained to reduce noise levels.			
N-2 Blasting shall be limited to occur between the hours of 8:00 a.m. and 4:00 p.m., Monday through Friday.			

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TABLE 1-2

SUMMARY OF IMPACTS AND MITIGATION MEASURES

DESCRIPTION	FRONT CANYON/ BACK CANYON (FC/BC)	MITIGATION MEASURES	RESIDUAL IMPACT
<b>TRAFFIC (Section 3.10)</b>			
CLASS I: SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS.			
There are no Class I impacts for the proposed project relative to Traffic.			
CLASS II: SIGNIFICANT ENVIRONMENTAL IMPACTS that can be mitigated.			
There is the potential for project-related trucks and other vehicles to affect either truck traffic safety or total traffic safety (accidents) in the vicinity of the landfill. At the landfill access road intersection, trucks and other vehicles will turn across traffic on Highway 101, either as they enter or exit the landfill.	FC/BC	TRAF-1, TRAF-2	Less than significant.
CLASS III: ENVIRONMENTAL IMPACTS THAT ARE POTENTIALLY ADVERSE BUT NOT SIGNIFICANT.			
The proposed project would result in an increase from an average 137 to 180 total vehicle trips per day added to the projected 40,000 average daily traffic on Highway 101.	FC/BC	None required.	Less than significant.
Landfill-related traffic at the intersection of the landfill access road and Highway 101 comprises less than 3% of total traffic during morning, noon or evening peak-hour traffic. This percent of total traffic would not increase as a result of the proposed project.	FC/BC	None required.	Less than significant.
At the intersection of the landfill access road and Highway 101, stopping sight distance is a safety factor. There is the potential for impacts related to stopping sight distance at the intersection.	FC/BC	TRAF-2	Less than significant.
On Highway 101, the length of traffic gaps for northbound traffic is a safety factor for vehicles to turn from the landfill access road into southbound traffic. There is the potential for impacts related to the length of traffic gaps.	FC/BC	TRAF-1, TRAF-2	Less than significant.
Vehicles and equipment associated with the Southeast Corner Modification could contribute to offsite traffic.	FC/BC	None required.	Less than significant.
There is the potential for onsite impacts related to vehicles and equipment associated with the Southeast Corner Modification.	FC/BC	TRAF-3, HS-5	Less than significant.
During closure and postclosure, the potential for impacts related to traffic volume, stopping sight distance and traffic gaps would be less than during project operations.	FC/BC	TRAF-1, TRAF-2	Less than significant.
CLASS IV: BENEFICIAL IMPACTS.			
There are no Class IV impacts for the proposed project relative to Traffic.			
<b>MITIGATION MEASURES</b>			
TRAF-1 A permanent stop sign and speed dots shall be installed and maintained at the landfill exit to Highway 101. All vehicles exiting the landfill site shall be required to make a complete stop prior to entering the highway.			
TRAF-2 To caution motorists approaching the intersection at Highway 101 and the Tajiguas Landfill entrance road, two signs, one for the northbound lanes and one for the southbound lanes of Highway 101 shall be provided. The signage shall be as follows: <i>Caution – Trucks Entering the Highway.</i>			
TRAF-3 All vehicles within the landfill site shall comply with the posted speed limit of 15 mph.			

In response to comments on the Draft EIR, some of the mitigation measures in Table 1-2 are revised, and some are new. A complete version of each new and revised mitigation measure is provided in Final EIR Section 4.2.

TABLE 1-2

SUMMARY OF IMPACTS AND MITIGATION MEASURES

DESCRIPTION	FRONT CANYON/ BACK CANYON (FC/BC)	MITIGATION MEASURES	RESIDUAL IMPACT
<b>AIR QUALITY (Section 3.11)</b>			
<b>CLASS I: SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS.</b>			
The allowable NO <sub>x</sub> and PM <sub>10</sub> emission increase threshold will be exceeded onsite as a result of project operations.	FC/BC	AQ-1 through AQ-5	Significant.
Onsite mobile source exhaust and stationary source combustion of landfill gas will result in emissions of NO <sub>x</sub> . These emissions are treated by the dispersion modeling as if the initially generated NO completely converts to NO <sub>2</sub> . Based on modeling results, ambient air quality standards for NO <sub>2</sub> will be exceeded.	FC/BC	AQ-1 through AQ-5	Significant.
Onsite mobile source exhaust and stationary source combustion of landfill gas will result in emissions of PM <sub>10</sub> . Based on modeling results, ambient air quality standards for 24-hour PM <sub>10</sub> concentrations will be exceeded.	FC/BC	AQ-1 through AQ-5	Significant.
Based on modeling results, the potential carcinogenic risk on and near an 800-meter segment of the project site boundary would exceed the significance threshold of 10-in-1-million.	FC/BC	AQ-4	Significant.
<b>CLASS II: SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED.</b>			
There are no Class II impacts for the proposed project relative to Air Quality.			
<b>CLASS III: ENVIRONMENTAL IMPACTS THAT ARE POTENTIALLY ADVERSE BUT NOT SIGNIFICANT.</b>			
Based on modeling results, the potential chronic and acute noncarcinogenic health risks along the project site boundary and at residences in the vicinity of the landfill would be below the EPA and CAPCOA significance criteria of 1.0.	FC/BC	None required.	Less than significant.
Odors generated by waste and landfill gas could result in offsite impacts.	FC/BC	None required.	Less than significant.
There is the potential for dust that is generated by landfill operations to result in offsite impacts.	FC/BC	None required.	Less than significant.
<b>CLASS IV: BENEFICIAL IMPACTS.</b>			
There are no Class IV impacts for the proposed project relative to Air Quality.			

In response to comments on the Draft EIR, some of the mitigation measures in Table 1-2 are revised, and some are new. A complete version of each new and revised mitigation measure is provided in Final EIR Section 4.2.

TABLE 1-2

SUMMARY OF IMPACTS AND MITIGATION MEASURES

DESCRIPTION	FRONT CANYON/ BACK CANYON (FC/BC)	MITIGATION MEASURES	RESIDUAL IMPACT
<b>AIR QUALITY (Section 3.11) (continued)</b>			
<b>MITIGATION MEASURES</b>			
AQ-1	Mobile source emissions shall be reduced through implementation of the following: <ul style="list-style-type: none"> <li>• Engines shall be turned off when the idling period will exceed 10 minutes.</li> <li>• All vehicles and equipment shall be regularly maintained.</li> <li>• 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.</li> <li>• Scrapers and compactors shall be retrofitted with diesel particulate filters (DPFs).</li> <li>• The maximum number of scrapers operating simultaneously shall be limited to four.</li> <li>• 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.</li> </ul>		
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: <ul style="list-style-type: none"> <li>• The tub grinder or other grinder shall be used a maximum of 4 hours per day when scrapers are in use.</li> <li>• When no scrapers are in use, the tub grinder may be used up to a maximum of 8 hours per day.</li> </ul>		
AQ-3	Dust generated by landfill activities shall be controlled through implementation of the following dust control measures: <ul style="list-style-type: none"> <li>• 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. At a minimum, this would include hourly watering of the active unpaved roads.</li> <li>• Traffic speed shall be limited to 15 mph on all roads.</li> <li>• Soil stockpiled for more than 2 days shall be covered, moistened, or treated with soil binders to prevent dust generation.</li> <li>• Exposed soil shall be revegetated by seeding and watering, or by spreading soil binders in areas not in active use.</li> <li>• 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.</li> <li>• Paved roads shall be vacuum-swept twice daily.</li> <li>• Monitoring wind speed.</li> <li>• Monitoring PM<sub>10</sub> at the landfill boundary.</li> </ul>		
AQ-4	A buffer, approximately 250 to 320 meters (approximately 800 to 1,050 feet) east-west by 800 meters north-south (approximately 2,600 feet, total of 50 acres) on the Baron Ranch, adjacent to the east boundary of Tajiguas Landfill, shall have public access restrictions. These restrictions would assure that the public could not access an area where 24-hour PM <sub>10</sub> or 1-hour NO <sub>2</sub> concentrations could potentially be greater than ambient air quality standards according to the results of air dispersion modeling.		
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.		

In response to comments on the Draft EIR, some of the mitigation measures in Table 1-2 are revised, and some are new. A complete version of each new and revised mitigation measure is provided in Final EIR Section 4.2.

TABLE 1-2

SUMMARY OF IMPACTS AND MITIGATION MEASURES

DESCRIPTION	FRONT CANYON/ BACK CANYON (FC/BC)	MITIGATION MEASURES	RESIDUAL IMPACT
<b>HEALTH AND SAFETY (Section 3.12)</b>			
CLASS I: SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS.			
There are no Class I impacts for the proposed project relative to Health and Safety.			
CLASS II: SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED.			
There is the potential for surface fire from an adjacent wildland fire or onsite storage of petroleum products. However, the surface of the landfill is relatively barren, and there are established landfill safety procedures and provision of adequate water reserves for fire protection.	FC/BC	HS-1	Less than significant.
There is the potential for fire related to onsite storage of petroleum products.	FC/BC	HS-1	Less than significant.
There is the potential for subsurface fire from a landfill design flaw, lack of control of incoming waste, or faulty performance of the landfill gas collection system.	FC/BC	HS-1, HS-3	Less than significant.
During landfill operations and closure/postclosure, there is the potential for a breach of site security that results in unauthorized dumping and/or scavenging.	FC/BC	HS-2	Less than significant.
There is the potential for worker safety impacts due to the steeper sides of the waste prism and the requirement for narrow switchbacks for the Front Canyon configuration.	FC	HS-5	Less than significant.
During landfill operations and closure/postclosure, the methane in landfill gas has the potential to ignite and/or explode if it is confined, with resulting personal injury and structural damage. Landfill gas also may escape through the landfill surface.	FC/BC	HS-3, HS-4	Less than significant.
There is the potential for uncollected landfill gas to escape through the landfill surface. However, landfill gas collection efficiency is expected to reach approximately 95 percent.	FC/BC	HS-3, HS-4	Less than significant.
There is the potential for resident and displaced rodents to inhabit or become lodged in landfill equipment and structures and, as a result, expose onsite personnel to disease.	FC/BC	NUI-1	Less than significant.
The Southeast Corner Modification would involve excavation and removal of compacted waste and soil from a portion of the existing landfill. The material would be transported to another area of the landfill for disposal. Health and safety risks are related to the excavation of buried waste and potential for fire, worker exposure to infectious waste, and potential hazards associated with exposure of methane gas to atmospheric oxygen.	FC/BC	HS-6	Less than significant.

In response to comments on the Draft EIR, some of the mitigation measures in Table 1-2 are revised, and some are new. A complete version of each new and revised mitigation measure is provided in Final EIR Section 4.2.

**TABLE 1-2**

**SUMMARY OF IMPACTS AND MITIGATION MEASURES**

DESCRIPTION	FRONT CANYON/ BACK CANYON (FC/BC)	MITIGATION MEASURES	RESIDUAL IMPACT
<b>HEALTH AND SAFETY (continued)</b>			
During operations and closure/postclosure, there are potential health and safety impacts associated with use of heavy equipment, including bodily injury, noise and dust.	FC/BC	HS-5	Less than significant.
There is the potential for rodent populations to increase during the postclosure period, with associated potential health impacts.	FC/BC	NUI-1	Less than significant.
<b>CLASS III: ENVIRONMENTAL IMPACTS THAT ARE POTENTIALLY ADVERSE BUT NOT SIGNIFICANT.</b>			
There is the potential for liquid waste, hazardous waste, infectious waste, septic tank pumpings and/or liquid sewage sludge to enter the landfill in waste loads. However, in-place operational procedures and load checking reduce this potential impact to less than significant.	FC/BC	None required.	Less than significant.
The potential for subsurface fire would be present but diminished during landfill closure/postclosure.	FC/BC	None required.	Less than significant.
Potential health and safety issues related to landfill workers arise from prolonged exposure to dust and noise, improperly disposed hazardous or medical waste, and operation of heavy machinery. SWUD follows existing OSHA policies, accepted safety standards and provides ongoing safety training.	FC/BC	None required.	Less than significant.
There are potential worker safety issues associated with ongoing activities. However, existing policies and procedures include emergency response training, provision of personal protective equipment, and placement of emergency equipment, such as fire extinguishers.	FC/BC	None required.	Less than significant.
<b>CLASS IV: BENEFICIAL IMPACTS.</b>			
There are no Class IV impacts for the proposed project relative to Health and Safety.			
<b>MITIGATION MEASURES</b>			
<p>HS-1 Measures to minimize fire hazards include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>• Fire suppression equipment such as fire extinguishers, dedicated water storage and fire hydrants shall be provided in compliance with county Fire Department and OSHA standards.</li> <li>• Landfill equipment shall be inspected and cleaned regularly.</li> <li>• Water trucks shall be maintained full of water and available for fire suppression.</li> <li>• Stockpile areas shall be accessible for fire suppression.</li> <li>• A "No Smoking" policy shall be enforced at the landfill.</li> </ul>			
HS-2 The perimeter security fence shall be inspected and repaired as necessary. The entrance gate shall remain locked when the landfill is closed.			
<p>HS-3 The operator shall install monitoring systems and monitor landfill gas. If monitoring indicates that impacts are occurring, corrective actions shall be implemented. These shall include, but not be limited to:</p> <ul style="list-style-type: none"> <li>• Adjusting the landfill gas collection system to increase landfill gas control.</li> <li>• Installing one or more additional landfill gas collectors.</li> <li>• Placing additional daily, intermediate and final cover to control fugitive gas emissions.</li> </ul>			

In response to comments on the Draft EIR, some of the mitigation measures in Table 1-2 are revised, and some are new. A complete version of each new and revised mitigation measure is provided in Final EIR Section 4.2.

TABLE 1-2

SUMMARY OF IMPACTS AND MITIGATION MEASURES

DESCRIPTION	FRONT CANYON/ BACK CANYON (FC/BC)	MITIGATION MEASURES	RESIDUAL IMPACT
<b>HEALTH AND SAFETY (continued)</b>			
HS-4	The operator shall routinely inspect landfill cover materials for cracks and/or fissures. Cracks and fissures shall be repaired.		
HS-5	There shall be one or more onsite personnel to direct vehicles and equipment on the landfill as they travel to and from the working face. SWUD shall develop procedures that include, but are not limited to, issues of timing and right-of-way. These shall be modified as necessary, specific to actual conditions and incidents that may occur.		
HW-6	An Excavation Plan shall be prepared to specifically address operations associated with excavation and removal of the in-place waste. It shall include procedures and sequencing to maintain stability of the excavation area. Further, a Health and Safety Plan shall be developed to address the specific work-associated activities of waste removal and relocation.		

30757/Rpts/FinalEIR (6/29/02/ks)

In response to comments on the Draft EIR, some of the mitigation measures in Table 1-2 are revised, and some are new. A complete version of each new and revised mitigation measure is provided in Final EIR Section 4.2.



## 2.0 RESPONSES TO COMMENTS ON THE DRAFT EIR

### 2.1 INTRODUCTION

This chapter of the Final EIR provides specific responses to public and agency comments on the Draft EIR. The Santa Barbara County Department of Public Works, Solid Waste and Utilities Division (SWUD) received 31 letters that provided comments on the Draft EIR. In addition to the letters, the County Public Works Agency received oral comments and 15 public comment forms at the five public meetings held to address the Draft EIR.

Included in this chapter is a copy of the comment letters, plus the transcripts and public comment forms from the public meetings. Each letter, transcript and public comment form has been assigned a document control number (e.g., 1, 23, 37); specific comments within each document have been assigned sequential comment numbers (e.g., 1-1, 1-2, 1-3). A listing of the document control numbers and the author/commenter for the comment letters, public hearing transcripts and public comment forms is provided in Table 2-1.

Section 2.2 of this chapter includes the comment letters and public meeting transcripts, and specific responses to each comment. Some of the comments were found to address the same issues or concerns. To provide consistency and aid in the review of this Final EIR, standard responses were developed and incorporated, as appropriate, in response to such recurring comments.

A number of comments addressed concerns about waste processing technologies. An overview of the County history of waste diversion and ongoing efforts to further utilize waste processing technologies, plus additional information about various waste processing technologies, is provided in Chapter 3.0 as a response to these comments. The information provided is responsive to the concerns evidenced in the comments contained in the letters and transcripts that are provided in this chapter.

## **2.2 COMMENTS AND RESPONSES**

This section contains comments on the Draft EIR that have been provided by agencies, organizations and individuals (see Table 2-1). In addition, responses to those comments are provided. The responses directly follow each comment letter, transcript and public comment form.

**TABLE 2-1**  
**LIST OF COMMENTERS**

DOCUMENT NUMBER	COMMENTER/ORGANIZATION
<b>LETTERS</b>	
1	Heal the Ocean/Attn: Hillary Hauser
2	GeoSolv, LLC
3	Environmental Defense Center
3a	Environmental Defense Center
4	The Land Trust for Santa Barbara County
5	Gaviota Coast Conservancy
6	Surfrider Foundation
7	Linda Smith
8	Dan Smith
9	Community Environmental Council
10	Citizens Planning Association of Santa Barbara County, Inc.
11	Governor's Office of Planning and Research/State Clearinghouse
12	California Integrated Waste Management Board
13	Department of Fish and Game
14	California Integrated Waste Management Board
15	California Regional Water Quality Control Board/Central Coast Region
16	Santa Barbara County Public Health Department/Environmental Health Services
17	City of Santa Barbara/Community Development Department
18	Santa Barbara County Air Pollution Control District
19	City of Lompoc
20	James Smallwood
21	Hatch and Parent/Attn: Mindy Wolfe
22	Otto Schleich
23	Justin and Ann Ruhge
24	Gail Elbek
25	Harold Poett
26	Lisa Ann Kelly and Family
27	Court Eilertson
28	Santa Barbara County Transportation Division/Attn: Court Eilertson
29	Joan Leon
<b>TRANSCRIPTS</b>	
30	Santa Barbara Public Hearing Transcript
31	Santa Maria Public Hearing Transcript
32	Buellton Public Hearing Transcript
33	Goleta Public Hearing Transcript
34	Lompoc Public Hearing Transcript
<b>PUBLIC COMMENT FORMS</b>	
35	Steven C. Johnson
36	Gaviota Coast Conservatory/Attn: Bob Hazard
37	Mark Kauppinen
38	Joan Leon
39	Environmental Defense Council
40	James Smallwood
41	Heal the Ocean/Attn: Hillary Hauser
42	Surfrider Foundation/Attn: Keith Zandona
43	Kathiann Brown
44	J. Wesley Brown
45	Richard Pata
46	LeRoy Scolari
47	Dick Dewees
48	Justin Ruhge
49	Joshua David Smith
<b>LETTER</b>	
50	Santa Ynez Band of Mission Indians

30757/Final EIR/Tbls&Figs (6/24/02/rm)





# HEAL THE OCEAN

In association with Ocean Futures

Executive Directors  
Hillary Hauser

Board of Directors  
Jean-Michel Couzeau  
Ned Doubleday  
Susan Harfuin  
Hillary Hauser  
Richard Mank

Françoise Suroouf Park  
John Robinson  
Charles Vinick  
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(Executive Committee)

Honorary Board Member  
Sally Ironfield

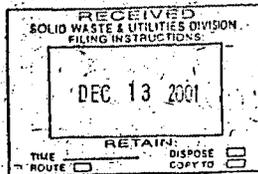
Technical Advisor:  
John Robinson

Advisory Board:  
Douglas Cummings, MD  
Richard Danson, MD

Patricia Duffy  
Steve Halseid  
Jeff Maassen  
Sam Serranton  
Ruth Slager  
Joel Smith  
Shawn Tomson  
Chris Wilkison  
Jerry Wolff, DDS

Office:  
Bret Stewart

December 14, 2001



Kathy Kefauver  
Santa Barbara County  
Public Works Dept.  
Solid Waste and Utilities Division  
109 E. Victoria Street  
Santa Barbara, CA. 93101

RE: Draft Environmental Impact Report for Tajiguas Landfill Expansion,  
Project: 01-EIR-5

Dear Ms. Kefauver:

Heal the Ocean, representing over 2,000 citizens concerned with the ocean pollution problems in Santa Barbara County, has been concerned about the polluted state of the ocean at Arroyo Quemada for some time. In Heal the Bay's "Beach Report Card," the beach at Arroyo Quemada has received an "F" rating for 83% of all weekly testing in this area - and Heal the Bay has rated this beach THE dirtiest beach in Southern California.

We have reviewed the draft Environmental Impact Report for the proposed expansion of the Tajiguas Landfill, which is on the coast at Arroyo Quemada. Since the landfill is unlined, and situated in a coastal canyon with a river running through it (Pila Creek) to the sea at Arroyo Quemada, the contributions of the Tajiguas Landfill to the ocean pollution problems in this area are of particular concern to us.

This letter is to record our objections to assumptions and inadequate conclusions in the draft EIR for the proposed expansion of the Tajiguas Landfill, a document that, in summary, does not adequately address the pollution of groundwater by landfill material.

We address our comments to the issue of groundwater.

1

## SECTION 3.2 WATER RESOURCES

Page 3.3-23 of the draft EIR states, "Groundwater is also present in the lower portions of the landfill mass."  
ARCADIS G&M "September 2001, Hydrologic Investigations Status Report" (page 15-17) describes groundwater present in monitoring and dewatering wells located throughout the landfill.

ARCADIS report in draft EIR's technical appendix states that 40,000 gallons of water (leachate) was removed from the landfill during the testing of the dewatering wells.

Page 3.3-50 of the draft EIR indicates groundwater quality impacts "would be considered significant" according to CEQA if waste is allowed "to come within 5 feet of the highest groundwater."

Table 3.2-3 stratigraphy of Tajiguas landfill project site states that the "unweathered Rincon is mainly massive, but zones of intensely fractured rock have been observed."

How "intensely fractured rock" can act as a berm or barrier to groundwater migration is not explained in the draft EIR.

Page 3.3-9 of the draft Environmental Impact report states, "The groundwater flows from topographically high areas downward to stream channels, where the flow emerges as discharge to the streams if the water level is high enough or as underflow in alluvial fill or fractured bedrock below the channel."

The October 2000 Technical Report Review of Surface Water Resources Page 6 indicates that the Pila Creek watershed yields 46 acre feet per year (i.e. almost 15 million gallons) and only 1,517,824 gallons of water is collected by the interceptor trench each year. This means that up to 13 million gallons of water per year is bypassing the collection trench and of this amount it is not known how much of this is groundwater that is mixing with the trash that is being stacked into the Tajiguas landfill.

The ARCADIS REPORT, included in the Technical Studies supplement, focuses on a cross-section of the lower portion of the landfill, and includes observations of gas extraction wells having standing water in the casings. The level of standing water indicates a level of saturation that is at least 100 feet above the bottom of the landfill. This is an indication that the groundwater beneath the landfill is not separated from the trash, but has saturated the trash.

Heal the Ocean ardently disagrees with the statement that "Tajiguas is currently in compliance with its operating permits" - because there is considerable evidence - in the draft EIR technical report itself - that groundwater, as well as surface water, is mixing with the trash.

In fact, the Tajiguas Landfill is violation of prohibition A. 10, Board Order No. 93-69 (Regional Water Quality Control Board) which stipulates that there be a five-foot separation of trash from groundwater. Specifically, this language states,

*"Discharge of waste within five feet of the highest anticipated elevation of underlying groundwater, including the capillary fringe, is prohibited."*

On May 5, 1998, the Regional Water Quality Control Board notified Santa Barbara County Public Works by letter that subsurface investigation *must be performed to determine whether the Landfill is or will be within five feet of underlying groundwater and that investigation of the buried alluvial zone of Pila Creek should be performed as well.* This has not been addressed, nor is this subject addressed in the draft EIR.

If anything, the Arcadis G&M report of groundwater in monitoring and dewatering wells located throughout the landfill indicates a saturation of the current landfill by groundwater. As noted in the draft EIR, the interceptor trench receives water daily (at the rate of 5,000-10,000 gallons per day, our addition) - during dry periods, when Pila Creek is not running.

As to the presence of springs (groundwater) underneath the Tajiguas Landfill, the draft EIR noticeably omits a sworn declaration of former landfill manager Bob Cady to the California Integrated Waste Management Board regarding water infiltration of the Tajiguas Landfill. This document was supplied to Santa Barbara County Public Works some years ago.

In this declaration, Mr. Cady describes his personal observations of "water consistently flowing in large quantities from natural springs along the east side of the landfill canyon, where the artificial channel was cut."

"I also observed water from above the canyon draining into the artificial channel, adding to the volume of water which flowed through it. The flow of water continued through the channel even as waste was dumped on the location and covered the channel."

"It is my observation that water continues to percolate from the sides of the canyon and from above the canyon into the mass of waste below."

"I personally observed water from underneath the landfill, coming from the former artificial channel and its overflow, into the waste at the base of the landfill, behind the landfill's earthen toe. The presence of this water continued throughout the time of my supervision of the landfill. It required regular pumping to remove."

The attached evaluation of the draft EIR for the proposed expansion of the Tajiguas Landfill, prepared by Geosolv, LLC, describes in more detail the groundwater pollution issues associated with the unlined landfill stacked on top of natural springs.

Page 3.3-40 of the draft EIR states, "Potential sources for the bacterial contamination include: native fauna, runoff from green waste, runoff from the active landfill surface, and avian feces." The draft EIR fails to include a proper consideration of leachate runoff, runoff from groundwater that percolates through the garbage and collected only partially in the interceptor trench.

Heal the Ocean submits a report prepared by GeoSolv, LLC, which describes in more detail the groundwater pollution issues associated with an

unlined landfill stacked on top of natural springs. We request that this report be included in the published comments to the draft EIR.

We also submit for inclusion to the record two graphs of bacterial readings associated with the Tajiguas Landfill. One is composed of Santa Barbara County's own figures, averaged for the year 2000, which indicate total coliform counts seven times the state standard/limits; fecal coliform eight times higher than the state standard/limits, and enterococcus 400 times higher than state standard/limits.

On January 16, 2001, Heal the Ocean took a professional sampler to the Tajiguas Landfill, to test for total and fecal coliform, and enterococcus, from three locations, including the trench water (groundwater) that is pumped into the overhead tanks near the Landfill offices. This water cannot come into contact with seabirds or septic systems - two sources of bacteria implied in the draft EIR as possible contributors to the ocean pollution problem at Arroyo Quemada.

The fecal coliform reading was 240,192 MPN/100ml (most probable number per 100 milliliter of sample water) - while state standards for fecal coliform are 400 MPN/100 ml. These readings indicate to us that groundwater in the landfill area, not accessible to seabirds or septic systems, is severely contaminated.

The draft EIR contains no such monitoring data of groundwater.

The draft EIR fails to specifically address the question of the bottom of the landfill in relation to groundwater - as to whether the bottom of the existing landfill is in contact with the trash.

Heal the Ocean maintains that the Tajiguas Landfill may well be in violation of Title 15, Article 3, 2530(c), which states: "All new...existing landfills, waste piles, and surface impoundments shall be operated to ensure wastes will be a minimum of 5-feet above the highest anticipated elevation of underlying ground water and discharges shall not be entitled to exemption under subsection 2510.(b) of this subchapter."

Before the Tajiguas Landfill can be expanded - or continued in its present state - there must be a mapping of the bottom of the current landfill, together with an evaluation of existing groundwater depth. The draft EIR must address the concerns of the Regional Water Quality Control Board in their communications to Santa Barbara County Public Works, as follows:

- Notice of May 5, 1998 requiring an investigation to determine whether the Landfill is or will be within five feet of underlying groundwater; documentation of how waste was placed over the original alignment of Pila Creek; an investigation of the buried alluvial zone of Pila Creek.
- Notice of Violation, June 19, 1998, with time schedule for compliance, requiring an analysis of contact between landfill material and surface and subsurface inflow - together with a solution for alleviating the problem.

The laws regulating existing landfills are clear in regard to groundwater. Until the current landfill is brought into compliance in relation to these laws, any

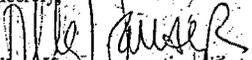
1-14

expansion of the Tajiguas Landfill, and any draft EIR for the expansion of the Tajiguas Landfill, has no practical significance, and may be in fact a nefarious waste of Santa Barbara County taxpayer money.

1-15

Heal the Ocean requests that the attached report from GeoSolv, LLC, "Evaluation and Reporting on Contaminant Hydrogeological Conditions at the Tajiguas Landfill," be included in the comments to the draft EIR. We request the inclusion of the Cady Declaration, and the bacteria study graphics, also.

Sincerely,

  
Hillary Hauser, executive director  
HEAL THE OCEAN

- Enc: 1) GeoSolv, LLC report, "Evaluation and Reporting on Contaminant Hydrogeological Conditions at the Tajiguas Landfill"  
2) Declaration of former Landfill Manager Bob Cady before the California Integrated Waste Management Board  
3) Bacteria test results, Santa Barbara County averages for year 2000; Heal the Ocean test January 16, 2001

CC: Regional Water Quality Control Board  
California Integrated Waste Management Board



**Document 1**  
**Heal the Ocean**  
**December 14, 2001**  
**Response to Comments**

Many of the comments in the Heal the Ocean comment letter are directed at the existing landfill and do not constitute a substantive comment to the Draft EIR. However, responses are provided to all comments as points of clarification.

Response 1-1

These are statements from the Draft EIR and from Arcadis Geraghty & Miller (2001b), which was distributed as a technical study to the Draft EIR. These comments are in reference to the existing setting at the Tajiguas Landfill.

Water elevations in wells through the waste mass were approximately 240 to 290 feet above mean sea level (amsl) on Bench 3 based on a piezo-penetrometer test on the *existing* Landfill. These are discontinuous zones of saturated waste materials that are separated by zones of low-permeability or unsaturated materials within the existing landfill footprint. These zones are discontinuous and do not compromise the stability of the *existing* Landfill waste mass. Water levels in the waste mass are discussed on Draft EIR Page 3.3-23. Additional discussion of water in the *existing* Landfill is provided in the Responses 1-7 and 3-24.

The slope stability analysis prepared by GeoLogic Associates (1997) for the *proposed* Landfill expansion, and included as a technical study to the Draft EIR, evaluated the slope stability of the proposed landfill expansion, assuming a groundwater profile 15 to 20 feet higher than what was indicated in Arcadis (2001). The report concluded that a potential maximum configuration of soil or waste fill stockpile on the top deck north of the Coastal Zone boundary (i.e., from elevation of about 400 amsl to elevation 700 amsl - the maximum elevation proposed under the Back Canyon configuration of the *proposed* project), with an overall slope gradient of 2.5:1 (H:V) has adequate stability under both static and seismic conditions.

A groundwater monitoring system has been established at the existing landfill in coordination with the RWQCB and would continue to be operated with the proposed expansion. The groundwater monitoring system is a series of monitoring wells that are north and south of the existing Landfill, as well as on the existing Landfill. Groundwater monitoring is conducted semi-annually, and the samples are sent to a state-certified laboratory for analysis. Samples and analyses are accomplished using established protocols approved by the RWQCB to ensure consistency in procedures and results. All ground and surface water sample results are reported to the RWQCB in semi-annual and annual water quality monitoring reports in compliance with the Tajiguas Landfill Waste Discharge Requirements (WDRs) Order No. 93-69. It is expected that this monitoring network would continue to be utilized and will be expanded to cover the expansion area based on the RWQCB's revised WDRs that would be issued for the Landfill expansion. There is no evidence, based on monitoring data, that the groundwater in Cañada de la Pila exceeds water quality standards.

Water from the Landfill (leachate) is collected via Landfill leachate collection systems, the Horizontal Well Dewatering System (HWDS), the Groundwater Leachate Collection and Recovery System (GLCRS), and the Landfill Leachate Collection and Recovery System in the lined portion of the Landfill (LLCRS). Water from all these systems is monitored specifically for water quality parameters, including bacteria. Three horizontal wells that extend approximately 150 feet into the waste mass near the base of the existing Landfill collect and extract leachate from the waste mass comprise the HWDS. Results from the HWDS show that the concentrations of total and fecal coliform bacteria in the landfill are negligible. Data are available for review at the SWUD offices and are summarized in the 4<sup>th</sup> quarter bacteria samples results (see Table 00). The GLCRS is a subterranean recovery trench located south of the Landfill. Bacteria present in the GLCRS are a result of surface water runoff from the Landfill area, some of which is directed to the GLCRS. Bacteria testing results show there has been a significant decrease in the presence of total and fecal coliform bacteria since the first sampling of the GLCRS in March 1999. The decrease in the levels detected is a result of improvements SWUD has completed at the Landfill to reduce surface runoff to the GLCRS. The LLCRS collects leachate from the lined area of the landfill on the eastern slope. The LLCRS is not routinely sampled and analyzed for total coliform bacteria because it rarely has flow. However, runoff from the LLCRS does contain some bacteria as a result of exposure to surface runoff that contains bacteria. All data related to these systems are available for review at the SWUD offices. Recent data (December 2001) are shown in Table 00.

The Tajiguas Landfill has been in operation since 1967 and was not subject to current regulations that require a 5-foot separation between waste and groundwater or requirements that Landfill facilities be lined; those regulations did not come into effect until the 1980s. However, the RWQCB recognizes the distinction in the regulations between a "grandfathered" landfill (i.e., the *existing* Tajiguas Landfill) and a new landfill or expansion (i.e., the *proposed* Landfill expansion project). The SWUD and the RWQCB have worked together since 1998 to improve conditions at the *existing* Landfill with respect to the presence of water in the Landfill. The HWDS was installed to remove water from the waste mass. A correspondence history is presented in Response 1-6 (Table 1) that shows the RWQCB was aware of water in the landfill and that environmental controls have been implemented to address the issue of water in the *existing* Landfill. A history of compliance with requirements of the WDRs is provided in Response 1-13.

The *proposed* Landfill expansion will be required to be constructed with a composite liner system in accordance with rigorous state and federal standards. The liner will be designed in compliance with state and federal standards and with requirements of the RWQCB. The bottom of the Landfill expansion is required to be at least 5 feet above the groundwater, so the liner system will not be saturated by groundwater. In addition, the RWQCB will revise the WDRs for the proposed Landfill expansion to ensure that adequate environmental monitoring systems are in place that will continue to protect water quality.

#### Response 1-2

This is a statement of one of the Significance Criteria from the Draft EIR. This criterion would be applied to evaluation of the proposed project or alternatives.

### Response 1-3

Drilling of borings in the Rincon Formation at the site have demonstrated the unweathered Rincon Formation to be a fairly uniform massive claystone. Although Table 3.2-3 of the Draft EIR states that the unweathered Rincon Formation contains zones of "intense fracturing," review of the actual boring log data indicates that the zones of "intense fracturing" occur only in the weathered Rincon Formation. Boring log data do indicate that some fractures occur in the unweathered Rincon. However, groundwater was not observed in these zones. Although such zones could be water bearing, they are not expected to be continuous, and would not transmit appreciable groundwater.

It should be noted that the proposed Landfill expansion will be developed with a composite liner system in accordance with rigorous state and federal standards. The proposed expansion also will be designed to be at least 5 feet above the groundwater capillary fringe (state/federal standards), so that the liner will not come into contact with underlying groundwater.

Furthermore, work conducted at the site indicates that, although there may be occasional fractured zones in both the weathered and unweathered Rincon Formation, the unit as a whole displays extremely low permeability. Field permeability tests were conducted on both the weathered and unweathered Rincon Formation that had been observed in borings to be fractured (Dames & Moore, 1989). Weathered Rincon Formation permeabilities ranged from  $7.7 \times 10^{-6}$  to  $9.7 \times 10^{-6}$  cm/second. These values demonstrate that the unit has a very poor ability to transmit water. Unweathered Rincon Formation permeabilities were considerably lower, ranging from  $9.7 \times 10^{-8}$  to  $7.7 \times 10^{-9}$  cm/sec (see Draft EIR page 3.3-20). Several borings into unweathered Rincon Formation even reported "no take" for permeability meaning the permeability was below measurable limits. Therefore, although the unit may contain fracture zones, these zones are discontinuous and do not affect the overall extremely low permeability the Rincon Formation.

### Response 1-4

See Response 2-10.

### Response 1-5

It is not clear to what cross-section the commenter is referring. The only cross-sections presented in the Arcadis (2001b), report are in an appendix, including sketches of cross-sections composed of data from a piezo-penetrometer test (PPT) conducted and presented by STI Engineering, Inc. (2000). Both the Arcadis (2001b) report and the STI (2000) report indicate discontinuous zones of saturated waste materials, separated by zones of low-permeability soils or unsaturated materials. Additional discussion of groundwater in the existing Landfill is provided in Responses 1-1 and 3-24.

### Response 1-6

Several comments were received on the Draft EIR based upon the assertion that water in the *existing* landfill is in violation of the site's Waste Discharge Requirements, RWQCB Order No. 93-69, or State law (CCR Title 23, Article 3, Chapter 15, Sec. 2530[c]); and CCR Title 27, Article 3, Sec. 20260[c]) because waste is within 5 feet of the underlying groundwater, known as the "5-foot separation rule."

The *existing landfill* was designed and permitted before the promulgation of this requirement. In addition, engineered alternatives are in place that protect groundwater quality. For this reason, the 5-foot separation rule does not apply to the existing unlined landfill. The RWQCB also has adopted this position.

The *proposed landfill* complies with the requirement to provide 5 feet of separation between the bottom of the waste and the top of the capillary fringe. The engineered alternative applies only to the old Landfill. The engineered alternative is part of the existing environmental setting, and will not be affected by the proposed Landfill. The proposed expansion would be lined and designed to meet the regulation that requires a 5-foot separation from groundwater (see Response 1-3).

State law stipulates that "*land treatment units*" (a different class of waste management unit that does not include landfills), are not entitled to exemptions to the 5-foot separation rule based on engineered alternatives. This prohibition does not apply to the many existing permitted landfills throughout the state of California.

At the Tajiguas Landfill, several engineered control systems described in Response 1-1 (the GLCRS, HWDS, LLCRS) and the North Groundwater Management System (NGWMS), French drain system, and a landfill gas (LFG) collection system are in place to protect water quality. Years of monitoring data show that these control systems are effective control measures. The RWQCB originally issued Waste Discharge Requirements (WDRs) Order No. 93-69 on November 16, 1993, for the Landfill. The WDRs are reviewed and, if necessary amended, every 5 years by the RWQCB. The RWQCB determined in its December 7, 1998 letter that the WDRs were adequate and did not require revision as part of the RWQCB's 5-year review of Order 93-69 (see Table 1; Correspondence 1). The existing WDRs were, therefore, adequate to protect water quality and would continue to be adequate for the next 5 years (until 2003).

The WDRs also require a Monitoring and Reporting Plan. The Monitoring and Reporting Plan for the Landfill was revised and issued on March 4, 1999 (see Table 1; Correspondence 2), to account for the many surface and ground water control improvements implemented by the SWUD since 1998. The Tajiguas Landfill is currently in compliance with the WDRs issued by the RWQCB Order No. 93-69 as evidenced by the chronology of events documented through the letters identified in the following summary and summarized in Table 1.

RWQCB staff reported on compliance issues raised at the Landfill by a neighbor in their April 2-3, 1998, staff report (see Table 1; Correspondence 3). The report noted several suspected or confirmed violations of Order 93-69 from 1993 through 1998, a period of 5 years. The violations and responses are listed on Table 2.

The RWQCB staff report summarized the RWQCB's position on the Tajiguas Landfill Expansion Project. Specifically, the SWUD must demonstrate how the Landfill expansion will be operated to protect water quality, and the Landfill must be in compliance with the WDRs before the expansion can be approved. Regulatory agencies commonly require full compliance with existing permits prior to issuing new permits for projects or activities. The RWQCB staff

report also concluded that the SWUD is aware of the issues cited in Table 2 and that the SWUD had expressed willingness to resolve the issues in a reasonable and timely manner.

The March 3, 1998, letter (see Table 1; Correspondence 3) clarifies what was expected of the SWUD to return to and maintain compliance with Board Order No. 93-69. The March 3, 1998 letter provides comments to the "Technical Workplan Surface Water Monitoring Erosion Control Plan" as submitted by the SWUD in response to excessive erosion during storm events during the previous El Niño year winter (1997-1998). The Plan was intended to improve erosion control on the landfill and address "Surface Water Degradation" issues as noted in the RWQCB's presentation at the April 2-3, 1998, RWQCB meeting.

The second purpose of the March 3, 1998 letter was to clarify the RWQCB's position and requirements for the *Tajiguas Landfill Expansion Project*, rather than the existing Tajiguas Landfill as implied by the commenter. The letter describes the specific requirements of the WDRs that must be maintained over the life of the landfill expansion, specifically "Discharges of waste within 5 feet of the highest anticipated elevation of underlying groundwater, including the capillary fringe, is prohibited." The RWQCB indicated that an "... evaluation of existing groundwater depth, but also groundwater depth after the landfill is constructed" would be required. The letter continues, making the point that, "Depending on geologic conditions, ground water elevation could increase as land filling occurs above. A demonstration that groundwater (and the capillary fringe) will never be less than 5 feet is required."

These comments were repeated in the RWQCB's "official" response to the NOP for the EIR on May 5, 1998 (see Table 1; Correspondence 4). No mention that the *existing* landfill was in violation of the WDRs is included in this letter with respect to the 5-foot separation between trash and groundwater. The RWQCB was advising the SWUD that the issue would have to be addressed in the upcoming EIR for the *Tajiguas Landfill Expansion Project*.

Other compliance concerns were addressed and are documented by Correspondence 3 through 56 as summarized in Table 1. Copies of Correspondence listed in Table 1 are available for review at the SWUD office. The RWQCB stated in letters to the Local Enforcement Agency (LEA)<sup>(1)</sup> dated November 9 and 12, 1999, that the Tajiguas Landfill is in compliance with WDR 93-69. Since the compliance statement was issued after the June 19, 1998, violation letter, the violations were cleared.

The Gaviota Coast Conservancy (GCC) provided a letter to the RWQCB on March 15, 2000 (see Table 1; Correspondence 44), that first raised the issue of the 5-foot separation between trash and groundwater and included the declaration by Robert Cady (November 11, 1999 – attachment to GCC's letter) that identified that springs were encountered during construction of the Landfill. These issues were raised again with the RWQCB in the GCC's letter dated May 25, 2000. At the request of the RWQCB, the SWUD responded to the GCC's concerns on June 30, 2000 (see Table 1; Correspondence 49). The SWUD expressed interest in working with the RWQCB on

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<sup>(1)</sup> The Local Enforcement Agency is the local agency (in Santa Barbara County, under County Environmental Health Services) that regulates and performs inspections at local landfill and transfer station facilities to ensure that the facilities are in compliance with the Solid Waste Facilities Permit issued by the California Integrated Waste Management Board (CIWMB) for each facility.

the 5-foot separation issue and requested any additional information the GCC may have on the presence of groundwater or springs beneath the landfill.

On October 27, 2000 (see Table 1; Correspondence 52), the RWQCB responded to the GCC's concerns (see Table 1; Correspondence 50). The RWQCB provided the SWUD's June 30, 2000, letter as an attachment to their response letter. The RWQCB stated that the County (SWUD) has "... not tried to hide the presence of springs and seeps beneath the Landfill from this Board or the public." The RWQCB also noted that the County has also reported springs in monitoring reports. To date, the GCC has not provided any additional information to the SWUD on the presence of springs at the landfill, as requested in the response letter.

The Arcadis, Geraghty & Miller Hydraulic Investigations Status Report was included as a Technical Study to the Draft EIR. This report provided historical and additional information on sub-surface water levels in the landfill and stability of the existing and proposed landfill expansion. This technical study also included an evaluation of the Robert Cady declaration. The information in this report was summarized in both Section 3.2 - Geology and Section 3.3 - Water Resources of the Draft EIR. The 5-foot separation issue is discussed in Draft EIR Section 3.3 - Water Resources.

The correspondence record shows that the RWQCB has had knowledge of the issues raised in the Draft EIR comments concerning water in the landfill since 1998. The SWUD also has been in contact with the RWQCB continuously on this issue to improve conditions at the Tajiguas Landfill since 1998.

#### Response 1-7

Information presented in this response is based on a June 21, 2002, letter to the RWQCB. A copy of this letter, with supporting graphs and figures, is on file at the SWUD offices.

The groundwater and leachate collection and recovery system (GLCRS) is a key component of the Tajiguas Landfill control system to protect groundwater quality downgradient of the Landfill. The main component of the GLCRS is an interceptor trench across the floor of Pila Creek. The overall function of the GLCRS is to capture flowing groundwater (including infiltration of surface water and leachate) in the alluvium and weathered Rincon Formation bedrock at a location downgradient of the Landfill where the canyon narrows. This underflow is then recovered and reused for onsite dust control at the site.

The interceptor trench acts as a highly permeable vertical layer. The objective is to maintain water levels in the trench at an elevation below the groundwater levels on either side of the trench. Groundwater flowing from upgradient of the trench in relatively low-permeability materials enters the gravel-filled trench and is recovered by pumping. The GLCRS is operated to keep the pumping level in the GLCRS at or below an elevation of 109 feet amsl. This level is approximately 20 to 25 feet lower than groundwater levels upgradient and downgradient of the GLCRS. Thus, the GLCRS creates a zone of depression in the groundwater table that results in effective capture of groundwater flowing in the alluvium and weathered Rincon Formation. As long as pumping levels in the GLCRS are kept below the level of the adjacent groundwater, flow past the trench is negligible.

The GLCRS was constructed in 1992 following a rigorous evaluation and design phase that included the following:

- Collection of groundwater data demonstrating that the groundwater gradient mimics surface topography. These data indicated that control of groundwater downgradient of the Landfill needed to occur along the axis of Pila Creek.
- Detailed geologic mapping of the area downgradient of the Landfill to establish the location of the Rincon Formation /Monterey Formation contact and the configuration of alluvium in the channel of Pila Creek.
- Drilling of three borings that included detailed lithologic logging, testing of samples for permeability, and evaluation of borehole permeability using packer testing (Dames & Moore, 1989). The results indicated low permeability of the weathered Rincon Formation south of the landfill ( $7.7 \times 10^{-6}$  to  $9.7 \times 10^{-6}$  cm/sec) and extremely low permeability of the unweathered Rincon Formation ( $9.7 \times 10^{-8}$  to  $7.7 \times 10^{-9}$  cm/sec, with several tests reported as "no take," meaning permeability was below measurable limits). On this basis, it was decided to construct the base of the GLCRS in the unweathered Rincon Formation.
- Drilling and testing of four additional borings along the approximate alignment of the proposed GLCRS to more accurately determine the depth of the geologic contacts (Emcon, 1991).
- Design of the GLCRS as a collection trench to intercept and allow recovery of groundwater flowing downgradient of the Landfill in the alluvium and weathered Rincon Formation.
- Design of a monitoring well system downgradient of the GLCRS to evaluate performance.

The County initiated construction of the GLCRS in 1992 as part of ongoing efforts to improve groundwater management and control at the site. The GLCRS was not constructed as part of any direct order or request from RWQCB.

The GLCRS was constructed with the following characteristics:

- The GLCRS is 200 feet long, 46 feet deep, and 3 feet wide.
- The GLCRS was constructed using an excavator to dig the trench, which was continually filled with biodegradable drilling mud to maintain trench stability. Following excavation to the targeted base level in the unweathered Rincon Formation, the trench was backfilled with gravel. Two 6-inch diameter extraction wells and a drainage pipe along the bottom were placed in the trench to facilitate groundwater recovery.
- Pumps placed in the wells allowed recovery of groundwater to a nearby interim storage tank for reuse as dust control at the Landfill.

- A 48-inch diameter culvert crosses the uppermost portion of the trench. The culvert conveys flow from the upper canyon, as well as surface water runoff in the landfill area (entering the culvert through drop inlets), to a point just south of the trench where the water empties into Pila Creek.

Since construction and beginning of operation in 1992, there have been a number of upgrades to the GLCRS system designed to increase the efficiency of groundwater recovery. These upgrades have included:

- The original extraction pumps, which had a combined capacity of approximately 10 gallons per minute (gpm), were replaced with pumps and associated piping capable of pumping a combined 30 to 40 gpm.
- The system initially used a 10,000-gallon storage tank. In 1998, the system was upgraded with the addition of two large storage tanks having a combined capacity of 680,000 gallons.
- In 1998, a landfill gas collection system was put in place to extract landfill gas, which includes methane and VOCs, from the landfill.
- During 2001, several additional inlets were added to storm water culverts, and a new 36-inch diameter culvert was constructed.
- In June 2002, the 10,000-gallon, single-walled storage tank, which receives the initial flow pumped from the GLCRS, was upgraded to a smaller, 5,000-gallon double-lined tank. This new tank will minimize the potential for accidental spills and leaks.

The 1997 addition of the large storage tanks was important. It allowed for more efficient pumping of the system during the wet season when the demand for dust control water is typically low. The effect of this additional pumping, together with effects from the coincident installation of the landfill gas recovery system, was reflected in the improvement in groundwater quality downgradient of the GLCRS. The VOC concentrations in monitoring wells downgradient from the landfill have been reduced over time.

Most of the inflow to the GLCRS occurs in the winter months, with considerably lower flows in the dry season. The seasonal differential in the amount of water recovered indicates that most of the water entering the trench is related to surface water flow. This relationship was initially studied by the County and reported to the RWQCB in an April 30, 1999, letter. As reported in the letter, measurements of very rapid water level rise in the GLCRS following rainfall events indicated that surface flow enters the trench. The source of the surface water flow is likely:

- Leakage from the 48-inch diameter culvert or, more likely, from permeable backfill around the outside of the culvert.
- Surface water flow from the west side of the canyon and western landfill slopes which runs to ditches along the access road and enters the 48-inch diameter culvert through drop inlets. A portion of this runoff may infiltrate into the permeable gravel backfill around the culvert, the

French drain system, and roadbed materials underlying the access road, then migrate down slope in these materials and enter the GLCRS.

Obviously, some flow entering the GLCRS is groundwater recovered from the alluvium and weathered Rincon Formation. Based on the amount of water recovered during the dry season (when no obvious surface water input is present, and inflow is all or predominantly groundwater), it is estimated that 3,000 to 6,000 gallons per day of groundwater is recovered by the GLCRS. The source of this groundwater is likely:

- Groundwater from the upper canyon, which flows in the unconsolidated materials beneath the landfill.
- Groundwater seepage from the west side of the canyon to unconsolidated materials.
- Leachate from the landfill.

The volume of leachate in the landfill mass that potentially enters remnant alluvium or weathered Rincon Formation beneath the landfill is low. This is supported by data in the Arcadis (2001b) report indicating that the overall permeability of the Landfill mass is very low. The lack of response among wells during pump tests in the Landfill mass reveals there are discontinuous zones of saturated materials present in the Landfill, separated by zones of low-permeability soils or unsaturated materials. This conclusion is supported by the lack of flow from the Landfill face following removal of cover materials on the face during the Benchfill. This lack of flow indicates the water is discontinuous and not migrating. In addition, the low permeability of the Landfill mass also is supported by the low flow observed from the three horizontal wells placed into the Landfill mass below the level of the water. Therefore, the volume of leachate entering the alluvium/weathered Rincon Formation beneath the Landfill is low.

A very rough estimate of the ratio of leachate to groundwater entering the GLCRS may be obtained by comparing the concentrations of total VOCs present in the Landfill leachate with the total VOCs present in the GLCRS. Sampling of four dewatering wells installed into the landfill mass conducted in August 2000 indicated an average total VOC concentration of approximately 4,544 µg/L. Sampling of the GLCRS in July 2000 (closest sampling event in time to the dewatering well sampling) showed total VOCs present at a concentration of approximately 127 µg/L. Assuming leachate in the Landfill mass had a uniform concentration, migrated beneath the Landfill, and entered the GLCRS together with groundwater having negligible concentrations of VOCs, the leachate was diluted by a factor of approximately 36. Assuming average daily flows of groundwater/leachate to the GLCRS of 3,000 to 6,000 gallons, roughly 80 to 160 gallons of this daily flow may be attributable to leachate, which then is intercepted by the GLCRS.

The effectiveness of the GLCRS in minimizing impacts to downgradient groundwater quality is demonstrated by downgradient monitoring well data reported regularly to the RWQCB. Since 1998 when increased storage allowed better operation of the GLCRS and the LFG recovery system began operation, MCLs for VOCs in all downgradient wells have not been exceeded.

#### Response 1-8

The springs described in the Robert Cady Declaration would be more accurately described as ephemeral seeps (those that flow in response to precipitation). Such seeps are observed occasionally at the site, associated with: (1) excavations that tap into discontinuous perched groundwater zones, which typically flow briefly then disappear, or (2) wet season seepage following periods of rainfall. Several hydrogeologic reconnaissance studies conducted at the Tajiguas Landfill site (Emcon, 1994a, 1994b; Arcadis, 2001b) have not identified any perennial springs (those that flow throughout the year). Additionally, published U.S.G.S. topographic maps of the pre-landfill area show Pila Creek as an ephemeral or intermittent stream, which indicates that there is not a significant flow from springs in this watershed.

Although the volume of flow from any ephemeral seeps that may exist beneath the Landfill is probably low, such flow may contribute to water present in the Landfill. As described in Response 1-7, water in the Landfill is discontinuous; and there is a very small volume of leachate that enters the underlying alluvium/weathered Rincon Formation. As described in detail in Response 1-7, this leachate is recovered in the GLCRS, and groundwater downgradient of the GLCRS does not exceed primary MCLs.

#### Response 1-9

The referenced section of the Draft EIR (pages 3.3-40 to 3.3-42) accurately describes possible sources of bacteria, including landfill runoff that may account for bacteria detected in surface water samples. The comment is correct in stating that bacterial contamination in groundwater is not discussed in the Draft EIR, because the discussion of groundwater quality (pages 3.3-42 to 3.3-46) emphasizes the parameters that have been detected in groundwater samples; it does not go into detail regarding many parameters (such as bacteria) that are not present. Samples of groundwater that have been tested for bacteria have consistently shown low to non-detectable indicator bacteria concentrations (such as reported in Santa Barbara County, 2000b, and Santa Barbara County, 2002a) (see Response 1-1). The negligible concentrations of bacteria present in the horizontal de-watering well water (leachate) indicate that landfill leachate is not a source of bacteria at the site. The GLCRS samples (trench water) are a mixture of surface and groundwater. Since the septic leach field servicing the shop and office trailers was disconnected several years ago, and improvements to the drainage system have been implemented, the GLCRS samples usually have tested low in bacteria, except following storm events that result in surface runoff entering the trench extraction system. High bacteria levels are typical of South Coast streams following storms.

The proposed Landfill expansion will include surface water and leachate control systems designed in accordance with existing regulations and approved by the RWQCB and CIWMB. A revised monitoring plan for surface and groundwater at the proposed Landfill expansion will be developed and approved by the RWQCB.

#### Response 1-10

The two tables of bacteria sampling results that were submitted with the comments on the Draft EIR are of limited value to determine sources, concentrations, or possible pathways for bacteria in surface or groundwater at Tajiguas Landfill for several reasons. The data that are supposedly from Santa Barbara County are from an unidentified sample location and are averaged for the

year 2000; therefore, a comparison with the actual reported sampling data is not possible. The data from samples collected by Heal the Ocean are from poorly identified sample locations and were collected without benefit of sterile sample containers, decontamination procedures, chain of custody control, and other standard sampling methods, techniques and equipment that are required to protect the integrity of the resultant data.

None of the samples described in this comment is representative of groundwater. The trench water (assumed to mean the GLCRS) is a combination of groundwater and surface water, both of which enter the trench. Therefore, the conclusion that, "These readings indicate to us that groundwater in the landfill area, not accessible to seabirds or septic systems, is severely contaminated" is not supported by the data presented.

Bacteria are not typically mobile in groundwater. Percolation of groundwater through earth materials tends to physically filter out even microscopic bacteria. This is the basic principal by which septic sewer systems operate. The absence of a groundwater route for bacteria migration at the Tajiguas Landfill is demonstrated by sampling and laboratory results from monitoring wells (MW-2, MW-3, MW-4, MW-14 and MW-15), private water wells (Jensen), and samples of landfill leachate (HWDS), each of which shows low or non-detectable concentrations of bacteria (County of Santa Barbara, 2001a). These results were confirmed by recent results from samples that were arranged and witnessed by Heal the Ocean (Santa Barbara County, 2002). The actual sampling results are provided in Table 00 of Response 1-1.

Based on years of monitoring data and several special studies of bacterial contaminants at Tajiguas Landfill, Pila Creek and Arroyo Quemado Creek, a pathway for bacteria to travel from the landfill and the Pila Creek watershed to Arroyo Quemado via surface water, groundwater or ocean transport processes is not evident (Draft EIR, p. 3.3-40 to 3.3-42 and Figure 3.3-7; URS, 2001a).

This leads to the question: if such pathways do not exist and therefore cannot be transporting bacteria or Landfill leachate to the beach, what accounts for the high bacteria levels reported at Arroyo Quemada Beach? First, all of the available data indicate that bacteria are ubiquitous in local surface waters throughout the County. Second, based on DNA studies, bird populations are a substantial source of the bacteria found at Arroyo Quemada Beach (URS, 2001b). Monitored concentrations of indicator bacteria in samples from the GLCRS, which demonstrate generally low bacteria concentrations during baseflow conditions, with increased bacteria concentrations following storm events when surface runoff enters the GLCRS, lead to the conclusion that birds, not landfill leachate, are impacting the Arroyo Quemada Beach water quality.

Beginning on April 6, 2002, a professional falconer has been employed at Tajiguas Landfill on a trial basis to control gulls. This program has been effective in removing a resistant gull population from the Landfill and surrounding areas, including Arroyo Quemada Beach. The monitoring of bacteria at Arroyo Quemada Beach by County Environmental Health Department ([www.sbcphd.org/ehs/ocean](http://www.sbcphd.org/ehs/ocean)) shows a corresponding decrease in beach bacteria during the same time that the falcons have been in use. As of June 20, 2002, Arroyo Quemada has had no beach postings for an unprecedented 11 weeks. Again, this reinforces the conclusion that the alleged migration of

bacteria from the Landfill to Arroyo Quemada Beach does not occur via surface water or groundwater pathways, but is caused by birds.

Response 1-11

See Responses 1-1, 1-6, 1-9 and 1-10.

Groundwater monitoring data are included in the referenced semi-annual monitoring reports (County of Santa Barbara, 2000b, 2001a, 2001b). Although the groundwater monitoring wells are not routinely tested for indicator bacteria, the monitoring reports (Santa Barbara County, 2001) include indicator bacteria results for surface water, GLCRS, HWDS, and storage tanks. Recent data (December 2001) are provided in Response 1-1.

Response 1-12

The Draft EIR discusses water levels in the waste mass on page 3.3-23 and presents detailed information in the referenced technical report (Arcadis, 2001b). This comment is unclear in what is meant by "as to whether the bottom of the existing landfill is in contact with the trash." CCR Title 15 does not address landfills. If the commenter intended to reference CCR Title 23, Sec. 2530(c), then the excerpt is mis-quoted because the statute states that the "discharge" not entitled to exemption for engineered alternatives applies only to land treatment units, not landfills.

See Responses 1-1 and 1-6.

Response 1-13

The technical studies referenced in the Draft EIR and the information in the Draft EIR describe the investigations that the SWUD undertook as part of research to support information contained in the Draft EIR in response to the May 5, 1998 RWQCB NOP comments (see Table 1; Correspondence 4).

Table 1 includes a summary of the correspondence between the RWQCB and the SWUD (Correspondences 4 through 56) from 1998 through the present that documents the following: (1) RWQCB has been responsive to the public's concerns; (2) SWUD has been responsive to the RWQCB's requirements; (3) SWUD has cleared all requirements of the June 19, 1998, violation, and (4) the Tajiguas Landfill is in compliance with the WDRs as documented in the RWQCB's November 9 and 12, 1999, letters to the LEA (see Table 1; Correspondence 35 and 36). The following summarizes the events documented by the correspondence summarized in Table 1.

The June 19, 1998, Notice of Violation (see Table 1; Correspondence 6) required a number of items to correct three instances in which WDR specification B.5 was violated:

- Violation associated with drainage system problems (December 9, 1997).
- Failure of leachate piping and discharge of leachate (January 20, 1998).
- Leachate collection system trench overflow and discharge to Pila Creek (February 27, 1998).

*The following items were requested by the RWQCB to correct the June 19, 1998 violation:*

1. A time schedule for submittal of a Leachate Recovery System management plan by August 15, 1998 (page 2).
2. A Final Erosion Control Plan by October 1, 1998 (page 3).
3. Completion of four actions by November 15, 1998 (described mid-page on page 3).
4. Submitting a final design and construction schedule for an out-of-channel sedimentation basin by April 30, 1999.
5. A study and proposed actions to characterize the volume and analysis and discussion of potential water sources for the cutoff trench, achieving gravity flow of all up-canyon water around the landfill, control or sedimentation from landfill impacted areas (out-of-channel whenever possible) and all other flows diverted with minimum disturbance, and Analyses focused on isolating the landfill from surface or subsurface inflow with a means of measuring success of recommended measures by April 30, 1999.

On July 16, 1998 (see Table 1; Correspondence 9), the RWQCB provided comments to the SWUD on a proposed Erosion Control Workplan that SWUD had submitted on May 5, 1998, (see Table 1; Correspondence 5), to correct the violations cited in the June 19, 1998 letter.

Additional requirements and due dates were included in this letter. These requirements were:

1. Completion of the out-of-channel sedimentation basin located north of the waste mass by November 15, 1998.
2. A long-term correction plan and implementation schedule for a leaky abandoned culvert by August 17, 1998.
3. Information regarding constituents found in groundwater samples and the connection to landfill gas by August 17, 1998.

The SWUD responded to the RWQCB's June 19, 1998, letter on August 12, 1998 (see Table 1; Correspondence 10) prior to the August 15, 1998, due date. This letter contained a proposed plan for the Tajiguas Landfill Interceptor Trench Management System (Trench Water Management Plan) that described a system for the management of water that enters the interceptor trench (GLCRS) and addressed the County's plan for preventing litter from entering Pila Creek and the ocean. This provided a response to requirement #1 of the June 19, 1998, letter described above.

On August 21, 1998, a time extension to September 18, 1998, to provide the information requested in the RWQCB's previous letters was granted by the RWQCB to the SWUD via phone conversations (see Table 1; Correspondence 12).

On September 8, 1998, the SWUD sent a letter to the RWQCB (see Table 1; Correspondence 13) with repair details for an abandoned culvert at the landfill that was intended to respond to item #2 of the July 19, 1998, letter, as described above. The SWUD intended to have a long-term solution in place prior to November 1998. However, in the event that it could not be implemented by that time, the existing interim collection and containment system would be prepared for the wet weather season.

In its September 16, 1998, letter to the SWUD (see Table 1; Correspondence 14), the RWQCB provided comments on the Trench Water Management Plan. The comments included

requirements for monitoring and reporting of the water level in the trench, that the monitoring would indicate that use of the collected liquid for dust control is reasonable, and that the proposed storage capacity should allow ample collection of liquid during periods when dust control is not needed. Concern was raised over securing storage tanks on the west ridge as part of this system and using an interim storage tank and sprinkler system to dispose of the collected interceptor trench water. The RWQCB required more information on the interim plan by November 16, 1998, if the proposed long-term storage tanks could not be secured.

The SWUD provided information on September 21, 1998, on the groundwater and constituents found in connection with landfill gas (see Table 1; Correspondence 14). The letter provided additional information requested by the RWQCB in its letter of July 16, 1998, described previously.

The RWQCB conducted a Landfill inspection on October 16, 1998, and, as documented, noted no violations as cited in its October 29, 1998, letter to the SWUD (see Table 1; Correspondence 16). Although improvements had been made at the landfill, the RWQCB had areas of concern and recommended several improvements. Additionally, the RWQCB reminded SWUD of the due dates (completion of the horizontal dewatering wells and stability analysis for the Benchfill project; as-built drawings and design criteria by December 15, 1998, for an up-canyon out-of-channel sedimentation basin) as required in its letter of July 16, 1998, described previously.

The RWQCB and LEA concurrently conducted another inspection at the Landfill on November 19, 1998, that is documented in the RWQCB's letter to the SWUD dated November 25, 1998 (see Table 1; Correspondence 17). The inspection was conducted to assess the winter preparedness work and compliance with the June 19, 1998, Notice of Violation letter. In the month since the previous inspection on October 16th, many erosion and sediment control projects had been completed, and the site appeared prepared for wet weather. The RWQCB commended the County's Solid Waste staff on the significant amount of erosion and sediment control that had been accomplished at the site and recommended that surplus erosion control supplies be available at the site for immediate deployment.

On December 1, 1998, the SWUD submitted a response to the June 19, 1998, Notice of Violation (see Table 1; Correspondence 18). Updates on the progress of an in-channel sedimentation basin south of the landfill and completion of the Erosion Control Workplan Addendum were previously submitted by the SWUD on June 1, 1998 (see Table 1; Correspondence 5 and discussion). The SWUD's December 1, 1998, letter identifies the permit requirements associated with locating the basin in the Pila Creek channel and commits to submit a progress report by March 1, 1999.

Another update letter was provided to the RWQCB from the SWUD on December 15, 1998 (see Table 1; Correspondence 19), in response to the RWQCB's inspections and observations on October 16, 1998 (see Table 1; Correspondence 16 and discussion). The SWUD acknowledged and thanked the RWQCB for its commendation on the improvements at the Tajiguas Landfill. The letter provided updates for the following five areas:

1. The SWUD completed the measures required through the Wet Weather Preparedness Plan and noted that trash racks were placed in Pila Creek to catch trash before it reached the Pacific Ocean.
2. The SWUD also provided an update on a repair project in Pila Creek south of the landfill to remediate unpermitted waste fill at the abandoned gas station site south of the landfill. The SWUD identified the extensive permitting requirements for this project.
3. Excavation of excess soil on the benches and side slopes associated with the Benchfill project would begin in spring 1999. As part of the Benchfill project, which proposed steepening the benches from a 3:1 to a 2:1 slope, the SWUD prepared a Preliminary Stability Analysis. The SWUD drilled exploratory boreholes on the benches in preparation for an excavation plan. Some of the boreholes encountered waste and soil that ranged from moist to wet. The SWUD indicated that additional work was being accomplished to analyze how moisture present in the lower benches would affect stability of the Benchfill project and committed to send a completed copy of the report to the RWQCB.

The SWUD also reported that three horizontal wells and a collection and storage system were installed to partially dewater the landfill and reduce or stop future seepage of water from the side slopes. Installation of the wells and dewatering were intended to improve overall slope stability of the Landfill. Preliminary as-built plans were provided to the RWQCB.

4. The SWUD responded to the cause of high moisture content along the lower two south-facing slopes of the Landfill. The RWQCB required that the issue be resolved prior to placement of any new fill in this area. The cause of the high moisture in this area was attributed to grading practices in the early years of Landfill operation. These practices resulted in water ponding against earthen fills that form the south-facing slopes of the Landfill. The SWUD installed the horizontal wells discussed under item 3, above. Additional measures to prevent water from entering the Landfill included:
  - Installation of a gas collection system that removes approximately 2,000 gallons of condensate per week.
  - Improved grading practices that promote drainage and minimize ponding of rainwater.
  - Improved daily and intermediate cover practice that reduce rainfall infiltration into the Landfill.
  - Elimination of spray-irrigation on one of the Landfill's side slopes.
  - Application of soil stabilizers (Soil Sement®) to reduce erosion and surface water percolation into the Landfill.
5. Confirmation that the out-of-channel sedimentation basin was completed. The SWUD provided as-built drawings and supporting criteria for the basin.

This letter represents the SWUD's steps to address water in the Landfill. This correspondence confirms that the RWQCB was aware of water in the Landfill and associated stability issues since 1998. The letter also documents that SWUD and RWQCB have worked cooperatively to effectively address the issue.

The RWQCB submitted two letters, dated November 9, 1999, and November 12, 1999, to the Local Enforcement Agency (LEA) that the Tajiguas Landfill is in compliance with the WDRs. Because the LEA's compliance letter was issued following the June 19, 1998, violation letter and issues identified in correspondence between the RWQCB and the SWUD from 1998 to 1999, the chronological record shows steps toward compliance and providing the RWQCB with requested elements to correct the violation issued in the June 19, 1998, letter. In short, the record reflects a violation issued by the RWQCB on June 19, 1998, corrective steps that were implemented by the SWUD to amend the violation (see Table 1; Correspondences 10, 12, 14, 18, 19, 20, 22, 24, 25, 26, 28, 32) and the RWQCB's compliance letter issued in November 1999 (see Table 1; Correspondences 34 and 35).

In summary, the comment's characterization of the record is incomplete because it cites notices issued by the RWQCB in 1998, but does not describe subsequent correspondence between SWUD and the RWQCB in response to those notices. The SWUD has responded to the June 19, 1998, violation letter. Following that response, the RWQCB issued a letter to the LEA stating that the Landfill is in compliance with its permits. In addition, the RWQCB issued WDRs and a revised Monitoring and Reporting Program for the Benchfill project currently being implemented at the Tajiguas Landfill.

The Tajiguas Landfill did receive a second violation in December 2001 (see Table 1; Correspondence 54). The SWUD submitted a Spill Prevention Plan on January 25, 2002, to achieve compliance with the WDRs (see Table 1; Correspondence 55). The RWQCB accepted the Spill Prevention Plan (see Table 1; Correspondence 56), and the measures identified in the plan are expected to be complete by October 2002.

See Responses 1-6 and 2-20.

Response 1-14

See Responses 1-1, 1-6 and 2-20.

Response 1-15

The responses associated with the GeoSolv Report, submitted as an attachment to the Heal the Ocean and the Environmental Defense Center comments, are at Responses 2-1 through 2-48.

TABLE 00 (Response 1-1)  
TAJIGUAS LANDFILL BACTERIA SAMPLING  
4TH QUARTER 2001  
ANALYTICAL RESULTS

Sample Location	48" Drain in Pila Creek	100' Down Stream from 48" Drain	GLCRS	MW-2	MW-3	MW-4	MW-14	MW-15	LLCRS	HWDS	Lab
Sample Date	12/4/05	12/4/05	12/4/05	12/4/05	12/5/05	12/4/05	12/6/05	12/6/05	12/5/05	12/5/05	
Test	Method Number	Units-Detection	Limit								
Chlorine Residual	SM 4500G	mg/L - 0.2	ND@0.2	ND@0.2	ND@0.2	ND@0.2	ND@0.2	ND@0.2	ND@0.2	ND@0.2	Creek
Total Coliform	SM 9221B,C	MPN/100ml -2	> 160,000	> 160,000	5,000	9	ND@2	ND@2	ND@2	2400	Creek
Fecal Coliform	SM 9221E	MPN/100ml -2	30,000	160,000	5,000	ND@2	ND@2	ND@2	ND@2	40	Creek
E. coli	SM 9223B	MPN/100ml -2	30,000	90,000	2,400	ND@2	ND@2	ND@2	ND@2	ND@2	Creek
Enterococcus	SM 9230B	MPN/100ml -2	160,000	> 160,000	16,000	ND@2	ND@2	ND@2	ND@2	900	Creek
Chlorine Residual	4500CIG	mg/L - 0.1	ND@0.1	ND@0.1	0.2	0.2	ND@0.1	0.2	ND@0.1	ND@0.1	FGL
Total Coliform	SM 9221B	MPN/100ml -2	> 160,000	> 160,000	17,000	2	<2	<2	<2	4	FGL
Fecal Coliform	SM 9221B	MPN/100ml -2	> 160,000	> 160,000	11,000	<2	NR	NR	NR	500	FGL
E. coli	EPA 1105	MPN/100ml -2	8,000	5,000	1,500	10	20	20	16	40	FGL*
Enterococcus	SM 9230C	cfu/100ml -1	140,000	140,000	4,200	2	4	<2	<2	280	FGL*

- Notes:
- \* Subcontracted to Sierra Environmental, Monitoring, Inc., Reno, NV
  - < Less than
  - > Greater than
  - cfu Colony-forming units
  - Creek Creek Environmental Laboratories, Inc., San Luis Obispo, CA
  - EPA (United States) Environmental Protection Agency
  - FGL Fruit Growers Laboratory, Santa Paula, CA
  - mg/L Milligrams per liter
  - ml Milliliters
  - MPN Most probable number
  - ND Not detected
  - NR Not required (fecal coliform analysis not required if total coliform result is ND)
  - SM Standard Methods



**Table 1 (Response 1-6)  
List of Correspondence  
Tajiguas Landfill Expansion  
Environmental Impact Report (EIR)**

Page 1 of 7

Correspondence #	Chronological Date/From/To	Regarding	Description
Correspondence 1	December 7, 1998 letter from the RWQCB to the SWUD (Order No. 93-69 attached)	Review of Waste Discharge Requirements order 93-69, Tajiguas Class III Landfill, Santa Barbara County	Tajiguas Landfill Waste Discharge Requirements, RWQCB Order No. 93-69.
Correspondence 2	March 4, 1999 letter for the RWQCB to the SWUD	Revised Monitoring and Reporting Program 93-69 for Tajiguas Class III Landfill, Santa Barbara County	Revisions to the Monitoring and Reporting Program for compliance with Waste Discharge Requirements, RWQCB Order No. 93-69 to require monitoring and reporting of newly constructed pollution control systems, additional surface water sampling points and constituents, and to update regulatory changes.
Correspondence 3	March 3, 1998 letter from the RWQCB to the SWUD (Attachment to the April 2-3, 1998 Staff Report)	Tajiguas Landfill Erosion Control Plan & Compliance Update	Describing the RWQCB's position on the landfill's compliance with the WDRs.
Correspondence 4	May 5, 1998 comment letter from the RWQCB to SWUD on the April 1, 1998, Notice of Preparation	Tajiguas Landfill Expansion - Notice of Preparation	Issue areas that require analyses include five foot separation from groundwater, flood events, groundwater conditions, surface water, old sedimentation basins, leachate recirculation, grading on the Baron Ranch, road alignment, slope stability evaluation, other alternatives, ocean impacts and compliance demonstration.
Correspondence 5	June 1, 1998 from SWUD to RWQCB	Erosion Control Work Plan	Erosion Control Work Plan submittal.
Correspondence 6	June 19, 1999 letter from the RWQCB to the SWUD and errata dated July 16, 1998.	Notice of Violation, Time Schedule Compliance, Tajiguas Class III Landfill, Santa Barbara County	Describing requirements and time lines for various components of work plans previously submitted by the SWUD and erosion control measures.
Correspondence 7	June 29, 1998 RWQCB Memo to File	Internal Memo-Complaint/Impact Investigation Staff Report – Tajiguas Class III Landfill – Santa Barbara County, Board Order No. 93-69	Internal memo.

Correspondence #	Chronological Date/From/To	Regarding	Description
Correspondence 8	July 8, 1998 letter from the RWQCB to the SWUD	Central Coast Regional Water Quality Control Board Internal Memo Regarding the Tajiguas Landfill	Explained that the June 29, 1998 memo (Correspondence 7 above) was considered an internal working draft and was not representative of the RWQCB's official stance on matters concerning the Tajiguas Landfill. The letter refers SWUD to the June 19, 1998 letter (Correspondence 6) is the RWQCB's official response to complaints and violations that occurred at the landfill during the past winter.
Correspondence 9	July 16, 1998 letter from the RWQCB to the SWUD	Report of Release Notifications	RWQCB comments on the Erosion Control Work plan Addendum and requirements and schedule for additional information on gas/ground water issue.
Correspondence 10	August 12, 1998 letter from the SWUD to the RWQCB	Notice of Violation, Time Schedule for Compliance, Tajiguas Class III Landfill, Santa Barbara County	Response to June 19, 1998 letter (Correspondence 5, above). Submittal of Trench Water Management Plan.
Correspondence 11	August 21 and 25, 1998 RWQCB Phone Log		Request for time extension for submittal of information required to clear violations.
Correspondence 12	September 8, 1998 letter from SWUD to the RWQCB	Repair of Abandoned Culvert at Tajiguas Landfill	Update on the progress of the violation associated with an abandoned culvert as required in the July 16, 1998 letter.
Correspondence 13	September 16, 1998 letter from the RWQCB to the SWUD	Trench Water Management Plan, Tajiguas Class II Landfill	Comments on the plan submitted on August 12 (Correspondence 7, above).
Correspondence 14	September 21, 1998 letter from the SWUD to the RWQCB	Erosion Control Work plan Addendum, Report of Release Notifications	Information provided RE: relation between groundwater constituents and landfill gas.
Correspondence 15	October 29, 1998 letter from the RWQCB to the SWUD	Landfill Inspection, Tajiguas Class III Landfill	Inspection summary. No violations noted during inspection, however noted that improvements to Pila Creek need to be done by November 15, 1998.
Correspondence 16	November 25, 1998 letter from the RWQCB to the SWUD	Landfill Inspection, Tajiguas Class III Landfill, Santa Barbara County	Inspection summary. Commendation to the County's Solid Waste staff for the significant amount of erosion and sediment control that has been accomplished at the site.
Correspondence 17	December 1, 1998 letter from the SWUD to the RWQCB	Improvements to Pila Creek South of the Landfill	Progress update on the construction of an in-channel sedimentation basin south of the landfill.
Correspondence 18	December 15, 1998 letter from the SWUD to the RWQCB	Landfill Inspection, Tajiguas Class III Landfill	Response to the October 29, 1998 letter from the RWQCB to the SWUD (Correspondence 16, above). Progress report on projects completed to amend violations.

Correspondence #	Chronological Date/From/To	Regarding	Description
Correspondence 19	December 22, 1998 letter from the SWUD to the RWQCB	Notice of Violation, Time Schedule Compliance Tajiguas Class III Landfill, Santa Barbara County	Response to the June 19, 1998 NOV (see Correspondence 5, above). Update on Trench Water Management improvements.
Correspondence 20	December 29, 1998 letter from the SWUD to Santa Barbara County Planning & Development	Coastal Development Permit Case No. 98-CDP-245	Notice that excess water recovered from the trench would be delivered to Goleta Sanitation District rather than used for spray irrigation.
Correspondence 21	March 8, 1999 letter from the SWUD to the RWQCB	Progress Report – In-Channel Sediment Basin South of Tajiguas Landfill, County of Santa Barbara	Update on progress of design, environmental review and permitting requirements for the in-channel sediment basin south of the landfill.
Correspondence 22	March 19, 1999 letter from the SWUD to the RWQCB	Status Report of Release Notification – Detection of VOCs in Lysimeter and Monitoring Well – Tajiguas Landfill	Report that phase one of the action to correct this violation was unsuccessful and phase two is being implemented.
Correspondence 23	March 24, 1999 letter from the SWUD to the RWQCB	Operation of Groundwater/Leachate Collection System- Tajiguas Landfill	Update of improvements to the Trench Water Management system (Groundwater/Leachate Collection System) and the results of operation and monitoring.
Correspondence 24	March 29, 1999 letter from the SWUD to the RWQCB	Notice of Violation, Time Schedule for Compliance, Tajiguas Class III landfill, Santa Barbara County	Update of the tasks that have been completed to manage the Groundwater/Leachate Collection Recovery System (cutoff trench).
Correspondence 25	May 5, 1999 letter from the SWUD to the RWQCB	Status Report of Release Notification letter from the SWUD to the RWQCB	Report that phase two to correct the violation is decreasing methane levels and SWUD will continue monitoring for a 2-month period.
Correspondence 26	April 30, 1999 letter from the SWUD to the RWQCB	Compliance Update	Submittal contained information on the correlation of the response of the GLCRS water levels with rainfall events, provided an update on the sedimentation basin progress, etc.
Correspondence 27	April 30, 1999 from Jim Kinninger to Environmental Health Services (LEA)	Complaint Letter	Number of questions regarding compliance status of the Tajiguas Landfill.
Correspondence 28	May 19, 1999 letter from the LEA to Jim Kinninger	Tajiguas Landfill #43-AA-0015 Bench fill Project Complaint	Responses to Mr. Kinninger's letter (Correspondence 23).
Correspondence 29	May 27, 1999 letter from the RWQCB to Jim Kinninger	Tajiguas Class III Landfill, Santa Barbara County; Compliance Issues	A response to Mr. Kinninger's letter (Correspondence 23) stating that conditions at the landfill continue to improve and summarizes actions that the SWUD had implemented.

Correspondence #	Chronological Date/From/To	Regarding	Description
Correspondence 30	August 16, 1999 letter from the SWUD to the RWQCB and EHS	Response to Comments Slope Evaluation, Tajiguas Landfill, Santa Barbara County	Review and response by consultants found that configuration of the landfill south slope is feasible.
Correspondence 31	August 16, 1999 letter from Santa Barbara County Planning and Development (P&D) to SWUD	Tajiguas Landfill Bench Plan: Review of Local Permit Requirements, APNs 081-150-019 and -026	Review of local permit requirements.
Correspondence 32	August 24, 1999	Status of Tajiguas Landfill Water System and Storm Drain Repair Projects	Update on progress.
Correspondence 33	August 27, 1999 letter from the RWQCB to the SWUD	Tajiguas Class III Landfill, Santa Barbara County	Comments on the SWUD's compliance update letter of April 30, 1999 (Correspondence 23, above).
Correspondence 34	November 9, 1999 letter for the RWQCB to EHS	Compliance Status, Tajiguas Landfill, Santa Barbara County	Stated that the Tajiguas Landfill is in compliance with Waste Discharge Requirements Order No. 93-69, the landfill's operators have satisfactorily addressed or are in process of addressing all violations of order No. 93-69 and noted in the August 27, 1999 letter (Correspondence 26) and the RWQCB concurs with the findings and conclusions of the slope stability analysis included in the SWUD's letter of August 16, 1999 letter to the RWQCB and Environmental Health Services (Correspondence 27)
Correspondence 35	November 12, 1999 letter from the RWQCB to EHS	Compliance Status, Tajiguas Landfill, Santa Barbara County	Says that the Tajiguas Landfill is in complete compliance with Waste Discharge Requirements Order No. 93-69.
Correspondence 36	November 15, 1999 letter from SWUD to the RWQCB	Tajiguas Landfill – Completion of Groundwater Recovery Trench Water System Improvements	Notification that construction of the proposed Water System Improvements is complete, tested and operational. Other drainage system improvements noted.
Correspondence 37	November 30, 1999 letter from the SWUD to the RWQCB	Project Status Report/Compliance Update Tajiguas Landfill, Santa Barbara County	Response to the August 27, 1999 letter (Correspondence 28). Updates on the Groundwater Extraction System (largely complete) and the down canyon out-of channel sedimentation basin (RWQCB to reevaluate the need for this basin based on erosion control improvements accomplished at the landfill).
Correspondence 38	December 3, 1999 letter from the SWUD to the RWQCB	Project Status Report/Compliance Update	Update on the Groundwater Extraction System at Piezometer P-20 is completed, tested and operational.

Correspondence #	Chronological Date/From/To	Regarding	Description
Correspondence 39	December 21, 1999 letter from the SWUD to the RWQCB	Methodology for Sedimentation Study of Pila Creek Watershed	Information on the method to use for the Pila Creek Watershed Sedimentation Study.
Correspondence 40	December 28, 1999 letter from the SWUD to the RWQCB	Project Status Report/Compliance Update Tajiguas Landfill, Santa Barbara County	Clarification of the scope of the evaluation for the need of the down-canyon out-of-channel sedimentation basin. The evaluation due date was February 29, 2000.
Correspondence 41	February 24, 2000 memo from SWUD to EHS	Tajiguas Surface and Groundwater Summaries	Summarized findings of Dr. Arturo Keller, Dr. John Gray, and Mr. Mark Grivetti that there is no need for concern with respect to groundwater issues at the landfill. Heal the Ocean obtained all surface and groundwater quality data in June 1997. No pollution concerns were identified during the 7 months they reviewed the data.
Correspondence 42	March 31, 2000 letter from the SWUD to the RWQCB	Comparative Soil Loss Analysis of the Pila Creek Watershed	Report submitted to support the evaluation of the need for the down-canyon out-of-channel sedimentation basin and included the chronology of events to date with regards to the sedimentation basin.
Correspondence 43	March 15, 2000 letter from the Gaviota Coast Conservancy (GCC) to the RWQCB	Concerns with the Tajiguas Landfill	Concerns included: bacteria (high levels where water enters Pila Creek downstream of the landfill), water quality testing results and reporting, turbidity, monitoring well locations, groundwater inflow and five-foot separation between groundwater and the landfill, lysimeters and VOC migration offsite, expansion of the landfill over the Vaqueros formation, and the landfill expansion liner.
Correspondence 44	April 13, 2000 letter from the SWUD to the RWQCB	Non-Hazardous Characterization of Liquid from Pollution Control Systems, Tajiguas Landfill, Santa Barbara County	Confirmation of required testing for the Horizontal Well Dewatering System annually and that the compounds monitored will consist of volatile organics compounds and metals. Results of the analysis are to be included in the annual report submitted to the RWQCB.
Correspondence 45	May 25, 2000 letter from the GCC to the RWQCB	Tajiguas Landfill Semi Annual and Annual Water Quality Monitoring Report, January 2000	Comments on the Report based on a more exhaustive list of compounds tested. Concern with "tentatively identified compounds" or "TICs", contamination of water downstream of the landfill, adequacy of downstream monitoring points, perched water in the landfill, adequacy of the North Groundwater Management System, and discontinuance of bacterial testing in Pila Creek.
Correspondence 46	June 21, 2000 letter from the GCC to the Santa Barbara County Grand Jury	Tajiguas Landfill	Concerned with the Grand Jury's recent report. Issues areas include: migration of leachate downstream of the landfill, unresponsiveness to Grand Jury recommendations by Public Works, inadequacy of monitoring wells, excessive bacteria and pore contamination.

Correspondence #	Chronological Date/From/To	Regarding	Description
Correspondence 47	June 30, 2000 letter from the SWUD to the RWQCB	Tajiguas Landfill Down-Canyon, Out-of-Channel Sedimentation Basin	Found that the combined efforts of the upper canyon in-channel and out-of-channel sedimentation basins and the aggressive sediment management discharge have addressed the sediment discharge concerns as noted in the June 19, 1999 RWQCB letter (Correspondence 4). The SWUD provided a chronology of events leading up to the development of the sedimentation basin and committed to pursuing the down-canyon, out-of-channel sedimentation basin as an additional best management practice. A schedule to develop the basin was to be provided to the RWQCB by July 21, 2000.
Correspondence 48	June 30, 2000 letter from SWUD to the RWQCB	GCC Letter to RWQCB Dated 3/15/00 – Tajiguas Landfill	SWUD responses to the GCC's concerns. This letter explained the landfill's storm drain systems and described their condition and flow rates. In addition, the surface and subsurface water testing results were explained and ongoing monitoring and site improvements were discussed. The SWUD expressed interest in continuing to work with the RWQCB on the five-foot separation from groundwater issue. The SWUD also requested any additional information the GCC may have on the presence of groundwater or springs beneath the landfill.
Correspondence 49	July 21, 2000 letter from SWUD to the RWQCB	Tajiguas Landfill Down-Canyon, Out-of-Channel Sedimentation Basin	Proposed schedule to develop the basin. Completion date expected by August 2003 due to the complex permitting requirements associated with development in Pila Creek.
Correspondence 50	October 24, 2000 letter from SWUD to the RWQCB	Response to RWQCB September 27, 2000 Letter Tajiguas Down-Canyon, Out-of-Channel Sedimentation Basin	Summarized an October 10, 2000 meeting where the County of Santa Barbara P&D explained the basin could not be permitted in it's proposed location. SWUD proposes locating the basin within the permitted operations area of the Landfill.
Correspondence 51	October 27, 2000 letter from the RWQCB to the GCC	Tajiguas Landfill, Santa Barbara County	The RWQCB's response to the GCC's March 15 and May 25, 2000 letters.
Correspondence 52	December 8, 2000 letter from SWUD to the RWQCB	Tajiguas Landfill Proposed Sediment Control Structure	Letter summarizing the historic chronology of the basin to the structure, the requirements and schedule to develop the structure. The structure completion date is October 21, 2002.
Correspondence 53	January 23, 2001 letter from P&D to the SWUD	Tajiguas Landfill Office Trailer and Sediment Control Structure – Exemption form Permit Requirements	Stated that the sedimentation basin does not require a Coastal Development Permit and is not a project under CEQA. The implementation of erosion and sedimentation control measures located below the 1978 Solid Waste Facilities Permit elevation limit of 400 feet MSL and considered part of the ongoing operation of the historic landfill.

Correspondence #	Chronological Date/From/To	Regarding	Description
Correspondence 54	December 31, 2001 letter from the SWUD to the RWQCB	Tajiguas Landfill Proposed Sediment Control Structure Update	Update of permitting status and that the Board of Supervisors had approved the project for advertising on December 11, 2001.
Correspondence 55	December 19, 2001 letter from the RWQCB to the SWUD	Tajiguas Landfill, Santa Barbara County; Leachate Collection and Removal System Overflow – Notice of Violation	Violation following notification by SWUD that the liner leachate collection and removal system tank had overflowed. The RWQCB required immediate action to prevent future spills and a Spill Prevention Plan detailing improvements to mechanical systems and operational procedures by January 30, 2002.
Correspondence 56	January 25, 2002 letter from the SWUD to the RWQCB	Tajiguas Landfill, Santa Barbara County; Leachate Collection and Removal System Draft Spill Prevention Plan – Compliance with Waste Discharge Requirements, Order No. 93-69 and the California Water Code	Submittal of the Spill Prevention Plan required by the RWQCB to achieve compliance with the December 19, 2001 violation.
Correspondence 57	March 5, 2002 letter from the RWQCB to the SWUD	Tajiguas Landfill, Santa Barbara County; Leachate Collection and Removal System Spill Prevention Plan	Acknowledge that the SWUD has implemented spill prevention measure to achieve compliance with the violation. Required a detailed schematic drawing and operating procedures for the entire system by July 5, 2002.



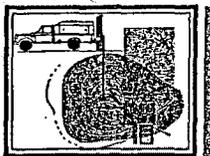
**Table 2 (Response 1-6)  
Summary of  
Issue Areas and Responses**

Issue Area	Suspected/Confirmed Violation	SWUD's Response	RWQCB's Response
Groundwater Contamination	Presence of volatile organic constituents (VOCs) in groundwater south of the landfill	Installed operational improvements to groundwater extraction trench (cut-off trench).  Installation of a gas extraction system.	Extraction trench and gas collection system appear to contain VOCs in groundwater on-site.
	Presence of a seep south of the extraction trench	Pumping water from trench to minimize discharge to Pila Creek.	Extraction trench appears to contain water on-site.
Surface Water Degradation	Sporadic presence of VOCs in surface water of Pila Creek south of the (cut-off) trench.	Operational improvements to groundwater extraction trench (cut-off trench).  Installation of a landfill gas extraction system to remove VOCs from groundwater.	Provided comments in the RWQCB's letter of March 3, 1998 (Discussed below).  Investigating compliance with Ocean Plan standards.
	Excessive Sediment /Turbidity	Submitted a "Technical Workplan, Surface Water Monitoring, Erosion Control Plan" to the RWQCB in January 1998.	
Trash	Trash in Pila Creek and on the nearby downstream beach.	Installed litter screens around culvert inlets, installed three permanent trash racks in lower Pila Creek and initiated use of ten portable litter fences around the Landfill working face. Use of litter crews to collect errant trash.	Monitoring concern to assess possible water quality impacts-lead agency for this concern is the County Environmental Health Services (EHS).

Issue Area	Suspected/Confirmed Violation	SWUD's Response	RWQCB's Response
Medical Waste	Suspected medical waste on the beach downstream of the Landfill.	Investigated the concern-not confirmed if the Landfill was the source. One-time event. Has not occurred since.	Coordinated with EHS for resolution.
Coliform	High level in the surf zone near the Landfill.  Completed the Bacteria Source Study for the lower Arroyo Quemado Creek watershed. The source of the greatest amount of bacteria was seabirds, most notably, seagulls.	Investigating sources with EHS.	Arroyo Quemado Creek, which is not influenced by the Landfill, was found to be significantly higher in Coliform than Pila Creek. Difficult issue to resolve.
Wood Chips	Wood chip use is good for erosion, but the wood chips possibly migrate off-site during heavy rains.		Require SWUD to demonstrate that the chips would not leave the site during wet weather events.
Foam	Discharge of foam to Pila Creek and the downstream beach.	Foam use is approved as alternative daily cover (ADC) But has not been used as ADC at the landfill since October 1998.	Warned SWUD that discharge of foam and failure to report is a violation of Order No. 93-69.

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December 12, 2001

**SUBJECT: EVALUATION AND REPORTING ON CONTAMINANT HYDROGEOLOGICAL  
CONDITIONS AT THE TAJIGUAS LANDFILL**

This is the completed report on evaluating the Draft EIR. Based on the reviewed information, our conclusion is that the Tajiguas Landfill as of today, poses undetermined likely risk to human health, drinking water and the environment. We recommend steps, that we believe, can help to assess the impact on the environment and design adequate mitigation plan.

We thank you for the opportunity to be part of this project and we are looking forward to work with you in the future on other environmental issues.

Sincerely,

*Franklin J. Goldman*

Franklin J. Goldman  
CEO/GeoSolv, LLC  
Registered Geologist No. 5557  
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*George Pavlov*

George Pavlov

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Tajiguas Landfill  
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Original Topography of Vicinity of Pila Creek

**INTRODUCTION**

Tajiguas Landfill was opened by Santa Barbara County in 1967 as a Class III solid waste disposal site. Small volumes of waste had been unofficially dumped on the canyon floor even before the site came under County control. Does not appear to be any record for any removal of alluvium. During the initial period of County operation, land filling took place along both banks of the Canada de la Pila streambed, from which flow had not been diverted. Waste was then placed in the streambed, damming off runoff from the upper watershed. Currently the landfill is permitted to receive 1,500 tons per day of municipal solid waste.

The landfill area occupies the central portion of the Canada de La Pila, a narrow canyon cut into the south flank of the Santa Ynez Mountains. Canada de la Pila Creek flows directly into the Pacific Ocean, about 0.4 mile south of the landfill. Elevations range from 120 feet above msl in the lower canyon area at the surface discharge point to about 1150 feet at the watershed divide. Canada de La Pila is an ephemeral creek and drains a watershed of about 468 acres. Of this, about 200 acres lie upstream from the landfill along the main canyon.

The Technical Report, prepared by the County of Santa Barbara, Department of Public Works, Solid Waste & Utilities Division, defines four laterally contiguous segments of the Pila Creek drainage basin, based upon physiographical characteristics and land use practices which are listed as follows:

- The relatively undisturbed headwaters area;
- The upper canyon area;
- The landfill area;
- The lower canyon area.

The landfill area includes the majority of the watershed area that has been disturbed by site development activities. The landfill itself occupies approximately 78 acres.

According to the Santa Barbara County Flood Control Districts 1993 Precipitation Report, the mean annual rainfall at the Tajiguas rain gaging station is 17.75 inches,

and the depth of the 100-year, 24-hours storm is 7.85 inches. The average annual runoff is five inches per year.

Rainfall in the northernmost portion of the Pila Creek watershed is a 20.01 inches per year area-weighted average and 18.34 inches per year area weighted average precipitation for the lower watershed area (Santa Barbara County Public Works Department - Solid Waste and Utilities Division, 2001). The calculated runoff from the upper and lower watershed areas are estimated to be 25 AF per year and 21 AF per year, respectively; resulting in a total combined runoff of 46 AF per year.

Geologic materials identified during field mapping and drilling consist of Quaternary-age alluvium, colluvium and artificial fill which overly Tertiary-age bedrock consisting of the Rincon Shale and the Monterey Formation. The alluvium consists of recent stream-laid deposits of Canada de la Pila Creek and occurs in a narrow zone in the canyon bottom. Recent alluvium unconformably overlies fill and colluvial soil in the valley bottom. The older alluvium unit underlies artificial fill and colluvial soils and overlies Rincon Shale. The older alluvium consists of silty to locally gravelly sand and is similar to the recent alluvium in composition. Colluvium consists of a heterogeneous mass of soil or rock fragments deposited by sheetflow or gradual accumulation at or near the base of a slope.

The contact between the Rincon Shale and the Monterey Formation trends roughly east-west on both sides of the canyon and dips approximately 50 to 60 degrees to the south. The contact between the two appears to be transitional over a 10 to 20 foot thick zone.

A zone of weathered bedrock, generally less than ten feet thick, is present over most of site area.

The Rincon Shale is the bedrock formation that underlies most of the landfill area as well as a broad area to the north. It is predominantly a grey to olive-drab mudstone containing 1/2 to 2 foot thick interbeds of orange-brown weathering dolomitic limestone, foraminiferal marl and pale yellow brown to olive-brown bentonitic, lithic-vitric tuff at the top of the formation.

Bedding in the Rincon Shale and the Monterey Formation at the site trend approximately east-west and homoclinally dip about 60 degrees to the south. Local variations in strike and dip occur, most of which appear to be related to faulting.

A fault zone is observed in a surface outcrop approximately 500 feet east of the canyon bottom, near the Rincon to Monterey contact. This fault zone strikes N80E and dips approximately 80 degrees to the south. The fault shows a reverse sense of

movement and juxtaposes the Rincon and Monterey rocks. The projected trace of this fault would cross the canyon bottom. This fault has not been mapped directly on the site. (D&M, 1988)

## SECTION A

### Groundwater in contact with landfill waste

2-1

A pumping system removes water coming from the upper canyon area behind the landfill in the canyon bottom in attempt to reduce inflows into the landfill bottom. Some surface water and groundwater however, enters the landfill along several paths, the most important of which may be the streambed and the streambed alluvium left in place under the landfill. Another source of recharge for the water table in the landfill would be direct infiltration of the rainfall.

2-2

The basal groundwater table (see September 2001 Hydrologic Investigations Status Report by ARCADIS G&M, page 15 of 17, Image 110) within the Tajiguas Landfill waste mass has been defined by the groundwater present in monitoring and dewatering wells located throughout the landfill (see GeoSolv cross section, based upon well data from the July 2001 SEMI-ANNUAL WATER QUALITY MONITORING REPORT PREPARED BY COUNTY OF SANTA BARBARA PUBLIC WORKS DEPARTMENT SOLID WASTE & UTILITIES DIVISION). This is a clear violation of the 5-foot separation rule which states that the bottom of the landfill waste mass must be five or more vertical feet above the highest seasonal groundwater table. (Combined SWRCB/CIWMB Regulations Division 2, Title 27, Article 3, §20240 and Title 23, Division 3, Chapter 15, Article 3, §2530)

2-3

A review of the Collection Trench Profile and Details in the June 17, 1998 Corrective Action plan shows that the original trench excavation was founded in at least eight (8) feet of unweathered Rincon to intercept some of the underflow of groundwater contaminated by the landfill from exiting the confines of the landfill and migrating offsite to the beaches and ocean. Although, this implies that the unweathered Rincon is impermeable, the Environmental Impact Report, TABLE 3.2-3 STRATIGRAPHY OF TAJIGUAS LANDFILL PROJECT SITE) states that the "The unweathered Rincon is mainly massive, but zones of intensely fractured rock have been observed." The Environmental Impact Report, page 3.3-9 states, "The groundwater flows from topographically high areas downward to stream channels, where the flow emerges as discharge to the streams if the water level is high

enough or as underflow in alluvial fill or fractured bedrock below the channel." It is clear that intensely fractured rock likely exists in bedrock below the channel and can be very permeable allowing contaminated underflow to bypass the interceptor trench. The original topography and Pila Creek bed are shown on GeoSolv Original Topography of Vicinity of Pila Creek map.

2-4

The Collection Trench Profile and Details cross section also verifies that the 20 to 35 feet of soil exposures on the east and west sides of the trench are permeable alluvium. (See GeoSolv Tajiguas Landfill Map) This provides migratory pathways for contaminated groundwater to bypass the trench and contaminate groundwater in the Monterey Shale formation, at the Arroyo Quemada community and the beaches beyond.

2-5

Since the community of Arroyo Quemada utilize groundwater from the Monterey/Alluvium hydrogeologic unit for domestic supply, the landfill is posing a threat to groundwater with potential and or existing drinking water beneficial uses (see page 3.3-49 of the EIR). Furthermore, unless otherwise indicated within the Basin Plan or a formal Regional Board Order which de-designates a surface or groundwater body's beneficial use designation, groundwater in the Rincon, Vaqueros and Sespe-Alegria, and the Gaviota hydrogeologic units are considered to have potential or existing drinking water beneficial use designations. Therefore, contaminated groundwater in the Rincon in direct contact with the contaminated groundwater that saturates the landfill mass, is considered to be drinking water and should be treated as such. The draft EIR conspicuously leaves out the beneficial use designations for the groundwater in the Rincon Hydrologic Unit.

2-6

On page 3.3-17 of the Draft EIR the Monterey Formation is stated to consist of "weathered and fractured Monterey Formation shales and siltstones south of the existing landfill, as well as valley bottom alluvial and colluvial deposits in the lower canyon area." Since the monitoring wells, located down gradient of the interceptor trench, are founded in colluvium, contaminated groundwater underflow in the fractured shales and siltstone may escape the grossly inadequate monitoring system and reach the beach and ocean.

Since, based on the preceeding discussion, the interceptor trench does not prevent all groundwater from escaping the landfill, it is necessary to establish its overall effectiveness.

The surface run-off in the upper portion of the Pila Creek watershed is captured in three retention basins located directly north of the current landfill. One is an out-of-channel basin and two are in-channel basins located at an approximate elevation of 400 to 500 feet above MSL. All three retention basins are unlined and are

constructed in natural soils. The out-of-channel basin captures storm water runoff predominantly from south and west-facing slopes along the east side of Pila Creek and upstream of the landfill area. Excess runoff from this out-of-channel basin is captured in the two nearby in-channel basins.

2-7 The water from the three basins is routed west of the landfill area in a 48 inch culvert, which is emptied into the streambed of Pila Creek at a box culvert opening located approximately 200 feet south of the administrative buildings. The box culvert opening is identified as the landfill's surface water discharge point. This surface-water diversion system was not installed until the landfill had been raised about 25 feet above the streambed.

Surface water runoff from a portion of the landfill upper deck and portions of the bench areas also drain into this 48-inch culvert. It would seem that surface water may have come in contact with the landfill mass and will be contaminated. Periodic monitoring for dissolved chemicals in the water of the diversion system is needed.

2-8 The east culvert system collects storm water runoff from the majority of the landfill proper and routes it to the same discharge point.

2-9 The interceptor trench is reported to receive groundwater from underflow from alluvium and formation rock as well as from water which is collected by the GLCRS. As of June 4, 1998 (i.e. approximately 6 years of water collection), they have produced 9,106,943 gallons of water from the trench (i.e. 1,517,824 gallons of water collected per year). This large volume of water appears to come from two sources; basal groundwater underflow contaminated by the landfill mass and from leachate collection pipes located in the upper portions of the landfill.

2-10 According to the October 2000 Technical Report Review of Surface Water Resources Page 6, the Pila Creek watershed yields 46 acre feet per year (i.e. 14,988,125 gallons) and only 1,517,824 gallons of water is collected by the trench each year. Since Pila Creek is not equipped with a stream gauging station, it is not known how much surface water run-off is captured by the culvert systems which are directing the flow into the Pila Creek bed at the surface water discharge point.

Since up to 13 million gallons of water per year potentially bypass the collection trench, it is important to have an accurate account of the total surface water run-off, collected by the culvert systems. The balance between the 13 million gallons and the amount of water, measured at the surface water discharge point, will provide the volume of groundwater contaminated by the landfill mass, escaping the collection trench. The water balance must include a determination as to how much water is used for irrigation, what types of earth materials are undergoing irrigation, all

methods of distribution and application of irrigation water, and where and when the irrigation is performed. In this way it can be determined how much water is lost to evapotranspiration, evaporation, and the landfill mass itself, etc.

#### INVESTIGATION AND MONITORING CONTAMINANT MIGRATORY PATHWAYS

2-11 The current groundwater monitoring system seems inadequate to intercept the dissolved contaminants in groundwater bypassing the trench. Regulations state that a sufficient number of groundwater monitoring points must be established to assure that contaminants cannot bypass the monitoring well network (Article 4, §20415 (D)).  
See response to 2-3

Many springs which have been reported in the Cady Declaration which are representative of some of the groundwater flow paths not addressed in any technical documents to date, are supposed to be clearly identified on a map so that their influence on landfill contaminant migration can be evaluated (Article 4, §21750 (g) (5)). See regulatory reference below.

2-12 §21750. SWRCB - Waste Management Unit (Unit) Characteristics and Attributes to be Described in the ROWD. [C15: §2595 & §2547(a) // T14: §17777, §18260, §18263, & §18264]

(a) Identify Potential Impairment — Dischargers shall provide in the report of waste discharge ("ROWD", including any such report integrated into a Joint Technical Document (JTD), pursuant to §21585) an analysis describing how the ground and surface water could affect the Unit and how the Unit, including how any waste, if it escapes from the Unit, could affect the beneficial uses of ground water bodies (including, but not limited to, any aquifers underlying the facility) and surface water bodies. The RWOCB shall use this information to determine the suitability of the Unit with respect to ground water protection and avoidance of geologic hazards and to demonstrate that the Unit meets the classification criteria set forth in Article 3, Subchapter 2, Chapter 3, Subdivision 1 of this division (§20240 et seq.).

#### (g) Hydrogeology.

(1) General — An evaluation of the water bearing characteristics of the natural geologic materials identified under (f)(2) including determination of hydraulic conductivity, delineation of all ground water zones and basic data used to determine the above.

(5) Springs — A map showing the location of all springs within the waste management facility and within one mile of its perimeter. The map shall be

accompanied by tabular data indicating the flow and the mineral quality of the water from each spring.

Two parallel groundwater monitoring curtains should be placed on either side of the interceptor trench to determine the nature of contaminated groundwater which bypasses the trench.

On pages 3.3-18, 3.3-21, and 3.3-22 the draft EIR states,

*"A component of the southward groundwater flow is blocked by cross-strike (east-west trending), low permeability aquitard units. For example, water level monitoring data indicate that some groundwater flow within the Vaqueros aquifer is deflected eastward, around the Rincon Formation (aquitard), where it may discharge as base flow to the alluvium in Arroyo Quemado (EMCON, 1994b). This suggests that bedrock aquifers exposed in Canada de la Pila may be hydraulically connected to those in adjacent canyons and watersheds via lateral flow along contacts with aquitard units.*

*These conditions indicate that at least a portion of the groundwater within the Vaqueros Formation flows eastward and may discharge to the Arroyo Quemado alluvium.*

*Seasonally, Vaqueros Formation water levels in monitoring wells e.g., (MW-10 and MW-13) near the former Pila Creek channel appear to be at or above the former ground surface elevation of approximately 250 feet above msl. This implies that a portion of the groundwater from the Vaqueros Formation likely discharges to the former Pila Creek channel alluvium or artificial fill beneath the existing landfill. As of late 1999, the County SWUD has initiated dewatering and monitoring to minimize this discharge potential."*

2-13 This groundwater flow diversion must be defined in the subsurface in order to develop a corrective action plan. Such a plan should address methods for preventing the migration of subsurface contaminants to groundwater and surface water by investigation and monitoring of the contaminant migratory pathways. Without a proper understanding of this groundwater flow regime and without knowing the migratory pathways for contaminated groundwater, minimizing the discharge potential of contaminated groundwater by strategically placing monitoring and dewatering wells is very unlikely to be effective and is certainly not verifiable.

Specifically, the groundwater and surface water pathways which can transport high levels of bacteria from the landfill waste to the beach at the Arroyo Quemado

Community where bacteria has been identified must be evaluated. It is curious that the November 2001, Bacteria Source Study, by URS Consultants, only reports water sampling for bacteria in Arroyo Quemado Creek watershed, which is the water shed east of Canada de la Pila watershed. This assumes that the bacteria is coming from Arroyo Quemado Creek and totally ignores the fact that the bacteria can be coming from the landfill directly. It appears, however, that the landfill's operators do not intend to address this issue as is demonstrated by the text in the draft EIR on page 3.3-40 which discusses the high bacteria counts in Ocean water at Arroyo Quemado Beach yet does not even consider addressing the question as to whether or not there is a relationship between water in the landfill waste and the contamination at the beach. Furthermore, the terms "landfill operations" and "landfill activities," which are used to imply these as potential sources of bacteriological contamination at the beach, seem to exclude the concept that the landfill waste mass may be a source of bacteriological contamination via subsurface flows. See excerpt below:

*As Study History of Protocol here*

*As discussed previously, widespread concern has arisen in Santa Barbara County over the presence of high bacteria counts in ocean water which has prompted beach closures and advisories at many County beaches. Of particular concern in the project area is Arroyo Quemado Beach. The beach area fronting the mouth of the creek has been subject to advisory or closure on many occasions since testing began in 1997. Residents in the Arroyo Quemado community and others have suggested that the landfill may be responsible for these conditions. The current evaluation of indicator bacteria focuses on conditions in Pila Creek, the ocean fronting Pila Creek, and a possible relationship between landfill activities and high indicator levels at Arroyo Quemado. Specifically, the data evaluation was designed to address three general questions of interest:*

- 1. Do landfill operations contribute to high indicator levels in Pila Creek?*
- 2. Do high indicator levels at the mouth of Pila Creek contribute to high long-shore indicator levels near the mouth of Arroyo Quemado Creek?*
- 3. Are there notable elevations in indicator levels elsewhere in the Arroyo Quemado watershed that could potentially contribute to high ocean levels near the mouth of Arroyo Quemado Creek?*

*URS (2001) contains considerable detail regarding the levels of bacteria in Pila Creek, the ocean, and the Arroyo Quemado watershed. Based on the available sampling data for the Canada de la Pila watershed downstream of landfill operations, it appears that bacteriological contamination of surface water at the mouth of Pila Creek is related to high bacteriological indicator*

counts recorded at the landfill's surface water discharge point (specifically, sample point p-1 7) during the wet season (i.e., late winter and spring months). Potential sources for this bacterial contamination include: native fauna, runoff from green waste, runoff from the active landfill surface, and avian feces deposited over a wide area of the watershed.

Bacteria contribution from native fauna does not appear to be a dominant source based on the observation that sites upstream from the landfill exhibit low levels of Enterococcus and fecal coliform/E. Coli relative to other sites in the watershed. Just below these sites, at the green waste disposal area, relatively high indicator levels are observed at TJ-03, however runoff from this area is nearly always contained in the out-of-channel sedimentation basin and rarely enters lower Pila Creek, eliminating green waste as a likely dominant contributor. Surface water runoff at the active landfill face during rainfall events is managed so that it is not likely to contribute significantly to bacteria loads. Waste is exposed only during operational hours, which minimizes runoff contact with the waste. However, the widespread presence of feces from the large seagull population that is attracted to the landfill is exposed to runoff during rainfall events and could be a contributing factor.

During the wet season, the degree of bacteria transport to the ocean water at the mouth of Pila Creek is consistent with conditions at other creek locations in the region such as Arroyo Buno, Jalama, Refugio, and Rincon. During the summer months, it does not appear that landfill operations affect bacteriological water quality at the point where Pila Creek discharges to the ocean."

2-14 Subsurface investigation is required to define the potential migratory pathways for groundwater contaminated by the landfill waste mass, between the beach and landfill, and to define the vertical and lateral extent of the existing landfill waste mass relative to all adjacent hydrogeologic regimes. Geophysical (such as areal temperature survey) an/or geological investigations should be performed to verify groundwater flow path regimes from recharge in the upper watershed, through the interceptor trench, and final discharge to the beach. An example of the type of point source which could undergo subsurface investigation is identified on page 2-23 of the draft EIR, which states,

"At some time during either the final closure period or postclosure maintenance period, at existing facilities such as the scale house and maintenance shop are no longer required or are replaced by new facilities, they will be removed. Specific permits that may be required for the removal/demolition of facilities would be obtained at the time of closure of each facility.

## SECTION B

### Sample Analyses

On Page 2-47, the draft EIR states that

2-15 "Groundwater quality for current landfill operations is monitored via eight monitoring wells and one lysimeter."

The current eight groundwater monitoring wells used to monitor the existing landfill are insufficient to identify subsurface flow pathways and contaminant migration, and is more appropriate for a single gas station underground storage tank site.

2-16 On page 3.3-43 of the draft EIR, it states that VOCs are the main contaminants of concern and that their apparent decrease in concentrations is due to effective control systems which minimize the impacts to downgradient groundwater from the landfill. This statement admits that the landfill is adversely impacting downgradient groundwater and yet does not explain the character nor the gravity of these impacts. Aside from the fact that there is an insufficient number of groundwater monitoring wells in the most critical locations necessary to evaluate groundwater quality conditions throughout and adjacent to the existing landfill, it is a likely possibility, based upon recent groundwater monitoring lab data, that gasoline constituents as well as chlorinated solvents are emanating from point sources from the landfill mass. The following is the table of contaminants identified within the landfill.

1,4-Dichlorobenzene	benzothiazole
1,1-dichloroethane	chlorobenzene
cis-1,2-Dichloroethene	chlorodifluoromethane
trans-1,2-dichloroethene	methoxytrimethylsilane
cis-1,2--dichloroethylene	fluorotrimethylsilane
2-methylbutane	trimethylsilanol
1,4-Dichlorobenzene	trimethylsilane (2-methoxyethyl)
Methyl t-Butyl Ether	1,2,4- trimethylbenzene
Trichloroethene (TCE)	vinyl chloride
Hexavalent chromium	

2-17

All groundwater samples should be analyzed for all gasoline constituents as well as for all oxygenates and lead scavengers by EPA Method 8260b. All groundwater samples should also be analyzed utilizing EPA Method 8260b for all constituents, including but not limited to, all chlorinated solvents as well as 1,4, dioxane. In addition, all groundwater and surface water samples should be analyzed for total and fecal coliform and enterococcus bacteria. Finally, all chemicals, identified in the groundwater in the past must be analysed as well.

All potential point sources of contamination which were buried in the landfill such as barrels of solvents should also undergo point source subsurface investigations.

The scale house and maintenance shop should undergo an immediate point source subsurface investigation based upon a complete Phase I Environmental audit to identify gasoline, chlorinate solvents and other VOCs commonly associated with this type operation.

#### HOLOCENE FAULTING AND POTENTIAL FOR SURFACE RUPTURE

2-18

For the 1988 Expansion EIR, an acceleration number of 0.39g was used. They then revised their number to 0.354g but still claimed that the slopes were still stable at 2/1. The EIR consultant, Geologic Associates, performed the new slope stability analysis using a maximum probable earthquake ground acceleration of 0.21g. This is the original number used in the same consultant's projection for benchfill stability. The slope stability analysis was done under the assumption that the landfill mass is not saturated. Their disclaimer states that if the landfill was saturated then they would not be held to their stability analysis projections.

2-19

Another issue is whether or not the proposed expansion is resting upon a Holocene fault. The draft EIR makes no mention as to whether or not the proposed landfill expansion will overly an active fault. On page 3-1 of the September 2001 SLOPE STABILITY EVALUATION, no mention is made as to whether or not local faults may cause surface rupture in the future which may impact the landfill and/or landfill expansion. Also, there is no mention as to whether or not these local faults are Holocene. Furthermore, the text refers to the Dames and Moore, 1995 report, yet does not expressly concur with the reports findings nor does it state specifically that the Dames and Moore report verifies that the faults in questions are Holocene or not.

#### SECTION C

2-20

Numerous violations in the operation of the Tajiguas Landfill have been noted to occur in the past. The landfill management has not made sufficient effort to correct many of them. In light of these fact, it is diffucult to imagine that the landfill operators will be anymore responsible with the expanded landfill. See the following history of viloations below.

2-21

A May 25, 1993 Regional board evaluation of the Emcon's June 30, 1992, Article 5 report entitled "Water Quality Monitoring Plan and Financial Assistance Report," stated there was a lack of monitoring in the Rincon and Monterey Shale formations and that a VOC plume could migrate without early detection because their wells do not have short screened intervals targeting the top and bottom portions of the aquifers to minimize dilution of the dissolved constituents of concern. The inadequacy of the groundwater monitoring network has still not been addressed.

2-22

The May 25, 1993 Regional Board letter required that a plan to define the extent of contamination be submitted. This has also never been completed either. Finally, the Board stated that LANDFILL EXPANSION not be allowed until full compliance with Article 5 has been attained and that the Article 5 Report for the existing Landfill was not adequate to incorporate the proposed expansion.

(93 Correspondence.tif, Images 5 thru 9)

A November 29, 1993 Board letter to the County commenting on the County's May 1991 "Water Quality Solid Waste Assessment Test report (SWAT report)," it stated that the Landfill leaked benzene and 1,4-dichlorobenzene concentrations found in surface water and 1,4-dichlorobenzene was also identified in ground water above the primary MCL as well as metals such as total chromium, manganese, and iron in groundwater exceeding primary or secondary MCLs which were above background levels and/or not considered naturally occurring, and therefore are considered to be a threat to water quality.

(93 correspondence, Image 36)

A January 7, 1994 County letter to the Regional board reported the analytical

results from ground water samples recovered on November 29 and December 1, 1993 as follows:

MW#2, MTBE @ 13 ppb and 1,4-Dichlorobenzene @ 0.9 ppb

MW#4, cis-1,2-Dichloroethene @ 5.6 ppb, 1,2- Dichlorobenzene @ 0.6 ppb, 1,4-Dichlorobenzene @ 3.7 ppb, MTBE @ 25 ppb and Trichloroethene (TCE) was detected at 0.6 ppb.

No verification as to what point sources of aforementioned contamination in groundwater has been provided.

(94 Correspondence.tif, Image 1)

A March 21, 1994 internal office memo admits that all of their testing for chromium had not including the specification of Hexavalent Chromium from total chromium. Hexavalent chromium had been as high as 0.15 ppm in MW#4 on January 19, 1991 and as high as high as 0.23 ppm in MW#3 on October 27, 1988.

(94 Correspondence.tif, Images 9, 10 , 2 & 3)

A May 4, 1994, Regional board letter to the County reported the following chemicals identified in groundwater and stated that this is indicative of a release:

Compound	MW#2	MW#3	MW#4	MW#10
1, 4-Dichlorobenzene	1.3			5.4
Methyl-butyl Ether	9.3			15.0
1, 2-Dichlorobenzene			0.5	
cis-1, 2 Dichloroethene	0.5			4.8
Trichloroethane		0.5		
Benzene	0.9			
Toluene	0.6			

No verification as to what point sources of aforementioned contamination in groundwater has been provided.

(94 Correspondence.tif, Image 7)

A May 20, 1994 Regional board letter to the County stated that the existing extraction trench was only good for "containing" contamination, but was not acceptable for corrective action and that since the contaminant releases were on-going, more aggressive source control efforts are needed.

(94 Correspondence.tif, Images 13 and 14)

In a July 14, 1994 EMCON letter to the its client, the County, they state, "The

presence of MTBE is somewhat odd at a landfill. MTBE is a compound used as a gasoline additive. We typically find it along with BTEX compounds at our LUFF projects, but not at landfills. Since it has not been consistently present in MW-4 several potential sources are possible. Gasoline may have been recently spilled at the equipment service area or during the construction of the collection trench.....MTBE should be evaluated since it is inconsistent with typical landfill impacts." No effort has been made to define the source of MTBE at the landfill.

(94 Correspondence.tif, Images 30 thru 33)

A February 1, 1996 County letter to the Regional board reports that the December 11, 1995, fourth quarter sampling event, had the following compounds identified in groundwater monitoring wells:

1) LCRS @ Tank

chlorobenzene @ 1.1 ppb  
 chlorodifluoromethane @ 5 ppb  
 fluorotrimethylsilane @ 13 ppb  
 trimethylsilane (2-methoxyethyl) @ 1 ppb

2) MW#2

chlorodifluoromethane @ 4 ppb  
 fluorotrimethylsilane @ 2 ppb

3) MW#3

chlorodifluoromethane @ 3 ppb  
 fluorotrimethylsilane @ 1 ppb

4) MW#4

vinyl chloride @ 0.54 ppb  
 trans-1,2-dichloroethene @ 0.69 ppb  
 1,1-dichloroethane @ 0.7 ppb  
 chlorodifluoromethane @ 6 ppb  
 fluorotrimethylsilane @ 9 ppb  
 2-methylbutane @ 1 ppb  
 methoxytrimethylsilane @ ? Ppb

5) MW#12 - unknown hydrocarbon @ 5 ppb

No verification as to what point sources of the aforementioned contamination in groundwater has been provided.

(96 Correspondence.tif, Image 4)

A October 15, 1996 County letter to the Regional board reports that the September 20 & 23, 1996, third quarter sampling event, had the following compounds identified in groundwater monitoring wells:

- 1) methoxytrimethylsilane in MW#2 @ 9 ppb, MW#3 @ 10 ppb, MW#4 @ 12 ppb, MW#10 @ 6 ppb, MW#12 @ 16 ppb and MW#15 @ 18 ppb
- 2) trimethylsilanol in MW#2 @ 16 ppb, MW#3 @ 20 ppb, MW#4 @ 29 ppb, MW#10 @ 74 ppb MW#12 @ 36 ppb, MW#14 37 ppb and MW#15 39 ppb
- 3) fluorotrimethylsilane in MW#2 @ 8 ppb, MW#14 @ 16 ppb and MW#15 34 ppb.
- 4) benzene in MW#10 @ 0.7 ppb
- 5) cis-1,2-dichloroethene @ 0.6 ppb

No verification as to what point sources of aforementioned contamination in groundwater has been provided.

(96 Correspondence.tif, Image 18)

A July 8, 1997 (incorrect letter date July 8, 1996) County letter to the Regional board reports that the June 23 & 24, 1997, second quarter sampling event, had the following compounds identified in groundwater monitoring wells:

- 1) methoxytrimethylsilane in MW#10 @ 9.1 ppb, MW#12 @ 5.1 ppb;
- 2) trimethylsilanol in MW#10 @ 150 ppb;
- 3) fluorotrimethylsilane in MW#15 @ 11 ppb
- 4) benzene in MW#10 @ 0.79 ppb
- 5) 1,2,4- trimethylbenzene in MW#15 @ 0.77 ppb

No verification as to what point sources of aforementioned contamination in groundwater has been provided.

(97 Correspondence.tif, Image 17)

A July 21, 1997, semi-annual, winter/spring 1997, MONITORING AND REPORTING PROGRAM NO. 93-69 report identified the following chemicals in the GLCRS on March 18, 1997.

- (1) cis-1,2--dichloroethylene @ 1.0 ug/1,
- (2) 1,4-dichlorobenzene @ 1.3 ppb

and the following chemicals were identified in the GLCRS on June 23, 1997.

- (1) cis-1,2-dichloroethylene @ 1.6 ppb
- (2) 1,2-dichlorobenzene @ 0.64 ppb
- (3) 1,4-dichlorobenzene @ 2.6 ppb
- (4) chlorobenzene @ 1.0 ppb
- (5) benzene @ 0.61 ppb
- (6) MTBE @ 40 ppb
- (7) trimethylsilanol @ 23 ppb

No verification as to what point sources of aforementioned contamination in groundwater has been provided.

(97 Correspondence.tif, Image 18)

An October 8, 1997 County letter to the Regional board reports that the September 15 & 16, 1997, third quarter sampling event, had the following compounds identified in groundwater monitoring wells:

- 1) fluorotrimethylsilane in MW#3 @ 12 ppb, MW#14 @ 5.3 ppb and MW#15 @ 65 ppb
- 2) trimethylsilanol in MW#3 @ 17 ppb, MW#10 @ 150 ppb, MW#13 @ 58 ppb and MW#14 @ 16 ppb
- 3) methoxytrimethylsilane in MW#10 @ 9.1 ppb, MW#12 @ 5.1 ppb and MW#13 @

21 ppb

- 4) benzothiazole in MW#3 @ 10 ppb
- 5) benzene in MW#10 @ 0.79 ug/l; and
- 6) chlorobenzene in MW#15 @ 14 ppb

No explanation has been provided as to the sources of this contamination in groundwater.

(97 Correspondence.tif, Image 15)

2-31 A May 5, 1998 Regional Board letter to Santa Barbara County Public Works required that a subsurface investigation must be performed to determine whether the Landfill is or will be within five feet of underlying groundwater and that investigation of the buried alluvial zone of Pila Creek should be performed as well. This has not been addressed. In addition, the Board recommended further subsurface investigation of the possible VOC contaminant source(s) prior to liner installation and that a subsurface investigation of whether or not a more concentrated plume of leachate exists under the western edge and toe of the landfill to determine if the leachate is mixing with clean groundwater prior to entering the extraction trench. This has not been addressed either.

(98 Correspondence.tif, Images 64 thru 66)

2-32 A May 29, 1998, written notice documented two releases of leachate from a drain pipe from Landfill's leachate collection system and from an abandoned culvert at the south end of the waste mass was discharging approximately ten gallons per hour of contaminated water to Pila creek. Although the drain piping for the leachate system has been replaced and the culvert drain has been contained by interception and pumping to existing storage tanks, a long term solution for a long-term solution for the culvert has not been pursued.

(98 Correspondence.tif, Images 90 thru 92)

2-33 A June 19, 1998 Regional Board letter to Santa Barbara County Public Works issued a NOTICE OF VIOLATION regarding violation of Specification B.5 of Waste Discharge Requirements Order No. 93-69. Specifically, three instances were outlined as follows:

- 1) On December 9, 1997, Board staff inspected the Landfill and issued a Notice to Comply with Minor Violations based on drainage system problems (a violation of Discharge Specification B.33).

- 2) In a January 20, 1998, letter the Discharger informed the Board that leachate collection system piping had failed and a discharge of leachate occurred.

- 3) In a February 27, 1998, letter the Discharger informed the Board that the Leachate Collection System trench (Cutoff Trench) had overflowed and discharged to Pila Creek. The Discharger indicated the collection trench would be pumped and collected water would be used to wash down the wet weather disposal deck or discharged directly to the southern most in-creek sedimentation basin.

2-34 Additionally neighbors in vicinity of the Landfill registered numerous complaints, accompanied by photographic evidence, regarding excessive sedimentation and litter entrained in surface water discharge from the Landfill. A formal complaint and presentation to the Board was made at the January 30, 1998 Board meeting and followed up with an agendized item at the April 3, 1998 Board meeting in San Luis Obispo.

(98 Correspondence.tif, Images 70 thru 74)

2-35 A June 29, 1998, Regional Board Interoffice Memo regarding a Complaint/Impact Investigation Staff Report as per Board Order No. 93-69, stated that the landfill operators failed to heed the Board's October 21, 1997 letter specifically warning landfills to be prepared for the El Nino induced precipitation and that some advice on what additional measures should be implemented was also provided. It also states that Mercury and Arsenic were identified in Pila Creek, that mercury exceeded Ocean Plan standards on January 29, 1998, and that the source of these heavy metals had not been determined. This issue has still not been resolved. Furthermore, although the Monitoring and Reporting Program required the Landfill staff to perform regular onsite inspections to check for any compliance concerns, Staffs review of the Landfill's Fourth Quarter Monitoring Report indicated that problems with wet weather were not reported, except for a brief mention of recent precipitation levels. Also, many problems which did not occur on scheduled days of inspection were not reported either. An example is the fact that Pila Creek had sporadically contained trash and high levels of sediment which was not reported in recent monitoring reports. The internal memo also mentioned that Landfill's staff do not appear to be passed on Board staff's concerns to the Landfill's managers and that written communication in the form of Notices to Comply and notices of violation as well as other appropriate enforcement actions appear necessary to ensure that Landfill management acknowledges receipt of documentation of identified problems.

(98 Correspondence.tif, Images 76 thru 82)

A September 16, 1998, Regional Board comments on the August 12, 1998 Trench Water Management Plan which disagreed with the County's statement that, "... some of the steps necessary to implement the Proposed Trench System Plan are beyond the control of the County." The Board also stated that the County's Plan lacked information regarding expected flow rates from the system during wet weather. Specifically, the Board pointed out that their interim plan for spray application of the collected liquid directly to an area on the western ridge line failed. Using direct application to land as a primary means of for applying thousands of gallons of water to already wet slopes may present stability problems, that concentrations of metals may accumulate in the area of the spray field, that soil samples should be collected and analyzed, that the proposed monitoring of runoff from the area did not specify what was going to be monitored, that no criteria had been proposed as to how data collected would be evaluated, and that no contingency plan had been made to establish their course of action if impacts from the spray field are detected.

(98 Correspondence.tif, Images 122 and 123)

An August 27, 1999 Regional Board letter to Santa Barbara County Public Works stated that control of storm water discharge as required in the Board's Notice of Violation issued on June 19, 1998 had still not been completed after more than one year and that the Board may implement formal enforcement actions. The Board further stated that the County do not have adequate ability to control sediment-laden runoff or other unforeseen releases of waste from the landfill.

(99 Correspondence.tif, Image 77 thru 79)

**RECOMMENDATIONS**

The following measures are necessary to ascertain the potential for impacts to water quality and to determine the need for additional feasible corrective actions and mitigation measures to reduce such impacts.

- 1) Define the contacts between the existing landfill mass and all man-made conduits, all discernable artificial fill, disturbed soils, and formations through field subsurface investigation. This will reveal conduits for the migration of landfill contaminants to surface water and groundwater. All subsurface investigation should be conducted through a conductor casing. A structure contour map of the bottom of the landfill relative to GW table contour map should be produced to provide crosssection of the bottom of the landfill relative to the water table. Engeneering designs must be developed and implemented for the purpose of

preventing the high water table from intersecting the landfill mass.

Maps and crossection of the bottm of the

- 2) Provide a detailed study of the faults at the site evaluating the potential impact on the existing landfill and on the proposed landfill expansion.

- 3) Special attention needs to be given to all potential point sources. A historical environmental audit of the types of waste that may have been placed in the landfill may yield specific point source locations of gasoline and solvent related constituents within the landfill to be investigated. The landfill operator has 90 days to perform subsurface investigations to define the point sources of all releases as well as the characteristics of all constituents of concern after a release has been confirmed (Article 4, §20425. (b) & (e)). The VOCs identified in groundwater are from unauthorized release(s) from point sources(s) which have not been delineated.

- 4) Establish a groundwater monitoring well network curtain between the landfill waste and the Arroyo Quemada Community which intercepts all subsurface conduits that may exist between the source and the receptor.

- 5) Perform a water budget for each individual water body and each hydrostratigraphic unit as well as for the whole watershed.

- 6) Analyze the collection trench's effectiveness. The water balance must include a determination as to how much water is used for irrigation, what types of earth materials are undergoing irrigation, all methods of distribution and application of irrigation water, and where and when the irrigation is performed.

- 7) Perform a subsurface investigation which isolates all discrete water flow regimes from the landfill mass through the alluvium and beyond the interceptor trench as well as for the portion of the groundwater flow within the Vaqueros Formation which allegedly flows eastward and may discharge to the Arroyo Quemado alluvium. Geophysical methods like areal and vertical temperature surveys can be effective for this purpose. After these hydrogeological flow regimes have been defined through subsurface investigations, their characteristics should be evaluated by fate and transport modeling.

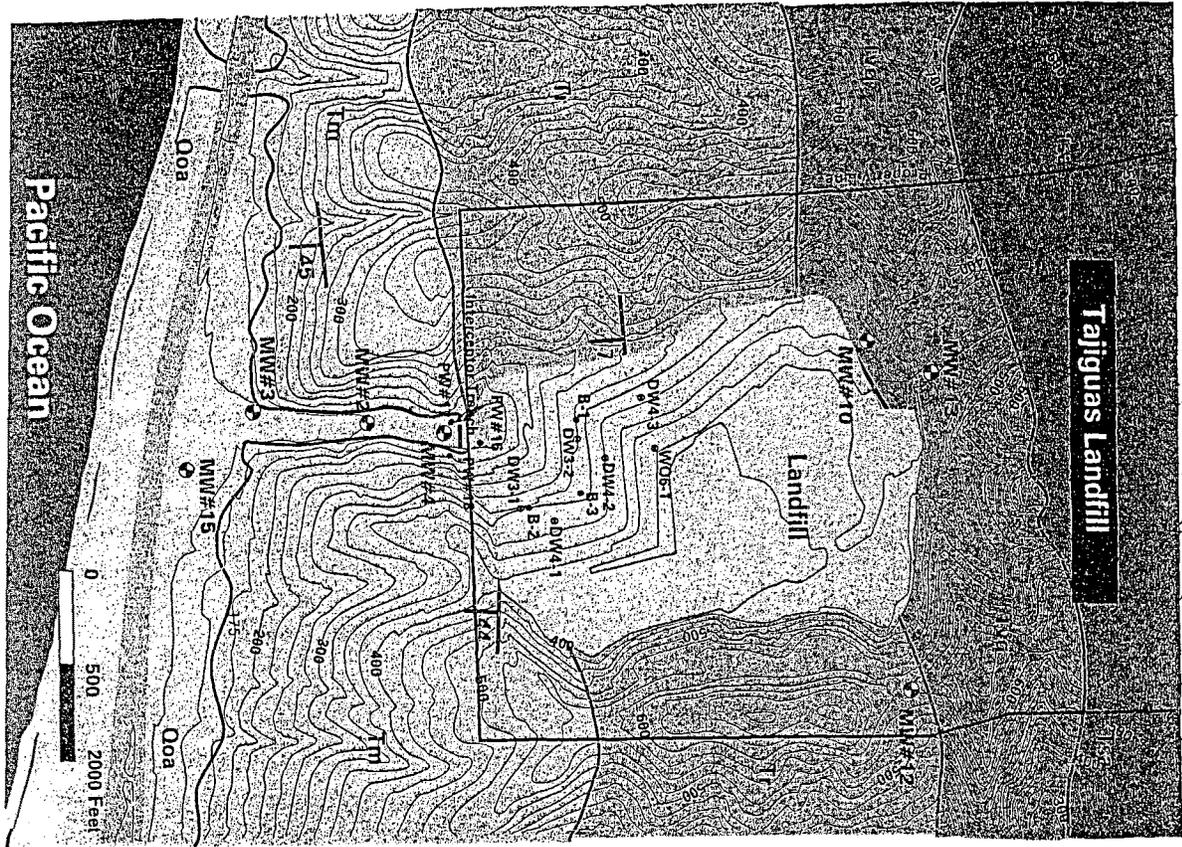
- 8) Collect continuous information on the water flow through the culvert systems including the total amount of water discharged at the surface water discharge point. Hydrographs and flow recorders will be suitable.

2-46 9) Provide a complete historical record with graphical descriptions in plan view and cross section of the evolution of the existing landfill waste mass relative to surrounding materials. Utilize past air photos, grading plans, geotechnical reports, etc.

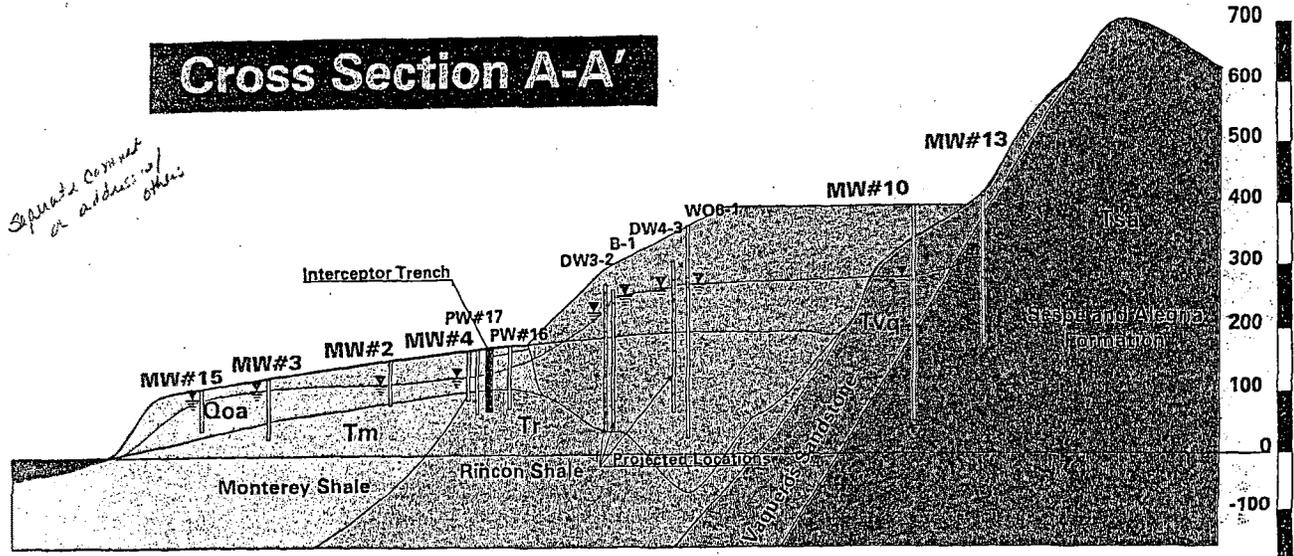
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2



### Cross Section A-A'



*Spreads cannot  
or address of  
other*

**Quaternary alluvial deposits (Qoa) –** Unconsolidated loamy clay, silt, sand, and gravel.

**Monterey Formation (Tm) –** Aquifer. Upper Miocene, consisting of buff-white, thickly bedded, highly fractured, siliceous marine shale (claystone and siltstone, with some minor carbonate and tuff interbeds). The claystone is slightly to moderately fractured, and deeply weathered to a depth of approximately 28 feet below ground surface (bgs).

**Rincon Formation (Tr) –** A lower Miocene marine deposit comprised of grayish-brown, thin to poorly bedded marine siltstone and claystone. They weather to an expansive clay soil. The weathered zone reaches thicknesses of 15-20 ft in some locations. The unweathered Rincon is mainly massive, but zones of intensely fractured rock have been observed. The stratigraphic thickness of the Rincon is approximately 1,470 feet at the site. The Rincon Formation is considered relatively impermeable although locally it provides small quantities of water due to the secondary (fracture) porosity.

**Vaqueros Formation (Tvq) –** Aquifer. Lower Miocene, consisting of medium to coarse-grained, friable to hard, cross-bedded, massive sandstone. Soil weathered from the Vaqueros Formation is described as well-graded silty sand. The stratigraphic thickness of the Vaqueros Formation is approximately 670 feet at the site. The Vaqueros is the principal water-bearing formation in the region. It yields small to moderate quantities of water to wells.

**Sespe and Alegria Formations (Tsa) –** Aquifer. The stratigraphic thickness of this unit is 1,665 feet at the site. The Sespe Formation is comprised of massive medium-grained sandstones interbedded with siltstones. The Alegria Formation consists of massive sandstones. The Sandstones are moderately to well-cemented and locally form prominent ridges. The Sespe and Alegria Formations are aquifers in the region that also yield small to moderate quantities of water.

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**BEFORE THE CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD**

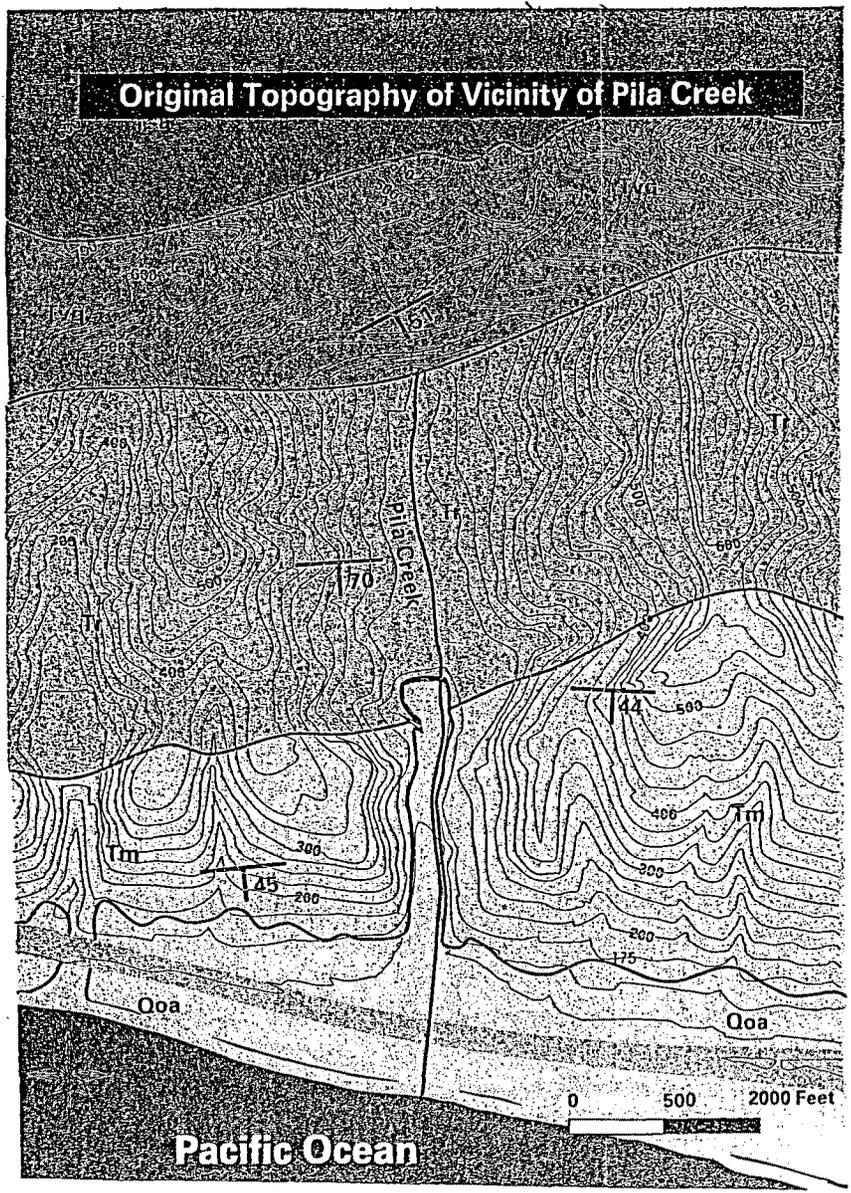
IN THE MATTER OF:

THE SOLID WASTE FACILITY PERMIT  
REVISION OF TAJIGUAS LANDFILL,  
SWIS #42-AA-0015

**DECLARATION OF FORMER  
LANDFILL MANAGER BOB CADY  
REGARDING WATER INFILTRA-  
TION OF TAJIGUAS LANDFILL**

BOB CADY, declares:

1. I am a resident of Santa Barbara County, California. I am retired from employment with the County of Santa Barbara. While employed by the County of Santa Barbara, I served as manager of the Tajiguas Landfill since its first days of operation in 1967. I have personal knowledge of the matters stated herein and, if called as a witness, could and would testify competently thereto.
2. At the time when the Tajiguas Landfill was first operated in 1967, a natural stream flowed from the upper canyon to the lower canyon, where waste was begun to be dumped.
3. Because the stream interfered with the dumping of waste at the site, it was re-channeled to the east side of the canyon in the first few years of landfill operation.
4. When the new channel for the creek was cut, it was required that the east slope of the landfill canyon be exposed by heavy equipment. I personally supervised and observed this activity.



1 5. The artificial creek channel ran the entire length of the canyon where waste now fills. The  
 2 channel was 12-foot wide (the width of a dozer cut) and approximately five-feet deep.  
 3 6. At that time and since beginning operations at the landfill, I personally observed water con-  
 4 sistently flowing in large quantities from natural springs along the east side of the landfill  
 5 canyon, where the artificial channel was cut.  
 6 7. Several years later, because of continued waste landfilling up the canyon, it was required that  
 7 the natural creek through the canyon be diverted around the canyon from the top of the canyon.  
 8 8. Under my supervision, the artificial channel, which had served as the stream channel, was  
 9 filled with demolition material. This material was loose and much of it was composed of  
 10 concrete rubble.  
 11 9. I personally observed the filled artificial channel collecting water from the natural springs  
 12 along the east side of the canyon. The filled-in channel served to conduct water the length of the  
 13 canyon, functioning much like a large "French drain."  
 14 10. I also observed water from above the canyon draining into the artificial channel, adding to  
 15 the volume of water which flowed through it. The flow of water continued through the channel  
 16 even as waste was dumped on the location and covered the channel.  
 17 11. It is my observation that water continues to percolate from the sides of the canyon and from  
 18 above the canyon into the mass of waste below.  
 19 12. I personally supervised construction of the earthen toe at the southern foot of the landfill.  
 20 The earthen toe served to hold the waste as it was originally placed at the southern base of the  
 21 canyon.  
 22 13. I have reviewed the benchfill proposal which is the basis for the permit revision issued by the  
 23 Santa Barbara County local enforcement agency. The benchfill proposal would remove earth  
 24 from the base of the landfill.  
 25 14. The removal of the earth from the toe of the landfill will seriously compromise the stability  
 26 of the landfill mass at the base of this mass.  
 27 15. I personally observed water from underneath the landfill, coming from the former artificial  
 28 channel and its overflow, into the waste at the base of the landfill, behind the landfill's earthen  
 29

1 toe. The presence of this water continued throughout the time of my supervision of the landfill. It  
 2 required regular pumping to remove.  
 3 16. The benchfill proposal would remove earth from the earth berms which were used to form  
 4 the existing benches of the original landfill. I personally supervised the construction of the  
 5 original benches.  
 6 17. Because of water saturation through the landfill from the natural springs, carried by the  
 7 artificial channel and by natural courseways, any activity— such as that planned for the benchfill  
 8 proposal— which would remove any portion of the existing berms, would diminish their  
 9 effectiveness at retaining the waste behind them.  
 10 18. During my supervision of the landfill, I observed the failure of the methods used to collect  
 11 and divert water around the landfill. In particular, I observed the collapse of the 48-inch  
 12 corrugated pipe used to convey stormwater around the west side of the landfill canyon.  
 13 Furthermore, the collection ponds continually collected sediment which displaced water, adding  
 14 to the failure of the system to drain and contain water at the head of the canyon.  
 15 19. I have repeatedly informed County officials of these problems throughout the years of my  
 16 knowledge of these problems.

17  
 18 I declare under penalty of perjury that the foregoing is true and correct.

19  
 20 Dated:  
 21 Santa Barbara, California

By: Original Signed  
 Bob Cady

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**Bacteria in the Tajiguas Landfill drain system entering into Pila Creek.  
(Averages for the year 2000, Santa Barbara County Figures)**

	State Standard/limits	
Total Coliform:	73,603	10,000
Fecal Coliform:	3,299	400
Enterococcus:	4,436	100

Units: Most probable number of bacteria per milliliter of sample water.

**On January 16, 2001 the Tajiguas Landfill groundwater was tested.  
The results show extreme levels of pollution.**

	Culvert	Trench Water (ground water)	Pila Creek at RR tracks	State Standard/limits
Total Coliform:	76	1,150	345	10,000
Fecal Coliform:	3,768	240,192	24,192	400
Enterococcus:	36	16,106	72	100

Units: All measurements are in Mpn/100ml

**Document 2**  
**GeoSolv, LLC**  
**December 12, 2001**  
**Response to Comments**

The County encourages public comment on the Draft EIR and understands that the document is complex and contains a large volume of technical information. The GeoSolv report is submitted under the seal of a California Registered Geologist and Certified Hydrogeologist.

The vast majority of the GeoSolv comments relate to the existing landfill and not to the proposed project. Although it could be argued that many of these comments are irrelevant to the EIR, detailed point-by-point responses to the GeoSolv report are included to correct errors and/or provide clarification under the headings corresponding to numbered comments below.

In responding to the serious nature of the statements and conclusions contained within the GeoSolv report, the County has expended significant time and effort by professionally certified staff and experts to provide a comprehensive review of the report. The GeoSolv report was reviewed by Engineering Geologist Brian Baca (RG, CEG, CHG) of Santa Barbara County Planning and Development. Mr. Baca's comments on the GeoSolv report are consistent with the evaluation and findings of Draft EIR Section 3.2. The report lacks the depth and detail necessary to support its statements and conclusions, and the deficiencies of this report are so great that the fundamental aspects of geology and hydrology are misrepresented and could lead the non-professional reader to mistakenly rely upon the contents of the GeoSolv report as a credible source of information about the Tajiguas Landfill.

Response 2-1

No response needed. This is a statement consistent with descriptive information presented in the Draft EIR and supporting documents.

Response 2-2

See Response 1-6.

Response 2-3

Reports cited in the References section of this comment indicate that the fractured nature of the Rincon Formation bedrock does not indicate that it is highly permeable. Dames & Moore (1989) conducted field permeability tests and reported measured permeability values for weathered and unweathered Rincon Formation bedrock that was frequently observed in detailed boring logs to be fractured. Weathered Rincon permeabilities ranged from  $7.7 \times 10^{-6}$  to  $9.7 \times 10^{-6}$  centimeters (cm)/second. Unweathered Rincon measured permeabilities were considerably lower, ranging from  $9.7 \times 10^{-8}$  to  $7.7 \times 10^{-9}$  cm/second. Several borings into unweathered Rincon reported "no take" for permeability, indicating permeability so low it was not measurable. For comparison, permeability of  $1 \times 10^{-7}$  cm/second or less is considered suitable for clay liner material for landfill design. Because of the relatively lower permeability of unweathered Rincon Formation bedrock, the collection trench for the groundwater leachate collection and recovery system (GLCRS) was designed and constructed to penetrate through the weathered zone, into the unweathered bedrock. These data do not support the comment that this

fractured bedrock can be "very permeable" and allow contaminated underflow to bypass the trench. Conversely, both the subsurface investigation data and groundwater monitoring results indicate that the unweathered Rincon Formation is practically impermeable, even where it is fractured.

See Response 1-3.

#### Response 2-4

Similar to the above (Response 2-3), reports cited in the References section of the GeoSolv report indicate that the material on either side of the interceptor trench is not a permeable migratory pathway allowing contaminants to bypass the GLCRS. Dames & Moore (1989) conducted a subsurface investigation and prepared Cross-Section A-A' on Plate 2, showing geologic materials along the alignment of the trench. Presumably, it is scaled from the referenced Tajiguas Landfill map included in the GeoSolv report, although some of the information contained in the map appears to be in error. In any event, the data do not support a conclusion that this soil is "permeable alluvium" or that it represents a "migratory pathway." Dames & Moore (1989) shows the soils exposed on either side of the trench to be low-permeability colluvium and fill, both composed of clayey soils with an estimated permeability of  $5 \times 10^{-7}$  cm/sec. Also, the areas of soils on either side of the trench are shown by Dames & Moore (1989) to be above the water table, therefore not a potential groundwater migration pathway. Further, under existing conditions (gaining stream), groundwater would flow along the surface or through the alluvium to the GLCRS trench.

#### Response 2-5

The potential impact ("threat") of the Tajiguas Landfill (Landfill) to local groundwater resources is constantly evaluated through the groundwater monitoring network. As described in Response 1-1, this network has been developed in coordination with the RWQCB and is located in the optimal locations for assessing potential impacts, based on the observed groundwater gradients at the site. The monitoring network includes wells downgradient of the Landfill within both the Monterey Formation and the alluvium. Thus, the network is adequate to identify potential impacts that may affect Arroyo Quemada. This conclusion is also supported in a 1998 study of the landfill groundwater issues prepared by Dr. Arturo Keller, a nationally recognized expert in groundwater contamination, and professor at the Bren School of Environmental Science and Management at the University of California, Santa Barbara (Keller, 1998). Dr. Keller concluded that there is no need for concern with respect to the groundwater issues present at the Landfill, either currently or as a result of the proposed expansion of the landfill, as long as the current monitoring plan is maintained and the current corrective action plan is followed.

The commenter is correct that, from a regulatory perspective, the Rincon Formation has potential beneficial uses, including use as a potential drinking water source. However, the extremely low permeability of the unit (see Response 1-3) and high concentrations of dissolved minerals does not allow production of a sufficient quantity or quality of water to serve as a domestic or other resource. In fact, this is the reason the Landfill was sited to overlie the Rincon Formation. The naturally low permeability of the unit minimizes the potential for impacts to local usable groundwater resources.

#### Response 2-6

Boring logs for the monitoring wells downgradient from the Landfill indicate that these wells are not "founded in colluvium" as stated in this comment. Wells MW-2, MW-4, and MW-15 are completed in alluvium. Wells MW-3 and MW-14 are completed in Monterey Formation shale bedrock. The screened depths of the monitoring wells are adequate to detect potential contaminants. These wells are part of the regular landfill groundwater monitoring system developed in coordination with the RWQCB. There also are additional wells in the vicinity downgradient from the Landfill that, although not part of the regular monitoring program, have been occasionally monitored. Monitoring data from these wells support the interpretations of groundwater conditions in the Landfill vicinity and indicate that the existing monitoring wells are adequate, and contaminants are not leaving the site.

Furthermore, the hydraulic gradient measured in the Pila Creek canyon area immediately downstream from the GLCRS shows a groundwater gradient from both sides of the canyon toward the creek. This confirms that wells located along the creek channel are appropriately located to monitor groundwater quality effects downstream from the landfill and to monitor the effectiveness of the GLCRS (County of Santa Barbara 2002b, Semi-Annual Water Quality Monitoring Report).

The effectiveness of the GLCRS is demonstrated by both the results of groundwater monitoring (see Response 2-1) and the hydraulic gradients that indicate the GLCRS and the monitoring well network are properly located within the preferential flow path downgradient from the landfill (see Figure 3.3-3a in Final EIR Section 4.4).

#### Response 2-7

In referring to the series of sedimentation basins and existing west culvert system, the commenter's statement that "This surface-water diversion system was not installed until the *landfill had been raised about 25 feet above the streambed.*" is misleading, as it implies that surface water in Pila Creek had not been properly managed up to that point. In fact, surface water in Pila Creek has been actively managed to accommodate Landfill activities since site development commenced during the 1960s. The overall goal of the surface water management activities was to control and route surface water drainage away from the Landfill area. The history of these surface water management activities is summarized in detail in Section 3 and in Appendices A and B of the Hydrologic Investigations technical report prepared by Arcadis, Geraghty & Miller (2001b) and included as a technical study to the Draft EIR. The reader is referred to this document to obtain a detailed understanding of historical surface water management activities at the Landfill.

Landfill best management practices (BMPs) call for minimizing areas of active waste disposal to the extent practicable at all times, and wet weather preparedness activities call for waste placement to be limited to areas where stormwater run-on and runoff are most easily managed. Stormwater is directed away from active waste disposal areas by means of diversion berms, and direct precipitation on active waste placement areas is limited by the use of tarps, where and when possible. Jointly, landfill BMPs act to minimize stormwater contact with waste materials at the Landfill, resulting in decreased potential for surface water to become contaminated by

contact with Landfill waste except for limited periods of time during rare, unforeseen precipitation events.

Monitoring of surface water quality at the Landfill is conducted on a regular basis in accordance with two programs administered by the RWQCB, including the Landfill's General Industrial National Pollution Discharge Elimination System (NPDES) Permit and the Monitoring and Reporting Program (M&RP 93-69). These programs require monitoring for a wide variety of physical and chemical parameters in surface water, including petroleum hydrocarbons, volatile organic chemicals and heavy metals. Monitoring is conducted at least six times a year (twice for NPDES and four times for M&RP) at a total of four locations along the course of Pila Creek. Sampling stations include locations situated both upstream and downstream of the Landfill area. The nature and scope of these monitoring programs are discussed in detail in Section 3.3.2.2.4 of the Draft EIR and in Section 3.2 of the surface water resources technical report (URS, 2001a).

#### Response 2-8

This is a statement extracted directly from page 4 of the Surface Water Technical Report and, therefore, does not require a response.

#### Response 2-9

Most of the water collected by the GLCRS trench is groundwater underflow. Water also is collected in French drains located along bench 2 of the Landfill and along the access road. This water is discharged daily into the GLCRS. During storm events, surface runoff enters the GLCRS by this route. Water collected from three horizontal wells draining the lower bench of the Landfill (HWDS) is collected in a separate system and does not enter the GLCRS. The lined area of the southeast part of the Landfill is drained by a liner leachate collection and recovery system (LLCRS) that also is collected in a separate storage system. Detailed discussion of the GLCRS is provided in Response 1-7.

#### Response 2-10

See Responses 1-1, 1-7 and 3-24 for a discussion of saturated wastes, the GLCRS and groundwater monitoring.

In the GeoSolv Report, it is suggested that an estimate of "the volume of water contaminated by the landfill mass, escaping the collection trench" can be made by relating three factors:

- An estimate of long-term average annual runoff (46 acre-feet per year [AFY] or 14,988,125 gallons per year).
- The average volume of water collected in the GLCRS trench (1,517,824 gallons per year).
- Actual measurements of surface water runoff on the site.

The analysis and data collection effort suggested by GeoSolv is without merit. An accurate periodic record of both runoff leaving the landfill site and the volume of water recovered from the GLCRS trench would not provide any information about potential groundwater flow bypassing the GLCRS collection trench. For example, measurements of surface runoff in any of the canyons on the Gaviota Coast would provide no information on the rate of groundwater flow through the alluvium deposited in the canyon bottom. The rate of groundwater flow through the

alluvial deposit is related to the hydraulic conductivity of the flow medium, the groundwater gradient and the geometry (cross sectional area) of the alluvial aquifer. It is not dependent on the volume of surface water that flows over the surface of the ground above the aquifer. In the specific case of Cañada de la Pila, measurements of surface runoff would provide no information on the rate of groundwater flow within the alluvial aquifer, with or without existence of the GLCRS trench (Baca, 2002a).

Surface water runoff data would show a correlation with the volume of water that flows to the trench. As acknowledged in Draft EIR Section 3.3, some surface water currently flows directly into the trench. In addition to higher surface water flow, periods of high rainfall would result in more recharge to up gradient aquifers (e.g., Vaqueros Formation). The additional recharge would raise water levels and increase groundwater discharge to the alluvial aquifer within which the GLCRS trench is located (Baca, 2002a).

The GLCRS trench may not intercept all of the groundwater underflow of Cañada de la Pila. Therefore, the most meaningful way to demonstrate that the GLCRS is performing sufficiently to protect groundwater quality downstream from the Landfill is through groundwater quality monitoring. This has been done over the years through a monitoring system developed in coordination with the RWQCB in accordance with state and federal technical standards and requirements. The effectiveness of the GLCRS system is described on Draft EIR pages 3.3-42 and 3.3-43 and in Response 1-7.

#### Response 2-11

The current monitoring system consists of a selected set of wells that would detect groundwater contaminants that may bypass the GLCRS. The monitoring system complies with the Monitoring and Reporting Program of Waste Discharge Requirements No. 93-69 and applicable regulations. The monitoring system is adequate for purposes of monitoring groundwater quality downgradient from the Landfill.

See Responses 1-1, 1-6, 2-3, 2-4 and 2-6.

#### Response 2-12a

The presence of springs described in the Cady Declaration is addressed in Response 1-8 and discussed generally in Response 1-1.

#### Response 2-12b

See Responses 1-1, 1-3 and 1-6.

The requirements referred to in this comment will be met in preparation of a Joint Technical Document (JTD) for the proposed expansion. Should the proposed expansion of the Landfill be approved, a JTD will be prepared. The JTD is part of the permit application for the revised Waste Discharge Requirements (WDRs) issued by the RWQCB and the Solid Waste Facility Permit issued by the CIWMB. The Draft EIR discusses potential impacts to surface water and groundwater in Sections 3.3.3.1 and 3.3.3.2, respectively.

#### Response 2-12c

See Responses 1-1, 1-3 and 1-6. Also, as described in Responses 1-7 and 2-4, material on either side of the GLCRS does not have high permeability and, therefore, does not represent a significant migratory pathway allowing contaminants to bypass the GLCRS. Review of the construction details for the GLCRS indicates that the trench intercepts all saturated material above the unweathered Rincon Formation across the canyon floor. The downgradient monitoring network is designed to assess groundwater quality in both the alluvium and Monterey Formation bedrock (see Responses 2-5, 2-6) south of the GLCRS. Additional wells along the GLCRS will not improve the efficacy of the monitoring network.

#### Response 2-13a

The monitoring of water elevations and water quality sampling in the Vaqueros Formation, which is described in the Draft EIR and supporting documents cited in this comment, is sufficient (see Responses 1-1 and 1-6). There is no indication of a need for corrective action.

The hypothetical flow of groundwater eastward toward the Arroyo Quemado watershed is based on the interpretation of a hydraulic gradient that includes two wells (MW-10 and MW-13) that show elevated water levels due to their proximity to the sedimentation basin in the former Pila Creek channel, and one well (MW-15) that is completed in a deeper zone of the Vaqueros Formation, with a lower measured groundwater elevation. The resulting apparent groundwater gradient suggests an eastward flow direction, although it is not likely that the actual flow would cross the natural divide between the two watersheds. East of the ridgeline that separates Cañada de la Pila from Arroyo Quemado, however, groundwater in the Vaqueros Formation would be expected to flow toward and discharge into Arroyo Quemado Creek. If contaminants from the Landfill were to be released in this area (current monitoring data indicate no such release), then MW-12 is perfectly positioned to detect them before there would be any contaminant migration that might affect Arroyo Quemado. Well MW-10 would similarly detect any release or flow toward the west. A revised and updated groundwater elevation contour map is included as Figure 3.3-3a in Final EIR Section 4.4.

#### Response 2-13b

The potential transport of bacteria in surface water and groundwater is addressed in both the Draft EIR and URS, 2001a and b, which are referred to in this comment. The comment that the Draft EIR does not address the possible relation between water in the Landfill waste and Arroyo Quemado beach addressed in the excerpt from the Draft EIR included with the comment: "The current evaluation of indicator bacteria focuses on conditions in Pila Creek, the ocean fronting Pila Creek, and a possible relationship between landfill activities and high indicator levels at Arroyo Quemado." A subsurface (groundwater) route of bacteria transport is not present based on the results of repeated sampling results, which show no significant bacteria concentrations in samples of groundwater monitoring wells, private wells and landfill leachate. The commenter does not identify a pathway through which subsurface flow would deliver bacteria to the beach.

See related Responses 1-9 and 1-10.

#### Response 2-13c

Contrary to what is implied in this comment, there is no evidence to show there are surface water pathways from the Landfill to the beach at Arroyo Quemada. The Pila Creek watershed and the Arroyo Quemado watershed are separate and discrete physiographic features. Surface waters in these watersheds do not commingle.

Elevated bacteria levels are known to be present at times in both the Pila Creek and Arroyo Quemado watersheds. These data are discussed at length in Section 3.3.2 of the Surface Water Resources Technical Report (URS, 2001a).

The Bacteria Source Study for the Lower Arroyo Quemado Watershed (URS, 2001b) focused exclusively upon identifying which species may be contributing bacteria to that watershed and, in turn, to the ocean at Arroyo Quemado beach. The scope and objectives of this study were developed cooperatively in a series of meetings with representatives of the Gaviota Coast Conservancy, Heal the Ocean, and Surfrider, as well as with members of the Arroyo Quemado community. The initially proposed scope for this study included sampling and testing of surface water from a location directly below the Landfill in the Pila Creek watershed. However, at the specific request of these local environmental organizations this sampling location was eliminated from consideration. It was determined by all participants that sampling downstream of the Landfill would not yield a DNA match for the Landfill, but would only yield matches of organisms that are found in the Cañada de la Pila watershed (a landfill does not have its own DNA; organisms that reside in the watershed have DNA that could identify the species present). The study succeeded in meeting the mutually accepted objective of identifying bacteria source species within the Arroyo Quemado watershed. Focusing the study to evaluate source contributions within the Arroyo Quemado watershed did not involve any assumptions regarding the potential origin(s) of the bacteria present.

See Responses 1-9 and 1-10.

#### Response 2-14

As previously discussed, the current monitoring system is sufficient to characterize and monitor potential groundwater migration pathways. The commenter's suggested geophysical surveys and point source investigations are not warranted. The quoted excerpt regarding postclosure requirements does not support the comment regarding a need for point source investigations.

See Responses 1-1, 1-6, 2-3, 2-4, 2-6, 2-11, 2-13a and 2-17.

#### Response 2-15

The current monitoring system of eight monitoring wells is in compliance with the Landfill WDRs and state and federal groundwater monitoring requirements. This system has evolved over the years in coordination with the RWQCB and is based on information collected from a review of area wells, borings, and other supporting information as the most appropriate locations to sufficiently monitor groundwater at the site. This monitoring system was incorporated into the Landfill's Monitoring and Reporting Program (March 1999).

See Responses 1-1, 1-6, 2-3, 2-4, 2-6 and 2-11.

#### Response 2-16

The source of the commenter's list of compounds identified within the Landfill is not clear. Many of the listed compounds have not been identified in groundwater within the Landfill itself (HWDS, dewatering wells). For example, 1,1-dichloroethane, trans-1,2-dichloroethene, 2-methylbutane, TCE, hexavalent chromium, benxothiazole, chlorodifluoromethane, methoxytrimethylsilane, fluorotrimethylsilane, trimethylsilanol, trimethylsilane, or vinyl chloride have not been identified within the Landfill (horizontal drains or dewatering wells).

As stated on Draft EIR page 3.3-43, VOCs are the principal groundwater contaminants of concern at many landfill sites, including the Tajiguas Landfill. The primary VOCs confirmed to have been detected at the site in at least one location, or at least at one time, are:

- 1,4-dichlorobenzene
- 1,2-dichlorobenzene
- chlorobenzene
- cis 1,2-dichloroethene (1,2 DCE)
- Methyl tert-butyl ether (MTBE)
- Benzene

As discussed on Draft EIR page 3.3-42, VOCs have been detected only in monitoring wells MW-2 and MW-4, and data collected over the last few years indicate these VOCs are present at levels below drinking water standards (Santa Barbara County, 2000b; 2001a; 2002b). As stated in the Draft EIR (page 3.3-43), specific compliance levels for VOCs at the Tajiguas Landfill do not exist. Comparison to drinking water standards is useful because regulators commonly apply this standard as a reference. Based solely on VOC data from the monitoring well network, groundwater present at the Landfill does not exceed MCLs. This indicates that groundwater impacts from the Landfill are not significant.

The monitoring well network south of the Landfill (downgradient) is located in the optimal location to evaluate groundwater quality based on groundwater gradient data (see Responses 2-5 and 2-6).

Some of the other compounds listed in Comment 2-16 have at one point or another been listed on lab reports as "tentatively identified compounds," or TICs. This is a term that laboratories use to report a suspected compound that may be present, but which cannot be positively identified or quantified. The laboratory chemists have considerable latitude in listing TICs. Reporting a TIC does not mean the compound is present. Because there is so much uncertainty regarding whether or not a TIC is actually present, and at what concentration, regulatory agencies, including the RWQCB, typically do not require actions related to the laboratory reporting of TICs. As stated on Draft EIR page 3.3-46, the impact of the landfill on site groundwater is evaluated on the basis of the target list of compounds required by the RWQCB that includes the most common VOCs associated with landfills. Therefore, additional testing is not required.

#### Response 2-17a

As described in the Draft EIR (Groundwater Quality, page 3.3-42), the RWQCB sets the testing parameters for the site. In setting these parameters, the RWQCB considers the types of contaminants typically associated with landfills. Current testing requirements include testing for

common gasoline constituents, including benzene, toluene, ethylbenzene, xylenes, and the oxygenate MTBE. In addition, many other compounds, including chlorinated solvents and their breakdown products, 1,4, dioxane, metals, common pesticides, and general mineral constituents, are routinely analyzed for. Additional testing has not been required by the RWQCB because the testing in place is sufficient to evaluate impacts from the Landfill on site groundwater.

In addition, testing of both surface water and groundwater also has been conducted to look for total coliform, fecal coliform, E. coli, and enterococcus bacteria, which are not expected to be present in groundwater (see Responses 1-1 and 1-10). This testing confirmed the absence or extremely low concentrations of these bacteria in site groundwater. These bacteria are normally present in both natural and developed watersheds throughout the South Coast area.

#### Response 2-17b

The Landfill itself, including the maintenance shop area, is the "point" source of the low concentrations of contaminants detected in two of the downgradient wells. It is inappropriate to consider a drilling or testing program to attempt to identify localized point sources of contaminants within the Landfill. Sources of contaminants in the Landfill are likely such items as spent household or auto cleaning solvent containers, or containers of spent gasoline. Typically, these containers are one quart to one gallon in size and will not be detectable in any kind of drilling/testing program. This is the reason that entire landfills are typically considered "point" sources of contaminants and that monitoring programs are designed to evaluate impacts from the entire landfill, and not just a portion of the landfill. There is no waste associated with the scalehouse (which is located south of the Landfill footprint) and no evidence to support identifying the scalehouse as a point source for waste impacts.

#### Response 2-18

Seismic analysis parameters may change over time, based on the currently accepted geologic information and standards of practice. The apparent discrepancy noted in this comment is due to an enhanced understanding of the local seismic environment. In addition, while the commenter states that "an acceleration number of 0.39 g was used," there is no such thing as an "acceleration number." The seismic input parameters for slope stability analyses use a variety of forms, including peak bedrock acceleration, maximum site acceleration, yield acceleration and seismic coefficient. Depending on the analytical method used, attenuation characteristics, including distance from a fault, return period of a seismic event, and other factors, there could be different values described as "acceleration" in seismic analysis reports that are entirely consistent. The seismic studies were conducted using appropriate data and assumptions, and included standard of practice techniques.

The comment is made regarding the GeoLogic Associates (GLA) slope stability analysis and their use of a maximum probable earthquake ground acceleration of 0.21g. This apparently refers to GLA, September 26, 2001, "Slope Stability Evaluation, Proposed Reconfigured Front Face and Stockpile Slopes, Tajiguas Landfill, Santa Barbara, California," which was provided as a technical report accompanying the Draft EIR. Page 3 of this report states "The maximum expected horizontal bedrock acceleration at the site, used as the design event for dynamic analysis (the maximum probable earthquake) is 0.24g."

The comment is made that, "The slope stability analysis was done under the assumption that the landfill mass is not saturated." This statement is not correct. GLA (2001) page 2, states that, "In order to be conservative, the groundwater profile used in the analysis included the 1998 County data in the lower areas of the slope; and elevations that are 15 to 20 feet higher than those indicated by the AGM (Arcadis, 2001b) data in the upper slope areas." That is, while GLA concluded that a fully saturated waste prism was not likely, it did include a conservative assumption of saturated conditions in the slope stability analysis. The GLA report did not suggest that "if the landfill was saturated then they would not be held to their stability analysis projections."

#### Response 2-19

Holocene faults are discussed on Draft EIR pages 3.2-3 through 3.2-25. The Draft EIR states on page 3.2-21, "That there are no known Holocene age faults (approximately 11,000 years before present) in the vicinity of the proposed expansion." Also on Draft EIR page 3.2-27, "Based on these investigations, there is no evidence of active or potentially active faults within the proposed expansion area." The statements in the Draft EIR are consistent with and based on the Dames & Moore 1995 report, among others, as discussed in detail in the Draft EIR.

#### Response 2-20

See Responses 1-6 and 1-10 to the Heal the Ocean letter. GeoSolv apparently searched through correspondence from RWQCB dating back several years, and noted in pages 14 through 21 of their report each instance of past detections from the monitoring system and alleged violations in the operation of Tajiguas Landfill. The Draft EIR for the Tajiguas Landfill addresses an expansion of the landfill, and does not specifically address every former compliance issue. The Tajiguas Landfill is responsibly operated and is in compliance with applicable laws and specific WDRs of RWQCB Order 93-69. The SWUD has responded to compliance issues raised by the RWQCB as those issues have arisen.

Correspondence in the files of RWQCB and SWUD indicate that each of the past violations has been corrected or addressed. The August 27, 1999, letter from RWQCB, which is cited in the GeoSolv report, indicates the documentation provided by SWUD demonstrates compliance with all issues raised in the earlier correspondence. Several items that involve a longer time frame to complete, such as a down-stream sedimentation control structure, were noted. A letter dated November 9, 1999, from the RWQCB specifically states that Tajiguas Landfill is in complete compliance with WDR Order 93-69 and that the Landfill operators have satisfactorily addressed or are in the process of addressing all violations noted in the August 27, 1999, letter.

As addressed in Response 1-6, the most recent correspondence from RWQCB that indicates any problems or violations cited in the GeoSolv report is the August 27, 1999, letter. The issues raised in the August 27 letter are addressed in the subsequent November 9, 1999, correspondence from RWQCB indicating that the Landfill is in compliance and that previously raised issues have been satisfactorily addressed. In an August 25, 1998, letter to State Senator Jack O'Connell, RWQCB Executive Officer Roger Briggs stated, "The Tajiguas Landfill site contains no 'fatal flaws,' in regard to our body of regulation, that would prompt us to prohibit expansion. The County of Santa Barbara continues to show the intent and ability to meet our requirements for landfill operation."

The GeoSolv Report (pages 14 through 21) itemizes a number of detections of chemicals in various monitoring locations at Tajiguas Landfill between 1988 and 1997 that are reported in SWUD's routine monitoring and reporting to RWQCB. GeoSolv suggests that for each detection of even trace concentrations of any compound, a subsurface investigation is required by law (page 22) to determine if a possible point source, such as a buried drum (page 13) exists in the landfill. The SWUD operates and monitors a waste management unit, which is itself considered the point source for a release detected by the monitoring system. Numerous groundwater protection and monitoring controls are in place. Drilling dozens of holes in the landfill each time a compound is detected in a sample would be inappropriate and would probably be a negative factor in the site's ability to contain waste.

Some members of the public have a lengthy history of voicing concern about the compliance history of the Tajiguas Landfill. In response to these concerns, and to SWUD's regulatory obligations, multiple investigations have been performed over the years to determine whether the Tajiguas Landfill poses a significant threat to the environment.

In particular, based on previous claims by the same groups sponsoring the GeoSolv report, investigations and scientific studies have been conducted. A Santa Barbara County Grand Jury investigation in 1999-2000 looked into these issues in detail, including reviewing a large volume of data, reports, and other documentary evidence, and conducting interviews with public health officials, environmental groups, former and present Public Works employees, and independent environmental experts. The conclusion from the most recent Grand Jury investigation is, "that the Department of Public Works have done an excellent job in keeping the landfill environmentally safe. It was also concluded that the Tajiguas Landfill was neither visually nor environmentally polluting." A 1998 study commissioned by the Tajiguas Landfill Groundwater Issues Focus Group (a group composed of Arroyo Quemada homeowners), prepared by Dr. Arturo Keller of UCSB (Keller, 1998), a nationally recognized expert in contaminant transport in groundwater systems, concluded the Landfill does not pose a threat to groundwater quality, either currently or as a result of the proposed expansion of the Landfill, as long as the current monitoring plan is continued and the current corrective action plan is followed.

Response 2-21

See Response 2-20.

The comment refers to letters that are over 9 years old and were written prior to the correspondence history presented in Table 1; Response 1-6. The May 25, 1993, letter was directed at the Tajiguas Landfill Expansion Project approved by the Board of Supervisors in 1989 and reviewed under 87-EIR-8. This previous expansion was more extensive than the currently proposed project and would have expanded the Landfill into the Coastal Zone and over Pila Creek north of the existing Landfill waste footprint. This expansion was never completed. The current proposed Landfill expansion avoids both the Coastal Zone and Pila Creek, thus reducing impacts compared to the previously considered expansion, and is in compliance with current regulations regarding landfills.

In correspondence 14 (Table 1; Response 1-6) the SWUD provided information to the RWQCB on the relationship between groundwater constituents and landfill gas. While migration of VOCs

offsite and the monitoring system may have been issues in 1993, the SWUD has since made improvements at the Landfill to address the RWQCB's concerns (see Responses 1-6 and 1-13). The correspondence in Table 1 (Response 1-6) documents the interaction of the RWQCB with the SWUD to identify required improvements, that improvements have been accomplished at the landfill, and that implementation and reporting on the success of the improvements was and is ongoing in compliance with the WDRs. These improvements include installation of a landfill gas collection system, the GLCRS, and other systems identified in Response 1-1.

The WDRs also require a Monitoring and Reporting Plan. The Monitoring and Reporting Plan for the Landfill was revised and issued on March 4, 1999 (Response 1-6; Table 1, Correspondence 2) to account for the many surface and groundwater control improvements implemented by SWUD since 1998. The chronology of events documented through the letters identified and summarized in Table 1 of Response 1-6 reflect compliance with the Waste Discharge Requirements (WDRs) issued by RWQCB Order No. 93-69 for the Tajiguas Landfill. The record provided in Table 1 (Response 1-6) shows that the existing monitoring system is effective and acceptable to the RWQCB. This system would be expanded, if necessary, in accordance with new WDRs for the proposed expansion project.

Correspondence 34 and 35 of Table 1 (letters dated November 9, 1999, and November 12, 1999, respectively) verifies Landfill compliance with its WDRs, Order No. 93-69. These letters from the RWQCB to the LEA stated that the Tajiguas Landfill is in compliance with Waste Discharge Order No. 93-69, and that the Landfill operators have satisfactorily addressed or are in the process of addressing violations of Order No. 93-69. These letters were produced *after* 1993 and, therefore, it can be concluded that the Landfill was in compliance with the WDRs as of 1998.

#### Response 2-22

See Response 2-20.

Detections of MTBE have decreased over the years. Data to substantiate this statement are available at the SWUD offices. See Response 2-21.

The RWQCB considers the entire Landfill a point source. See Response 2-17b.

#### Response 2-23

See Response 2-20.

It is unclear to what internal office memo the commenter is referring. The comment does not identify who the memo was from or who or what agency was discussing the issue. The results presented are, however, over 10 years old. Improvements in environmental control systems and monitoring requirements have been developed during the 1990s, as documented in Response 1-1. The requirement to test for the constituents identified in the comment may not have been in effect at the time indicated. See Response 2-21 for a compliance discussion.

The RWQCB considers the entire landfill a point source. See Response 2-17b.

Response 2-24

See Responses 2-20 and 2-22.

The GLCRS has been expanded to provide increased containment capacity for water pumped from the trench. This system allows the trench to be pumped continuously if conditions require (as in times of storm events) and allows water to be contained onsite rather than possibly allowing releases downstream. This permanent improvement was completed when tanks were obtained through a land swap with the parcel to the west in mid-2001. The system now provides 680,000 gallons of containment. See Response 1-1 for a discussion of environmental controls at the Tajiguas Landfill.

Response 2-25

See Responses 2-20 and 2-22.

Response 2-26

See Response 2-20.

The RWQCB considers the entire Landfill a point source. See Response 2-17b.

Response 2-27

See Response 2-20.

The RWQCB considers the entire Landfill a point source. See Response 2-17b.

Response 2-28

See Response 2-20.

The RWQCB considers the entire Landfill a point source. See Response 2-17b.

Response 2-29

See Response 2-20.

The RWQCB considers the entire Landfill a point source. See Response 2-17b.

Response 2-30

See Response 2-20.

The RWQCB considers the entire Landfill a point source. See Response 2-17b.

Response 2-31

See Responses 1-1, 1-6 and 1-13.

The May 5, 1998, letter is the RWQCB response to the Notice of Preparation for the *proposed* Tajiguas Landfill Expansion Project. VOCs were addressed as documented in Correspondence 14 of Table 1 (dated September 21, 1998) and Correspondence 25 of Table 1 (dated May 5, 1999), which indicate that the landfill gas (LFG) extraction system had been installed and had

been online approximately 1 month. The methane levels in lysimeters had dropped from 60 percent to 45 percent. The SWUD committed to continue to monitor the system for effectiveness.

Response 2-32

See Response 2-20.

The commenter is incorrect in the assumption that a long-term solution to prevent leaks at the culvert drain has not been pursued. The SWUD is currently constructing a sediment structure to collect runoff from the southern slopes of the Landfill (see Responses 3-5 and 5-4). To construct the sedimentation structure, the leachate collection systems, described in Response 1-1, are being reconfigured to avoid potential leaks to the creek. This project is expected to be completed by Fall 2002.

Response 2-33

See Response 2-20. See the compliance history presented in Responses 1-6 and 1-13.

The letters cited in this comment are over 5 years old and have been addressed by the SWUD in consultation with the RWQCB. Most importantly are Correspondence 16 and 18 (Response 1-6; Table 1) dated November 25, 1998, and December 15, 1998. These letters document there were no violations cited during a site inspection by the RWQCB. In these letters, as well as Correspondence 34 and 35 (dated in November 9, 1999, and November 12, 1999) the RWQCB states that the Tajiguas Landfill is in complete compliance with Order No. 93-69 *after* the issues raised in 1997 and early 1998.

Response 2-34

See Response 2-20.

Since the issues of litter and sediment in Pila Creek were raised in 1988, SWUD has improved Landfill BMPs in an effort to minimize such impacts. The SWUD continues to evaluate Landfill operations and keep informed of emerging technologies in an ongoing effort to expand and improve engineering controls. These efforts have met with approval from both the RWQCB and the local community, and have resulted in continuing improvement to watershed conditions downstream of the Landfill.

Portable litter fences are placed near the Landfill working face to catch errant trash, and litter fences are placed around downdrains to prevent litter from entering the landfill drainage system. Also, trash racks have been placed in Pila Creek south of the Landfill to catch errant litter during high storm flows before water leaves the site. The litter controls have sufficiently controlled litter from leaving the site, as evidenced by the lack of neighbor complaints due to trash in the last year. Landfill operations for the expansion project (i.e., waste disposal and daily cover placement at the working face) will be similar to ongoing operations, and the ongoing litter control program will continue to assure that litter does not leave the site.

Sediment at the Landfill has been reduced by a number of measures. Stormwater runoff is routed through in-channel or out-of-channel sedimentation basins that catch and remove sediment from water that is discharged to Pila Creek. Soil binders are used on areas that will not be disturbed on the landfill for extended periods of time. Revegetation occurs in areas that subsequently will not be disturbed. These measures are referred to as Best Management Practices (BMPs) and are discussed in Draft EIR Section 3.3.2.2.4. The BMPs would be expanded to reduce surface water quality impacts during the life of the proposed expansion.

Response 2-35

See Responses 1-6 and 1-10. The comment refers to concerns expressed in a RWQCB memorandum that is now approximately 4 years old. Since that time, SWUD has remained in close communication with the RWQCB regarding the nature, status and effectiveness of wet weather preparedness measures at the Landfill. On September 24, 2001, SWUD submitted to the RWQCB a Wet Weather Preparedness Plan. The plan details measures taken to properly manage surface water runoff, sedimentation/erosion and litter in the Pila Creek watershed. Part of that process involves periodic inspections of the Landfill and surrounding area throughout the rainy season by trained and experienced staff. Results of these routine inspections are recorded on inspection forms, and these forms are kept on file at the Landfill office. Any observed problem is promptly noted, and appropriate action is taken. The SWUD is not aware of any similar concerns regarding litter, sedimentation and/or responsiveness being expressed recently by the RWQCB.

See Response 2-20

Response 2-36

See Response 2-20.

The comment refers to concerns expressed in a RWQCB memorandum that is now approximately 3-1/2 years old. Since that time, SWUD has documented that surface water flow enters the trench system, and has configured the Landfill so as to direct a larger proportion of surface water runoff from the Landfill area into the sedimentation basins located north (i.e., upstream) of the existing Landfill. Moreover, water storage capacity has been increased by the addition of two storage tanks (with a total 680,000 gallons of capacity) to the system through a recent land swap with Aera Energy to the west of the Landfill site. Jointly, increased usage of the up-canyon sedimentation basins, coupled with additional tank storage capacity, has resulted in decreased need for spray application, resulting in a lessened potential for exacerbating the issues raised in this comment.

Response 2-37

See Response 2-20.

The comment refers to concerns expressed in a RWQCB letter that is now approximately 2 years old. The SWUD has addressed earlier RWQCB concerns regarding control of stormwater and sediment by routing more runoff into sedimentation basins located north of the Landfill. As these issues have since been addressed to the full satisfaction of the RWQCB, no formal enforcement actions were undertaken.

Response 2-38

The contact between pre-landfill topography and the existing waste mass is indicated by the topographic map shown on Draft EIR Figure 3.3-1. Early grading of the site is shown on the 1969 topographic map (presented as Plate 7 in Santa Barbara County, 1997a). Man-made conduits, including historic diversions of Pila Creek now buried beneath the landfill, are described based on interpretations of aerial photographs and shown on Figures 2, 3, and 4 of Arcadis Geraghty & Miller (2001b). Two subsurface investigations have been conducted to explore buried conduits and saturated conditions in the landfill: Arcadis Geraghty & Miller (2001b), and STI Engineering, Inc. (2000). The proposed project includes engineering designs that will prevent the water table from contact with waste, as described in Draft EIR Sections 2.9 and 3.3.3.2.

Response 2-39

See Responses 2-19 and 2-38.

Response 2-40

See Responses 2-17 and 2-38.

Response 2-41

See Responses 2-4, 2-5, 2-6, 2-15 and 2-38.

Response 2-42

Although these recommendations are noted, it is not clear how a water balance would provide any information useful to evaluating potential water quality impacts (see Responses 2-10 and 2-38). Monitoring of surface water and groundwater quality is a more direct means of evaluating water quality impacts. Monitoring is conducted in accordance with programs dictated by the RWQCB, including the General Industrial NPDES Permit and the Monitoring and Reporting Program (M&RP 93-69). The County disagrees that a water balance is necessary to ensure that water quality objectives are met.

Response 2-43

Water is not used for irrigation at the Tajiguas Landfill. However, water pumped from the GLCRS and other sources is used for dust control by spraying water from trucks onto the landfill, as described on Draft EIR page 3.3-21 and in Draft EIR Section 3.3.2.2.5. Regarding the effectiveness of the GLCRS and a water balance, see Responses 2-9, 2-10, 2-12c, and 2-42. Effectiveness of the GLCRS also is addressed in detail in correspondence to the RWQCB dated April 30, 1999 (see Correspondence 26 in Table 1 of Response 1-6).

See Response 2-38.

Response 2-44

See Responses 2-13a, 2-14 and 2-38.

Response 2-45

Although these recommendations are noted, it is not clear how collection of continuous surface water flow rate data through the culvert system will provide any information useful to evaluating

potential water quality impacts. Monitoring of surface water quality is conducted in accordance with programs dictated by the RWQCB, including the General Industrial NPDES Permit and the Monitoring and Reporting Program (M&RP 93-69). The County disagrees that collection of flow rate data is necessary to ensure that surface water quality objectives are met.

Response 2-46

Please see the Arcadis Geraghty & Miller report (2001b) provided as part of the Technical Studies for the Draft EIR for the requested information.

**The following are responses to items in the GeoSolv report that follow the numbered comments.**

**Cross Section A-A':**

Many errors are evident on this cross section. The location of the section is not shown on a map. The wells are grossly out of scale, thereby misrepresenting the depths and formations penetrated by the wells. Landfill waste is shown extending below sea level, while the actual waste is, in fact, located at elevations of about 150 feet above mean sea level and higher. The horizontal and vertical bar scales indicate a vertical exaggeration of 3 times, but this vertical exaggeration is not applied to the dip of strata. The 100-foot high bluff at the beach is shown as Quaternary Alluvium (Qoa), although it actually is composed of Tertiary Monterey Formation (Tm).

**Original Topography of Vicinity of Pila Creek:**

The bar scale on the map is inconsistent. The source of topographic and geologic information for this map is not given. In comparison to local (Emcon, 1994a; 1994b) and regional geologic mapping (Dibblee, 1988), the geology is incorrect in several aspects. The extent of alluvium (Qoa) is shown as a wide deposit extending through the narrow canyon of Pila Creek where it flows over the Monterey Formation (Tm). The beach bluff is represented as alluvium, rather than the Monterey Formation. The flow line of Pila Creek indicates a perennial stream (solid blue line) flowing south in a straight line from the landfill area to the ocean; it should be shown as an ephemeral (dashed line) stream that makes several turns eastward before entering the ocean about 1,200 feet to the east (see USGS, Gaviota 7.5 min. quadrangle).

**Appropriate Citation of Authorship:**

In the Introduction section of the GeoSolv report (pages 4 and 5), a statement is made describing field mapping, drilling and geologic formations. This work and the associated descriptions were performed by Dames & Moore for the County of Santa Barbara, and presented in a report dated January 30, 1989. Segments of text from the Dames & Moore report were taken verbatim, without proper citation of authorship. GeoSolv visited the site for less than 2 hours with County staff on September 20, 2001, and no geologic mapping or subsurface investigation was conducted on this date. Furthermore, the GeoSolv maps and cross section do not cite a source for the geologic information presented.

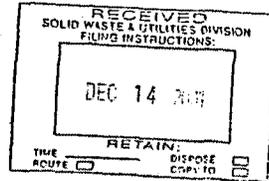




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December 14, 2001

Kathy Kefauver  
Santa Barbara County  
Public Works Department  
Solid Waste and Utilities Division  
109 E. Victoria Street  
Santa Barbara, CA 93101



RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR TAJIGUAS LANDFILL  
EXPANSION PROJECT: 01-EIR-5

Dear Ms. Kefauver:

The Environmental Defense Center (EDC), a non-profit public interest law firm, represents the Santa Barbara Chapter of the Surfrider Foundation (Surfrider) regarding the proposed expansion of the Tajiguas Landfill. We have reviewed the draft Environmental Impact Report (EIR) for the proposed project, as well as related information, and conducted research regarding the technical issues involved with the proposal to significantly expand this large, unlined seaside landfill. In sum, we find that the draft EIR is deficient pursuant to the requirements of the California Environmental Quality Act (CEQA) with regards to the project objectives, project description, impact assessment, policy consistency analysis, and alternatives analysis. The concerns stated in this comment letter can be addressed by revising and recirculating the draft EIR for public and responsible agency review and comment.

**I. The Project Objective is too narrow to allow for adequate consideration of a reasonable range of alternatives.**

The project objectives stated in the draft EIR fail to include the underlying project purpose, and instead state a narrow desired outcome. As a result, the draft EIR finds that otherwise valid feasible alternatives that would reduce significant impacts fail to meet the overly narrow objectives and are dismissed without due consideration. The objectives must be rewritten to comply with CEQA's requirements and to facilitate adequate consideration of a reasonable range of alternatives to the proposed project.

Under CEQA, a project's objectives must be included in its EIR, and under the revised CEQA Guidelines Section 15124(b), the objectives must include the underlying purpose of the project. Furthermore, Section 15124(b) of the CEQA Guidelines states that, "A clearly written statement of objectives will help the lead agency to develop a reasonable range of alternatives to evaluate in the EIR."

While CEQA Guidelines Section 15124(b) requires the statement of objectives to include the underlying purpose, review of the EIR indicates that the project objectives are written more

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Kathy Kefauver  
December 14, 2001  
Page 2

like a project description. The objective is to "increase the solid waste disposal capacity of this existing County-owned and operated facility to meet the waste disposal needs ... for 15 years or approximately until the year 2020." On page 4-75, the draft EIR states, "the current project objective is to provide waste disposal capacity at the Tajiguas Landfill for 15 years." This objective is too narrowly crafted to facilitate consideration of a suitable range of alternatives. As a result, none of the alternatives considered in the draft EIR can fulfill the very specific and narrow outcome described by the objectives. This unfairly precludes meaningful consideration of feasible project alternatives that could fulfill the underlying project purpose and may lessen or avoid significant impacts, which is contrary to the requirements of CEQA.

In addition, a lead agency must analyze a range of reasonable feasible alternatives that meet most of the basic project objectives and avoid or substantially lessen significant impacts in an EIR. CEQA Guidelines Section 15126.6 (attached); *Citizens for Goleta Valley v. Board of Supervisors* ("Goleta I") (1988) 197 Cal.App.3d 1167 [243 Cal.Rptr. 39]. By crafting the objectives too narrowly and failing to include the underlying project purpose, the lead agency has artificially restricted which alternatives are considered in detail in the EIR. Alternatives that do not meet the narrow objectives need are quickly dismissed in the EIR.

The underlying purpose for this project can be understood by reviewing the draft EIR's Section 1.5, "Need for the Proposed Project." This describes the legal requirements that the County have a plan for accommodating waste disposal for 15 years at any given time. Thus, the underlying purpose is not necessarily to expand the Tajiguas Landfill. It is to provide for the disposal of the solid waste generated within the Santa Ynez and Cuyama Valley vicinities and the South Coast of Santa Barbara County until a planned, new, in-County regional landfill is operational which the Board of Supervisors staff to do within 15 years. The objective must be modified to comport with CEQA's requirement that it describe the underlying purpose, rather than a stated outcome. Otherwise, the draft EIR improperly, needlessly and artificially restricts the alternatives that can be considered for approval because only the proposed project could meet the overly narrow objectives as stated in the draft EIR.

**II. The Project Description is internally inconsistent and confusing.**

A. The Draft EIR describes a longer-term expansion than needed to fulfill the basic objectives and comply with the Board of Supervisors 8-3-99 Policy Directive.

Both the objectives and the project description describe the project as a 15-year expansion to provide waste disposal capacity at Tajiguas until the year 2020. However, since the underlying objective is to meet the requirements of AB 939 and provide waste disposal capacity only until the new, in-County regional landfill is operational, by or before 2015, the project description of expanding until 2020 goes beyond what is necessary to fulfill the objectives. CEQA requires that project descriptions include a clearly written statement of objectives and be stable and consistent. (CEQA Guidelines Section 15124)

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The objectives include meeting the "waste disposal needs ... for 15 years or approximately until 2020." However, 2020 is 19 years after the release of the draft EIR. The need for the project is to meet the requirements of state law (AB 939) that communities provide a minimum 15 years of disposal at existing or planned facilities. By proposing to expand Tajiguas until 2015 and concurrently planning for a new in-County landfill with 25 to 50 years of capacity, and by already narrowing potential new landfill sites to two, the County is already complying with AB 939. Expanding until 2020 is not needed to comply with AB 939, and results in needless environmental impacts.

One objective, and perhaps the underlying project purpose, is to "provide adequate disposal capacity to allow for the siting and development of a new in-County regional landfill, a process to be completed as soon as possible, a process [which began in 1999] that may take up to 15 years." (Emphasis added.) The draft EIR (page 1-15) states that, "County staff reported to the County Board of Supervisors that the siting and development process may take up to 15 years to complete," and that, "the siting process for a new regional landfill has begun." Indeed, this process was initiated at the Board's direction in August of 1999. Therefore, the new landfill siting and development process is anticipated by County staff, County decision-makers, the County's landfill siting consultants and the public to be complete no later than 2015. Thus, instead of vaguely describing the project's completion date and describing the project as lasting more than the time needed to meet the objectives (i.e., until 2020 instead of 2015), the project description should reflect the objectives and describe the project as an expansion lasting 15 years from 8-3-99 when the Board directed the Division to begin siting a new landfill, or until the new landfill is operational (i.e., by 2015), whichever comes first. By describing the project as lasting until about 2020, the draft EIR describes a larger expansion project that will result in greater environmental impacts than necessary to meet the objectives.

The original proposal was to expand Tajiguas for 25 years (4-1-98 Notice of Preparation for Tajiguas Expansion Project), but that was changed after the Board of Supervisors directed the Public Works Department to site and construct a new regional landfill in the County (10-8-99 Revised Notice of Preparation). Siting and constructing the new landfill is expected to take a maximum of 10 to 15 years. (Draft EIR page 1-6; 7-7-00 notes from meeting with the County's landfill siting consultants Barry Keller, ARCADIS, John McGinnis, I.R.I., and County Solid Waste Division). Therefore, the project description should not ambiguously describe a 15-year, but actually 19-year expansion project. Instead, it should reflect what is necessary to achieve the underlying purpose of complying with AB 939 and bridging the temporal gap between the time the current permitted capacity at Tajiguas is used and the new landfill is operational (i.e., by 2015).

Such a project as ambiguously described would result in greater project-related environmental impacts than would an expansion until the new landfill is operational in or before 2015, which is the scale of expansion needed to fulfill the objectives and meet the need for the project. Grading, site preparation and operation, including excavation from the large cover material borrow areas associated with an expansion to provide capacity through the year 2020 would affect more environmental resources than would grading associated with an expansion

through 2015, the outside estimated date of the opening of the planned new landfill. The greater impacts relate to habitat disruption, air quality, aesthetics and other impacts caused by the expansion. Therefore, the draft EIR must provide a stable project description consistent with the Need for the Project and the Board of Supervisors' policy directive, "to provide adequate waste disposal capacity ... to allow for the siting and development of a new in-County regional landfill, a process to be completed as soon as possible, a process that may take up to 15 years [beginning in August 1999] to complete." The project as vaguely described as an expansion through the year 2020 is larger and more impacting than need be to fulfill the basic objectives, meet the Board directive and to satisfy Need for the Project.

Attached is an undated document titled "Revisions to EIR to Reflect Board's Long Term Solid Waste Disposal Policy." The County prepared this draft project description as it developed the draft EIR. This document, provided by Mark Schleich of the County Solid Waste and Utilities Division to the EDC, describes the project in the following manner:

#### "Section 2.0 Project Description

The proposed project is being evaluated as a means of providing up to a 15-year capacity expansion of the Tajiguas Landfill to meet the interim solid waste disposal needs of southern Santa Barbara County and the Santa Ynez and Cuyama Valleys until a new in-County regional landfill (a separate project) can be developed. The intent is that, once the new landfill is developed and operational, the closure of Tajiguas would occur."

This formerly proposed project description meets the dual objectives of providing disposal capacity until a new landfill is operational and complying with AB 939. However, it was modified before the release of the draft EIR to reflect a larger expansion than needed to fulfill the basic project purpose, and, as stated, the described project will cause more severe environmental impacts than warranted to fulfill the underlying purpose and to meet the basic project objectives. Thus, the Project Description should be revised to clearly state that the expansion project would terminate when the new landfill is operational.

- B. The project description should include phasing of the expansion to ensure that environmental resources at the project site are not needlessly destroyed by the initial site preparation (e.g., grading and liner installation) for expansion.

The expansion project fails to include phasing of the construction and installation of the liner for the expansion in order to minimize environmental damage that would be caused by constructing the expansion all at once. If the new in-County regional landfill is operational sooner than 2015, it would make little sense and would needlessly impact the environment to construct the expansion all at once when not all of the expansion capacity may be needed. If constructed in phases, once a new landfill is operational, the expansion could cease. If not constructed in phases and the new in-County landfill is operational prior to 2015, then the project would impact more resources, including sensitive habitats, than necessary to provide the required capacity until the new landfill is operational.

3-3

The legislative intent of CEQA includes the following policy: "It is the intent of the Legislature that all agencies of the state government which regulate activities of private individuals, corporations and public agencies which are found to affect the quality of the environment, shall regulate such activities so that major consideration is given to preventing environmental damage, while providing a decent home and satisfying living conditions for every Californian." (Public Resources Code 21000(g)) Furthermore, "it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such project, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or mitigation measures which will avoid or substantially lessen such significant effects." (Public Resources Code Section 21002)

As applied to the proposed project, CEQA requires the lead agency to identify feasible ways to avoid or lessen significant impacts through mitigation or alternatives. One such way to feasibly and more effectively protect the environment against the significant effects of this project is to phase the expansion since it is unknown exactly when the new in-County landfill will be operational and thus when the proposed expansion could be terminated.

Originally, the County proposed such incremental and phased expansion for this very purpose. As described in Sections 2.2 and 2.3 of the Public Works Department's "Revisions to EIR to Reflect Board's Long Term Solid Waste Disposal Policy":

"The Back [and Front] Canyon configuration[s] would be developed in phases. Utilization of the new vertical airspace above the existing waste footprint, including the currently permitted benchfill capacity, would occur before expanding into new areas of waste disposal, to the extent practical from an engineering perspective. For the purposes of liner construction and waste disposal, each phase would be developed incrementally, beginning with areas adjacent to the existing waste footprint. In this manner, disturbance over the landfill area would be phased, with relatively small portions of the site being disturbed at any one time, thereby limiting the capital cost of each phase of development and minimizing environmental impacts."

This phasing of the maximum 15-year expansion was intended by the Public Works Department's Solid Waste Division to address environmental impact concerns raised by EDC, Surfrider, and others. These concerns include a concern that unnecessary environmental impacts would occur in the canyon if the expansion were constructed without phasing and the new in-County regional landfill was constructed and operational prior to the filling of the expansion area. Therefore, the project description should include phasing, and incremental expansion and incremental installation of liners as a feasible mechanism to ensure against needless environmental impacts.

The draft EIR on page 2-2 states that both the back and front configurations are planned to be developed in phases. However, this refers only to the placement of waste after construction

and does not include phasing the construction itself, which may be a feasible way to lessen significant impacts. Unlike the draft project description quoted above, the phasing of liner installation is not proposed at all. This means that the entire expansion area would be graded during project construction, rather than phasing the construction of the expansion area and installation of the liner. The result of this is that impacts to biological resources would not be incremental, but would occur at the project outset, and thus could not be terminated when and if the new in-County landfill is constructed prior to the use of the expansion project's capacity. Considering this, there would be little incentive for the Division to stop placing waste at Tajiguas if it had unused, expanded capacity, even if a new landfill was operational. This fails to feasibly minimize damage to biological resources, damage that could feasibly be avoided by phasing the construction and liner installation.

### III. The Draft EIR's Analysis of Environmental Impacts is Inadequate

#### A. The cumulative project list is incomplete.

The draft EIR fails to identify all new and ongoing projects in the region that have cumulative impacts shared with the proposed Tajiguas Landfill Expansion Project. The current operation of the Tajiguas Landfill Benchfill Project permitted in 1999 is an ongoing project that affects water quality, biological resources, air pollution, noise, aesthetics, traffic and a wide range of impacts that will be added to by the proposed project. This is relevant to the draft EIR's consideration of alternatives because when a proposed project would contribute to an existing or cumulative significant impact, the proposed project is responsible for mitigating its contribution to that impact. With regards to issues like degraded water quality, which the draft EIR recognizes is at least in part related to seagulls attracted to the Benchfill Project, there is already a significant impact caused by the operation. The proposed project will add to an existing impact caused by this related, cumulative project. The draft EIR however, fails to recognize the Benchfill Project as a cumulative project, and it therefore does not recognize related cumulative impacts, including significant impacts, to which the proposed project will add.

In addition, on 8-3-99 the County Board of Supervisors directed the Solid Waste Division to begin the process of siting a new landfill in the County. The Division identified at least 74 potential sites and during the past two years has worked diligently to identify a site for the planned new facility, narrowing the list to two potential sites according to the Division this summer. Notwithstanding Surfrider's contention that a single Program EIR should be prepared for the Division's proposal to modify its CIWMP pursuant to CEQA Guidelines Section 15165, the proposed new landfill is a related, planned and foreseeable new solid waste disposal facility that may add to or minimize cumulative impacts relating to waste disposal. Therefore, the planned new landfill should be added to the list of cumulative projects, and the draft EIR should carefully evaluate how and the degree to which each cumulative project would contribute to the proposed project's impacts. This will assist the lead agency in its determinations regarding the need for and type of mitigation measures to include in the proposed Tajiguas Expansion Project.

3-4

The draft EIR discusses an ongoing effort to expand the Santa Maria Landfill. The fate of that project has bearing on the impacts of the proposed project. If the Santa Maria Landfill is not expanded, then a greater waste stream may be directed to Tajiguas, and if it is approved, its approval may render less environmentally damaging alternatives that involve the Santa Maria Landfill feasible. Therefore, the Santa Maria Landfill Expansion Project and the possible closure of this facility are projects that should be included the draft EIR's cumulative impact analysis.

B. Analysis of the Draft EIR's Section 3.2 Geology

Section 3.2.1 - Regulatory Standards

This section of the draft EIR fails to list the California Coastal Act and specifically Section 30253, which requires new development to minimize geological hazards and assure stability and structural integrity of the landfill. As a result, there is no discussion of whether this statutory requirement is met.

This section also describes the requirements of CCR Title 27, Section 20260, as they relate to the proposed new project. Considering the discussion of cumulative projects above, this text should be clarified to state that these requirements apply to cumulative effects as well, such as impairment of beneficial uses in water bodies.

Section 3.2.2 - Existing Conditions

Joint Technical Document and Expansion Project EIR

The draft EIR refers to the Joint Technical Document (JTD) which will be required by the permitting agencies: the Regional Water Quality Control Board (RWQCB) and the California Integrated Waste Management Board (CIWMB). The JTD will contain the slope stability analysis required for landfills with cut slopes exceeding 3:1. If the JTD will include analyses of issues, such as stability, that are not included in the draft EIR, please describe why this is not deferring the impact assessment in violation of CEQA. Are additional analyses anticipated in the JTD relevant to the assessment of the project's environmental impacts? If so, those analyses must be in the draft EIR to foster informed decision-making by the lead agency and full disclosure for the public.

Analysis of steeper slopes

Does the Division anticipate potentially increasing the landfill slopes above 2.4:1 in the future? The draft EIR should evaluate the environmental effects of steeper 2:1 slopes to 1) avoid piecemeal review of this project and the potential future benchfilling to 2:1 slopes, and 2) facilitate analysis of the geological and water quality impacts associated with proposed new alternatives #6 and #6(a). These alternatives include 2:1 slopes to minimize the footprint size and related environmental effects.

Section 3.2.3 - Project Impacts

Slopes

The criteria in the draft EIR for determining whether or not an impact is significant with regards to geology include: 1) if the project would result in potentially hazardous geologic

conditions such as cut slopes 1.5:1 or greater, 2) if the project would result in cut slopes in excess of 15 feet, and 3) if the project would result be located on slopes exceeding 20%. The project, including the borrow areas and fill areas, will exceed all of these significance criteria, and therefore the draft EIR should find significant impacts relating to geology.

The project description states: "the ridge located north of the northeast portion of the existing landfill, plus portions of the eastern slope ... would be graded to a maximum overall slope of 2.4:1 ... with benches approximately every 40 to 50 vertical feet, with slopes between benches of 2:1." These slopes would not exceed the 1.5:1 significance criteria, however, considering the draft EIR's finding that there is water throughout the lower portions of the landfill, even slopes of 2:1 may not be structurally stable. In addition, it appears that the borrow areas will exceed the 1.5:1 slope threshold for significant impacts over a large area.

The Liner and Waste Slope discussion and evaluation of "fill slope stability under dynamic loading" beginning on page 3.2-29 relies on a "site design peak horizontal ground acceleration of .21 g." The results indicate that the factor of safety of 1.5:1 is met "with an engineering buttress fill (or equivalent stabilizing feature) placed along the west toe of the refuse fill in the lined areas." However, the draft EIR does not include a mitigation measure requiring "an engineering buttress fill (or equivalent stabilizing feature) placed along the west toe of the refuse fill in the lined areas." There is no discussion of any existing buttress fill to hold back the toe of the existing waste mass. Further, the draft EIR does not address whether or not the existing waste mass is a stable platform to expand on. Thus, this fill slope stability impact should be found significant because the identified necessary measure is lacking from the project description, impact assessment, and mitigation measures.

Mitigation for Slope Stability

In addition to the omission of a necessary mitigation measure, Measure GEO-1 on pages 3.2-33 and -34 is deficient pursuant to CEQA for other reasons. First, this measure states that "Cut-slopes shall not exceed 2:1 unless the slope stability report [to be included in the later JTD] concludes that steeper slopes will be stable. In that case, slopes may exceed 2:1 provided the slopes adhere to the design standards in the report." This measure defers analysis of the steeper slopes in violation of CEQA. Further, the draft EIR does not address the borrow area slopes which appear to exceed 2:1.

Given the steep topography of the ridges surrounding the proposed expansion area, 2:1 or steeper cut slopes would necessitate cutting the ridgeline to the east down in elevation significantly such that grading would occur into the Arroyo Quemado watershed east of the project site. (Figures 2-2 and 2-3) The impacts of this are not analyzed. The draft EIR states that only limited grading would occur for an access road within this watershed. However, given that measure GEO-1 potentially allows cut slopes to be steeper than 2:1, the areal and voluminous extent of grading may be substantially greater than described. Therefore, the social, financial, legal and technical feasibility, and the direct and indirect impacts of this mitigation measure, must be assessed in great detail based on evidence. (CEQA Guidelines Section 15126.4(a)(1)(D). See also *Stevens v. City of Glendale* (1981) 125 Cal.App.3d 986.)

Mitigation Measures GEO-1(a) and (b) require 1) a detailed slope stability report, and 2) a detailed geologic and/or soils engineering study to determine landfill structural stability as required by CCR Title 27. These measures, by requiring later, post CEQA studies to determine the level of geological impacts, defer both the required impact analyses that should be included in the draft EIR and the requirements of the mitigation measures themselves. Under CEQA, a lead agency cannot defer impact analyses and mitigation measures to a later time and/or another agency unless specific performance standards are provided. Because the impacts won't be known until these studies are complete, and no performance standards are provided, these are ineffective, deferred mitigation measures. (*Sundstrom v. County of Mendocino* (1<sup>st</sup> District, 1988) 202 Cal.App.3d 296 [248 Cal.Rptr. 352].)

#### Liquefaction

The draft EIR finds the potential for liquefaction to be "very low." However, in reaching this finding the draft EIR states, "This is because materials below the proposed landfill expansion area are classified as primarily tertiary sedimentary rocks, with some limited extent of dense to very dense soils, which are not typically susceptible to liquefaction." This analysis ignores the fact that the draft EIR states on page 3.2-17 that, "Along the buried Pila Creek channel, the landfill is underlain by unconsolidated Quaternary Alluvium." This area under the existing landfill contains underground flow, which percolates down from the streambed and basins upstream from the landfill, as well as natural underflow, which occurs in the unconsolidated alluvium along all creeks in this region. Much of the alluvium is sand derived from the weathering of the numerous sandstone formations of the watershed upstream from the landfill. According to Dr. Edward A. Keller in the eighth edition of 'Environmental Geology,' "Sand with a high water content may liquefy when shaken or vibrated," as in during a tremor. The proposed expansion project will be structurally tied into the existing landfill, which sits atop saturated alluvium consisting largely of sand. Since the liquefaction impact analysis ignores the fact that the landfill presently sits atop this unconsolidated alluvium, the liquefaction potential is not "very low," and the impact is instead potentially significant.

The cover material that the project will rely on is required to be high in clay in order to inhibit infiltration of rainwater into the waste mass. According to Dr. Keller, page 142, "A third way water can cause landslides is by contributing to spontaneous liquefaction of clay-rich sediment." Therefore, in addition to the area under the landfill being prone to liquefaction as described above, the cover material required for preventing environmental damage is also prone to damage by liquefaction. This potential impact was not assessed.

In addition, the landfill itself is saturated with leachate water. (Exhibit I, Cross-Section A-A1) The draft EIR fails to discuss the potential for the landfill to liquefy due to its saturated and unconsolidated, though compacted nature. Additional analysis is required to determine if liquefaction impacts related to the cover material, the landfill itself and the underlying alluvium are significant.

### C. Analysis of the Draft EIR's Section 3.3 Water Resources

#### Section 3.3.1 - Applicable Standards

The list of applicable legal standards relating to water quality fails to include the California Coastal Act. Specifically, Section 30231 of the Act requires that, "The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing ... substantial interference with surface water flow, ... maintaining natural vegetated buffer areas that protect riparian habitats, and minimizing alteration of natural streams." The proposed project's required detention basins will substantially reduce surface flows, and the draft EIR and the URS 2001 report acknowledge the adverse effect of seagulls attracted to the landfill on water quality. Therefore, the draft EIR has to address the project's compliance with the Coastal Act's stringent requirements to maintain or improve water quality.

#### Section 3.3.2 - Existing Conditions Creek Flow and Springs

On page 3.3-3, the draft EIR states, "This creek supports continuous flow only during and immediately following significant storm events, which typically occur between the months of November and April. Pila Creek is typically dry for the majority of the year in the project area." This statement should be clarified because the Pila Creek in-stream detention basins on the project site typically always have water in them, even though some of this water is removed by pumping for dust control on the landfill. Furthermore, Pila Creek, where it daylight from the Tajiguas culvert that passes underground at the west side of the landfill footprint, has been observed to support flow most of the time, or virtually all year long, albeit at low flow rates. (Personal observations, Brian Trautwein, 9-20-01, Personal communication, Bob Hazard, Gaviota Coast Conservancy) The draft EIR on page 3.4-13 identifies white alder trees in Pila Creek, and these trees are highly indicative of perennial surface flow. Please clarify by providing evidence, such as water sampling events for the culvert and Pila Creek at the culvert, when this creek was not flowing at all (i.e., not trickling) at this location on the project site.

Similarly, page 3.3-10 states that the creek flows only after significant rainfall events and that no perennial springs have been noted in the watershed. This contradicts the Robert Cady declaration, which is included as part of the draft EIR, and which states that numerous springs were encountered when the landfill was constructed. (Appendix A, Technical Studies) Please explain this discrepancy. Could there be springs that were exposed during construction, which are now buried beneath waste or fill?

Where does the water seen trickling out of the culvert during the dry season (e.g., through September) come from, since there is no water flowing into the culvert during the summer and fall?

Groundwater

On page 3.3-4 the draft EIR states that, "Groundwater is present in both the fractures and intergranular spaces of these [Gaviota, Alegria, Sespe, Vaqueros, Rincon and Monterey formations] consolidated rocks." According to GeoSolv, an expert geo-hydrological consulting firm retained by Surfrider, Heal the Ocean and Gaviota Coast Conservancy, "unless otherwise indicated within the Basin Plan or a formal Regional Board Order which dedesignates a surface or ground water body's beneficial use designation, groundwater in the Rincon, Vaqueros and Sespe-Alegria, and the Gaviota hydrogeologic units are considered to have potential or existing drinking water beneficial use designations." Evaluation and Reporting on Contaminant Hydrogeological Conditions at the Tajiguas Landfill, Geosolv, 12-12-2001, (Exhibit 1, page 6)

3-14

Furthermore, GeoSolv has concluded that "the basal groundwater table in the waste mass has been defined," and is higher than and in contact with these fractured rock formations. Therefore, groundwater in the landfill waste mass is in contact with and can travel into these aquifers and move laterally (east and west) to adjacent canyons. The draft EIR's Existing Conditions section does not describe this existing feature of the site.

3-15

The draft EIR notes that, "A component of the southward groundwater flow is blocked by cross-strike (east-west trending), low permeability aquitard units, ..." and that, "some groundwater flow ... is deflected eastward, around the Rincon Formation (aquitard), where it may discharge as base flow to the alluvium in Arroyo Quemado. (EMCON, 1994b)." (Draft EIR at page 3.3-18 - 3.3-22.) This potential migration of groundwater flow to the east and potentially to the west may not be limited to flows from the Vaqueros formation, but may include flows from other formations and from the water in the landfill waste mass itself, which is in contact with fractures in these formations, and which therefore has the potential to migrate offsite underground. The draft EIR does not address this groundwater flow. Thus, there is a potentially significant surface and groundwater quality impact. According to GeoSolv, an extensive monitoring program to detect existing eastward and/or westward migrating groundwater from the landfill vicinity is currently lacking, and should be required to address this impact to surface water quality in adjacent waterways including Hondo Creek and Arroyo Quemado Creek.

3-16

Page 3.3-4 of the draft EIR states that "groundwater is also present in the shallow alluvium that overlies the bedrock units, particularly in the lower portions of the stream valleys. The alluvial deposits are up to 100 feet in thickness in the larger canyons." The landfill was built on top of the buried Pila Creek channel, which, at this location, is in the alluvium. The placement of unconsolidated, though compacted, waste material fill on top of the alluvium essentially increases the height of the alluvial material above the underlying bedrock. The waste acts as alluvial material, and groundwater is present in the waste. (Exhibit 1, Cross-Section A-A<sub>1</sub>) The draft EIR states on page 3.3-23 that "Groundwater is also present in the lower portions of the landfill mass." This existing condition violates CCR Title 27, which requires a five-foot separation between the lowest point of the waste mass and the highest point of the groundwater measured when groundwater is at its highest point, including the capillary fringe. GeoSolv indicates in Cross Section A-A<sub>1</sub> that groundwater is 100 feet up

into the waste mass. How far into the waste mass does groundwater extend vertically under the existing conditions?

3-17

Further, there is no liner between the mass and the former ground surface and compacted soil does not prevent water from moving between landfill units. Page 3.3-23 states that the water in the landfill "is interpreted to be locally present in local cells of intermediate permeability separated from each other by zones of low permeability, as would be expected from typical landfill operations." Does this groundwater extend down into the alluvium, or is there some mechanism preventing water in the waste from contacting water in the former ground surface and alluvium? If so, at what elevations below 240 to 290 feet msl is the landfill dry? When wells were drilled as part of the ARCADIS Geraghty & Miller evaluation of groundwater in the landfill, did the tests indicate that the water in the cells was totally isolated by the cells, or is there hydrological communication between the cells and between the cells and the underlying former ground surface and alluvium?

3-18

The ARCADIS study evaluation identified large quantities of water extracted from at least one dewatering well. What is the existing condition of the water in the waste mass with regard to its bacteria content, and was the water extracted by the dewatering well, which had to be trucked to a waste water treatment plant for disposal, tested for bacteria? If so, what were the results?

3-19

The draft EIR refers to the Rincon as an aquitard, which is a "relatively impermeable unit that forms a barrier to or significantly retards groundwater flow." The draft EIR and GeoSolv find that the Rincon has "zones of intensely fractured rocks," and the draft EIR states that, "fractures and intergranular spaces of these consolidated rocks." Given this, to what relative degree can the Rincon be considered to block southward groundwater movement? Might these fissures and fractures direct it to the east, to the west, and/or to the south? Does groundwater move through the Rincon formation's intense fractures? Does the Division currently monitor all of these fractures, and does the Division know where all of these existing fractures are? Please provide a three-dimensional map that depicts all of these fractures and other conduits for groundwater migration in the Rincon, in the zones between the various formations, and in the other formations. Such a map is needed to depict the existing conduits that potentially serve to transport contaminated groundwater from the vicinity of the landfill offsite. Therefore, such a map of existing hydrogeologic conditions is needed to determine the degree to which the existing landfill and the proposed expansion may contribute to leachate movement offsite to other ground and surface waters.

3-20

The draft EIR states that "The potentiometric gradient or slope of the water table is related to the topography, being steeper in mountain areas and shallower in lowland areas." Since the groundwater table tends to follow the topographic contours of the land surface, has the groundwater risen from the alluvium on which a portion of the landfill was placed into the waste mass in response to the elevated ground surface at the landfill?

Has construction of compacted earthen berms (i.e., as part of the landfill) near the mouth of the canyon (i.e., by the canyon neck near the Monterey formation's contact with the Rincon

3-21 formation) acted in any way as a dam to subsurface alluvial flows, causing that groundwater table to rise or facilitating groundwater diversion to the east or west through fractures, fissures or other conduits within or between formations? Please explain the reasoning and provide evidence in support of the response.

3-22 Page 3.3-9 of the draft EIR states that "less than 10% of the annual recharge to the Vaqueros Formation is due to direct recharge. Therefore, inflow of groundwater from adjacent, upgradient hydrogeologic units is the primary component of groundwater recharge." Since a portion of the unlined landfill waste mass is located above the Vaqueros Formation near MW #13 (draft EIR Figure 3.3-4 and GeoSolv, Cross Section A-A1), can it be proved that water from within the landfill is not entering this formation?

#### Groundwater and GLCRS

3-23 On page 3.3-15, the draft EIR states, "the [Pila Creek] culvert extends above the groundwater leachate collection and recovery system (GLRCS), and any leakage around the culvert likely enters the GLRCS." (Emphasis added.) The GeoSolv report notes that the GLRCS trench does not extend to the bedrock on either side of the canyon. "The collection Trench Profile and Details cross section also verifies that the 20 to 35 feet of soil exposures on the east and west sides of the trench are permeable alluvium. ... This provides a pathway for contaminated groundwater to bypass the trench and contaminate groundwater in the Monterey Shale formation and the beaches beyond." (Exhibit 1, page 6) When asked on September 20, 2001 if the GLRCS trench captures all subsurface flow, a Division staff person present at the site visit indicated they believed it did not. (Personal communication Mark Tatum, 9-20-01) Page 3.3-21 of the draft EIR states that the GLCRS trench is key-seated into the underlying bedrock, but it does not indicate whether or not it is keyed into the bedrock on the sides of the canyon. GeoSolv states that it is not. The draft EIR notes on page 3.3-22 that the alluvium and colluvium in the valley floor are hydraulically connected to the underlying Monterey Formation. Given this, does the Division believe that the trench captures all subsurface alluvial flow moving in all southward directions? Could the trench be widened and keyed into the bedrock formations to its east and west? Could the few monitoring wells located in the alluvium downstream from the trench be located such that they may miss contaminated groundwater leaving the site? Could contaminated water in the alluvium be entering the Monterey Formation near the trench as indicated by GeoSolv, and migrating offsite via conduits not currently monitored, including fractures and fissures? Please provide the documents to support your answers.

#### Groundwater Source

3-24 The draft EIR states on page 3.3-18 that "The water in the alluvium ... is derived from discharge from the Vaqueros and Monterey Formations ... and from the infiltration of precipitation." Considering that there is no lining between the waste, which has water in it, and the alluvium, which has water in it, is some of the water that recharges the alluvium derived from water in the landfill waste?

3-25 The same paragraph states, "The groundwater discharges via evapotranspiration, stream flow, and as underflow to downgradient hydrogeologic units." Does groundwater also discharge in

the waste mass, as suggested by Cady's description of the landfill construction, and by GeoSolv?

#### Groundwater Movement

3-26 If "bedrock aquifers exposed in Canada de la Pila may be hydraulically connected to those in adjacent canyons and watersheds via lateral flow along contacts with aquitard units," as stated in the draft EIR, does this mean that contaminated water may move laterally through those connections to offsite surface and/or groundwater bodies? How many monitoring wells does the Division maintain east and west of the landfill? Are these well(s), if any, at the proper depth to tap into and monitor water flowing along contacts with aquitard units, and within other conduits such as fractures and fissures. Would it be feasible to monitor each potential pathway for groundwater to move offsite in these ways?

#### Groundwater Elevation and Landfill Expansion

3-27 Page 3.3-20 states that "the [proposed] backcanyon landfill bottom elevations will be situated above any groundwater locally present in the Sespe-Alegria." However, this refers to only the present elevation of such groundwater. If, as the draft EIR notes, groundwater elevations and gradients are related to topography, would placement of compacted fill in this area (e.g., a rise in the topographical ground elevation) potentially cause the groundwater in the Sespe-Alegria formation or other formations to rise as well, possibly into the future waste mass location?

3-28 The draft EIR notes that two new monitoring wells were drilled into the Vaqueros at the location of the proposed expansion area, and that groundwater levels were 376 and 362 feet above sea level, which is below the proposed bottom of the expansion area. How far below the bottom of the proposed expansion are these levels, and what time of year were these measurements taken, i.e., were they taken when groundwater was at its expected highest level? What is the highest expected level of water in the Vaqueros at this location, and would placement of a massive area of fill (the expansion), by changing the topography, cause the groundwater level in the Vaqueros to rise?

#### Groundwater and Toxic Compounds

3-29 On page 3.3-42, the draft EIR finds that "if these [methane and carbon dioxide] gases come into contact with groundwater, the toxic organic compounds can be transferred to the water." The draft EIR concludes that there is water in the landfill mass. Thus, water is in contact with these gases which are present in the waste, and toxic compounds are transferred to groundwater. This is a significant water quality impact.

#### Leachate Quantity and Source

3-30 The draft EIR finds on page 3.3-55 that large quantities of leachate would not be generated. However, the ARCADIS report in the EIR's technical appendix states that 40,000 gallons of water (leachate) was removed from the landfill during the testing of the dewatering wells. Is this not a large quantity of leachate? Did this 40,000 gallons come up into the landfill from groundwater rising up into the waste, or from infiltration from precipitation? The draft EIR finds that the expansion will not cause large quantities of leachate, however, this conclusion is

based on the semi-arid nature of the climate and does not consider rising groundwater as a source of leachate water, or even evaluate what the actual situation is.

3-31 The draft EIR finds that groundwater quality impacts "would be considered significant" pursuant to CEQA if the Division, "Allows waste to come within 5 feet of the highest groundwater." (Draft EIR, page 3.3-50) Therefore, since the EIR concludes on page 3.3-23 that groundwater is present in the lower portions of the landfill, the existing and proposed projects cause significant impacts that the draft EIR fails to identify despite the statement that impacts "would be considered significant." Related to this, the Regional Water Quality Control Board's 5-3-98 letter to the County regarding the Tajiguas expansion project's NOP states that, "A landfill expansion is considered the same as the siting of a new landfill... All siting criteria contained in subtitle D and Title 27 must be evaluated." These include, "Prohibition A.10 - Discharge of wastes within five feet of the highest anticipated elevation of underlying groundwater, including the capillary fringe, is prohibited." The Board's letter also states that ... "before expansion may be approved ... this includes ... returning the landfill to full compliance with its WDR's." This violation of the five-foot rule makes any expansion of the landfill inappropriate.

#### Potential Impacts to Water Quality in Arroyo Hondo

3-32 The Arroyo Hondo Preserve, which still conducts agricultural operations, gets its potable water from a well in the Vaqueros Formation, which flows artesian at times. This type of flow indicates flow in the aquifer from a higher elevation. The Arroyo Hondo well is located significantly lower than the elevation where this formation is exposed in Pila Canyon (at roughly 500 feet msl and directly below the proposed expansion area). Waste will be disposed of to approximately 700 feet msl above the Vaqueros Formation in Pila Canyon. Given the potential for differential settlement of any clay or other liner proposed for the expansion area, if leachate were to enter the Vaqueros, could it migrate downgradient to the Arroyo Hondo well field and/or into Arroyo Hondo Creek, habitat for several endangered and threatened species?

3-33 Please provide evidence regarding how long the liner and/or clay barrier will be effective at preventing any leachate that may be present from seeping into soil and/or bedrock below the expansion area.

#### Surface Water

3-34 Section 30231 of the Coastal Act requires that water quality in coastal waters, such as Pila Creek, be maintained or improved. The draft EIR notes that "time equivalent data are not always available for comparison." What are the Division's plans to obtain time equivalent data? The draft EIR finds that "areas downstream of the landfill generally have much higher levels [of EC, turbidity and TSS] than those situated upstream of the landfill." The draft EIR states that this "would be expected in any comparable watershed, regardless of the presence of a landfill." Please provide supporting documents for this statement. Specifically, how much were these constituents elevated below the landfill compared to above the landfill, and what control watersheds of similar size, topography and geology were used for comparisons, if any? What disturbances in the control watershed(s) add TSS and turbidity to those waters?

Given that the elevated levels of turbidity and TSS in the water occur downstream of the landfill but not upstream, how can the Division illustrate that the landfill facility is not adding to this sedimentation?

#### Surface Water Turbidity

3-35 Surfriider disagrees with the draft EIR that "there is no evidence that landfill operations have contributed to increased erosional impacts in the Pila Creek drainage system." This statement is misleading. The draft EIR identifies "much higher levels" of EC, turbidity and TSS downstream from the landfill compared to upstream. These water quality constituents are related to erosional and depositional processes in the watershed. Since the levels are much higher below the landfill, the evidence indicates that the landfill is responsible for this water quality problem, regardless of the presence of sedimentation basins. Moreover, the draft EIR fails to discuss litter as a water quality concern and significant levels of trash have been documented in Pila Creek below the landfill and at the creek mouth on the beach.

3-36 Page 3.3-40 refers to "sampling locations ... shown in Figure 3.3-9." There is no Figure 3.3-9 in the draft EIR.

#### Surface Water Bacterial Contamination

3-37 With regards to bacteriological contamination of Pila and Arroyo Quemado Creeks, the draft EIR states, "Potential sources for the bacterial contamination include: native fauna, runoff from green waste, runoff from the active landfill surface, and avian feces." However, the draft EIR fails to describe that the Pila Creek culvert became corroded, allowing groundwater to seep into it continuously or during high groundwater periods, which are times bacteria counts in Pila Creek were high. The Division has reportedly lined the lower portions of this corroded pipe in recent years. Does this pipe still leak, allowing groundwater from above the pipe to enter the pipe? How does this culvert go through the area of the GLRCS trench, where is it located relative to the trench, and could the disturbed soils associated with installation of the culvert many years ago act as a conduit for groundwater movement from upstream (north) of the trench to below (south of) the trench? Please provide a diagram as well as a written response.

3-38 Could groundwater derived from the landfill, during periods of high groundwater, bypass the trench via the disturbed alluvium on either side of the trench or along the culvert's path via the Monterey Formation, and then surface as groundwater in Pila Creek, adding to its recorded high levels of bacteria?

3-39 The draft EIR on page 3.3-41 finds that during the wet season, bacteria transport in Pila Creek is similar to that in other creeks. However, the other creeks listed all have domestic sources of fecal material and are known to have high bacteria counts at times. Arroyo Burro has homeless people, septic systems, horses and many pets in the watershed. Jalama Creek has large numbers of cattle and horses, in the watershed, and these animals can be seen standing and defecating in the creek at various locations (personal observation, Brian Trautwein, Keith Zandona, Project Clean Water Animal Waste Committee Report). Refugio Creek has a large agricultural component, many septic systems including old septic systems near the creek, and

equestrian facilities next to the creek. Rincon Creek is similar to Refugio Creek. Each of these are major South Coast creeks, while Pila Creek is significantly smaller. Pila Creek does not have agriculture, equestrians, homeless encampments, or significant cattle operations. Pila Creek does have a landfill. Why does the draft EIR compare Pila Creek to creeks that have domestic bacteria sources and that are much larger watersheds? This appears to be an inappropriate comparison. How do the bacteria levels in Pila Creek compare to those in similar sized creeks that do not have domestic bacteria sources? The fact that Pila Creek has pollution levels similar to known polluted creeks does not exonerate, and in fact may implicate the landfill.

Avian Sources of Bacterial Contamination of Surface Waters

The draft EIR finds that "the widespread presence of feces from the large seagull population that is attracted to the landfill is exposed to runoff during rainfall events and could be a contributing factor." The 11-2001 study by URS indicates that seagulls are responsible for some of the bacteria found in Arroyo Quemado Creek. Seagulls use Arroyo Quemado Creek at the mouth as a source of freshwater, and are attracted to the landfill because they can get food there in the trash. Therefore, if seagulls attracted to the landfill are a source of bacterial pollution in Arroyo Quemado and Pila Creeks and the ocean, then this is related to the operation of the landfill. The continued operation of the landfill if expanded will continue to contribute bacteria to these creeks in this way, likely causing water quality standards to be exceeded. Arroyo Quemado Beach, which is located at the creek mouth, was designated by Heal the Bay as the dirtiest beach in all of Southern California due to high levels of bacteria. The expansion project will exacerbate, rather than mitigate this problem. Proposed mitigation measures for nuisance birds are similar to what the Division already does, and this has proved to be inadequate to prevent significant deterioration of surface water quality and impairment of beneficial uses. The proposed project, by continuing this landfill-related water pollution problem, results in a significant water quality impact under CEQA, evidenced by the frequent County Health Department warning status of the beach. This violates the Coastal Act, which requires that water quality in the coastal zone be maintained or improved.

The draft EIR finds that "it does not appear that bacteriological indicators of water quality found at Canada de la Pila are related to concentrations of those indicators at Arroyo Quemado." However, the draft EIR does find the avian feces may contribute to these indicators at Pila Creek, and the 2001 URS study finds that avian feces contribute to bacteria pollution at Arroyo Quemado. The draft EIR also finds that birds attracted to the landfill in Pila canyon go to Arroyo Quemado. How can the draft EIR find that these indicators do not appear related when the evidence provided by the Division, including the draft EIR and 2001 URS study, identify seagulls as a source of the pollution? Based on the evidence provided by the Division, seagulls attracted to the landfill contribute to pollution in both creeks. This is a project-related impact, and while it is part of the very degraded baseline water quality conditions, the expansion project will continue it into the future and add to this significant cumulative impact of the landfill.

Surface Water Quality Impact Assessment

The draft EIR finds that water quality impacts "would be considered significant" if the project would "substantially degrade water quality." The County's CEQA Thresholds for water quality impacts find that an impact would be significant if a project would "violate water quality standards." The URS 2001 study and the draft EIR identify seagulls as a vector for transporting bacteria into Pila and Arroyo Quemado Creeks. The proposed project would continue and would not mitigate this impact other than continuing nuisance bird mitigation efforts that have not prevented seagull waste from birds attracted to the landfill from polluting the creeks. Arroyo Quemado was recently labeled the dirtiest beach in southern California due to the high levels of bacteria there, which exceed state and local water quality standards. Therefore, the proposed project will substantially degrade water quality related to transport of bird feces each time it rains on the watersheds where birds attracted to the landfill defecate. Each time this occurs during the expansion project, this would constitute a significant water quality impact. The draft EIR incorrectly concludes in contradiction of the evidence that the project would not result in significant water quality impacts.

Surface Water Use

The draft EIR informs the reader that the Tajiguas project does and will continue to reduce stream flows in Pila Creek significantly. While the draft EIR indicates that this is a benefit or mitigation measure of the project, it results in significant adverse effects to water quality and habitat in the coastal zone, including depriving a riparian habitat of flows needed to sustain riparian vegetation and aquatic species. Significantly lower flows in Pila Creek mean that any pollution in the creek will be more concentrated, as less water is available due to the project to flush pollutants out of the creek or to dilute their concentrations.

According to the draft EIR, the existing basins and the proposed basin to retard creek runoff volumes will prevent runoff from entering the creek during any storm event up to a nine-year return runoff event. This significantly deprives the creek below the basins of surface flows and this adversely affects water quality. By causing the creek to flow 30 to 37% less (draft EIR page 3.3-61) and to go dry earlier in the year, the project's water retention facilities degrade water quality and adversely affect flows. Surfrider disagrees with the conclusion that "impacts to surface water flows and quality ... are ... not significant." This conclusion does not consider that standards for bacterial contamination have been exceeded at Pila and Arroyo Quemado Creeks, that seagulls attracted to the landfill are substantial contributors to the bacteria load at the creeks (URS 2001 and draft EIR), or that reducing stream flow is an adverse impact. Impacts to flows and water quality are significant and adverse based on the evidence in the record.

In addition to reducing surface flows in the creek, the basins may starve the water of sediment. Sediment starved water has greater erosional capacity than sediment laden water, and causes more erosion as a result. The draft EIR purported to address downstream erosion impacts, but the impacts associated with discharging sediment-starved water into the creek were not analyzed in the draft EIR.

Water Use

3-46 The draft EIR states on page 3.3-59 that Well #3 in the Monterey Formation would be used if water levels in the Vaqueros water supply well drops regularly due to pumping activities. However, this measure is not included in the mitigation measures for impacts to water supply on pages 3.3-62 and -63. The County's adopted CEQA Thresholds to determine the level of impacts to bedrock aquifers state that an impact would be significant if it causes overdraft in such an aquifer. The project will reduce recharge to bedrock aquifers by between 17 and 22 AF/Y, and will rely on water drawn from these aquifers. The draft EIR fails to assess impacts to bedrock aquifers pursuant to the adopted thresholds.

Cumulative Water Quality Impacts

3-47 There is a serious ongoing water quality problem in Pila Creek and at Arroyo Quemado, and this problem is caused at least in part by seagulls attracted to the landfill, according to the draft EIR and the URS 2001 study. Since the landfill would not be closed but would instead be expanded after it runs out of permitted capacity, the proposed project will continue to attract seagulls and continue this water quality problem. Proposed mitigation measures have largely been implemented, and have not proven effective at reducing water pollution borne by seagulls. Given that the project would contribute to and continue a significant water quality impact, the project must mitigate its contribution to these impacts to the maximum extent feasible. After the landfill runs out of currently permitted capacity, the expansion project will be the project causing the seagulls to contaminate the creeks and ocean. Thus, this is a significant project-specific and cumulative impact. Mitigation measures proposed to deal with seagulls are essentially the same measures currently being employed at the landfill and these have proven ineffective at preventing exceedences of water quality standards.

D. Analysis of the Draft EIR's Section 3.4 Biological Resources

Section 3.4.1 - Applicable Standards

3-48 The draft EIR fails to list on page 3.4-2 the California Coastal Act and the County Local Coastal Plan and Coastal Zoning Ordinance as they relate to the project's biological resources impacts. Specifically, Sections 30240 and 30231 of the Coastal Act relate to protecting biological resources and are applicable to the project. All policies in Section 9 of the LCP are potentially relevant to the project. In addition, the State Fish and Game Code Section 4700 relating to Fully Protected mammals is applicable due to the presence of Ringtails at the project site but is not listed. In addition, Fish and Game Code Section 5937 requires that the operators of dams, such as the onsite and proposed detention basins, must release enough water from such dams to support downstream aquatic species in good condition.

Section 3.4.2 - Existing Conditions

3-49 The draft EIR identifies purple needlegrass on the project site, but does not discuss if this habitat is in the coastal zone or whether or not this area(s) meet(s) the LCP and Coastal Act definition of ESHA. Perennial native bunch grassland habitats have been eliminated by 99.9% in the state and are easily disturbed by human activities and development. Similarly,

the draft EIR does not discuss whether or not annual grasslands, which support rare species including the fully protected white-tailed kite, are ESHA or in the coastal zone. Other habitats, including coastal sage, which the LCP identifies as a type of ESHA, will be impacted in the coastal zone and support sensitive species, but are not described relative to the definition of ESHA. The definition of ESHA does not provide for degraded ESHA habitats to be considered non-ESHA.

Section 3.4.3 - Project Impacts  
Creek Setback and Mitigation Measure BIO-2

3-50 The draft EIR describes a 50-foot setback from Pila Creek. Setbacks must be measured from the top of the bank or the edge of the riparian vegetation because creek setbacks are designed to protect the riparian habitat, which can extend beyond the top of bank. Please clarify in the discussion, as it is in the mitigation measure, that the setback would be measured from the top of bank or from edge of riparian vegetation, whichever is greater, consistent with how the County employs development setbacks under its General Plan and LCP.

The County's LCP requires that for creeks in rural areas, such as the project site, creek setbacks should be 100 feet. Even though only a portion of the creek onsite is in the coastal zone, it flows into the coastal zone, and therefore the size of the setback outside the coastal zone is relevant to protecting stream resources in the coastal zone, including water quality. The County General Plan's Conservation Element also includes 100-foot setbacks for creeks. The proposed setback does not comply with the General Plan or, for those portions of the project, including grading, within the coastal zone, with LCP Policy 9-37. Setbacks must be large enough to protect the resource. The Coastal Commission's 6-25-94 Guidelines state that setbacks for all Environmentally Sensitive Habitat Areas (ESHAs as defined under Public Resources Code Section 30107.5), which Pila Creek is, should be a minimum of 100 feet, and that setbacks for creeks should be measured from the outer edge of riparian vegetation or, in cases where there is no riparian vegetation, from the top of bank.

Impacts to Red-Legged Frogs and Pila Creek

3-51 The draft EIR does not discuss the adverse effects caused by the 30 to 37% reduction in the average annual stream flows caused by runoff control facilities, or how such reductions could adversely impact riparian and aquatic habitats and red-legged frogs. The project site is in the federally designated critical habitat for red-legged frogs, in the Fish and Wildlife Service's Recovery Unit 45 in the red-legged frog Recovery Plan, and it includes upland dispersal habitat. The impacts on dispersal and recovery should be adequately analyzed in the draft EIR.

Impacts to Ringtails and Mountain Lions

3-52 The draft EIR concludes that impacts to these species would not be significant because these animals can move away from the project site upon initiation of construction. Please describe if and how forcing these animals into existing territories of other mountain lions and ringtails could result in the deaths of these animals due to increased competition or other factors if adjacent territories are already occupied at their carrying capacities. Given that these are fully protected species, they are rare. The draft EIR notes that the project would restrict their range

by forcing them away from the project site environs, and therefore under CEQA Guidelines Section 15065, the project triggers a Mandatory Finding of Significance relating to these species. Thus, we disagree that the impacts to these species would be Class II, because the draft EIR admits their respective ranges would be restricted by the project.

Impacts to Arroyo Hondo Preserve

At the time the draft EIR was prepared, Arroyo Hondo was a private ranch. The draft EIR at page 3.8-2 states that the land to the west is a ranch, but does not recognize its current status. Now it is an ecological preserve owned by the Land Trust for Santa Barbara County. The project noise can be heard from within this preserve. The Biological Resources impacts and Land Use impacts at the Preserve caused by this noise were not evaluated in the draft EIR.

Section 3.4.5 - Mitigation Measures

Significant biological impacts must be mitigated to the maximum extent feasible. CEQA Guidelines Section 15002(a)(3). Also see Public Resources Code Section 21081(a)(3). Moreover, "The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." Public Resources Code Section 21002. The proposed measures can be revised to feasibly lessen the residual significant impacts identified in the draft EIR. The lead agency must show, based on evidence that the additional mitigation commitments described below are not feasible, not effective, or would not further lessen significant impacts.

Measure BIO-1 should specify all of the sensitive plant species that would be salvaged and transplanted. The areas to which these plants are transplanted on County land should be permanently protected by such means as a permanent conservation easement to ensure proper protection for these salvaged resources. This feasible proposed measure should also specify whether some or all of the sensitive plants will be salvaged, and should require salvage of as many as possible that are identified. It should include provisions for botany monitors to flag and direct the transplanting of these plants prior to and during construction.

Measure BIO-3 should be augmented to provide for replacement of all oak trees that would have greater than 25% of their canopies removed. This measure should apply to all tree species, including bay trees which occur on the project site.

The impacts of Measure BIO-5 should be analyzed in the draft EIR. (CEQA Guidelines Section 15126.4(a)(1)(D). (See also *Stevens v. City of Glendale* (1981) 125 Cal.App.3d 986).) Relocating desert woodrats into areas where this species may already be at its carrying capacity may be ineffective because saturating an area with a species above its carrying capacity may increase competition and mortality. Mitigation measures must be certain, feasible, and effective. *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692 [270 Cal.Rptr. 650].

The biological impacts of Measure BIO-6 should be evaluated. Specifically, if non-natives are used in the hydroseeding, will these species invade native habitats and compete with native grasses or other species? To avoid such impacts, this measure should require that hydroseeding occur with only native species from the project vicinity. (See also LCP Policy 3-17.)

Measure BIO-7 should require that sensitive habitats be replaced at a minimum 3:1 ratio, rather than 1:1 as proposed. This is a feasible mitigation measure and is in fact what the County often requires of private applicants. "The [Coastal] Commission regularly requires as much as 3:1 mitigation ratios or greater for loss of wetlands and environmentally sensitive habitats," according to the Commission's Executive Director, Peter Douglas. (11-8-01 Coastal Commission letter to letter to State Senator Byron Sher regarding SB 107.) Revegetating an area with native plants does not replace the biological value of the habitat lost to construction because a habitat is more than the plants; it includes the microbes and animals too. For this reason, a higher than 1:1 ratio should be required if avoidance is not feasible. This measure should also specify a requirement for avoidance to the extent feasible, since the total footprint of disturbance has only been generally identified. The County's CEQA Thresholds state that avoidance should be the primary mitigation for habitat impacts. It also states that habitat replacement should occur onsite when feasible, when avoidance is infeasible. It states that habitat replacement onsite and offsite is "generally not preferred because it always results in some habitat loss... and because prospects for successful habitat replacement problematic." Thus, for unavoidable habitat impacts, replacement should occur at a 3:1 ratio.

This measure should also require the habitat replacement to occur at the time of the impact, rather than at the time of closure, to avoid exacerbating the temporal impacts that will result from removing decades and centuries old plant communities and starting from scratch. The current measure allows for deferral of the revegetation until closure of the landfill, but the draft EIR does not say the landfill will be closed after this expansion project. The County can feasibly restore areas in the project vicinity and at Baron Ranch concurrent with construction or sooner, and therefore delaying this mitigation and exacerbating temporal biological impacts as proposed is not necessary and can and therefore must be avoided. More immediate revegetation is feasible, and would substantially lessen the significant habitat impacts identified in the draft EIR. In addition to the more immediate 3:1 replacement of unavoidable habitats, this measure should require planting of only native plant species on the landfill surface at the time of closure so that non-native plants are not planted in this generally sensitive mountainous area.

Measure BIO-8 must describe where red-legged frogs will be removed to, in the event they are discovered under (f) of the measure.

We propose that Measure BIO-8(i) should specify that each time vegetation is impacted as part of basin maintenance, revegetation will occur at a 2:1 ratio.

3-63 Measure BIO-9 can feasibly require that artificial lighting be minimized all year (as opposed to October through March as stated.) This would help to lessen significant impacts associated with wildlife disturbance year-round.

3-64 New Mitigation Measure:  
The SWUD shall provide for the release of water from its basins to maintain stream flow in Pila Creek at all times water is flowing into the basins. Releases shall mimic the inflow patterns of water entering the basins.

E. Assessment of Draft EIR's Nuisance Impact Analysis.

Section 3.6.3 – Project Impacts

3-65 The draft EIR states that nuisance impacts would be considered significant if the project would create a public nuisance or cause a violation of regulations or standards. The seagulls that the draft EIR finds are attracted to the landfill and that will continue to be attracted to the expansion project after the current permitted capacity is used up will continue to defecate in the two watersheds that experience exceedences of water quality standards for bacteria. These documented exceedences, which the URS 2001 study and EIR associate with seagulls attracted to the landfill, are expected to continue after project implementation. In addition, mitigation measures for nuisance birds are essentially those measures employed to date, which have not prevented seagulls attracted to the landfill from polluting the creeks and ocean. Therefore, the project will likely continue to cause this nuisance impact which violates water quality standards. Thus, nuisance impacts should be classified as significant pursuant to the thresholds described on page 3.6-11.

F. Assessment of Draft EIR's Land Use Impacts / Policy Consistency Analyses.

3-66 Projects cannot be approved if they violate or are inconsistent with any one general plan or LCP policy. *San Bernardino Audubon Society v. County of San Bernardino* (1984) 155 Cal.App.3d 738, 753 [202 Cal.Rptr. 423]; *Napa Citizens for Honest Government v. Napa County* (2001) 91 Cal.App. 4th 342, 378 [110 Cal.Rptr.2d 579].

The following policies and laws would be or may be violated by the proposed project.

3-67 LCP Policy 9-14 requires that new development adjacent to or in close proximity to wetlands shall be compatible with ... and shall not result in a reduction in the biological productivity or water quality of the wetland due to runoff ... or other disturbances. The project will continue (after the currently permitted capacity is used) to cause degradation of water in Arroyo Quemado estuary and Pila Creek every time it rains because, as noted in the draft EIR and URS 2001, birds attracted to the landfill defecate in the watersheds and this fecal material is washed into the creeks. In addition, water quality will likely be impacted by subsurface migration of leachate. Thus, the expansion project will degrade the water quality in these water bodies and the ocean via avian vectors, in violation of LCP Policy 9-14.

3-68 LCP Policy 1-1, by incorporating the Coastal Act's resource protection provisions, requires that ESHA be protected and that only uses dependent on ESHA that would not significantly degrade ESHA be allowed in ESHA. It also requires that development adjacent to ESHA be sited and designed to avoid significant disruption to the ESHA. (Public Resources Code Section 30240(a) and (b).) The draft EIR admits that substantial acreage of coastal sage habitat, a habitat specifically identified in the LCP as ESHA, will be directly removed by the project. Additionally, areas adjacent to ESHA, including Pila Creek, will be developed, and have the potential to significantly impact ESHA, including ESHA in the coastal zone south of, and downstream from, development just inland from the coastal zone. This violates the Coastal Act and LCP.

3-69 Coastal Act Section 30231, included in the LCP, and LCP Policy 3-19 require that water quality and biological productivity in coastal waters including Arroyo Quemado Creek and Pila Creek be maintained or enhanced. This project will degrade water quality after the currently permitted Benchfill Project ends by encouraging seagull defecation in Pila Creek, its watershed, and Arroyo Quemado Creek, its estuary and the ocean.

3-70 The project will also continue to block the flow of approximately 30% to 37% of the average annual flows in Pila Creek, preventing them sustaining the creek downstream into the coastal zone. Section 30231 of the Act requires "preventing ... substantial interference with surface water flow...." The project will violate this requirement by continuing to restrict Pila Creeks' flows to the detriment of its habitat and water quality.

3-71 LCP Policy 9-18 requires that new development shall be sited and designed to protect native grassland areas. The draft EIR does not describe any areas of native grassland, but states native grasses are present. The draft EIR includes no evidence that any attempt was made to determine if the areas of native grasses are native grasslands pursuant to the County CEQA thresholds or any other grassland identification methods, or whether the native grass areas may constitute ESHA.

3-72 LCP Policy 9-29 requires that areas be retained as grassland habitat to protect foraging areas for the white tailed kite. This project notes that kites, a fully protected bird species under the Fish and Game Code Section 3511, forage in the project area. The project may violate this policy by impacting foraging areas for kites.

3-73 LCP Policy 9-36 requires that when sites are graded, significant amounts of native vegetation be preserved. These impacts are not minimized in the EIR. Alternatives that would further minimize removal of native vegetation and perhaps render the project consistent with this policy are discussed below.

3-74 LCP Policy 9-37 and the Conservation Element (page 149) generally require that creek setbacks in rural areas be 100 feet. By proposing only a 50-foot setback, even in the inland portion of the site, will adversely affect Pila Creek in violation of these policies. No

justification for halving this setback standard has been provided, and standard measures such as sediment controls do not warrant such a drastic reduction of the creek setback.

3-75

LCP Policy 2-6 requires there to be adequate water available for the project. However, the draft EIR finds that the Vaqueros water supply well may need to be augmented. Mitigation measures requiring the use of alternative water sources should the Vaqueros well be overdrawn have not been included or analyzed.

3-76

Coastal Act Section 30251 requires protection of visual resources in the coastal zone. The draft EIR finds that impacts to views will be significant. These significant impacts illustrate that the project may violate the Coastal Act and LCP's view protection provisions. Inadequate mitigation is provided for this impact. This impact can be lessened by a dense planting of sycamores in the neck of Pila Canyon from Highway 101 to the maintenance building area.

3-77

LCP Policy 3-13 requires that development projects be denied if it can be shown that the development can be carried out with less alteration to the natural terrain. Various alternatives can reduce the need for excessive cutting and filling. Please see Surfrider's discussion of alternatives below.

3-78

The Land Use Element's Land Use Policy 3 requires that no urban development shall be permitted beyond the boundaries of land designated for urban uses except in neighborhoods in rural areas. Expanding an industrial facility such as the landfill into the rural portion of the County and Pila Canyon violates this general plan policy.

3-79

The Open Space Element's Other Open Land Policies, Policy #2, requires that the utilization of open lands shall be consistent with protection and long-term productivity of County watersheds. This project is not consistent with maintaining the productivity of Pila and Arroyo Quemado Creeks' watersheds. It would significantly degrade water quality and biological resources and will continue to substantially inhibit flows in Pila Creek.

3-80

The County's Landfill Siting Element requires that the bottoms of new or expanded landfills be located more than five feet above the highest expected groundwater level. The draft EIR admits that there is groundwater in the unlined landfill. Landfills cannot be sited where they would impair the beneficial use of waters of the state. GeoSolv finds that, since waste is in contact with aquifers, this impairs the presumed beneficial use of groundwater related to water supplies. Additionally, contrary to the findings in the draft EIR, the site is located on saturated alluvium and therefore is in an area susceptible to soil liquefaction. Finally, the Siting Element requires consistency with the general plan, but as noted herein, the project would violate various policies of the general plan and LCP. Therefore, expanding this landfill would violate the Siting Element.

3-81

The Circulation Element has as a policy a maximum capacity of 33,000 ADT on 101. According to the draft EIR, "The ADTs for Highway 101 in the vicinity of the landfill are approximately 33,000." (Page 3.10-5) Additionally, the draft EIR notes that "During the life

of the proposed project, traffic volumes are expected to increase to 40,000 ADT." By the time the project is initiated in 2005 after the current Benchfill Project is complete, traffic volumes will likely exceed the policy capacity, and thus the project may violate the Circulation Element.

3-82

Under the Coastal Zoning Ordinance, sanitary landfills are not permitted as a use, nor can they be even subject to a CUP, under the AG-II zone district. (draft EIR, page 3.7-34) According to the draft EIR, the landfill has been grandfathered in. However, the landfill is slated to reach its current permitted capacity in 2005 and expansion would go beyond the 'grandfathered' footprint. Related and necessary supporting activities and developments including a borrow area would be in the coastal zone. This is not permitted in the zone district. Other potential borrow areas offsite are located outside the coastal zone, and therefore the draft EIR's statement that the borrow activity would occur with or without the expansion is inaccurate and an assumption intended to allow the proposed new borrow area to occur in the coastal zone's AG-II zone district. The project as proposed is inconsistent with the Coastal Zoning Ordinance because landfill activities are not allowed in the AG-II district

3-83

For the foregoing reasons, the landfill is not a compatible use at this location. It is inconsistent with the zone designation, adversely affects various rural and sensitive ecological resources and water quality in the coastal zone and at the beach, and violates numerous general plan, LCP and Coastal Act provisions. A landfill is not a compatible use this close to the ocean, and therefore land use impacts including policy inconsistencies are considered significant and unavoidable.

#### G. Assessment of Draft EIR's Section 3.8 Visual Resources Impact Analyses.

3-84

The discussion of visual resource impacts utilizes a future baseline – the conditions after the completion of the Benchfill Project. Under CEQA, the baseline is the existing condition at the time the NOP is released. The draft EIR should evaluate impacts against both the current and this future baseline for full disclosure of impacts, including cumulative impacts to views.

3-85

While the draft EIR carefully evaluates view impacts from many public-viewing locations, it does not discuss the visual resource impacts caused by the project as seen from nearby flight paths. This site is visible from flight paths, and this is a public view impact for people traveling to and from the Santa Barbara Airport.

3-86

The site is visible from locations on West Camino Cielo and the ridges of the Arroyo Hondo Preserve, which is open to the public periodically, but impacts from these public-viewing locations are not discussed. To adequately assess public view impacts the draft EIR should consider these other viewing locations.

3-87

Grading for an access road on Baron Ranch near the landfill as part of the project will be screened by chaparral, according to the draft EIR. However, after fires, which occur every 25 to 50 years, this road would not be screened by chaparral for a period of approximately 5

years. A fire has not occurred at this location for approximately 30 years. Therefore, the draft EIR is not entirely correct to conclude there would be no view impacts from viewpoint #2.

#### Section 3.8.5 – Mitigation Measures

Significant impacts must be mitigated to the maximum extent feasible under CEQA. Significant impacts including those to Viewpoints 4 and 5 can be further mitigated by the following measures.

1. Planting of native sycamore trees from local seed or cutting stock in the neck area of Pila Canyon will help to block significant adverse views of the landfill, even after closure, as the trees can grow to 100 feet tall. Even at 25 feet (about 10 to 15 years old) the trees will begin blocking views of the landfill from the highway, access road and ocean. (Note: this measure may be similar to one included in the Division's 1988 EIR for expanding Tajiguas.)
2. Under-grounding of utility lines in the Canyon neck area.
3. The old gas station, which is slated for removal anyway, should be replaced with native trees such as sycamores from local genetic stocks to help mitigate visual impacts.

Mitigation Measure VIS-1 should specify that the landfill will be contoured and vegetated with local native species to be consistent with the surrounding terrain. This is a feasible measure that will help further mitigate significant impacts.

#### H. Assessment of Draft EIR's Section 3.9 Noise Impact Analysis.

The draft EIR fails to address the noise impacts to the Arroyo Hondo Preserve, which does entertain public visitors during the daytime. Page 3.9-5 states that the nearest sensitive land use is Arroyo Quemado, but a nature preserve at Arroyo Hondo is closer and is sensitive to noise impacts from a biological resource and a land use compatibility perspective.

The draft EIR on page 3.9-9 describes construction activities as short term. This may be true relative to the length of the project (i.e., until a new landfill is operational by 2015), or it may be that the draft EIR is only describing construction of new buildings. However, construction of the landfill, including grading and blasting, would occur longer than the 30 days stated. In addition, blasting for the borrow material would occur throughout the project life. These impacts should be considered significant based on the thresholds stated in the draft EIR. The noise from grading and blasting would be within approximately 1600 feet of the Arroyo Hondo Preserve, a sensitive receptor, and noise from the landfill can be heard within the Preserve. (Personal observation, Brian Trautwein) This blasting would represent a "substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels without the project." (draft EIR, page 3.9-8) Moreover, this noise would be sudden and unanticipated, rather than continual or on a specific schedule. This adds to the significance of noise impacts because the noise blasts would not be immediately anticipated

by sensitive receptors. Just because blasting and other noises would be sporadic does not qualify them as less than significant.

#### Section 3.9.5 Mitigation Measures

Measure N-1 can feasibly be made more effective at reducing noise impacts by requiring that all haul trucks (in addition to landfill trucks) be maintained to reduce noise levels. These trucks can be checked at the scale house for noise levels, and trucks that are not maintained to run quietly can be denied future entry until they are tuned up and/or made to run more quietly.

A proposed new measure requiring blasting to occur at the same time(s) every day that blasting occurs to reduce the sporadic, unexpected nature of the sound may reduce the noise impacts to sensitive receptors who can plan for, or plan around, the blasting schedule.

#### I. Assessment of Draft EIR's Traffic Impact Analysis.

This section of the draft EIR fails to address the potential impact of trucks delivering waste from the Santa Maria Landfill washeded, in the event that landfill closes before Tajiguas does and the waste is shipped to Tajiguas. As noted below, waste from Santa Maria may be directed to Tajiguas during the life of the proposed expansion project.

The ADTs on Highway 101 are already at the Circulation Element's policy capacity. Any increase in this should be considered significant. The project will increase haul traffic by 50% to 130 trucks per day (180 total trips per day). Increasing the diversion rate, sending Foxen Canyon waste to another landfill, or a combination of other feasible alternatives could reduce these project-related traffic impacts, as well as other impacts. Additionally, this increased traffic and traffic safety impact could be mitigated by adding an overpass or additional infrastructure not described in the draft EIR.

#### V. The Draft EIR fails to describe the future closure of the Santa Maria Landfill.

The draft EIR states that the County's Foxen Canyon Landfill will close in approximately 2 years, and that the waste from the existing Foxen Canyon washeded will be directed to Tajiguas, assuming it is expanded. It states that the Lompoc Landfill has capacity to accept waste for 47 years. According to the draft EIR, the Santa Maria Landfill does not have permitted capacity to provide for waste disposal except in the very near term. According to the draft EIR, for the Santa Maria Landfill, "At the current waste disposal rate of 375 tpd, [assuming no increases in disposal rate] [a planned but not permitted] ... expansion provides capacity to 2017." Without this desired expansion of the Santa Maria Landfill, it will close prior to the date at which Tajiguas would close assuming the Tajiguas expansion through 2015 is approved.

The draft EIR acknowledges an increase in incoming waste to Tajiguas due to closure of the Foxen Canyon Landfill. However, it fails to account for an increase in waste disposal rates at

Tajiguas that may be needed to accommodate Santa Maria's waste stream in the event the Santa Maria Landfill is not expanded and that waste is redirected to the expanded Tajiguas. In previous conversations with the Solid Waste Division, the potential closure of the Santa Maria Landfill could increase disposal rates at Tajiguas, assuming the latter is expanded. If this anticipated potential scenario occurs, then the expanded Tajiguas may not have the disposal capacity to meet the County's needs through 2015 or until the new in-County landfill is operational. For full disclosure of potential project-related impacts, the draft EIR should evaluate the environmental repercussions and consequences to the proposed project caused by this foreseeable and reasonable scenario.

VI. The Draft EIR's Alternatives Analysis is Flawed.

A. The project objectives are too narrow to facilitate consideration of a range of alternatives.

As noted above, the objectives are crafted narrowly and merely describe a desired, specific outcome (i.e., the project). CEQA requires that a reasonable range of alternatives be analyzed in an EIR and that an EIR focus on feasible alternatives that substantially lessen or avoid significant impacts while meeting most of the basic project objectives. CEQA Guidelines Section 15126.6. As noted under Section I above, the project objectives stated in the draft EIR lack the underlying purpose of the project (e.g., to provide infrastructure for the Santa Ynez Valley, Cuyama Valley and South Coast solid waste disposal needs until a new in-County regional landfill is developed by 2015). By merely stating the lead agency's desired outcome - the proposed project - the EIR and the lead agency do not give adequate consideration to a range of feasible less damaging alternatives that would fulfill the underlying purpose.

Evidence of the alternatives analysis' deficiency includes a statement by the County's EIR consultant that appeared in the 11-30-01 Santa Maria Times. Bob Mason with TRC noted during a public hearing regarding the proposed Tajiguas expansion and the siting of the County's planned new landfill that, If the Board of Supervisors decides not to go ahead with the expansion, the environmental studies done for the 15-year expansion would not be sufficient to identify an alternative site, and the EIR process would start over. Given that no alternative could fulfill the overly narrow objectives, and that the remaining capacity at Tajiguas is rapidly disappearing, the Board of Supervisors will have little choice but to approve the project. This undermines the intent and requirement of CEQA that a range of reasonable, feasible alternatives capable of fulfilling most of the basic objectives while substantially lessening or avoiding significant impacts be analyzed.

For instance, the draft EIR discusses alternative technologies, but does not consider these to be feasible alternatives to the project that fulfill the basic objectives. The draft EIR discusses existing alternative in-County landfills, but dismisses these in part because they would not achieve the overly narrow objective of expanding the Tajiguas Landfill. In addition, the draft EIR dismisses the Reduced Project Alternative because, by failing to expand Tajiguas for the

full 15 years, it would not meet the narrow objectives. If the objectives are rewritten to comport to the requirements of CEQA Guidelines Section 15124(b), then less damaging feasible alternatives currently not analyzed in the Draft EIR or dismissed for not meeting the overly narrow objectives may meet the basic objectives and become the environmentally superior alternative.

B. The draft EIR fails to provide evidence regarding alternatives' feasibility, the relative environmental impacts of alternatives and the proposed project, and alternatives' ability to meet the underlying project objectives.

The draft EIR is deficient because it contains conclusions that are not supported by analysis, evidence that alternatives are not feasible, and that alternatives do not substantially lessen or avoid significant impacts. CEQA requires lead agencies to base such determinations on substantial evidence in the record. CEQA Guidelines Section 15002(a)(3) and 15021(a)(2). Also see CEQA, Public Resources Code Section 21081(a)(3) and *Mountain Lion Foundation v. Fish and Game Commission* (1997) 16 Cal.App.4th 105, 134 [65 Cal.Rptr.2d 580]. "The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." Public Resources Code Section 21002. Also see *Goleta I, Supra*, 197 Cal.App.3d 1167

C. Analysis of the draft EIR's Alternatives to the Proposed Project and Proposed New Alternatives for Consideration in the EIR.

Existing In-County Landfills

Regarding utilization of existing in-County landfills as alternatives to expanding Tajiguas, on page 4-5, the draft EIR states that, "It was determined that there is not currently sufficient capacity in the County to accept waste that would go to Tajiguas during the 15-year life of the project." If otherwise feasible, is there capacity in existing in-County landfills to accept some portion of the waste that would otherwise go to Tajiguas if Tajiguas were expanded? Directing some waste to another existing in-County landfill would reduce the amount of waste going to Tajiguas during its proposed expansion, and this raises the possibility of new, less damaging feasible alternatives not considered in the draft EIR. Several such alternatives are proposed below as potentially feasible ways to lessen significant environmental impacts while fulfilling the basic project objectives.

Foxen Canyon and Lompoc City Landfills

The draft EIR cites Lompoc officials as stating that Lompoc "would not accept waste from the Tajiguas Landfill wasteshed (Demery, 2000)." As a result, use of the Lompoc Landfill was deemed "not feasible" on page 4-10. The 109 (average) tons of waste and 100 tons (average) of green waste per day that would be diverted, under the proposed project to Tajiguas is currently in the Foxen Canyon Landfill wasteshed and not in the Tajiguas Landfill wasteshed.

(Figure 1-5)<sup>1</sup> Therefore, despite Lompoc's policy that waste from the current Tajiguas washed to enter Lompoc's landfill, there is no evidence that it is infeasible for the Lompoc facility, which has 47 years of remaining capacity, to accept the waste currently going to Foxen Canyon once the Foxen Canyon Landfill closes. Both facilities are located in the Santa Ynez River Valley. If, once Foxen Canyon is converted to a transfer station, this waste is directed to Lompoc instead of to Tajiguas, then a smaller expansion footprint at Tajiguas may accommodate the waste which currently goes to Tajiguas for the next 15 years. This scenario is described as *Proposed New Alternative #1* below. A smaller expansion footprint at Tajiguas would substantially lessen significant aesthetic and biological impacts, and directing waste from the Foxen Canyon washed to Lompoc would cause less significant mobile air quality impacts due to the shorter haul distance between Foxen Canyon and Lompoc compared to the distance between Tajiguas and Foxen Canyon.

*Proposed New Alternative #1:  
Foxen Canyon Waste directed to Lompoc/Reduced Footprint Tajiguas Expansion*

Under this alternative, the waste currently entering Foxen Canyon would not be sent to Tajiguas upon closure of Foxen Canyon, but would be directed from the Foxen Canyon Transfer Station to Lompoc, avoiding the projected 22% increase in waste entering Tajiguas after Foxen Canyon is closed (Figure 1-5). This would facilitate a considerably smaller expansion footprint at Tajiguas. Therefore, since the Lompoc facility has substantial currently-permitted capacity, the impacts of which have been mitigated through the permitting and CEQA processes, this alternative would substantially lessen significant project-related impacts to sensitive biological resources and aesthetics. Moreover, this alternative would meet the underlying purpose of providing infrastructure during the length of time needed to develop the new in-County landfill) of solid waste disposal.

*Proposed New Alternative #1 Impact analysis:*

The washed for Foxen Canyon is primarily the Santa Ynez Valley, according to the draft EIR at page 4-10, and Lompoc is in the Santa Ynez River Valley. Lompoc is about twice as close to the Foxen Canyon Landfill than Tajiguas is. Transportation impacts including significant mobile source air quality impacts would be lessened due to this shorter travel distance and due to the fact that waste from the Foxen Canyon washed would not need to be hauled over the Nojoqui Grade on Highway 101 to Tajiguas. The significant biological impacts of the proposed Tajiguas expansion, including development in ESHA in the coastal zone, would be substantially lessened because the expansion and borrow area footprints could be minimized if Foxen Canyon waste is directed to Lompoc. The Lompoc Landfill has 47 additional years of permitted capacity, and the associated environmental impacts have already been mitigated; therefore, this alternative avoids significant biological impacts rather than transferring them to Lompoc. Similarly, significant aesthetic impacts caused by the proposed

<sup>1</sup> Please explain why Figure 1-5 and page 2-1 state that waste diverted from Foxen Canyon to Tajiguas will consist of 109 tpd of solid waste and another 100 tpd of green waste and Table 4-2 states that an average of only 80 tpd of total waste is received at Foxen Canyon?

Tajiguas expansion would likely be substantially curtailed if a smaller Tajiguas expansion were made feasible by directing waste from the Foxen Canyon washed to Lompoc.

*Proposed New Alternative #1(a):  
Foxen Canyon Waste directed to Lompoc/Reduced Footprint Tajiguas Expansion and Alternative Technology*

Under this scenario, waste from Foxen Canyon, once that facility is converted to a transfer station, would be directed to Lompoc until a new in-County regional landfill is sited and constructed, and a smaller footprint expansion would be constructed at Tajiguas incrementally or at one time. During the expansion, alternative technology(ies) as described in Section 4.4, would be pursued. If feasible and constructed, an alternative technology (e.g., waste to energy, MRF, Hydromex<sup>2</sup>) facility, once built, would further reduce the residual waste to be disposed of in Tajiguas, substantially further reducing either the final disposal elevation and/or footprint size at Tajiguas while meeting the underlying project purpose. Under this alternative, once a new in-County regional landfill is operational, residual waste from the Foxen Canyon Transfer Station and the Tajiguas washed would be directed to the new landfill.

*Proposed New Alternative #1(a) Impact Analysis:*

This would substantially lessen significant biological impacts as described for New Alternative #1, and would potentially lessen significant aesthetic and mobile source impacts associated with the proposed project depending on the air quality and aesthetic impacts of the alternative technology.

*Draft EIR Foxen Canyon Expansion Alternative*

As stated above, CEQA requires that a lead agency not approve a project if there are feasible alternatives that meet most of the basic objectives of the project and that would avoid or substantially lessen the significant impacts. (Public Resources Code Section 21002.) The lead agency's decision with regards to the feasibility of alternatives and the relative level of impacts must be based on substantial evidence in the record.

The draft EIR (Table 4-1) states that the Foxen Canyon Expansion is not feasible. However, there is no analysis or evidence in the record to support this conclusory statement. The draft EIR on page 4-10 states that "there are no plans for future expansion of the Foxen Canyon Landfill." This statement does not render such expansion infeasible, and therefore the draft EIR incorrectly dismisses this alternative as infeasible without basing that finding on any evidence or analysis. As a result, Table 4-1 in the draft EIR does not compare the impacts of this alternative with those of the project and terms the comparison "not applicable." The draft EIR is thus deficient.

<sup>2</sup> Hydromex, Inc., is company that creates building and other products out of solid waste. (Exhibit 2)

*Draft EIR Foxen Canyon Expansion Alternative Impact Analysis:*

In this case, the draft EIR, without analysis, evidence or consideration of site specific factors, concludes that expansion of the Foxen Canyon Landfill to accept all waste from the existing Tajiguas watershed "would be expected to have similar impacts compared to the Tajiguas expansion in all areas except traffic." However, given the much lower visibility of the Foxen Canyon Landfill compared to Tajiguas, expansion of the Foxen Canyon Landfill is likely to substantially lessen the significant aesthetic impacts identified in the draft EIR for the proposed Tajiguas Expansion located along well-traveled Highway 101. Significant identified impacts to biological resources at Tajiguas, including development in ESHA in the coastal zone, could be substantially lessened by this alternative. However, the draft EIR dismisses without evidence this alternative as infeasible, and it does not provide any comparative analysis of the relative site-specific biological and aesthetic impacts of the project and this alternative. (Table 4-1.) Therefore, the draft EIR dismisses a potentially feasible, less damaging alternative that would meet the basic underlying purpose of the project, and as a result, it does not comply with CEQA's requirements that the feasibility of alternatives be determined based on substantial evidence in the record.

*Proposed New Alternative #2:  
Smaller Foxen Canyon Expansion/Reduced Tajiguas Expansion Footprint*

This proposed alternative would entail a smaller expansion of the Foxen Canyon Landfill than described above such that it could continue to receive substantially the same rate of waste as it currently receives until a new in-County regional landfill is operational by 2015. Similar to proposed New Alternative #1, the rate of disposal at Tajiguas would not be increased by the closure of Foxen Canyon. This would facilitate a smaller footprint expansion at Tajiguas that would be designed to accommodate only the waste from Tajiguas' current watershed until the new in-County landfill is operational. This alternative represents a potentially feasible way to achieve the underlying project purpose while substantially lessening significant impacts to aesthetics and other environmental resources.

*Proposed New Alternative #2 Impact Analysis:*

As with the Proposed New Alternative #1 above, this alternative would lessen significant impacts to aesthetic resources that the proposed project would cause because the expansion footprint at the more visible Tajiguas site would be reduced. Since Foxen Canyon is visually removed from the public and Tajiguas is visually present along the well-traveled Highway 101, the effect of this alternative transferring some of the proposed expansion to Foxen Canyon results in less significant overall impacts to public views. In addition, significant impacts to air quality from mobile sources would be substantially reduced because waste from the Foxen Canyon watershed would continue to be delivered to Foxen Canyon during the approximately 15-year project life instead of being hauled a much longer distance over the Nojoqui Grade to Tajiguas. No comparative analysis of the significant biological, aesthetic and mobile source air quality impacts caused by the proposed project and any Foxen Canyon expansion alternative was provided in the draft EIR because the draft EIR improperly

assumed without evidence or analysis that any expansion at Foxen Canyon is not feasible. (Table 4-2.) However, given that the Tajiguas Expansion as proposed would cause significant impacts to biological and other resources, biological impacts, air quality impacts, aesthetic impacts, and overall project impacts are likely to be substantially less with this alternative than with the proposed project.

*Proposed New Alternative #2a:  
Smaller Foxen Canyon Expansion/Reduced Project Alternative/Alternative Technology*

Under this scenario, waste from the Foxen Canyon watershed would continue to be directed to Foxen Canyon, which would be expanded moderately to have the capacity to accept this waste, and a smaller footprint expansion than proposed would be constructed at Tajiguas. During the Tajiguas expansion, alternative technology(ies) as described in Section 4.4, would be pursued. If feasible and constructed, an alternative technology (e.g., waste to energy, MRF, or waste to product) facility would further reduce the residual waste to be disposed of in Tajiguas, reducing the final disposal elevation and/or footprint at Tajiguas while meeting the underlying project purpose.

*Proposed New Alternative #2a Impact Analysis:*

This alternative would substantially lessen significant air quality impacts from mobile sources because waste from the Foxen Canyon watershed would not be hauled over the Nojoqui Grade long distances to Tajiguas. The smaller expansion at Tajiguas, which is much more visible to the public than the Foxen Canyon Landfill, would substantially lessen overall significant aesthetic impacts, and would potentially lessen significant biological impacts associated with the proposed project, including development in ESHA in the coastal zone.

*Draft EIR Proposed Expansion of the Santa Maria Landfill to accept all waste from Tajiguas Watershed*

The draft EIR confuses the Santa Maria Landfill's situation with regards to the actual permitted, versus the contemplated expanded capacity and life of this facility. It states:

"As shown in Table 4-2, [the Santa Maria Landfill's] permitted daily capacity is 740 tpd, and it receives an average 375 tpd. At that rate, the landfill has capacity to 2017."

Does "that rate" refer to the 740 tpd rate or the 375 tpd rate?

The text continues:

"A process to permit an expansion of the landfill within the existing landfill property is in process."

The text continues:

"At the current rate of 375 tpd, the expansion provides capacity to 2017."

The previous sentences stated that "the landfill has capacity to 2017," so how can the referenced expansion provide capacity only to 2017?

Why does Table 4-2 state that the Santa Maria Landfill has a permitted capacity 13,998,400 cubic yards but the text states that, "when the permit is issued, the Santa Maria landfill will have a permitted capacity of 13,998,400 cubic yards"?

These inconsistencies are irreconcilable. How can this be an alternative when there is not adequate, currently permitted capacity at Santa Maria to receive waste from the Tajiguas watershed? Sending all of the Tajiguas waste to Santa Maria cannot be considered a feasible, reasonable alternative unless the Santa Maria Landfill is to be sufficiently expanded.

#### *Cumulative Impacts of the Santa Maria Landfill Closure and Expansion Projects*

If this facility is not expanded, and it continues to receive waste at the 375 tpd rate, when will it run out of permitted capacity? If this facility is not expanded and it receives an elevated rate of disposal consistent with growth projections for the watershed, when will it run out of capacity? If this facility runs out of permitted capacity prior to the construction and opening of a new in-County regional landfill, where will the waste from the Santa Maria watershed go? If the Santa Maria Landfill is not expanded and runs out of capacity prior to Tajiguas being closed (i.e., within 15 years, assuming expansion of Tajiguas proceeds) might the waste from the Santa Maria watershed go to Tajiguas? If so, will the proposed Tajiguas Expansion be physically able to accept waste from the Santa Maria, Santa Ynez Valley, Cuyama Valley and Foxen Canyon watersheds through 2015, which is the outside date estimated for the new in-County regional landfill to become operational? If not, where would waste from various parts of the County be disposed at after the Tajiguas Expansion is completely full and before the new in-County regional landfill is operational?

This section of the draft EIR confuses the reader regarding the fate of the Santa Maria Landfill and the wastestream for that landfill. Given discussions with County Solid Waste staff, the closure of the Santa Maria Landfill may occur prior to the opening of a new in-County regional landfill. Waste from the Santa Maria landfill watershed could then be directed to Tajiguas. This would significantly reduce the estimated 15-year life of the proposed Tajiguas expansion project. If this occurs, when would the proposed Tajiguas expansion capacity be used up?

The draft EIR notes that this alternative is feasible pending an agreement between the City of Santa Maria and the County, but it fails to address an important question regarding expanding the Santa Maria Landfill as an alternative to expanding the Tajiguas Landfill. The draft EIR states that "the City has not updated site-specific analysis of biological, cultural or other resources that would be affected by expanding the Santa Maria Landfill outside the current limits of the site." Since the County's draft EIR includes utilization of the Santa Maria Landfill as an alternative to expanding Tajiguas, the burden is on the County as the CEQA

lead agency to provide a comparative analysis of the impacts of expanding these two facilities. (*Goleta I*) Instead of complying with CEQA, the draft EIR calls the impacts of this alternative "unknown" and does not compare them to the impacts of expanding Tajiguas as is required in an EIR.

#### *Proposed New Alternative #3: Redirection of Santa Ynez Valley, Foxen Canyon and Cuyama Waste to the Santa Maria Landfill/Reduced Footprint Tajiguas Expansion*

The draft EIR finds on page 4-11 that the Santa Maria Landfill could feasibly accept waste from the Tajiguas watershed if the County and City reached an agreement. Therefore, the draft EIR finds that sending Tajiguas' waste to the Santa Maria Landfill may be feasible. In the event the Santa Maria Landfill is not expanded, directing all waste from the Tajiguas watershed to Santa Maria would cause the Santa Maria Landfill to reach its permitted capacity in 9 years according to the draft EIR. According to the draft EIR, "At that time, ... another disposal site would be required." However, what if that other disposal site was a reduced footprint expansion at Tajiguas, as described in the following paragraph?

3-108  
Proposed New Alternative #3 would divert waste from the Santa Ynez and Cuyama Valleys and from Foxen Canyon to Santa Maria and would entail a smaller expansion of Tajiguas to accept waste only from the South Coast. Following the opening of the new landfill, waste from both Santa Maria and Tajiguas would, or just from Tajiguas, would then go to the new landfill. Please describe based on evidence and analysis, the feasibility of and the impacts of (relative to the proposed project) such an option. Would this alternative enable both facilities to remain open (i.e., not meet or exceed permitted capacity) until the new in-County Landfill is operational (i.e., on or before 2015)?

#### *Proposed New Alternative #3 Impact Analysis:*

Under this scenario, significant impacts to biological resources and aesthetics caused by the proposed project would be substantially lessened because 1) the footprint of expansion into sensitive habitats and public vistas at Tajiguas would be reduced, and 2) the Santa Maria Landfill may not need to be expanded prior to the new landfill opening. This alternative would meet the underlying purpose of providing solid waste disposal infrastructure until the new in-County landfill is operational.

#### *Proposed New Alternative #4: Redirection of Foxen Canyon Waste to the Santa Maria Landfill/Reduced Footprint Tajiguas Expansion*

3-109  
Under this alternative, waste from the Foxen Canyon watershed would be directed to the Santa Maria Landfill once Foxen Canyon closes in approximately 2 years. This increase in disposal rates (209 tpd including 100 tpd greenwaste) at Santa Maria is well within the currently unused permitted capacity of that facility (365 tpd), and therefore this is technically and legally feasible pending agreement between the City and County. Tajiguas would be

expanded, albeit with a smaller footprint as described in 'New Alternative #3,' and would continue to accept waste from its current wasteshed.

*Proposed New Alternative #4 Impact Analysis:*

The smaller expansion footprint at Tajiguas would substantially lessen significant aesthetic and biological resources associated with the proposed Tajiguas expansion. Due to their closer proximity, hauling Foxen Canyon waste to the Santa Maria Landfill would cause less significant mobile source air quality impacts than hauling it to Tajiguas would cause, keeping inland North County waste in the North County. Therefore, this alternative is potentially feasible, meets the underlying project objectives, and appears to substantially lessen significant impacts caused by the project.

*Proposed New Alternative #4a:  
Redirection of Foxen Canyon Waste to Santa Maria Landfill / Reduced Tajiguas Expansion / Alternative Technology*

3-110 This alternative would be similar to #2(a) and #4 above. As with #4 above, it would direct Foxen Canyon wasteshed waste to Santa Maria when Foxen Canyon closes and would provide a smaller than currently proposed expansion of the footprint at Tajiguas. This expansion footprint would be reduced even further through the implementation of a feasible alternative technology to reduce the waste stream destined for Tajiguas. By reducing the footprint of the Tajiguas expansion, it would result in substantially lessened impacts to biological and aesthetic resources compared to the proposed project.

*Draft EIR Alternative to use VAFB Landfill*

3-111 The draft EIR dismisses this alternative as infeasible without basing this conclusion on evidence and analysis. Table 4-1, which compares impacts of the project with the impacts of the alternatives, states that this facility is limited to use by the Air Force. However, the draft EIR states that "any decision for the County or other entity to use the Vandenberg AFB Landfill would not be made at the base level; it would be made at the Air Force level in Washington, D.C." There is no reference to attempts made by the County to discern the feasibility of this alternative. Instead, the lead agency concludes without the benefit of evidence or analysis that since the decision to allow County use of the VAFB facility would have to be made in Washington, D.C., it must be infeasible. Alternative project sites not owned by the applicant or lead agency cannot be assumed to be infeasible, and are considered reasonable alternatives for the purposes of CEQA. (*Citizens of Goleta Valley v. Board of Supervisors (Goleta II)*, 52 Cal.3d at pp. 559-560.) Therefore, use of this federal facility as an alternative disposal site for all or some of the waste currently or planned for disposal at Tajiguas may be feasible, but was dismissed as infeasible without adequate evidence on which to base that decision.

Moreover, the VAFB Landfill can accept up to 400 tpd, but currently only receives 50 tpd. Thus, up to 350 tpd could legally be disposed of at this facility, pending an agreement with the Air Force, however the information in the draft EIR is inadequate to inform the public and decision makers regarding how much remaining permitted capacity exists at the VAFB Landfill. Therefore, this facility could serve as part of an alternative to expanding Tajiguas, or as part of an alternative involving a smaller expansion of Tajiguas, as described below.

*Proposed New Alternative #5:  
Redirection of Foxen Canyon Waste to VAFB Landfill/Reduced Footprint Tajiguas Expansion Project*

Under this alternative, the Foxen Canyon wastestream, upon closure of the Foxen Canyon Landfill, would be directed to VAFB if an agreement with the Air Force could be obtained. The Foxen Canyon waste stream averages 80 tpd, according to table 4-2. Therefore, this would increase the disposal rate at VAFB from 50 tpd to 130 tpd, well below the permitted capacity of 400 tpd. The Tajiguas Landfill would be expanded, but with a smaller footprint to lessen and avoid significant visual and biological impacts that would be caused by the larger proposed expansion. Once the new in-County regional landfill was operational by 2015, waste from the Foxen Canyon Transfer Station and from the Tajiguas wasteshed would be directed to the new landfill and Tajiguas would be closed.

*Proposed New Alternative #5 Impact Analysis:*

Due to the smaller expansion and borrow area footprints at Tajiguas, significant impacts to sensitive habitats and aesthetics that the larger proposed expansion would create would be substantially lessened. These impacts have already been mitigated through the permitting process for the Vandenberg facility. Given that the distance and elevation gains between Foxen Canyon and VAFB are less than between Foxen Canyon and Tajiguas, transporting waste from Foxen Canyon to VAFB would cause less mobile source air pollution than transporting the same waste to Tajiguas would cause, substantially lessening another significant project-related impact.

*Draft EIR Proposed Larger Expansion Project Alternative*

3-112 Under CEQA, an EIR must consider a range of alternatives that meet most of the basic objectives, that are feasible, and that would substantially lessen a significant impact. (CEQA Guidelines Section 15126.6) The Larger Project Alternative should be dismissed from further consideration and removed from the EIR. This alternative would increase significant impacts, rather than decrease significant impacts of the proposed project. Moreover, it violates the Board's 8-3-99 policy directive. Therefore, it cannot be considered as a viable alternative to the project because the intent of CEQA is to identify ways to feasibly attain most of the basic project objectives while lessening the environmental impacts of the project.

*Draft EIR Reduced Project Alternative*

3-113  
The draft EIR dismisses a reduced project, 10-year expansion alternative as inconsistent with the objective of providing waste disposal infrastructure until the new in-County landfill is operational. As noted previously, the objectives are so narrowly crafted as to preclude serious consideration of all alternatives because only the project can meet the objective of expanding Tajiguas for 15 years. However, in combination with other alternative waste disposal strategies, as described above, the Reduced Project Alternative can be a feasible component of various feasible alternatives that would fulfill the underlying project purpose.

Furthermore, as discussed below, the Reduced Project Alternative may be a feasible approach to lessening significant impacts to biological and aesthetic impacts, and may meet most of the basic objectives.

The Reduced Project Alternative is a 10-year expansion of Tajiguas. The planned new in-County regional landfill will be operational within 10 years to 15 years at the outside, according to information provided to us by the Solid Waste Division's consultants and the draft EIR. The proposed project does not include incremental, phased expansion of the landfill and instead would prepare the facility to receive waste through approximately 2020. Thus, if the new in-County landfill was operational in 10 years then this would negate the need for expanding Tajiguas to accommodate waste disposal through 2020. In that case, the expansion as proposed would represent overkill and would cause significant environmental impacts that could be feasibly avoided or substantially lessened through the Reduced Project Alternative.

The lead agency should avoid the impacts associated with expanding the landfill as currently proposed through 2020 if there is a feasible way to do so while still providing waste disposal capacity until the new landfill is operational. By tiering off this EIR, since it addresses the impacts of expanding the facility through 2020 the County could approve an additional 5-year expansion after the 10-year expansion was completed, if the new landfill was not yet operational. Thus, with this EIR, the County can show that it has analyzed the impacts of providing 15-years of capacity and has a plan to do so to meet the project's underlying purpose and AB 939's requirements, even if it approves the less damaging 10-year Reduced Expansion Project Alternative.

*Proposed New Alternative #6:  
Reduced Footprint Tajiguas Expansion Alternative with Future Benchfilling to 2:1 slopes if needed to provide capacity until the new landfill is operational*

The proposed expansion would be built with 2.4:1 slopes and will have a slope stability analysis that is required for landfills built with slopes of 3:1 (draft EIR page 3.2-28). If a 10-year, reduced Tajiguas Expansion footprint were approved, assuming liquefaction and stability concerns are addressed, additional capacity could be gained subsequent to the 10-year reduced footprint expansion by future benchfilling to achieve 2:1 slopes while minimizing the impacts relating to the landfill footprint. The EIR should analyze the impacts

of the Reduced Project Alternative with future benchfilling to a 2:1 slope after the 10-year expansion is complete, if expansion beyond the 10 years is needed because the new landfill is not operational at that time.

The County should consider this approach a potentially feasible way to phase the expansion while maximizing use of the limited and constrained space at Tajiguas in order to minimize significant impacts to biological resources at the site. In addition to lessening significant biological impacts associated with the footprint size, this alternative approach would fulfill the underlying objectives of 1) providing waste disposal capacity until the new landfill is operational and 2) complying with AB 939.

*Proposed New Alternative #6a:  
Reduced Footprint Tajiguas Expansion constructed to a 2:1 slope*

3-114  
Under this scenario, Tajiguas would be expanded until the new in-County landfill is operational by 2015, but would be expanded with a 2:1 slope instead of a 2.4:1 slope to minimize biological and other impacts associated with the size of the footprint. This project alternative would be similar to the proposed project except for the steeper 2:1 slopes, which are feasible with a slope stability analysis, according to the draft EIR. It would differ from Alternative #6 because it would be constructed from the outset to have 2:1 slopes, whereas Alternative #6 would be constructed with 2.4:1 slopes, which would only be steepened through benchfilling if the new in-County landfill was not operational after 10 years of expansion with 2.4:1 slopes.

In addition to lessening significant biological impacts, both Alternatives #6 and #6a would meet the basic objectives of the project because they could ultimately provide 10 years of disposal capacity as required under AB 939 and until the new landfill is operational.

Out of County Disposal Alternatives

3-115  
The draft EIR recognizes that using existing, out-of-County landfills for disposal would avoid "impacts associated with disturbance of new ground." (Draft EIR page 4-59) For the Tajiguas Expansion project, such impacts include significant aesthetic and biological resource impacts. However, the draft EIR then states, "the analysis of out-of-County landfills focuses on the relative merits of various landfill sites with respect to mobile source emissions." This ignores the CEQA criteria for consideration of alternatives that, to be considered, alternatives must substantially lessen or avoid at least one significant impact. (CEQA Guidelines 15126.6) As noted, out-of-County disposal alternatives would avoid impacts associated with disturbance of new ground, including numerous significant aesthetic and biological impacts. However, the discussion of the relative impacts of these alternatives is limited to mobile source air quality impacts and does not discuss the fact that each of these alternatives would substantially lessen or avoid biological and aesthetic impacts. The draft EIR is incorrect to state regarding the Chiquita Canyon Landfill on page 4-63 that "Therefore, this alternative would not result in the reduction or elimination of a significant impact, but would result in an increase in offsite mobile air emissions." In actuality, due to the reasons stated on page 4-59,

specifically that permitted out-of-County landfills have already mitigated impacts to biological resources and aesthetics, these alternatives do avoid significant impacts related to new ground disturbance. The EIR must discuss the significant impacts that would be avoided or lessened, as well as those that would be increased, by all alternatives.

Out-of-County landfill alternatives require expansion of the existing South Coast transfer station, or construction of a new transfer station including a MRF and composting facility. The draft EIR states that expanding the existing transfer station is not feasible. However, there is no evidence or analysis to support this conclusion. In fact, the Board has stated that expanding the transfer station is a "disfavored land use ... and could not be constructed without inordinate delays and expense." An analysis of the feasibility of expanding the South Coast transfer station is necessary to support any conclusion that it is not feasible. Merely because the Board recognizes this would be difficult does not render the alternative infeasible. What is required is a comparative analysis based on evidence supporting a finding regarding whether or not it would be practical to proceed with the project. (*Goleta I*, supra, 197 Cal.App.3d at p. 1181) Such an analysis is lacking in the draft EIR.

Similarly, on pages 4-66 and -67, the draft EIR concludes that new transfer station(s) on the South Coast are "not in compliance with the requirements of CEQA to ...feasibly attain most of the basic objectives of the project but ... avoid or substantially lessen any of the significant effects of the project" (CEQA Guidelines Section 15126.6)." However, the draft EIR misrepresents the CEQA requirements for consideration of alternatives. Section 15126.6(b) of the CEQA Guidelines states, "...the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." (Emphasis added.) Thus, since as noted in the draft EIR on page 4-59, out-of-County disposal alternatives "would not result in impacts associated with new ground disturbance," these options would avoid the project's identified significant biological and aesthetic impacts. Therefore, the draft EIR cannot dismiss these out-of-County alternatives because they may increase an impact or be more costly, because these alternatives avoid at least two types of identified significant impacts.

Instead the draft EIR must evaluate the alternatives' feasibility, ability to achieve most of the basic objectives of the project, and impacts, including project impacts that are lessened or avoided by the alternatives. On page 4-67 the draft EIR states that, "Because no [new transfer station] site has been identified, it is not possible to analyze these potential impacts." In failing to analyze the impacts of new in-County transfer stations, the draft EIR deprives the public and decision makers of information relating to the relative merits of these potentially feasible alternatives compared to the project, and violates CEQA. Furthermore, on page 4-65, the draft EIR discusses three specific alternative sites for a new in-County transfer station identified by the County's CAC subcommittee, so claiming that no site has been identified is inaccurate and disingenuous.

#### Draft EIR Rail Haul of Municipal Solid Waste Alternative

3-116  
As with the other out-of-County alternatives, the draft EIR dismisses rail haul because, under certain scenarios, it would increase mobile source air emissions associated with rail transport of waste to remote landfills capable of receiving waste by train. However, the draft EIR does not discuss which significant project impacts (e.g., biological and aesthetic) would be substantially lessened or avoided by this alternative. CEQA requires that consideration be given to a range of alternatives that are feasibly capable of attaining most of the basic project objectives while substantially lessening or avoiding any significant project impact. The draft EIR finds that, "development of a rail haul capability for municipal solid waste would be possible." Therefore, this alternative is feasible. Moreover, it would avoid significant project impacts while fulfilling the project's underlying purpose, and was improperly dismissed because it could result in greater impacts under one impact category: air quality.

In addition, the draft EIR refers to the potential "development of a new in-County Transfer Station with rail haul capability," but immediately discounts and fails to assess the impacts of this option because "such a facility is not yet available, and no potential sites have been identified." However, identifying and analyzing such potentially feasible, less damaging options is exactly what the draft EIR is supposed to do to fulfill CEQA's legislative mandate that most of the basic objectives of proposed projects be fulfilled through means that lessen significant impacts whenever feasible. Therefore, the draft EIR is deficient for dismissing the "in-County Transfer Station with rail haul capability" option merely because the lead agency has failed to take the time to identify a site(s) for it and to elaborate on it.

#### Alternative Disposal Technologies

3-117  
Similarly, the County dismisses alternative technologies which are feasible and being used throughout the nation and world without consideration of their relative impacts compared to the proposed project, and without consideration of whether or not they can feasibly attain most of the project's basic objectives. The draft EIR needs to discuss these technologies as alternatives in the draft EIR, rather than concluding that they "do not present an actual alternative." Otherwise, it is confusing to the public and decision makers to include these options in the analysis of alternatives in Section 4.0, but to state that they are not alternatives. Why are they presented in the draft EIR's analysis of alternatives section if they are not options to be considered? These options are not said to be infeasible, could attain the underlying project purpose, and would substantially lessen impacts associated with site preparation for the proposed expansion. Pursuant to CEQA Guidelines Section 15126.6, the lead agency must provide evidence and base its decision to not pursue these alternative technologies on 1) a lack of feasibility, 2) a lack of ability to substantially lessen or avoid significant impacts, or 3) a lack of ability to attain most of the basic project objectives. The draft EIR completely fails to do this.

Additionally, as discussed above, these alternatives can be combined with Reduced Expansion Footprint project alternatives and with other alternatives to lessen significant impacts.

*Draft EIR's Source Reduction Alternative*

Source Reduction alternatives listed on page 4-70 to 4-71 can be implemented more effectively and this could render a smaller Tajiguas expansion feasible while still providing adequate disposal capacity for the residual waste. According to the Community Environmental Council, "In Europe, legislation requiring manufacturers to take responsibility for the waste generated by their products has caused a wave of product redesign that has reduced the amount of packaging waste." (Alternative Waste Management Technologies, 1998) Moreover, according to the same report, "Up to a point, source reduction is the most cost effective form of waste diversion." Please describe the feasibility of enhancing the effectiveness of each source reduction strategy, since these are feasible, ongoing alternative waste management strategies.

*Draft EIR's Enhanced Recycling Alternative*

Enhanced recycling is feasible, and would reduce the size of the expansion area at Tajiguas, reducing the project's impacts, while helping to achieve the project's basic objectives. The draft EIR, however, dismisses this option without adequate analysis. Why would it be feasible or infeasible for the County to initiate recycling for the thousands of residents in the Tajiguas watershed who do not have curbside recycling, including those in apartments and mobile home parks? The draft EIR discusses a MRF (Materials Recovery Facility) but only in the context of out-of-County alternatives. In addition, the draft EIR must consider the much more plausible alternative of developing a MRF and continuing in-County disposal (i.e., at Tajiguas and/or other in-County landfills and ultimately at the planned new in-County landfill. According to the 1998 CEC report, MRFs are considered to be a feasible approach to diverting greater quantities of waste away from landfills.

*Proposed New Alternative #7:  
Reduced Footprint Tajiguas Expansion and MRF*

This alternative would entail development of a MRF and continued disposal at Tajiguas, albeit with a smaller expansion footprint made feasible by the increased diversions at the MRF. The draft EIR notes that "in 1999, the CAC subcommittee appointed by the Board completed a siting study for a combined transfer station/material recovery facility." They identified 17 suitable sites and narrowed the list to the three most optimal sites. In addition, the Gaviota oil and gas processing plant, which may have since been, or may soon be, mothballed, may be an ideal location for a MRF. It is already environmentally disturbed, has a little used overpass for the truck traffic, unused industrial structures and land, and is located adjacent to the Highway, railroad tracks and a marine terminal, which may prove useful for shipping recovered materials.

*Proposed New Alternative #7 Impact Analysis:*

Depending on the visibility of the MRF, this option would reduce significant aesthetic impacts by reducing the final footprint and/or landfill height of the Tajiguas Landfill

expansion. Similarly, this would also reduce significant biological impacts. Most of the CAC identified MRF sites and the Gaviota site are already degraded aesthetically and biologically and/or would be out of the public's view corridors. Therefore, this feasible option would help to achieve the project objectives of providing waste disposal capacity until the new in-County landfill is operational or 2015, whichever occurs first, while substantially lessening environmental impacts.

*Draft EIR's Waste-to-Energy Alternative*

3-119  
Various actions associated with the waste to energy alternative described on page 4-72 and-73, including mass burn technology, are said to increase costs. However, increased costs do not always render an alternative infeasible. As noted in the CEQA Guidelines Section 15126.6 (b) states that the "discussion of alternatives should focus on alternatives to the project ... which are capable of avoiding or substantially lessening any significant effects ... even if those alternatives ... would be more costly." Moreover, "The fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible. What is required is evidence that the additional costs or lost profitability are sufficiently severe as to render it impracticable to proceed with the project." (Goleta I, supra, 197 Cal.App.3d at p. 1181.)

The statement on page 4-75 that "the proposed project is the means by which the County will meet its requirements for environmentally safe land disposal for residual waste for up to 15 years," demonstrates the bias of the draft EIR. This pre-decisional conclusion invalidates the analysis of alternatives and underscores our comments that the County fails to give due consideration to potentially feasible alternatives that are capable of feasibly meeting most of the basic objectives while avoiding or substantially lessening one or more significant impact.

*Proposed New Alternative #8:  
Waste-to-Product Technologies*

3-120  
The draft EIR does not include any alternatives that convert municipal solid waste to products, such as building products. The Hydromex, Inc. technology is one such method that may feasibly reduce the need for landfill expansion area, and may therefore reduce significant impacts associated with the proposed project. In addition, by producing products such as concrete and wood substitutes, this technology may be able to reduce impacts caused by aggregate mining and timber harvesting, and may thus facilitate more environmentally-friendly building development. This technology can greatly reduce the amount of residual waste that needs to be disposed of in landfill. According to the attached information, Hydromex does not generate hazardous byproducts and the products it generates are also not toxic. A Hydromex-type facility does not require substantial land area, and could be located with or without a MRF/transfer station at locations noted above. Assuming that these claims are correct, this technology may represent an environmentally superior method of waste reduction. It could lessen the project's impacts to biological and aesthetic resources, and, since it could provide substitute building materials, it could lessen a host of other impacts caused by aggregate mining and timber harvesting. This technology can also generate an

energy product that can be used in combustion power plants, and this fuel could be hauled via trucks, trains or sea if the facility was located at one of the aforementioned potential MRF sites. The EIR should evaluate the feasibility and relative environmental impacts of utilizing this type of technology, with or without a MRF, and with a smaller Tajiguas Footprint Expansion Alternative.

#### *Draft EIR's No Project Alternative*

3-121 This No Project Alternative entails something more than a continuation of the baseline condition, and therefore is not the true "No Project" alternative. The no project alternative may instead entail people conducting illegal dumping or burning trash in their yards. As stated on page 4-76, the draft EIR's No Project Alternative entails either rail haul or truck haul of waste to other landfills. But these alternatives are already considered in the draft EIR Sections 4.3.1 through 4.3.3. Rail haul, even though there is no existing infrastructure, was never shown to be infeasible in the draft EIR, but was dismissed due to lack of infrastructure. As noted above, this alternative needs to be fleshed out and analyzed. Specifically, the construction of the infrastructure needs to be described, and the impacts of this alternative need to be analyzed. The statement on page 4-79 that, "impacts would be substantially greater in all identified areas" is inaccurate and contradicts statements on page 4-76 and -77 that, "impacts would not be expected with regards to [noise, odor, water and other environmental considerations]" ... "such as biological and cultural resources."

Even if, as noted, this option may increase air pollution impacts, if this would substantially and feasibly lessen or avoid any other significant impact(s) while meeting most of the basic objectives as rewritten to comply with CEQA Guidelines Section 15124, then the County cannot approve the project. That is why it is important for the County to give due consideration to alternatives, including the potentially less damaging rail haul options. The impact analysis on page 4-79 must compare all significant project impacts (as should Table 4-2) for this alternative and the project.

#### *Environmentally Superior Alternative*

3-122 Page 4-80 states that "other alternatives could eliminate or reduce onsite environmental impacts of the proposed project at Tajiguas. However, these operational impacts would essentially be transferred to the landfill(s) that accept the waste." This statement misrepresents the fact that these other landfills already have been through the CEQA process and have mitigated their impacts. Therefore, these alternatives would avoid significant impacts at Tajiguas but would not create new impacts at alternative sites because those sites, through their respective permitting and CEQA processes, have already anticipated and mitigated such impacts. Thus, the conclusion that these sites "are not necessarily environmentally superior to the proposed project" is not correct. Based on the discussion in the draft EIR, significant impacts would be avoided by implementing one of numerous alternatives, and this question can only be answered with more careful consideration of "comparative analysis and data." (*Goleta I*)

#### *Southeast Corner Modification*

3-123 The draft EIR fails to consider the feasibility of an alternative that would modify the height requirement for the portion of the landfill in the coastal zone, allowing it to remain above its currently permitted height. This option would save considerable space (equivalent to 2 years' disposal) that could enable the Tajiguas expansion footprint to be reduced, along with footprint size-related significant impacts to biological and other resources.

The conclusion that transport of waste from the southeast corner to Foxen Canyon is infeasible is not supported by evidence because it is feasible for the Board to reverse its policy regarding Foxen Canyon. Similarly, it may be feasible to dispose of this waste at VAFB, with approval from the Air Force. This has not been shown to be infeasible.

Disposing of the waste in the southeast corner modification area in Santa Maria or a new in-County landfill may also be feasible, and could substantially lessen significant impacts by rendering the Tajiguas Expansion footprint considerably smaller (approximately 10 to 15% smaller). However, the draft EIR focuses only on those impacts that may be increased by these options and does not, as CEQA requires, describe how these alternatives could substantially lessen or avoid any significant impact of the proposed project.

#### **VII. Conclusion**

3-124 In closing, the draft EIR describes the project in such an ambiguous way that as literally interpreted, the project could result in much greater impacts than needed to fulfill the basic objectives. The objectives are too narrow. They describe the proposed project and fail to include its underlying purpose. As a result, none of the stated alternatives could possibly fulfill the objectives as stated. Numerous alternatives, however, could feasibly fulfill most of the basic objectives while avoiding or substantially lessening significant impacts. However, the draft EIR does not include an in-depth alternatives analysis and thus none of the alternatives could be implemented in a timely fashion after certification of the EIR. The draft EIR's impact analysis leaves many questions unanswered and improperly classifies significant impacts as less than significant, and fails to include feasible mitigation measures, which could lessen significant impacts. Finally, the project is sited in an inappropriate location and violates many elements of the County's General Plan and the Local Coastal Plan and Coastal Act. Therefore, unless the project is revised to include alternatives and mitigation to feasibly lessen significant impacts and comply with adopted policies and state law, and the revised draft EIR is recirculated, the project cannot be approved.

Thank you for your attention to these comments.

Kathy Kefauver  
December 14, 2001  
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Sincerely,

*Brian Trautwein*  
Brian Trautwein  
Environmental Analyst

cc: Sabrina Haswell, Coastal Commission  
Carl Benz, Fish and Wildlife Service  
Morgan Wehjte, California Department of Fish and Game  
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California Integrated Waste Management Board  
Mark Schleich, Santa Barbara County Solid Waste Division

**Document 3**  
**Environmental Defense Center**  
**December 14, 2001**  
**Response to Comments**

Response 3-1

The objectives of the proposed project were developed in response to the Santa Barbara County Board of Supervisors' desire to initiate a new direction in municipal solid waste disposal and its concern that the Tajiguas Landfill not be considered as a long-term disposal option. As a result, the Department of Public Works and County Administrator developed a plan that identifies long-term, intermediate-term and short-term strategies for solid waste disposal and presented the plan to the Board of Supervisors on August 3, 1999, as summarized below:

**Long-Term Component:** Develop a new regional landfill within the County. Development of a new site could take up to 15 years for siting, site acquisition, planning, design, environmental review, permitting and construction.

**Intermediate-Term Component:** Prepare an EIR for expansion of Tajiguas to provide 15 years of disposal capacity, to allow for development of a new in-County regional landfill. If a new landfill were to open sooner than 15 years, the operational life of Tajiguas could be reduced.

**Short-Term Component:** Adding capacity to Tajiguas until environmental review of a 15-year expansion could be completed. On August 3, 1999, the Board of Supervisors approved the Public Works Department and County Administrator's recommendations regarding Refuse Disposal Strategies for the South Coast, as follows:

- Consider the long-term, intermediate-term and short-term refuse disposal strategies identified in the Public Works Department staff report.
- Consider a 15-year Tajiguas Landfill expansion for purposes of environmental review.
- Direct staff to develop another County Landfill site as a long-term disposal solution.
- Remove from CEQA project level consideration a Material Recovery Facility (MRF)/transfer station/compost/future technology facility at the Tajiguas Landfill, as the site was considered unsuitable as a location for a long-term disposal option.
- Direct staff to initiate independent process for development of a MRF/Transfer Station, as well as a compost facility.
- Direct staff to proceed with all short-term options, including a Benchfill project at the landfill.

On August 3, 1999, the Board of Supervisors issued a statement of purpose for the EIR as follows: In accordance with the State CEQA Guidelines, the purpose of the Environmental Impact Report (EIR) for the Tajiguas Landfill Expansion Project for a proposed 15-year capacity expansion of the Tajiguas Landfill is to serve as an informational document that will inform public agency decision-makers and the public generally of the significant environmental effect of a project, identify ways to minimize the significant effect and describe reasonable alternatives to the project.

The project objectives are provided in Draft EIR Section 1.4 as follows:

- *Provide approximately 15 years of additional reliable and cost-effective municipal solid waste disposal services for the residents of southern Santa Barbara County and the Santa Ynez and Cuyama Valleys.*
- *Meet the minimum 15-year County disposal capacity requirements of the California Integrated Waste Management Act (Assembly Bill [AB] 939) and goals of the County Integrated Waste Management Plan.*
- *Provide a well-managed municipal solid waste disposal facility to maximize the control necessary to assure the safe disposal of solid waste generated in southern Santa Barbara County, and the Santa Ynez and Cuyama Valleys until the Year 2020.*
- *Meet the Board of Supervisors' policy directive of August 3, 1999, to provide adequate disposal capacity at the Tajiguas Landfill to allow for the siting and development of a new in-County regional landfill, a process to be completed as soon as possible, a process that may take up to 15 years to complete.*

The fourth bullet reflects the purpose of the project, consistent with directives of the CEQA Guidelines §15124(b): "The statement of objectives should (*emphasis added*) include the underlying purpose of the project."

The purpose of the project is to provide 15 years of landfill capacity. The expansion of Tajiguas is one potential means to that end. The EIR analyzes a reasonable range of alternatives to achieve that end. The objectives have not been tailored to pre-ordain the selection of expanding Tajiguas as an outcome. In fact, the alternatives analysis considers a range of alternatives much broader than merely expanding Tajiguas.

#### Response 3-2

The proposed project meets the Board of Supervisors' policy directive of August 3, 1999, to provide adequate disposal capacity at the Tajiguas Landfill to allow for the siting and development of a new, in-County regional landfill, a process to be completed as soon as possible. However, this process that may take up to 15 years to complete. The timing reflects the anticipated start of the proposed project in 2005, as discussed Draft EIR Section 1.4.

The Board of Supervisors is the decision-maker for the proposed project and has wide latitude in its decision-making role. As discussed in Draft EIR Section 1.6.1 (p. 1-18), the Board could decide to approve or disapprove the project, could limit the number of years of additional operation or could apply other conditions, including a provision for the proposed expansion project to terminate when the new regional landfill becomes operational.

Based on the Board's directive, there is no need to evaluate the expansion project for a different number of years than provided in the Draft EIR. The Draft EIR evaluated the maximum number of years the landfill could operate as the "worst case" scenario in order to provide a thorough presentation of potential impacts. The final decision is the prerogative of the Board of Supervisors.

The comment appears to be based on the premise that rates of disposal, capacities and closure dates of landfills can be calculated with precision. In fact, these calculations are estimates, and

actual experience may depart from these estimates. The SWUD has actual data regarding past disposal rates, and can estimate future disposal rates based upon anticipated population growth rates. The SWUD also has data regarding past diversion, and can estimate future diversion rates. Landfill capacity also can be estimated based upon the footprint and volume of the proposed landfill expansion, along with the anticipated density of solid waste to be placed there. All of these numbers are necessarily based on projections and estimates, as they are used to predict future events. If the County approves the Landfill expansion, then the date the expanded Landfill reaches capacity may be sooner or later than the estimated year 2020. The year 2020 represents a reasonable estimate, however, based on SWUD's projections and best available data. Whether to commit to close the Tajiguas Landfill sooner than 2020 is a policy decision for the Santa Barbara County Board of Supervisors. Whether to close Tajiguas as soon as another landfill becomes operational also is a policy decision for the Board. The EIR provides the Board with information regarding the potential impacts of the project so the Board can make an informed decision regarding this issue.

#### Response 3-3

The Landfill will reach its capacity following the Benchfill project that is currently being implemented at Tajiguas. The Santa Barbara County Board of Supervisors also approved the Benchfill project on August 3, 1999. The Benchfill project was to extend the life of the Landfill from 12.0 million cubic yards (cy) to 15.1 million cy (i.e., approximately another five years over its previously permitted capacity). The Benchfill project is currently in process and will use the benches and the top of the Landfill for waste disposal until approximately 2005. The Tajiguas Landfill Expansion Project is anticipated to continue landfilling operations at the Tajiguas location from 2005 to 2020, an additional 15 years following completion of the Benchfill project. The 15-year expansion project (2005 to 2020) is evaluated in the Draft EIR.

The landfill expansion and installation of the liner will be phased in the following sequence. The top of the existing landfill (top deck) will be filled first, to an elevation of 660 feet above mean sea level (amsl) for the Front Canyon configuration or an elevation of 700 feet amsl for the Back Canyon configuration. Second, a liner will be constructed along the east slope of the existing landfill footprint, with waste placed on the lined area. During the last phase, in the area north of the existing landfill footprint, a liner will be constructed, and waste will be placed in the area north of the existing landfill. The timing of each phase and construction of the liner will be dependent on the rate of waste received over the course of the 15-year project.

#### Response 3-4

Cumulative projects are identified in Section 3.1.4 of the Draft EIR as, "future public and private projects along the Gaviota Coast." As noted in Draft EIR Section 3.1.4, the list of cumulative projects was provided by County Planning and Development and by Caltrans. These projects are described in Draft EIR Table 3.1-3. As described in the CEQA Guidelines (§15355), "a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." For the Draft EIR, the environmental baseline consists of ongoing landfill operations. The land area and air space delineated for the proposed project are located adjacent to and on top of the currently permitted landfill, referred to in the comment as the "Benchfill Project." Therefore, ongoing operations and the proposed expansion will not occur at the same time, but in sequence. As a

result, the benchfill and the proposed project together do not provide a basis for cumulative impacts.

In accordance with Section 15355 of the CEQA Guidelines, the cumulative impact of a project is defined as the change in the environment that results from the incremental impact of the project when added to other, closely related past, present and probable future projects. The area designated for cumulative projects in the EIR is the coastal area that extends from Gaviota State Park to just west of Goleta. A specific site for a potential new landfill that may be identified through the ongoing County landfill siting study has not been selected by the County. Therefore, as of summer of 2002, a "probable" site for a new landfill has not been identified, and such a site is not considered to be a cumulative project. A potential future regional landfill mentioned in the comment may or may not fall within the region designated for analysis of cumulative impacts and may not occur within the same time frame as the proposed expansion. Further, because there are no reasonably foreseeable specific sites for the future landfill mentioned in the comment, cumulative impacts of a landfill at such a future site cannot be analyzed.

The Santa Maria Landfill has been expanded to approximately 14 million cubic yards. This expansion was permitted on September 28, 2001 (Zhao, 2002). The permitted daily capacity is 740 tons per day (tpd), while the landfill receives an average 375 tpd. The expansion has an anticipated life until 2017, which is 3 years less than the proposed Tajiguas expansion. The Santa Maria Landfill currently accepts municipal solid waste from the unincorporated area of northern Santa Barbara County, southern San Luis Obispo County and the City of Santa Maria. The commenter is referred to Draft EIR Section 4.2.1.3 for a discussion of the Santa Maria Landfill.

The Santa Maria Landfill expansion was not included in the Draft EIR cumulative impact analysis because, as mentioned above, the area designated for cumulative projects in the EIR is the coastal area that extends from Gaviota State Park to just west of Goleta. The Santa Maria Landfill Expansion does not fall within this region. In addition, the Santa Maria Landfill is not a new development; it represents an existing, ongoing activity.

The Tajiguas Landfill will reach its capacity following the ongoing Benchfill project that currently is being implemented at the site and is incorporated into the EIR analysis under existing baseline conditions. The Santa Barbara County Board of Supervisors approved the Benchfill project on August 3, 1999. The Benchfill project was to extend the life of the Landfill and increase its capacity from 12.0 million cubic yards (cy) to 15.1 million cy (i.e., approximately another 5 years over its previously permitted capacity). The Benchfill project is currently in process and will use the benches and top of the Landfill (the "top deck") for waste disposal until approximately 2005. The Tajiguas Landfill Expansion Project is anticipated to continue landfilling operations at the Tajiguas location from 2005 to 2020, an additional 15 years following completion of the Benchfill project. The 15-year expansion project (2005 to 2020) is evaluated in the Draft EIR.

#### Response 3-5

The proposed Tajiguas Landfill Expansion project has been designed to avoid the coastal zone located on APN 81-150-19 (the southern parcel where the existing Landfill is located).

In an August 16, 1999, memo to Phil Demery (Correspondence 31<sup>(1)</sup>), Santa Barbara County Planning and Development reviewed the local permit requirements for APNs 081-150-019 and -026. In the memo, P&D found that:

“The Tajiguas Landfill has been in operation since 1966 prior to the enactment of the Coastal Act, the passage of the California Environmental Quality Act, and the onset of State regulation of landfills through the Solid Waste Management Act. Therefore, the only potentially applicable regulation was the County of Santa Barbara Zoning Ordinance 661. The Tajiguas Landfill, a County owned Public Works Facility, was not subject to a County permit requirement because Ordinance #661 specifically states that it is not applicable to “the County of Santa Barbara or any district of which the Board of Supervisors is the governing body.” Thus the landfill became a legal facility with no established limits of operation within the boundaries of the original landfill property (APN 081-150-019). In 1978, the landfill received a Solid Waste Facilities Permit (SWFP) from the State of California. The 1978 SWFP imposed a 400-foot elevation limit on the landfill but did not otherwise affect the permit status of the facility. *Landfill activity within the parcel and below 400 feet in elevation was (and is) a continuation of the historic operation of the original landfill. This landfill activity is not subject to Coastal Zone requirements.*” (emphasis added).

In 1988, 87-EIR-8 was completed to allow a larger expansion at the Tajiguas Landfill north, east and west of the Landfill footprint, and to an elevation of 500 feet. This expansion project would have allowed the expansion to occur laterally and fill over portions of what is now the natural channel of Pila Creek north of the existing Landfill. This expansion project was never completed. In 1988, a new SWFP was issued to expand the height limit to 500 feet throughout the Landfill, including the coastal zone. However, no Coastal Development Permit to allow the increase in height within the coastal zone portion of the landfill has been issued.

Historically, Landfill activity below 400 feet in elevation has been considered to be a continuation of the historic operations of the original Landfill. This is the reason the downstream sedimentation structure (referred to in the past as the down canyon in-channel and later the down canyon out-of-channel sedimentation basin) has not required CEQA review or coastal permits (see Correspondence 53).

The Landfill expansion has avoided the Coastal Zone and would not expand the Landfill beyond the 400-foot elevation within the Coastal Zone. Therefore, the proposed project is an expansion of an existing use. As analyzed in Draft EIR Sections 3.2 - Geology, 3.3 - Water Resources and 3.4 - Biological Resources, coastal resources would not be impacted by the expansion project. Therefore, the California Coastal Act does not apply to the project. Elements that, under the worst-case analysis, may occupy the Coastal Zone above 400 feet, plus applicable coastal policies, are discussed in Draft EIR Section 3.7.4.3.

Most components and activities associated with the Landfill expansion would occur north of the Coastal Zone boundary. However, the southeast corner modification and relocation of the green waste pad may occur on the existing landfill footprint within the Coastal Zone. The southeast

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<sup>(1)</sup> Refer to Response 1-6 (Table 1) for all Correspondence references.

corner modification is required to bring the existing landfill into conformance with coastal zoning, the Coastal Plan and the California Coastal Act, as discussed in Draft EIR Section 3.7.3.4.1.

Relocation of the green waste pad would potentially be allowed in the Coastal Zone. Production of mulch in support of agricultural uses is allowed under the AG-II zone district with a major CUP. Agricultural uses are given priority under the Coastal Act, with the intent to keep the maximum amount of prime agricultural land in production. Coastal policies applicable to these aspects of the proposed project are discussed in Draft EIR Section 3.7.3.4.2.

The requirements of CCR Title 27, Section 20260, are applicable to reclassification of existing units (landfills). Reclassified landfills are required to comply with the siting criteria in Section 20260. These criteria include the requirement that “. . . Class III landfills shall be located where site characteristics provide adequate separation between nonhazardous solid waste and waters of the state. The classification criteria in this section are used for reclassification of existing landfills at disposal sites approved as Class II-1 or II-2 (under previous versions of these SWRCB regulations) and expansions of such landfills.”

Further, in Section 20260 under item (b) Geologic Setting, the factors that shall be evaluated to ensure there is no impairment of beneficial uses of the surface or groundwater include:

- “ (A) size of the landfill;
- (B) hydraulic conductivity and transmissivity of underlying soils;
- (C) depth to ground water and variations in depth to ground water;
- (D) background quality of ground water;
- (E) current and anticipated use of the ground water; and
- (F) annual precipitation.”

The Tajiguas Landfill was reclassified from a Class II-2 to a Class III landfill by the RWQCB in 1993. The Waste Discharge Requirements (WDRs) for the Landfill (Order No. 93-69) state: “The California Regional Water Quality Control Board, Central Coast Region (hereafter Board) finds: 1. The County of Santa Barbara, Department of Public Works (herein after “Discharger”) owns and operates the Tajiguas Class III Landfill. . .”

With implementation of the proposed project, both the existing Tajiguas Landfill and the proposed expansion would remain a Class III facility. Therefore, the RWQCB made the finding that the Tajiguas Landfill is in compliance with the siting criteria of CCR Title 27, Section 20260 in 1993 when the WDRs were issued to Tajiguas as a Class III facility. The site would not be required to be reclassified. Therefore, this section does not apply to either the existing Tajiguas Landfill or the expansion project.

*The expansion project, rather than the existing landfill,* would be required to be in compliance with Section 20260 that pertains to Class III Landfills. Siting criteria under this section are the same as for Section 20260. The expansion project would be appropriately designed to conform

to the requirements of this section, including adequate separation between waste and groundwater. In addition, in new areas where waste would be placed, a liner system would be installed in compliance with applicable regulations that would further protect water resources.

See Response 1-6.

#### Response 3-6

Draft EIR Sections 2.2.1 and 2.3.1 of the Project Description specifically define the *maximum* cut slope for both the Front Canyon Configuration and the Back Canyon Configuration as 2.4:1. A preliminary slope stability analysis was provided in the Technical Studies for the Draft EIR and summarized in Draft EIR Section 3.2.3.2.3. The analysis indicated that slopes could potentially become unstable if inclined steeper than 2:1. Mitigation Measure GEO-1 in the Draft EIR requires further refinement of the slope stability analysis *if* slopes may exceed 2:1.

Mitigation Measure GEO-1 does not defer the impact assessment. The worst case (2:1 cut slope) is presented as a component of the project description. Slopes may actually be less than 2:1 (i.e., a 3:1 slope). Analysis based on the worst-case scenario indicated that slopes could be constructed up to 2:1 without resulting in potentially significant impacts. Because all factors of design cannot be known at this time (i.e., prior to grading cut slopes), refinement of the grading plan and studies associated with the grading plan would be accomplished at the Landfill design or at the time of construction *if* slopes are required to be in excess of 2:1. The Project Description has disclosed and evaluated the anticipated worst-case scenario. As stated above, Mitigation Measure GEO-1 in the Draft EIR requires further refinement of the slope stability analysis *if* design or field conditions dictate that slopes should exceed 2:1 and would reduce impacts to geology to a less than significant level. The Landfill is required to be designed within the parameters described in the Project Description, or additional CEQA review would be necessary.

Referencing the Joint Technical Document (JTD) does not constitute impermissible deferral of mitigation. The JTD will contain design details at an engineering level. Such a level of detail is not required to analyze environmental impacts for purposes of CEQA. Engineering the proposed landfill at such a level of detail is extremely costly, and such expenditures of public funds are imprudent until the County makes the policy decision whether to proceed with the expansion. For CEQA purposes, the EIR must contain sufficient information to enable the Board of Supervisors to determine whether slope stability can be assured, given "worst-cast" assumptions. The analysis indicates that, as mitigated, slopes will be stable, with engineering details to be worked out as part of the JTD process. The analysis also provides a performance standard with which the Landfill will have to comply.

#### Response 3-7

See Response 3-6.

A slope of 2.4:1 represents the maximum slope, unless slope stability analyses indicate that steeper slopes will be stable. This approach does not constitute "piecemeal" environmental review; rather, the Landfill is being analyzed as a whole, while accounting for the possibility that

the design will be modified as engineering details are refined during the engineering/permitting process.

Response 3-8a

The slope stability analysis prepared by GeoLogic Associates (2001a and b) that was included in the Technical Studies and summarized in the Draft EIR considered a scenario where water levels in the landfill were 15 to 20 feet higher than the actual water level in the dewatering wells cited in the ARCADIS, Geraghty and Miller Hydraulic Investigations Status Report (2001b), also included as a Technical Study to the Draft EIR. This information is summarized in Draft EIR Section 3.2.

The criteria cited in the comment are to determine if impacts related to geology are potentially significant. The comment quotes only part of the impact criteria in the Santa Barbara County Thresholds and Guidelines Manual. The concluding statement following the significance criteria listed is: "Mitigation measures may reduce impacts to a less than significant level. These measures would include minor project redesign and engineering steps recommended by a licensed geologist and engineers subsequent to detailed investigation of the site."

The project description limits the maximum cut slope. Mitigation Measure GEO-1 in the Draft EIR fulfills the Thresholds and Guidelines requirement for a mitigation measure that would recommend steps to be undertaken in the event slopes may exceed 1.5:1. Mitigation Measure GEO-1 requires that additional detailed engineering evaluations (slope stability, geologic and/or soils) be accomplished in the event slopes exceed 2:1. In addition, in compliance with CCR Title 27, slopes would be constructed to meet stability requirements for Class III landfills. Inclusion of Mitigation Measure GEO-1 serves to reduce impacts to a less than significant level, in compliance with the County's Thresholds and Guidelines Manual.

Response 3-8b

The required engineered buttress fill is included in Draft EIR Table 2-5. During construction of the engineered buttress, it may be necessary for cut slopes to temporarily exceed 2:1. However, the overall slope of the Landfill expansion would be 2.4:1. Because the engineered buttress is intended to provide stability for the Landfill expansion, it therefore must be constructed to be stable in itself. This is another design feature that may or may not be necessary, depending on the final design of the Landfill expansion. The EIR provided a "worst-case" analysis that included the soil excavation, etc. and associated impact analysis for the engineered buttress.

See Response 3-8a.

Response 3-9a

Please see Responses 3-6, 3-7 and 3-8a. In the event cut slopes are greater than 2:1, Mitigation Measures GEO-1 would mitigate any significant impact to a level of insignificance; therefore, a finding of significant impacts to geology is not appropriate.

Response 3-9b

The maximum area of disturbance allowed under the project description is shown in Draft EIR Figures 2-2 and 2-5. The figures depict the maximum area of disturbance by the landfill

expansion. The cut slopes would be limited to the disturbance footprint shown in the figures. Any deviation from the project description described in this EIR would require additional CEQA analysis.

See Response 3-6.

#### Response 3-10

The comments imply that the entire existing landfill overlies unconsolidated, saturated, sandy alluvial soil in the Pila Creek channel and may be adversely affected by seismically induced liquefaction of this soil. In addition, the comments contend that both the cover material and the landfill itself could liquefy during a seismic event and may compromise the stability of the existing landfill and the proposed expansion. It should first be noted that the Pila Creek channel containing alluvial soil is a narrow channel that, at most, underlies only a small fraction of the entire area of the existing Landfill. As such, its overall influence on the 3-dimensional stability of the landfill as a whole is small. Regardless, the following discussion is provided.

For seismic-induced liquefaction to occur, three conditions must be met: 1) the soil should be predominantly loose sand/silt that is prone to densify when vibrated; 2) the soil must be saturated; and 3) vibration of the soils must occur. That is to say, site soils must be of a grain size and density that is "liquefiable" under the groundwater and seismic conditions typical of the site. As is discussed below, this is not typically the case for the soils exposed and anticipated at the Tajiguas Landfill.

#### Alluvium

The potential for liquefaction of the alluvium in the Pila Creek channel was evaluated during slope stability evaluation conducted for the West Slope (GeoLogic Associates, 1997). As a part of that study, the alluvial deposits were investigated by excavating two borings near the existing maintenance building within the bottom of the canyon. Unconsolidated alluvium, consisting of silty clay to clayey silt with occasional gravel size siltstone fragments was encountered to a total depth of approximately 20 to 28 feet. Standard Penetration Tests (STPs) completed in these borings yielded N values in the range of 12 to 20, indicating that the soil is medium stiff to stiff in its natural condition. In addition, grain-size analyses of samples of these soils indicated a fines content between 35 and 90 percent. These factors alone indicate that these soils are not prone to liquefaction (California Division of Mining and Geology, 1997).

#### Cover Soil

As mentioned in the comment, the cover will rely on clayey soil to inhibit infiltration of rainwater into the underlying waste mass. It is true that sensitive, saturated clays may lose their strength when subjected to strains due to vibration. The mentioned quote from Dr. Keller in the comment may relate to this condition. However, the cover will not contain sensitive, saturated clay. The clay in the cover will be in a remolded condition, placed in a controlled manner to achieve the designed compaction and hydraulic conductivity, and maintained to minimize the risk of saturation. As mentioned above, clayey soils are not prone to seismic-induced liquefaction. As a result, it is concluded that the proposed cover soils are not prone to liquefaction.

### Landfill Material

The Landfill consists of heterogeneous material and is highly permeable. Such materials are not prone to liquefaction because, due to high permeability, pore pressures generated by vibrations are dissipated concurrently, and no excess pore pressures develop. Without excess pore pressures, liquefaction cannot occur. This conclusion is supported by the observed behavior of municipal landfills during past earthquakes. In fact, liquefaction of waste fill has never been observed. In view of this information, it is concluded that the potential for the Landfill material to liquefy during a seismic event is not likely to occur.

Based on the above discussion, it is concluded that there is no significant potential for seismic-induced liquefaction to occur at the Landfill, either in the alluvial soil in the narrow Pila Creek channel, in the cover materials or in the waste itself.

### Response 3-11

See Responses 1-1, 1-6, 1-8, 1-12, 2-20, 3-10 and 3-24.

### Response 3-12

See Response 3-5 with respect to applicability of the Coastal Act to the expansion project.

The comment describes existing conditions at the Tajiguas Landfill rather than conditions that would be expected with the proposed Tajiguas Landfill Expansion Project and associated impacts. The basins referred to in the comment were built in the 1980s, are currently in place and will continue to be used to control sediment from the Landfill. Another out-of-channel basin was constructed in 1999. They are part of the baseline conditions. The basins would not increase or decrease surface flows in Pila Creek over existing baseline conditions. Pila Creek is a naturally intermittent stream. The sedimentation basins affect the rate of stormwater discharge along the creek. The basins do not affect overall flows, however.

Impacts from seagulls are addressed in the Draft EIR under Section 3.6 - Nuisance. The Tajiguas Landfill is located in a rural area, with the closest residences being approximately 2000 feet to the southeast of the landfill at the community of Arroyo Quemada. Approximately 13 residences are located here. Adjacent to the Arroyo Quemada community is the Arroyo Quemado lagoon at the ocean outfall of Arroyo Quemado. This watershed is separate and distinct from Cañada de la Pila where the Tajiguas Landfill is located.

The Draft EIR correctly states that the birds are attracted to the Tajiguas Landfill. This is an existing baseline condition. However, the Draft EIR also has included Mitigation Measure NUI-2 to develop a Bird Management Plan utilizing a variety of methods listed in the measure to control birds at the Landfill. Using these methods in a varied manner would serve to reduce significant impacts to a less than significant levels. These methods include several that have not been previously used at Tajiguas, but have been successfully used at other landfills in California (i.e., Miramar Landfill, City of San Diego). Once the birds are deterred from the Landfill, the bird population along the Gaviota coast will continue to be attracted to the area by the fresh water source at Arroyo Quemado and/or Arroyo Hondo, the recreational areas frequented by humans in the area such as the Vista Point on U.S. Highway 101 west of the Tajiguas Landfill, Refugio State Beach and other campgrounds and picnic grounds in the area (where food from

humans is easily available), and areas with low human disturbance, such as remote beaches along the Gaviota coast where the birds can roost undisturbed. Implementation of enhanced bird management controls at the Landfill will reduce the attraction of the Landfill and will reduce the extent to which birds affect surrounding habitat and water quality. The birds will be along the coast because they naturally occur in the area or prefer other anthropomorphic attributes offered by the Gaviota Coast. Although the bird management controls will reduce bird impacts associated with the Landfill compared to existing conditions, it is likely that the Landfill will continue to attract some birds, so this impact is unlikely to completely disappear.

#### Response 3-13a

By design, the sedimentation basins are intended to capture storm water runoff that would otherwise be routed around the Landfill via the west culvert system to the surface water discharge point. It is not uncommon for these basins, particularly the two in-channel basins, to contain the storm water runoff in them for a number of months after surface flows have ceased entering them from the up-stream portions of the Pila Creek watershed.

Based upon routine observations, as well as upon records of periodic water sampling events conducted at the surface water discharge point, it is SWUD's experience that this culvert does not support continuous flow. Available records indicate that, at times, it is not even possible to collect a water sample from this location. Landfill BMPs include applying water to roadways and other high-traffic areas of the landfill during dry weather in order to minimize dust generation. This dust control water may make its way into the west culvert system through drop inlets along the haul road and may appear at the culvert mouth as a small discharge.

Additionally, a fire suppression standpipe situated at the top of the stream bank south of the landfill, directly below the culvert mouth, has been observed to leak water at high pressure. Water leaking from this standpipe was observed to pond in a small depression at its base, and likely contributed to the moist sediments and very small, localized puddles of water that may periodically be observed in the streambed of Pila Creek at this location. The leaking stand-pipe has been repaired. While it cannot be ruled out that some amount of water that may periodically be seen draining from the culvert may be derived from subsurface seepage into the culvert system from surrounding geologic materials, this seepage is a minor contributor to any low volume flow that may be observed during extended periods of dry weather.

White alder is located in Pila Creek north of the existing landfill where water may pond in wetter years in the upper Cañada de la Pila watershed. Often times white alder is located below or just above the high water mark of area South Coast creeks and is classified as a facultative wetland plant species (usually occurs in wetlands [estimated probability 67 percent to 99 percent], but occasionally found in non-wetlands) as indicated by the US Fish and Wildlife Service (1988). The presence of sufficient subsurface soil moisture is typically all that is necessary to support these trees. Moreover, according to tree ecologists, it is estimated that sufficient soil moisture is required during only 10 percent of the growing season to ensure the continued survival of white alders. Consequently, it is not rare to observe these trees thriving in what would normally be considered be a dry environment. Other South Coast area creek examples are El Capitan Creek, Rattlesnake Canyon and Mission Creeks that are ephemeral and support white alders in the foothills above the coast.

### Response 3-13b

As discussed in Response 1-8, ephemeral seeps are present in portions of the Pila Creek watershed. These areas often are recognized by locally conspicuous areas of heavier vegetation, which suggest that underlying soils may be water-bearing. A detailed review of historical aerial photographs was recently conducted to evaluate the conditions associated with development of the Landfill area (Arcadis, 2001a, 2001b). Observations of these historical data indicate that the majority of seepage occurs from the west side of the canyon, and that seepage was seasonally-influenced, being most apparent during and immediately following the rainy season. Seepage was found to be limited to areas where the Rincon Formation is exposed. These observations differ from statements presented in the Robert Cady Declaration (Appendix A, Arcadis, 2001a and b) that indicate the presence of "consistently flowing" springs encountered along the eastern edge of the canyon during early development of the Landfill area. Experience in soil borrow activities at the Landfill indicate that discrete water-bearing zones are locally present within the native geologic materials exposed during excavation into the side slopes of the canyon. Observations from the excavation areas indicate that these water-bearing features tend to be of limited lateral and vertical extent and tend to dry out after only several days of exposure. Therefore, to the extent springs were encountered during earlier construction activities, their presence was of little significance, structurally or otherwise. Besides descriptions presented in the Cady Declaration, no evidence of perennially flowing springs has been encountered at the Landfill. While the presence of the flowing springs in the area noted by Cady cannot be ruled out, there is no other information to indicate that such features are a widespread or common occurrence in the area.

### Response 3-13c

Pila Creek is ephemeral, or only supports surface flow during and for periods following storm events. There are two areas on the floor of the canyon where there is typically some standing water: (1) the in-channel sedimentation basins in the upper canyon; and, (2) a very small area near the outlet of the box culvert where the 48-inch pipe that runs under the landfill discharges to Pila Creek (the outlet is located just downgradient of the GLCRS).

The in-channel sedimentation basins in the upper canyon area typically, though not always, contain water throughout the year. Water in the sedimentation basins is derived from the following sources:

- Surface water runoff from the entire Pila Creek watershed north of the Landfill during and following storm events.
- Discharge of groundwater from the alluvium upstream of the sedimentation basins.

The area just below the culvert outlet south of the landfill and just downstream of the GLCRS usually contains very localized, stagnant water, or at least moist ground. The source of water at this location is flow out of the culvert. Culvert outflow does not create "flow" in lower Pila Creek, except during and following precipitation events. Rather, this water ponds, is stagnant, and either evaporates or percolates into the alluvium in lower Pila Creek, becoming groundwater. The source of the water exiting the culvert is likely from:

- Surface water during the rainy season and for some period thereafter.
- Other surface water that enters drop inlets to the culvert throughout the year.

- Very minor seepage from the west side of the canyon that is intercepted by the culvert and backfill around the culvert.

The springs outlined in the Cady Declaration are discussed in Response 1-8.

Response 3-14a

This comment regarding groundwater use designations accurately summarizes RWQCB policy.

Response 3-14b

This "existing feature of the site" is not included in the Draft EIR because GeoSolv's interpretation of fracture pathways in the Rincon Formation is not accurate and is not supported by facts. See Response 2-3. The information pertaining to water levels in the waste mass is described in the Draft EIR (page 3.3-23) and in the accompanying Technical Report (Arcadis, 2001a and b).

Response 3-15

See Response 2-13a.

Response 3-16

See Responses 1-5 and 1-6 regarding the 5-foot separation issue. Also see the responses that follow the numbered Responses to Document 2.

The quoted excerpt from Draft EIR page 3.3-4 is from a section describing regional conditions and depth of alluvium in larger drainage basins, which do not include Cañada de la Pila. Although water is found in the Landfill mass, as described on Draft EIR page 3.3-23, the waste mass does not "increase the height of the alluvial material" and does not have similar hydraulic characteristics to the alluvial materials. The elevation of water in the Landfill dewatering wells is approximately 100 feet above the pre-landfill topography at well DW 4-2. Although it may not be possible to demonstrate "dry" materials beneath the saturated waste, the intervening layers of low permeability compacted clay soils provide a hydraulic barrier to groundwater movement.

Response 3-17

See Responses 1-7 and 3-16.

Data in the Arcadis (2001b) report indicate that overall permeability of the Landfill mass is low. The lack of response among nearby wells during pump tests in the Landfill mass indicates there are discontinuous zones of saturated materials present in the Landfill, separated by zones of low-permeability soils or unsaturated materials. This would be consistent with historical operations that resulted in landfilling of materials into discreet cells. Although there may be some flow between cells, such flow is limited and was not observed in the pump tests.

Response 3-18

Since this water was taken to a sewage treatment plant for disposal, it was not tested for indicator bacteria. However, because of the elevated temperature within the Landfill waste mass, among other factors, bacteria are not expected to occur in leachate water samples. This is confirmed by sampling from the horizontal wells (HWDS) tapping into the lower portion of the Landfill (near

the base of the Landfill), which indicates no significant concentrations of bacteria (County of Santa Barbara, 2001a; 2002).

There are three horizontal wells present in the lower portion of the Landfill mass that produce small amounts of water that has been tested for total coliform, fecal coliform, E.coli and enterococcus bacteria. The results of this testing did not indicate any significant concentrations of these indicator bacteria being present in the water. Thus, the Landfill mass itself is not a source of bacteria at the site or in the nearby area.

#### Response 3-19

Responses 1-3 and 2-3. For information regarding the geology of the site, see Draft EIR Figures 3.2-1 through 3.2-5.

Maps indicating the surface exposure and bedding attitudes of the Rincon and other formations are shown on Draft EIR Figure 3.2-5 and in reference documents, including EMCON (1994) and Dibblee (1988). A map and cross section depicting the hydrogeologic units at the site are presented in Draft EIR Figures 3.3-3 and 3.3-4.

#### Response 3-20

The natural groundwater elevation has not risen as a result of landfill installation. The water observed in the waste prism is perched in cells of waste that are separated by low permeability soil that has been placed as part of landfill cover operations. This water is likely derived from the waste itself, from rainfall during landfill operations and by long-term infiltration of rain. The fact that water is standing as much as 100 feet above the toe of the Landfill and is not discharging out the face of the Landfill, or rapidly to the GLCRS, is evidence of the overall low permeability of the waste fill. It would be surprising, in fact, if the landfill were found to be dry.

#### Response 3-21

During reconfiguring of the Landfill (Benchfill project), existing cover on the southern face of the Landfill was removed, stockpiled, additional Landfill waste was placed on the southern face at a 2:1 slope, and the cover material was replaced. During removal of the cover, no free water was encountered in the Landfill materials, even along the lower benches. This is additional evidence that the water encountered within the Landfill during the (Arcadis, 2001b) work is localized (Arcadis, 2001b).

The cover material replaced upon completion of the Benchfill project has essentially the same characteristics as the cover material that was originally in place. As no groundwater was exposed during removal of the initial cover, the new cover is not expected to alter subsurface flow conditions in the vicinity of the mouth of the canyon.

#### Response 3-22

Because a portion of the Landfill overlies the Vaqueros Formation, it is possible that some amount of water within the Landfill may infiltrate the Vaqueros Formation. If groundwater in the Vaqueros Formation were impacted by Landfill leachate, it would be detected in monitoring wells MW-10, MW-12, and MW-13, shown on Draft EIR Figure 3.3-3. There is currently no indication of exceedances of groundwater quality standards in the Vaqueros Formation at these

monitoring wells (see Draft EIR Table 3.3-1). In some locations, such as along the former Pila Creek channel across the Vaqueros Formation, there is evidence of low permeability Rincon soils placed between waste and the underlying Vaqueros Formation. On this basis, it appears that Landfill leachate does not enter the Vaqueros Formation or, if it does, the volume is insignificant.

Response 3-23

See Responses 2-3, 2-4, 2-6 and 2-10.

Response 3-24

Water in the Landfill mass occurs in discontinuous zones surrounded by low permeability soils and is not free-draining into underlying alluvial soils, although some hydraulic connection with the underlying alluvium is likely.

The volume of water in the Landfill mass that potentially enters remnant alluvium beneath the Landfill is extremely low. This is supported by data in the Arcadis (2001b) report that indicates the overall permeability of the Landfill mass is very low. The lack of response among wells during pump tests in the Landfill mass reveals that there are discontinuous zones of saturated materials present in the Landfill, separated by zones of low-permeability soils or unsaturated materials. This conclusion is supported by the lack of flow from the Landfill face following removal of cover materials on the face during the Benchfill. This lack of flow indicates the water is discontinuous and not of significant volume. In addition, the extremely low permeability of the Landfill mass is also supported by the low flow observed from the three horizontal wells placed into the Landfill mass below the level of the water. Therefore, the volume of water entering the alluvium beneath the Landfill is extremely low.

It is important to note that, even if some water from the Landfill mass enters alluvium beneath the Landfill, this water is intercepted by the GLCRS. The GLCRS was constructed across the alluvium and weathered Rincon Formation on the canyon floor. The GLCRS was designed and operated to intercept potential underflow from the alluvium beneath the Landfill and the weathered Rincon Formation. A discussion of the GLCRS is provided in Response 1-7.

Response 3-25

The springs reported in the Robert Cady Declaration are discussed in Response 2-12. Given the extremely low permeability of the unweathered Rincon Formation bedrock, groundwater discharge from this unit to the Landfill materials is not significant.

Response 3-26

See Response 2-13a.

Response 3-27

The expansion liner system would be designed to maintain a 5-foot separation between waste and highest elevation of groundwater. The liner systems would be designed to the satisfaction of the RWQCB and in compliance with existing regulations. Although the following design has not been approved by the RWQCB, a typical liner system is described here. The liner system would consist of two sets of multiple layers, one set adjacent to the waste and one set below an

impermeable barrier to the waste. Adjacent to the waste, the layers would be placed in the following order (starting with the layer closest to the waste): a clay layer adjacent to the waste, a geotextile layer, a gravel layer to collect leachate from the decomposing waste and to allow drainage, and a high-density polyethylene (HDPE) layer. The HDPE layer is similar to a sheet of plastic that would create an impermeable barrier to isolate the waste from the surrounding environment. The system below the HDPE layer would be a clay layer, a geotextile layer and a gravel layer. A total of seven layers would typically comprise the total liner system.

Therefore, the proposed Landfill expansion would be designed with a liner between waste and the underlying ground surface, along with subdrains as necessary to insure that at least 5 feet of separation is maintained between waste and the highest anticipated groundwater, as described on Draft EIR page 3.3-55. See Response 3-28.

#### Response 3-28

As stated on Draft EIR page 3.3-55, the base of the Landfill expansion would be designed to achieve the required 5-foot separation between waste and the highest anticipated groundwater (see Response 3-27 for a description of the liner system). The precise elevation of the base of the Landfill is unspecified at this time, and will be determined during detailed design for the JTD.

To date, the highest groundwater elevations observed in the two new Vaqueros Formation wells is 379 feet at V-1 on January 18, 2002, and 363 feet at V-2 on May 22, 2002.

Placement of a fill such as the proposed expansion over the Vaqueros Formation and the associated changes in topography are not expected to cause a rise in groundwater levels within the Vaqueros Formation. The Vaqueros Formation in Cañada de la Pila is composed of cemented sandstone that is essentially non-compressible. Furthermore, lining of the Vaqueros Formation as part of the Landfill expansion will reduce potential recharge in the unit. Therefore, water levels are not expected to rise in the Vaqueros Formation as a result of the Landfill expansion.

#### Response 3-29

Since 1998, a landfill gas collection system has operated at the Landfill. The objective of this system is to recover landfill gas generated during decomposition of organic materials in the Landfill. The presence of this system has operated effectively and minimizes the possibility that landfill gas will contact the water within the Landfill.

As discussed in the Arcadis (2001b) report, there are discontinuous zones of water present within the Landfill. These zones are interpreted to be separated by low-permeability barriers that restrict the migration of these waters. This interpretation was based on differing water levels in the Landfill encountered during drilling, the types of materials encountered, the results of pump testing, which show a lack of interconnection, and the lack of any flow out of the Landfill when the cover materials were recently removed (see Response 3-24).

Although there is the potential that landfill gas contacts the water in the Landfill, any resulting contamination that might occur is likely to be localized. This is demonstrated by the results of

water sampling in the horizontal and dewatering wells that show very low levels of VOCs present in the Landfill water. In addition, water in the Landfill that may possibly seep out through the alluvium beneath the Landfill is captured in the GLCRS (see Response 3-24). Monitoring wells downgradient of the GLCRS are located in both the alluvium and bedrock (Monterey Formation) in order to evaluate possible groundwater impact that may occur.

Thus, although landfill gas may contact water in the Landfill, this does not represent a significant water quality impact.

#### Response 3-30

The referenced statement from the Draft EIR is regarding the proposed Landfill *expansion*, which differs from the *existing* Landfill, as the proposed *expansion* will be a lined facility with a built-in leachate drainage and collection system, plus operation and design features to limit infiltration into the Landfill, as described in the Draft EIR. Also, a 5-foot separation from the capillary fringe will be maintained to avoid saturation of the liner system by underlying groundwater. Water in the *existing* Landfill is primarily a result of historic infiltration of precipitation on the Landfill surface and infiltration of surface runoff rather than water rising from below. In the early years of operation of the *existing* Landfill, grading and drainage were not always conducted in a manner to limit infiltration into the fill, which has resulted in the current volume of water held in storage within waste cells in the lower levels of the Landfill. Current operation of the *existing* Landfill includes several engineered measures to address the occurrence of water in the *existing* fill. These measures include:

- Grading of daily and intermediate cover to reduce infiltration.
- A system to remove groundwater from buried stream alluvium north of the Landfill (NGWMS).
- Horizontal wells to drain the toe of the Landfill (HWDS).
- Dewatering wells that could be used, if necessary, to remove water from the Landfill for stability concerns.
- A liner leachate collection and recovery system (LLCRS).
- A landfill gas recovery system.
- An extraction trench system (GLCRS) to control migration downstream of the Landfill and maintain groundwater quality.

#### Response 3-31

See Response 1-6.

#### Response 3-32

Arroyo Hondo is a separate watershed from Cañada de la Pila. Therefore, the two watersheds are not hydrologically connected.

See Responses 4-1 and 4-3.

#### Response 3-33

The Landfill expansion design described in the Draft EIR includes redundant and complementary systems to ensure the effectiveness of the Landfill liner and to prevent Landfill impacts on groundwater quality. The proposed composite liner system will include two low-permeability

layers that have complementary physical and hydraulic properties. The combined performance is significantly better than the performance of either individual component alone. The low-permeability elements of the liner will be complemented by a laterally extensive drainage network referred to as the Leachate Collection and Removal System (LCRS), which will convey landfill-impacted liquids off of the low-permeability layers. This redundant system is designed to remove liquids from above the composite liner, which reduces the potential for leakage even further. The LCRS will be covered with a heavy geosynthetic filter fabric and at least 2 feet of clean soil, which will protect it and the underlying low-permeability liners from potential damage. The preamble to the EPA Subtitle D regulations states that "the composite liner system is designed to be protective in all locations, including poor locations."

With respect to the high-density polyethylene (HDPE) geomembrane liner material, geomembrane durability and resistance to chemical attack has been studied by nearly all HDPE manufacturers. When subjected to a mixture of chemicals at concentrations similar to or greater than those observed in landfill leachates, HDPE geomembrane liners show little if any degradation, even over prolonged periods of time. A paper prepared by Ruldolf Bonaparte (1995) concluded that "the service life for an HDPE geomembrane used as a component of a liner system in an appropriately designed and constructed MSW landfill should be in excess of the time period for leachate and gas production; the available information suggests that service life of this material will be measured in terms of hundreds of years." Therefore, geomembrane failure as a result of chemical degradation is considered very unlikely and speculative.

Similarly, State regulation requires that the clay and LCRS gravel portions of the liner also be stable against potential chemical degradation. The soil component of the liner system below the geomembrane is composed of stable geological materials that are highly resistant to degradation and that are expected to function indefinitely in the chemical and physical environment of a Municipal Solid Waste (MSW) landfill liner system. Two leading authorities on the long-term properties of clay liners are Professor James K. Mitchell of the Virginia Polytechnic Institute and Virginia State University, and Professor David Daniel of the University of Illinois. In Mitchell and Jaber (1990), it states that, "By their very nature most clay soils are quite stable materials in their natural state, because they are towards the end point of the degradation phase of the weathering and rock-forming cycle. Thus, if a naturally occurring clay soil is compacted to high density, thereby producing material with a very low hydraulic conductivity, and it is maintained within the same ranges of temperature, pressure, and chemical and biological environment, it would be expected to function as a seepage barrier indefinitely." In Daniel and Liljestrand (1984), it states that, "No detrimental effects were observed when a wide range of actual and simulated landfill leachates were passed through specimens of natural earthen liner materials." As a result, failure of these systems by leachate is also extremely unlikely.

The base liner, leachate control and recovery system, and landfill gas collection system included as part of the project have proven efficiencies in the removal of leachate before it can leak from the Landfill. Specifically, recent research confirms that well-designed modern landfills do provide adequate protection against water quality impairment (Giroud, Badu-Tweneboah & Bonaparte, 1992; Bonaparte & Gross, 1990). In the 1990 study, Bonaparte & Gross presented the results of a field study in which the authors investigated the quantity and origins of flow in

the leachate collection systems of 30 existing lined landfills. This research confirmed that modern landfills result in negligible pollutant discharges to groundwater.

#### Response 3-34

The baseline for evaluation in the Draft EIR is the existing environmental setting with the existing Landfill located in the Pila Creek watershed. It is an existing land use. Surface water quality data at the Landfill are collected in accordance with, and on a schedule dictated by, operational permits and monitoring programs issued and overseen by the RWQCB. The examination of surface water quality data for the Pila Creek watershed was undertaken using available data collected under these existing compliance programs, as well as using additional data collected above and beyond program requirements at the discretion of the SWUD. To clarify and correct a point raised in this comment; time-equivalent data for surface water quality are available for comparison, but are not always available for all sampling points on a given sampling day. Comparison of time-equivalent data, as available, was used to evaluate potential spatial relationships in water quality trends. The available data set is considered satisfactory for this purpose, and the trends identified through this analysis are discussed in Draft EIR Section 3.3.2.2.4 and in Section 3.3.1 of the Surface Water Resources Technical Report (URS, 2001a).

As summarized in this comment, evaluation of time-equivalent surface water data indicated a general downstream increase in electrical conductivity (EC), turbidity and total suspended solids (TSS). The specifics of how concentrations of these monitoring parameters varied between areas situated upstream and downstream of the Landfill are also discussed in Draft EIR Section 3.3.2.2.4 and in Section 3.3.1 of the Surface Water Resources Technical Report (URS, 2001a).

#### Response 3-35

See Response 3-34.

The proposed Landfill expansion is not expected to increase erosion in the watershed because continued best management practices (BMPs) to control erosion and sedimentation would be implemented. Phased closure of the *existing* Landfill would occur as the expansion project proceeds. The southern portion of the Landfill is expected to be closed by "capping" with soil and by revegetating the capped areas as described in Draft EIR Section 2.11 (i.e., "phased closure"). Revegetation would decrease sedimentation coming off the *existing* Landfill compared to baseline conditions.

As the Landfill *expansion* would proceed, portions of the *existing* Landfill would undergo phased closure when Landfill operations are completed in those areas. This action would decrease sedimentation coming off the expansion area. As a result of the decrease in overall long-term sedimentation with phased closure of the Landfill and implementation of BMPs to control erosion and sedimentation during the Landfill expansion, the project is not expected to result in significant erosion/sedimentation or water quality impacts over baseline conditions.

The BMPs currently used at the Landfill to control erosion/sedimentation would continue to be used under the expansion project. BMPs such as sedimentation basins, erosion control methods and techniques are described in Draft EIR Section 2.8.6, Section 2.9.4 and Section 3.3.2.2.4.

Litter in Pila Creek was documented through a citizen concern expressed in a letter to the RWQCB on April 30, 1999 (Correspondence 27). The SWUD implemented several methods to exclude litter from entering Pila Creek. Litter screens have been installed around storm water drainage inlets at the Landfill, and trash racks have been installed on Pila Creek, both to catch trash before it is carried by storm flows off the landfill site. Complaints have decreased, with no complaints received in the past year since these methods have been implemented.

Response 3-36

See Draft EIR Figure 3.3-7.

Response 3-37

The source of water to the culvert beneath the Landfill is discussed in Response 3-13. Because the culvert passes over the GLCRS, a portion of the water in the culvert (and backfill) probably entered the GLCRS. Repair of the leaking portions of the culvert in the vicinity of the GLCRS probably reduced the leakage significantly. However, some water carried in the backfill probably continues to leak into the GLCRS and is captured.

Regarding bacteria concentrations in Pila and Arroyo Quemado Creeks, groundwater and even landfill leachate are not a source or migration pathway based on numerous sampling data (Santa Barbara County, 2002). Bacteria are typically found in all surface waters. Pila Creek and Arroyo Quemado Creek have concentrations of indicator bacteria that are actually lower than most watersheds in the South Coast of Santa Barbara County.

See Response 1-10.

Response 3-38

As described in Responses 1-1 and 3-18, sampling has demonstrated that elevated levels of bacteria do not exist in the Landfill leachate. Further, sampling also has demonstrated that elevated levels of bacteria are not present in groundwater downgradient of the GLCRS. Therefore, the referenced scenario of high groundwater bypassing the GLCRS and contributing to high bacterial levels in Pila Creek is not reasonable.

Response 3-39

The comment properly identifies Pila Creek as unique, having no direct correlative examples elsewhere in the County. It is the only coastal watershed in the County that is developed with a landfill. However, because bacteria data are available for only a few selected coastal watersheds in the County, there are no other local alternatives available for comparison to conditions in Pila Creek. Regardless, ample data exist for coastal watersheds of all descriptions throughout the County to demonstrate that the majority of increases in ocean bacterial contamination corresponds to storm water flows from creeks during the wet season.

Bacteria are naturally present in every watershed and are flushed out in greater concentrations during storm water flow than under low flow conditions. Cañada de la Pila is not different from other watersheds in this respect. Pila Creek is a natural stream channel in the northern portion of the Landfill site and, as documented in Draft EIR Section 3.4, supports various plant and animal species in the watershed and on the landfill site.

See Response 3-40.

#### Response 3-40

A recent DNA Study at Arroyo Quemado, using similar methodology to the Rincon DNA Study, identified the primary source of bacteria at this location to be avian, and seagulls to be the highest contributor (USR, 2001b). High bacteria counts in areas where birds are attracted is a nation-wide issue. Areas in the Great Lakes region, reservoirs in the East and inlet areas in the Northwest all have reported high bacteria counts related to increased bird populations.

The baseline conditions described in the Draft EIR note there are birds foraging at the Tajiguas Landfill that are likely attracted to the area by the Landfill. However, as also noted in Draft EIR Section 3.6.2.2, the Landfill and the entire Gaviota Coast are located in proximity to the Channel Islands where one of the largest west coast gull breeding colonies is located. In addition, Arroyo Quemada Beach is the only beach along the South Coast tested for water quality that does not have human disturbance associated with developed recreational activities at the creek mouths. Jalama, Gaviota, El Capitan and other creeks that are tested for water quality have developed recreational campground/picnic sites at the coast that draw humans and their pets. These recreational uses allow for repetitive disturbances to the birds at these locations. The birds would tend to congregate at lagoons where there is minimal disturbance and, in the wintertime, where there is adequate beach present during most of the day for loafing.

The Landfill expansion project is not expected to increase the number of birds attracted to the Landfill over the current baseline. The size of the working face is proposed to be kept as small as possible, a continuation of existing practices. The bird management program includes additional measures to discourage birds from being attracted to the Landfill. Thus, the expansion project is not expected to exacerbate bacteria contamination due to birds.

Please see Response 3-12 for a discussion of Mitigation Measure NUI-2 and its effectiveness.

Seagulls and other bird species are natural inhabitants of the South Coast, including the area surrounding Tajiguas landfill. While it is recognized that the Landfill is attractive to bird species, it is not solely responsible for their presence in the area. The birds are opportunistic feeders and will forage for the easiest food sources. In addition, local and migrating birds may learn to prefer human food sources to natural prey over several generations, making the bird population a cosmopolitan issue. The "natural" carrying capacity of the bird population along the coast is impossible to calculate given the number of human-induced and natural variables in the existing environment.

#### Response 3-41

While it is apparent that seagulls and other bird species are contributors to bacterial contamination in both watersheds, an important distinction needs to be drawn between similar source mechanisms and the actual physical contribution of bacteria from one watershed into another. Available data indicate that bacteria contamination in both of these watersheds results, in part, from similar source contribution mechanisms (i.e., bird feces), and are thus source related. However, this should not be interpreted to mean that bacterial contamination present in one watershed may influence the other. Pila Creek and Arroyo Quemado Creek occupy

physically distinct and separate watersheds, and no surface water pathway exists between the two that would allow bacterial contamination present in one watershed to impact the other. Therefore, while bacteria conditions in these two watersheds are source-related, there is no demonstrable relationship between actual bacteria concentrations in one to the other.

#### Response 3-42

The impacts cited in this comment are documenting existing conditions that the County is currently aware of and taking aggressive and proactive steps to address. As discussed in Response 3-40, because the overall practices will remain substantially the same as currently practiced, the expansion will not exacerbate bacteria contamination due to birds.

#### Response 3-43

This comment describes the existing setting at the landfill. There is no evidence to support the assertion that riparian vegetation and aquatic species habitat are negatively impacted due to reduced stream flow in Pila Creek. Pila Creek is an ephemeral feature, meaning it supports flow during only part of the year. This is a fundamental characteristic of the watershed, and is independent of whether or not a landfill is present.

Although the existing sedimentation basins act to contain periodic storm water flows from areas situated upstream of the Landfill, other components of the existing drainage control system (east and west culvert systems) act to continuously route storm water flows off of and/or around the Landfill and back into the stream bed of Pila Creek at the facility's surface water discharge point, assuring stream flow during all but the most insignificant rainfall event. These drainage control systems collect surface water runoff from all areas of the canyon not currently routed to the existing sedimentation basins and deliver it directly to Pila Creek. Moreover, the expansion will have no effect upon the natural runoff from areas below the Landfill, and runoff from these areas will continue to feed Pila Creek as they always have. While the existing drainage control systems do act to reduce the total volume of water entering the lower portion of Pila Creek, because of the factors described above, lower Pila Creek does receive sufficient runoff to support surface flow during those times of the year when it normally would.

#### Response 3-44

See Response 3-43.

#### Response 3-45

A distinction must be made between baseline conditions associated with the *existing* landfill and the potential impacts of the *proposed expansion*. The EIR describes the baseline conditions (i.e., under current landfill operations) and compares them to the proposed expansion project. Under the proposed expansion project, the sedimentation basins would not remove additional water above the baseline condition. Therefore, no change is anticipated over current conditions, and impacts would be considered less than significant.

Regarding current conditions, the SWUD is not aware of any evidence suggesting negative impacts due to increased erosion in areas downstream of the Landfill, and has not received any such complaints from landowners in the area. As discussed in Response 3-43, the existing drainage control system collects surface runoff from areas not draining into the sedimentation

basins and routes it directly into Pila Creek at the facility's surface water discharge point. The sediment load carried in this storm water is introduced directly into the streambed of Pila Creek. Evidence of sediment accumulation, not sediment erosion, can be seen at the culvert opening in the form of fine sand and mud deposits. It also should be noted that the existing sedimentation basins are designed to capture only the readily settleable fraction of sediment load from impounded storm water. At those times when the sedimentation basins do spill into the western drainage system, the fine sediment fraction (less than #200 sieve) of these storm waters is transferred directly into the Pila Creek streambed. The proportion of fine sediments entrained in storm waters from the upper Pila Creek watershed is estimated to be approximately 50 percent of the total sediment load.

In addition, the sedimentation basins were constructed to reduce the amount of sedimentation entering into Pila Creek, control storm water from the Landfill, and improve water quality. The basins are required through the Tajiguas Landfill's Waste Discharge Requirements (Order No. 93-69) issued by the RWQCB.

#### Response 3-46

This suggested mitigation measure is accepted. Well No. 3 in the Monterey Formation will be used if the water level in the Vaqueros water supply well drops regularly from pumping activities. See Final EIR Section 4.2.1 for new mitigation measure WR-4 and to Final EIR Table 1-2.

As stated in Draft EIR Section 3.3.2.1.3, the bedrock aquifer that is commonly used for water supply is the Vaqueros sandstone. In addition, groundwater may be used from the Monterey, Vaqueros, Rincon and Sespe-Alegria Formations. Well No. 3, located in the Monterey Formation, has the potential for providing approximately 16 acre-feet/year (af/yr) of the total Landfill water requirement of approximately 55 af/yr. There is an excess supply of water, assuming that Well No. 3 would be available to provide water as needed should the other sources occasionally fall short of predicted capacity. During Landfill operations, the water level from wells in use in the Vaqueros Formation will be monitored.

As discussed in Draft EIR Section 3.3.3.3, a water use versus supply analysis was completed for the proposed Landfill expansion. The analysis evaluated the safe yield of the Vaqueros Formation and estimated the quantity of water required on an average annual basis for Landfill operations. Water demand was compared to water supply capacity; supply excess of 15.5 to 22.5 af/yr was found. The supply sources included Well No. 3, located in the Monterey Formation. Because water in this well has high organic constituents that naturally occur in this formation, it would require some level of treatment, depending on its planned use.

As stated in Draft EIR Section 3.3.3.3, the proposed project would not exceed the safe yield of the aquifer and will not significantly impact groundwater or surface water resources.

Further, a discussion of the proposed project and its effects on recharge is provided in Draft EIR Section 3.3.2.1.3 (page 3.3-9).

Response 3-47

See Response 3-40.

Response 3-48a

See Response 3-5.

Response 3-48b

Ringtails are acknowledged as listed and as a fully protected mammal under State Fish and Game Code Section 5937. "Take" under the Fish and Game Code (Section 86) means hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill. Ringtails may not be hunted or trapped. This definition does not address protection of the habitat used by this species.

The baseline conditions described in the Draft EIR note that the expansion is proposed primarily in the area that currently is disturbed by the existing soil borrow area, an area that is subject to ongoing excavation and Landfill activities. Because existing habitat within the Landfill site is regularly disturbed by ongoing Landfill activities, animals such as ringtails are expected to avoid such disturbed areas, and the habitat would not be critical to the maintenance of the species. Prior to 1967, the ringtail was harvested as a furbearer. It could be taken in season with no bag limit. As of January 1976, the legislature conferred the status of fully protected furbearer on the ringtail (Belluomini, 1980). Fully Protected Species are not expected to be "taken" under the proposed Landfill Expansion project.

Noise and human activities currently occur with ongoing landfill operations. The analysis in Draft EIR Section 3.4.3.3.2 noted that ringtail would occur on the slopes and creek portions of the northern project site rather than in the active Landfill and soil borrow area. The project is not expected to result in the "take" of any individual birds or mammals. The Draft EIR acknowledges loss of habitat for these species as a significant but mitigable impact. Wildlife are mobile, unlike plants, and in the short term, wildlife are expected to move away from landfill disturbance activities. In the long-term, the Landfill would be closed and revegetated. Once Landfill activities cease, wildlife are expected to return and use the Landfill for foraging. For this reason, the impact to ringtail habitat is considered significant but mitigable.

Response 3-48c

Under the proposed expansion project, the sedimentation basins would not remove additional water above the baseline condition.

See Responses 3-43 and 3-45.

Response 3-49

Non-native annual grassland on site is discussed in Draft EIR Section 3.4.2.1.3. The description notes that purple needlegrass occurs on the site but, as stated in Draft EIR Section 3.4.2.1, is scattered among non-native grasses and forbs and is likely more abundant on the east-facing slope of the Baron Ranch to the east of the Landfill. For purposes of resource evaluation in Santa Barbara County, a native grassland is defined as an area where native species comprise 10 percent or more of the total relative cover (Santa Barbara County, 1995a). The Biological

Assessment included as a technical study to the Draft EIR did not identify any native grasslands on the project site based on field surveys (see Draft EIR Figure 3.4-1). Therefore, the purple needle grass that does occur as scattered individuals on the landfill site would not meet the definition of a "grassland."

Sensitive wildlife species, including the white-tailed kite, are identified as potentially using the site for foraging as discussed in Draft EIR Table 3.4-3 and Section 3.4.2.3.3, but are not known to occur on the project site. Neither grasslands nor coastal sage scrub representing an Environmentally Sensitive Habitat Area (ESHA) as defined by the California Coastal Act exists on the property.

An ESHA is defined as "any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem which could easily be disturbed by human activities and developments" (Coastal Act Section 30107.5). The non-native grassland and coastal sage scrub habitats within the current landfill and soil borrow areas occur in both the Coastal Zone and inland portions of the existing Landfill site. These areas are disturbed by landfill and soil excavation activities. The only excavation work proposed within the Coastal Zone is the modification of the southeast corner of the landfill. The southeast corner modification would occur over the existing landfill footprint (an artificial fill slope) and would not disturb native plant habitats. The west slope of Cañada de la Pila adjacent to the existing Landfill footprint has been disturbed in the past by grading activities associated with the Landfill (water line placement, access road construction, etc.). These areas do not represent rare or especially valuable habitats due to past and ongoing disturbances, and similar habitats are common throughout the Gaviota Coast.

#### Response 3-50

Mitigation Measure BIO-2 in the Draft EIR requires a 50-foot setback from the top of bank of Pila Creek or the edge of the oak woodland/riparian vegetation and is intended to reduce impacts to a less than significant level and to be in compliance with the County's Comprehensive Plan.

The Conservation Element reference provided by the Comment is a quote from Dr. D.C. Erman of the University of California, supported by the Water Resources Center. This states that:

"... the wider the strip, the greater degree of protection afforded, but full protection may be economically unfeasible. We estimate that as little as 100 feet on either side of a stream could provide a good deal of protection to the stream ..."

However, the impact assessment guidelines for Riparian Habitats in the Santa Barbara County Thresholds and Guidelines Manual (Santa Barbara County, 1995a) indicate that:

"c. Intrusion within the upland edge of the riparian canopy (generally 50 feet in urban areas, within 100 feet in rural areas, and within 200 feet of major rivers) *leading to potential disruption of animal migration, breeding, etc. through increased noise light and glare, and human or domestic animal intrusion.*" (emphasis added).

The riparian vegetation along the ephemeral Pila Creek in the vicinity of the Landfill expansion area (in the canyon north of the existing landfill) is narrow. The upland area to the east of Pila Creek is highly disturbed by Landfill and borrow excavation activities. Access roads are located along the top of the bank.

Buffer areas for other County development projects have been adjusted up or down on a case-by-case basis, depending on the existing conditions, quality of habitat disturbed, and possibility of the habitat being replaced or enhanced. The Landfill Expansion project would not reduce any of the wildlife habitat values listed in the Thresholds and Guidelines Manual. The east bank of Pila Creek north of the existing Landfill is located between the creek on one side and the out-of-channel sedimentation basin and soil borrow area on the other side. The area in between has been disturbed by landfill access roads and other landfill activities. The watershed is small compared to others on the south coast, and the creek is ephemeral. Due to limited water availability, the existing riparian corridor along Pila Creek is confined to the bed and banks adjacent to the creek. Water, both surface and subsurface, that occurs in sufficient quantities to support riparian species is generally found only along the bed and banks of creeks along the south coast and is limited to the width of the riparian corridor. As banks gain in elevation above the creek channel, available water is diminished. This situation is typical for other south coast streams. In addition, the Landfill access roads are situated at the top of a steep slope approximately 60 feet above the elevation of the creek channel. At this elevation above the creek, revegetation with the goal of producing a wider riparian corridor would not be successful because there would not be sufficient water available to support riparian species.

CEQA Section 15041 also requires that mitigation to lessen or avoid significant effects on the environment be consistent with applicable constitutional requirements, such as the "nexus" and rough proportionality standards established in case law (*Nollan v. California Coastal Commission* (1987) 483 U.S. 825, *Dolan v. City of Tigard* (1994) 512 U.S. 374, *Ehrlich v. City of Culver City*, (1996) 12 Cal. 4th 854).

No activities within a 50-foot setback along Pila Creek would occur with the Landfill expansion. The 50-foot setback would allow for a buffer zone for riparian vegetation to be established adjacent to the creek and for upland habitat in the higher elevations further east of the creek, between the creek and the Landfill expansion area. Because the area to the east of the Creek has been highly disturbed by various existing Landfill operations, the nexus for requiring greater mitigation for impacts that the Landfill has avoided through the project design is not required.

Most expansion project components and activities would occur north of the coastal zone boundary. However, the southeast corner modification and the relocation of the green waste pad may occur on the existing Landfill footprint within the coastal zone. As described in Draft EIR Section 2.0, these two project components would be located on the existing man-made Landfill, would be several hundred feet from Pila Creek, and would have no impact on the creek. Coastal policies applicable to these project components are discussed in Draft EIR Section 3.7.3.5.

#### Response 3-51

Under the proposed expansion project, the sedimentation basins would not provide greater reductions in stream flows than existing baseline conditions. Therefore, no change is anticipated

over current conditions, and impacts would be considered less than significant. The Draft EIR discusses existing (or baseline) impacts to the California red-legged frog (CRLF) in Draft EIR Section 3.4.3.3.2. The existing sedimentation basins are the "runoff control facilities" referred to in the comment and also provide open water habitat that is crucial to the CRLF lifecycle. Upland dispersal habitat is located on the west side of Pila Creek, on the bank opposite the existing landfill. An access road is currently located in this area, but the area generally is disturbed by noise and road maintenance only. The east side of Pila Creek, as explained in Response 3-50, is disturbed by ongoing landfill and soil borrow activities. Little to no native vegetation occurs to the east of Pila Creek in this area and, therefore, little to no dispersal habitat for the CRLF. A 50-foot setback east of Pila Creek has been required as described in Response 3-50.

Impacts would occur to the CRLF as maintenance of the sedimentation basins occurs. The maintenance of the basins would change in operations from existing conditions (i.e., from both basins maintained each year to one basin maintained each year and water use altered to conserve CRLFs and their habitat). The changes in practices are described in Draft EIR Mitigation Measure BIO-8.

The SWUD has consulted with USFWS for purposes of ensuring that ongoing Landfill activities result in no take of CRLF. These consultations will continue in the future. Mitigation Measure BIO-8 requires SWUD to conduct the expansion so as to avoid impacts to CRLF.

#### Response 3-52

Mountain lions and ringtails do occur on the project site as described in Draft EIR Section 3.4.3.3.2. However, the habitat that would be removed by the proposed expansion is degraded due to current Landfill and soil excavation activities. Chaparral that is within the disturbance area of the expansion is fragmented and is disturbed regularly by human activities. These mammals, particularly the mountain lion, have large home ranges. An adult male mountain lion's home range often spans over 100 square miles. Females generally use smaller areas of about 20 to 60 square miles (California Department of Fish and Game, 2002). The landfill would represent only a small portion of the range available to ringtails and mountain lions on the Gaviota coast and Santa Ynez Mountain area. Wildlife are expected to retreat to other areas of their own territories rather than the territories of other individuals. The Pila Creek watershed, with the existing Landfill and associated activities, would not be considered to be prime habitat for these species by biological standards.

#### Response 3-53

The status of the Arroyo Hondo preserve is acknowledged. The Land Trust for Santa Barbara County has submitted a letter of comment regarding this changed status. Zoning and land use remain agricultural. To date, a final management plan has not been prepared for the preserve, which is open minimally to the public, mostly on weekends. As part of the existing and proposed operation of Tajiguas, there are no waste disposal operations on Sundays. Please see Responses 4-1 through 4-10 for additional information.

As noted in this comment, noise from the existing Landfill is audible at the preserve. Baseline conditions associated with the existing Landfill include area noise, related dust, and traffic

associated with the existing Landfill. These conditions would continue with the Landfill expansion and are documented in Draft EIR Section 2.10.

Noise is an ambient condition at the Landfill and is associated with current operations. Noise from the Landfill could be expected to occur throughout the life of the existing Landfill (2006) and Landfill closure period (30 years), even if the Landfill Expansion is not approved.

Ambient noise from the Landfill would continue with the proposed expansion. Draft EIR Section 3.9 identified sensitive noise receptors surrounding the Landfill, but the preserve has not added additional noise sensitive receptors as defined by the County's Threshold and Guidelines Manual (i.e., residential development, hospitals, commercial lodging facilities, or care facilities). As shown on Draft EIR Figures 3.9-2 and 3.9-3, noise levels from operations for either the Front Canyon configuration or Back Canyon configuration of the proposed expansion project will not exceed 60 dBA on the Arroyo Hondo Preserve and, therefore, do not represent a significant impact to the preserve. Further, there would be no waste disposal operations on Sundays.

#### Response 3-54

The Draft EIR has provided mitigation measures that are feasible and would reduce significant impacts. However, as discussed in Draft EIR Section 3.4.5, even with mitigation, biological impacts are considered Class I. The mitigation measures are based upon Standard Conditions use by Santa Barbara County Planning and Development and provide consistency between the Landfill expansion and other projects throughout the County.

#### Response 3-55

Mitigation Measure BIO-1 in the Draft EIR specifies all plants listed in Draft EIR Table 3.4-2 (Sensitive Plants Species That Are Known to Occur or Have Potential to Occur in the Project Area) will be salvaged and/or propagules relocated. The mitigation allows for both plants and propagules because some species transplant well, some do not, others do better being grown from propagules that retain the genetic integrity of the population. It is impossible to identify numbers of individuals that would be required to be salvaged. However, the salvage activities are to be done under the supervision of a County-approved biologist who would ensure the salvage operations are done correctly, with the intent of conserving the population. The mitigation measure requires surveys and will require salvage operations to take place prior to clearing of native vegetation.

The mitigation measure requires that the County accomplish salvage and revegetation to ensure the long-term viability of these sensitive species. The landfill parcels and the Baron Ranch are under County ownership. Therefore, a conservation easement is not necessary to preserve the relocations. In addition, the Land Trust has offered Arroyo Hondo to be a site for revegetation efforts, if needed.

#### Response 3-56

Mitigation Measure BIO-3 in the Draft EIR requires that trees with 25 percent or more of their root zone disturbed be replaced. With ongoing landfill and expansion operations, any crown damage would correspond with any root zone damage due to the type of excavation and

equipment required for the Landfill expansion. The provision to include damaging the crown of the tree is unnecessary.

The Landfill expansion would not occur in areas where bay trees occur. California bay trees occur north and west of the Landfill expansion area in the vicinity of the natural channel of Pila Creek. This area would not be disturbed by the Landfill expansion activities. Therefore, no impacts to bay trees would occur, and mitigation is not required.

#### Response 3-57

Mitigation Measure BIO-5 in the Draft EIR requiring relocating desert woodrats would be accomplished under the direction of a biologist familiar with the requirements of the species. The mitigation measure also requires the biologist to identify sites for relocation. Site selection would entail locating areas that would be able to support the relocated individuals. Additionally, the mitigation measure requires follow-up monitoring and development of success criteria to ensure the relocation is successful. The mitigation measure also includes a requirement to develop contingency measures to ensure the success of the relocation program.

There is ample area on both the Landfill site and Baron Ranch that provides habitat suitable area for desert woodrat. With mitigation measure requirements and the ample habitat on land under County ownership, the mitigation measure is certain, feasible and effective, and ensures impacts to desert woodrat are mitigated.

#### Response 3-58

Hydroseeding has been used to control erosion at the existing Landfill. Permanent native vegetation will be placed to provide maximum erosion control for the Landfill Expansion Project. The criteria that will be used to choose native plant species for the vegetative cover include the following:

- Rooting depth, not to exceed the vegetative soils layer depth
- Tolerance to landfill gas
- Resistance to fire, disease and pests
- Adaptability to site climate
- Rapid germination, growth, self-propagation and persistence
- High percentage of surface coverage
- Low maintenance needs

#### Response 3-59

The County's Thresholds and Guidelines Manual, Biological Habitat Description and Project Design Suggestions also recommend that "... continuous, unbroken habitat areas are preserved to the greatest extent feasible." The Manual further provides for the evaluation of resources on site. Under the Evaluation of Project Impacts, the Thresholds and Guidelines Manual notes that less than significant impacts are presumed to be in "areas of historical disturbance such as intensive agriculture." Further, the Habitat Replacement/Compensation Guidelines recommend that:

"Replacement mitigation should involve the same habitat type, location(s) within the same watershed and as close as possible to the site of impact, and should result in comparable and compensating size and habitat value."

The habitat that would be removed with the proposed Landfill Expansion is degraded due to current Landfill and soil excavation activities. Chaparral that is within the area of the expansion is fragmented and is regularly disturbed by human activities. The Landfill expansion has been designed to avoid Pila Creek and contiguous habitat areas to the extent feasible. The habitat that would be replaced in Cañada de la Pila or Arroyo Quemado throughout the landfill expansion would be monitored in compliance with Mitigation Measure BIO-7. Both the Cañada de la Pila and Arroyo Quemado watersheds have water for irrigation and access roads. Because of these factors, the plantings would be maintained more frequently than at a rural, remote restoration site, thereby increasing the success of the plantings. The recommended replacement ratio of 1:1 is therefore appropriate to mitigate impacts.

#### Response 3-60

Habitat replacement at the time of impact would not be possible given the ongoing disturbance that would occur during the 15-year life of the Landfill. The mitigation measure defers revegetation until closure of the landfill, which is a component of the project description. Any extension of the life of the landfill beyond 15 years will require additional CEQA analysis. As noted in Response 3-59, the mitigation hierarchy lists avoidance, habitat restoration onsite and habitat restoration offsite. Offsite habitat replacement generally is not preferable to onsite habitat replacement. However, in the event that onsite habitat replacement cannot be accommodated, offsite restoration would be accomplished on the County-owned Baron Ranch in Arroyo Quemado. The intent is to replace habitat values removed by the Landfill in the long-term to locations onsite, if possible, so that the site will become useable to surrounding wildlife in the long-term.

See Response 3-58.

#### Response 3-61

The SWUD has met with the U.S. Fish and Wildlife Service (USFWS) to discuss management of the CRLF at the Tajiguas Landfill sedimentation basins in Pila Creek. The USFWS has indicated that refugia would be required to be set aside for the CRLF while sedimentation basin maintenance is occurring. The proposed method is to delay maintenance activities until all CRLF tadpoles have left the basin to be maintained in any one year. One basin would undergo maintenance while allowing the other to be retained with water as the refugia for the frogs. Relocated frogs would be moved from the basin to the unmaintained basin that year. A temporary barrier would be placed between the basins to prevent the relocated frogs from re-entering the basin that would be scheduled for maintenance.

#### Response 3-62

The sedimentation basins have been maintained since the 1980s. Therefore, the basin habitat has been disturbed repetitively for approximately 20 years. The vegetation in the basins is dominated by weedy species such as castor bean (*Ricinus communis*), tree tobacco (*Nicotiana glauca*) and cocklebur (*Xanthium strumarium*). A few emergent willows and cattails occur in the basins.

The requirement to revegetate the basins is intended to remove exotic vegetation and restore native vegetation within and around the basins. Replacing vegetation at a 2:1 ratio is not

practical because of the repetitive disturbance associated with basin maintenance. The soil containing propagules of cattails and other native species would be retained and replaced along the margins of the basins with the intent of re-establishing native cover around the perimeter and on the banks of the basins in the long-term. In addition, non-native species would be eradicated. At landfill closure, it is expected that, with the revegetation efforts over the years, and the resulting decrease in sedimentation from the closed Landfill slopes, the basins would not need to be maintained. The basins would revert to a natural stream channel, with native riparian vegetation. Because the existing vegetation does not provide high quality native habitat and because the basins will be repetitively disturbed during Landfill operations, the replacement ratio in the mitigation measure (1:1) is appropriate to offset impacts.

Response 3-63

Mitigation Measure BIO-9 in the Draft EIR was written in the manner that it was because daylight savings time is in effect from April through October with extended hours of daylight, and it is expected that artificial lighting would not be required during this time. The Landfill closes at 4:30 p.m., with crews present until 5:00 p.m. It is expected that crews can complete any additional work that may be required at the Landfill within daylight hours from April through October. However, Mitigation Measure BIO-9 has been revised based on this comment (see Final EIR Section 4.2.2 and Final EIR Table 1-2).

Response 3-64

The suggested mitigation to release water from the in-channel sedimentation basins to maintain stream flow is not necessary. The in-channel sedimentation basins have been containing water in Pila Creek since the 1980s and represent an existing baseline condition. Maintenance and operational water use have been conducted under U.S. Army Corps of Engineers 404 Permit No. 95-50338-LM and amendment dated October 19, 1998. Only recently has a Streambed Alteration Agreement been required by the California Department of Fish and Game. No impacts are associated with operating the basins to impound water for dust control on the Landfill, as has occurred in the past. This represents a continuing activity.

See Response 3-43.

In addition, water in excess of the basins' capacity is released downstream via a 48-inch diameter subterranean pipe that carries water around the Landfill and releases the water south of the Landfill to Pila Creek. Cañada de la Pila is a relatively small watershed compared to others on the south coast, and Pila Creek is ephemeral. Water release downstream occurs during or following storms, but ceases shortly thereafter. This is similar to storm response of other ephemeral streams on the south coast. Because ongoing water use would not result in new impacts, mitigation is not required.

Response 3-65

See Response 3-12.

Response 3-66

See Response 3-5.

Response 3-67

See Response 3-5. The southeast corner modification of the project is located on the Landfill footprint, is an artificially created fill slope (the waste footprint of the landfill), and is not located near any wetlands. This policy does not apply to the project.

Response 3-68

See Response 3-49.

Response 3-69

See Responses 3-5 and 3-12.

Response 3-70

See Response 3-64.

Response 3-71

See Responses 3-5 and 3-49.

Evidence to support the findings for definition of native grasslands is included in the Biological Assessment prepared for the Tajiguas Landfill Expansion Project as a Technical Study and is summarized in Draft EIR Section 3.4.

Response 3-72

See Response 3-5.

The white-tailed kite is in the Biological Assessment prepared for the Tajiguas Landfill Expansion Project as a Technical Study and is summarized in Draft EIR Section 3.4.

Response 3-73

See Response 3-5.

Response 3-74

See Responses 3-5 and 3-50.

Response 3-75

See Response 3-5.

The Threshold of Significance defined by the County's Threshold and Guidelines Manual for consolidated rock ("bedrock") aquifers is considered the amount of new pumpage by a proposed project which would place the aquifer in a state of overdraft.

The Landfill Expansion does not represent new pumpage. Water use would continue similar to current water use at the Landfill. In addition, the Landfill is the only use that utilizes the Vaqueros Formation as a water source in this watershed. Consistent with evaluation of other land uses in the County, the watershed divides (ridgelines) are designated as aquifer boundaries for environmental review (Santa Barbara County, 1995a). Water supply is discussed in Draft EIR Section 3.3.

Response 3-76

See Response 3-5.

Draft EIR Section 3.8 discusses Viewpoints 4 and 5, views from the entrance to the Tajiguas Landfill and from the Pacific Ocean. These impacts were determined to be Class I, Unavoidable Significant Impacts. For these impacts, the County Board of Supervisors must make a "Statement of Overriding Considerations" under §15083(b) of the CEQA Guidelines if the project is approved. The SWUD has been planting trees along the lower portion of Pila Creek to screen the entrance of the Landfill from Highway 101. Complete screening of the entire waste fill slope at its current elevation of 400 feet is not possible, however. Trees and other vegetation would screen the Landfill entrance. However, to mitigate the Class I visual impact to the extent feasible, two new mitigation measures have been included in this Final EIR (See Response 3-88).

Response 3-77

See Response 3-5.

A portion of the Landfill Expansion has been designed to be located in the soil borrow area north of the existing Landfill where the existing vegetation has been removed for the most part (please see Draft EIR Figure 3.4-1) and the terrain has been highly altered. The Landfill Expansion has been designed to be placed within areas of previous disturbance and/or at the fringes of previously undisturbed areas.

Response 3-78

The County of Santa Barbara Board of Supervisors placed a Waste Disposal Facility Overlay designation as part of the original Santa Barbara County Comprehensive Plan adopted in December 1980. On page 174-b of the Land Use Element, a Waste Disposal Facility is defined as "An area for the disposal of waste materials." In addition, the Santa Barbara County Planning Commission made a General Plan Consistency Determination on August 18, 1993, for the Tajiguas Landfill facility. No changes to the General (Comprehensive) Plan that affect either the parcels of the Landfill site or surrounding parcels have been made since the time these two actions took place. Therefore, the Landfill is a use that, although located outside the urban boundary, was in existence prior to enactment of the County's Comprehensive Plan. It is currently an existing facility and may be found consistent with the Comprehensive Plan based on past decisions by the Board of Supervisors.

Response 3-79

The Tajiguas Landfill site (i.e., the waste footprint and soil borrow area) should not be considered open land. Only the area to the north of the soil borrow area can be considered open land. However, since the expansion project would not occur in this area, no impacts are associated with the expansion on what would be considered open land. The site is developed with the existing Landfill and borrow site and has associated Landfill equipment and facilities throughout the site (landfill gas collection system, drainages systems, etc.). The site is developed as opposed to "open land," which typically is defined as land without human development (parklands, grazing lands, etc.). Therefore, this policy would not apply to the Tajiguas Landfill Expansion project.

Response 3-80

See Response 1-6.

Response 3-81

The traffic study prepared by ATE (Associated Transportation Engineers, 2001) used a base year 1998 ADT volume of 31,000. An ADT volume of 34,000 was reported in the *2000 Traffic Volumes on California State Highways* (California Department of Transportation, 2000). This volume is consistent with the 15-year range (31,000 – 40,000 ADT) in the ATE traffic report. The Circulation Element provides exceptions to the Roadway Standards as explained on Draft EIR page 3.10-1. As stated in the Draft EIR and the ATE study, there will remain sufficient gaps in the traffic stream to accommodate project traffic with future increased volumes on U.S. Highway 101. The AM and PM peak-hour volumes in both directions at the intersection of U.S. Highway 101 and the Tajiguas Landfill access road are at Level of Service (LOS) A. Projected traffic increases associated with the proposed Landfill expansion project are expected to remain below a level of significance (ATE, 2001).

Response 3-82

See Response 3-5. Coastal Policies would not apply to the Landfill expansion. The entire Landfill expansion footprint is located to the north of the Coastal Zone boundary; thus, it is not located inside the Coastal Zone.

The borrow area described in the coastal zone would be used for final cover on the Landfill below the 400 foot elevation. There is potential for this material also to be used for final cover on the Landfill expansion. A similar excavation was accomplished on the east side of the canyon for operation of the landfill below 400 feet.

Evaluations to use the Rincon Formation for final cover during closure of the landfill are included in two documents: The Preliminary Closure Plan and Preliminary Post-Closure Maintenance Plan (Emcon, 1994c) that identified a line item in the preliminary costs estimate as "On-site clay acquisition and processing cost" (item 7c), and the Final Closure and Post-Closure Maintenance Plan (Santa Barbara County, 1999) that included soils reports identifying the Rincon and Sespe-Alegria Formations as potential soil cover materials. In addition, the cost estimated for excavation and placement of low-permeability clay soil layer are fairly low, indicating that costs to import appropriate soils from off-site were not considered.

The Rincon Formation was identified as the potential cover source for low-permeable material. The Rincon Formation provides a clay-rich cover layer that would prevent infiltration of precipitation. Hauling similar cover material from off-site would not prove to be cost-effective and would result in significant air quality impacts off site associated with vehicles hauling the material.

Response 3-83

See Responses 3-5 and 3-78. The existing Tajiguas Landfill facility has been found consistent with the current Comprehensive Plan in the past. Neither the urban/rural boundary nor regulations have changed since the time consistency with the Comprehensive Plan was

determined, as explained in Response 3-78. Therefore, the Landfill is potentially consistent with the Comprehensive Plan as described in Draft EIR Section 3.7.1.2.

#### Response 3-84

Draft EIR Figures 3.8-5 through 3.8-14 have been revised to include existing conditions as of March 2000 (Revised Figures 3.8-5 through 3.8-14 in Final EIR Section 4.4) included in the Draft EIR. As shown in Revised Figures 3.8-5 and 3.8-14, Viewpoints 4 and 5 are the only viewpoints from where the landfill can be seen. As shown in the revised figures, differences between the existing conditions and the proposed project are greater than the differences between the existing permitted conditions and the proposed project.

As described in the CEQA Guidelines (Section 15355), "a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." For this EIR, the environmental baseline consists of current operations and onsite landfilling activities.

#### Response 3-85

It is acknowledged that the Landfill may be visible from an airplane, from which the Landfill operations area will appear as brown and green patches of earth, consistent with the pattern of disturbance related to other activities along the coast. However, the extent of the Landfill's visibility from an over-flying airplane is questionable. The main runway at the Santa Barbara Airport is oriented in an east-west direction and, due to prevailing winds, most takeoffs and landings are from the east. The Landfill is approximately 20 miles west of the airport.

A person in an airplane might be able to see the Landfill within the rugged coastal topography. However, it is not clear that the person would necessarily be able to distinguish the combination of disturbed and vegetated landscape of the operations area as a Landfill, as there are other, similar, disturbances in the area. These include rock outcrops, agricultural fields and quarries.

The Landfill and operations area currently represent a disturbance of approximately 189 acres, encompasses the landfill footprint, borrow site and some undisturbed area. The proposed project will occur primarily within this area and will add approximately 71 acres of new disturbance, primarily within the relatively disturbed area of the existing borrow site (see Draft EIR Figures 3.4-2 and 3.4-3 for a depiction of existing and proposed disturbance areas).

#### Response 3-86

The analysis of visual impacts in the Draft EIR addresses potential public views of the Landfill from places where the public has free access 24 hours a day, 7 days a week and from where people may be able to see the Landfill. The Santa Barbara County Thresholds and Guidelines Manual (Santa Barbara County, 1995a) places emphasis on impacts to public views or impacts to the Coastal Zone or other visually important areas. Areas that may be open to the public some time in the future were not evaluated, due to the speculative nature of future public access. CEQA Guidelines §15145 provide that, "If, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact."

The visual impact from West Camino Cielo is shown in new Figures 3.8-19 and 3.8-20, which are included in Section 4.4 of this Final EIR. These photographs were taken from the location shown in Revised Figure 3.8-1, approximately 2 miles east of where West Camino Cielo intersects with Refugio Road. West Camino Cielo is an unmaintained County road that is described by the County as "dangerous" (Ramirez, 2002). From the west, West Camino Cielo can be reached via Refugio Road from Highway 101, and from the east, West Camino Cielo can be reached via Highway 154, although an extensive portion of this road is unmaintained dirt and requires a 4-wheel drive vehicle for safe passage. A complete traverse of West Camino Cielo from Refugio Road to Highway 154 indicates that the landfill can be seen only from the western portion near Refugio Road. Due to the winding and rutted condition of Camino Cielo and the precipitous drop-off from the road, it is not possible to safely sightsee while driving on this road. To see the Landfill as shown in new Figures 3.8-19 and 3.8-20 and from the location shown in Revised Figure 3.8-1, requires the viewer to stop and pull over to the side of the road.

Regarding visibility of the Landfill from the recently purchased Arroyo Hondo preserve, the intervening canyon of Cañada de la Huerta is located between the Arroyo Hondo Preserve and the Tajiguas Landfill. Arroyo Hondo and Cañada de la Pila are separated by a ridge north of the existing Landfill footprint. Currently, the ridge parallels the soil borrow area, and the existing Landfill footprint is visible from this point further to the south. As explained in Response 3-85, much of the proposed Landfill expansion area is currently disturbed by the soil borrow area. Additional areas of new disturbance have been minimized; therefore, the change in visual character with the proposed expansion would not be significantly different from the current Landfill and borrow site configuration. The Landfill expansion will be a continuation of the existing Landfill. Also, the proposed Landfill expansion has been public information since the initial Notice of Preparation was released in April 1998. The Draft EIR was released in October 2001 and the Land Trust for Santa Barbara County purchased the Arroyo Hondo Ranch in October 2001.

#### Response 3-87

A response to this comment requires speculation that a fire at a specific location will occur during the life of the proposed project. Such an occurrence is statistically probable, but not certain and, therefore, is speculative. The CEQA Guidelines provide that it is not necessary to evaluate a particular effect that is speculative. ("If, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact" [§15145]).

If there should be a fire during the period of the proposed landfill expansion, and if that fire burns the chaparral that screens the area in question from Viewpoint 2, then the landfill perimeter road that will be built on the Baron Ranch may be visible from Viewpoint 2. As shown in Draft EIR Figure 3.8-6, there are existing areas of rock and disturbance within the same viewshed. It is speculative to state with certainty that, once built, the 5 acres of disturbance on the Baron Ranch could be distinguished from other disturbed areas that already are present and visible following a wildfire (see Draft EIR Figure 3.8-6).

Response 3-88

Comment noted. A new mitigation measure has been added in response to this comment. See Mitigation Measure VIS-2 in Final EIR Section 4.2.1 and Final EIR Table 1-2.

The gas station is not proposed to be removed as part of the proposed project. The revegetation as required in Mitigation Measure VIS-2 would screen the entrance to the Landfill in a manner consistent with the surrounding area.

There are various electrical utility lines in the vicinity of the landfill and along the U.S. Highway 101 corridor along the Gaviota Coast. The existing electrical utility line that services the landfill, located in the canyon neck area, is visible from U.S. Highway 101, as are other electrical lines all along the Gaviota Coast. Undergrounding the electrical utility line in the "canyon neck area" that services the landfill will not affect the visual nature of the area. Therefore, such a requirement is not included as a mitigation measure for the project.

See Response 3-76.

Response 3-89

This suggested mitigation measure is accepted to the extent that use of local native species does not affect closure (i.e., integrity of the cover material). Mitigation measure VIS-1 has been revised to include the use of local native species. The revised mitigation measure is provided in Final EIR Section 4.2.2 and Final EIR Table 1-2.

See Response 3-58.

Response 3-90

See Response 3-53.

Response 3-91

The comment asserts that a new landfill will be operational by 2015. This is speculation by the commenter. Although the Board of Supervisors expects a new regional landfill to take 10 to 15 years to develop, it is speculative to state with certainty that the new regional landfill will be operational by 2015.

Noise levels that will extend into the southeast corner of the Arroyo Hondo Property are shown in Draft EIR Figures 3.9-2, 3.9-3, 3.9-4 and 3.9-5. This issue also is addressed in Response 3-53.

A mitigation measure (N-2) has been added to restrict the hours of blasting at the Landfill (see Final EIR Section 4.2.1). The commenter also is referred to Final EIR Table 1-2.

Response 3-92

It is reasonable to assume that all haul vehicles meet the specific requirements of the California vehicle codes regarding use and maintenance of appropriate mufflers. The authority for enforcing vehicle codes is the California Highway Patrol or the County Sheriff's Department, not the County of Santa Barbara. Therefore, it is not necessary to revise Mitigation Measure N-1 based on this comment.

Response 3-93

This suggested mitigation measure is accepted to reduce any residual noise impacts that may occur with the proposed expansion. Blasting will be required to occur between the hours of 8:00 a.m. and 4:00 p.m., Monday through Friday. The new mitigation measure is provided in Final EIR Section 4.2.1 and in Final EIR Table 1-2.

Response 3-94

The Santa Maria Landfill has been granted a new permit that would allow operation of that facility for 15 additional years. It is speculative to assume that waste from Santa Maria would be directed to the Tajiguas Landfill.

Response 3-95

See Response 3-81.

As stated in the ATE Traffic Study, the accident rate reported for the study area segment of U.S. Highway 101 is well below the State average. Without fatal accident data, no conclusion can be made that the project access is or will be unsafe.

Response 3-96

See Response 3-94.

Response 3-97

See Response 3-94.

Response 3-98

See Response 3-1.

The CEQA Guidelines (§15125.6[d]) provide for alternatives to be discussed in less detail than the proposed project.

Please refer to Final EIR Chapter 3.0 for a discussion of waste processing technologies.

Response 3-99

In accordance with the CEQA Guidelines (§15126.6[d]), an alternative should "... include sufficient information about each alternative to allow meaningful evaluation, analysis and comparison to the proposed project." The commenter is referred to the discussion of alternatives in Draft EIR Chapter 4.0. The evaluation explains the potential feasibility of the alternatives evaluated relative to the project objectives. Draft EIR Section 4.1, Alternatives Overview, addresses CEQA Requirements (4.1.1), Project Objectives (4.1.2), Background (4.1.3), Basis of Alternatives Analysis (4.1.4) and Selection of Alternatives to be Evaluated (4.1.5).

Please refer to Final EIR Chapter 3.0 for a discussion of waste processing technologies.

Response 3-100

See Responses 3-101 and 3-108.

Under existing policies of the Santa Barbara County Board of Supervisors, the City of Santa Maria, the City of Lompoc, and the United States Air Force, it is not feasible to dispose of waste from the Tajiguas Landfill in the Foxen Canyon Landfill, the Santa Maria Landfill, the Lompoc Landfill or the Vandenberg Air Force Base Landfill. The commenter is referred to Draft EIR Sections 4.2.1.1 - Foxen Canyon Landfill, 4.2.1.2 - Lompoc Landfill, 4.2.1.3 - Santa Maria Landfill and 4.2.1.4 - Vandenberg Air Force Base Landfill.

For the purpose of this EIR, an alternative is considered infeasible if it would involve a change in policy of a governing agency. It is speculative to assume that the County Board of Supervisors will change policy to re-open the Foxen Canyon Landfill. It is speculative to assume that the City of Lompoc and City of Santa Maria would change their policies and begin accepting waste that currently is disposed at the Foxen Canyon Landfill or to accept waste disposed at the Tajiguas Landfill. It also is speculative to assume that the United States Air Force will change its policy and accept waste from the Foxen Canyon and/or Tajiguas landfills. In accordance with the CEQA Guidelines (§15126.6[f][3]), "An EIR need not consider an alternative whose . . . implementation is remote and speculative."

In addition to the policies of the cities of Lompoc and Santa Maria regarding not accepting waste disposed at the Foxen Canyon and/or Tajiguas landfills, the County of Santa Barbara's 1997 Countywide Integrated Waste Management Plan (CIWMP) plans for regional solid waste management. The CIWMP assumed the current wastesheds. In accordance with state regulations, the CIWMP was approved/adopted by the County, the cities within the County and the California Integrated Waste Management Board (CIWMB). The wastesheds identified in the CIWMP for the Lompoc and Santa Maria landfills do not include the Santa Ynez Valley (serviced by Foxen Canyon) or southern Santa Barbara County (serviced by Tajiguas). Therefore, not only would the policies of the cities of Lompoc and Santa Maria need to be changed to accept waste currently disposed at Foxen Canyon and/or Tajiguas, but the CIWMP would need to be revised to reflect changes in the wastesheds for the in-County landfills. The CIWMP revision would need to be approved/adopted by the County, the cities in the County, and the CIWMB.

In addition to the wastesheds defined in the County's CIWMP, for southern Santa Barbara County (including the cities of Santa Barbara and Goleta) and the Santa Ynez Valley (including the cities of Solvang and Buellton), there are existing franchise agreements for solid waste services that specify waste for disposal shall be routed to Tajiguas. The existing franchise agreements have varying expiration dates over the next 10 to 15 years. Therefore, in addition to the need to change the policies of the cities of Lompoc and Santa Maria, and the need to redefine the wastesheds and re-approve/re-adopt the CIWMP, the existing franchise agreements would require re-negotiation in order for waste currently disposed at Foxen Canyon and/or Tajiguas to be redirected to another in-County landfill (i.e., Lompoc and/or Santa Maria) or to an out-of-County landfill. It is speculative and beyond the sole jurisdiction of the County Board of Supervisors as to whether these factors might be changed and approved. Therefore, the alternative of re-directing waste that currently is disposed at Foxen Canyon and/or Tajiguas to the Lompoc and/or Santa Maria landfills is not a feasible alternative to the proposed Tajiguas expansion project.

Response 3-101

See Response 3-100.

The City of Lompoc would have to decide whether it is willing to accept waste that now goes to the Foxen Canyon Landfill. As stated in Draft EIR Section 4.2.1.2 (page 4-10), the City of Lompoc's policy is to protect the value of the Lompoc Landfill air space for the City of Lompoc and its watershed and not to accept waste from outside the Lompoc watershed. Further, the City of Lompoc has previously made it known that it would not accept waste from the Tajiguas watershed. The cities of Buellton and Solvang and other areas of the Santa Ynez Valley that utilize the Foxen Canyon Landfill do not fall within the Lompoc watershed (King, 2002). Therefore, based on the current policy of the City of Lompoc, when the Foxen Canyon Landfill closes in 2004, that waste will have to be disposed of at Tajiguas.

As the County of Santa Barbara has no jurisdiction over the City of Lompoc decision to not accept waste that now goes to the Foxen Canyon Landfill, it is speculative to assume that the City of Lompoc would change its policy and choose to receive that waste. In accordance with the CEQA Guidelines (§15126.6[f][3]), "An EIR need not consider an alternative whose . . . implementation is remote and speculative."

Response 3-102

See Response 3-101.

To divert the approximately 100 tpd of solid waste currently being disposed of at the Foxen Canyon Landfill to the Lompoc Landfill rather than transporting it to Tajiguas for disposal would not result in a sufficient reduction in the daily/annual tonnage of solid waste disposed of at Tajiguas to allow a reduction in the size of the proposed expansion (see Responses 3-100 and 3-101 for a discussion as to why such a diversion is not possible under the current policy of the City of Lompoc, the existing County CIWMP, or the existing waste services franchise agreements).

Due to the topography of Cañada de la Pila and the engineering requirements of the Tajiguas Landfill expansion project, the expanded Landfill footprint would not be smaller, even if the approximately 30,000 tons per year (460,000 tons over the 15-year life of the expansion project) of waste currently disposed at the Foxen Canyon Landfill were diverted from Tajiguas. Therefore, not only is a diversion of Foxen Canyon waste to the Lompoc Landfill speculative and not a feasible alternative, the size of the expanded Tajiguas Landfill would remain the same; the diversion of the Foxen Canyon waste would not lessen the impacts to biological, cultural or visual resources associated with the proposed expansion of Tajiguas.

Response 3-103

See Responses 3-101 and 3-102.

See Final EIR Chapter 3.0 for a discussion of other waste processing technologies. Final EIR Chapter 3.0 finds, as did Draft EIR Section 4.4, that, while one or a combination of waste processing technologies are technically feasible, it is speculative as to whether such technologies could be implemented during the time frame of the proposed Landfill expansion, due to

development considerations (e.g., siting, environmental, regulatory, financial) and implementation considerations (e.g., multi-jurisdictional policy and contract issues). Therefore, not only is the diversion of waste from the Foxen Canyon Landfill to the Lompoc Landfill speculative and not feasible based on the current policy of the City of Lompoc, the current County CIWMP and franchise agreements, but the increased diversion of waste from the Tajiguás Landfill through the implementation of other waste processing technologies is speculative during the time frame of the expansion project and does not represent a feasible alternative to the proposed project.

Response 3-104

As discussed in Draft EIR Section 4.2.1.1, the Santa Barbara County Board of Supervisors has made the decision to not expand, but to close the Foxen Canyon Landfill and build a transfer station at the site of the closed landfill. Currently, the Foxen Canyon Landfill is scheduled to close in 2004.

County staff's Board Letter, dated June 24, 1997, for subsequent action on July 7, 1997, stated that Foxen Canyon Landfill would be closed (Santa Barbara County, 1997). In addition, the Board Letter stated that the Foxen Canyon Landfill expansion previously proposed and analyzed in 90-EIR-14 would not be implemented. The Board of Supervisors adopted the recommendations of the Board Letter.

This decision was based on a determination by the Board of Supervisors that, due to changes in landfill design regulations (Subtitle D of the federal Resource Conservation and Recovery Act and California Code of Regulations [CCR] Title 23 - now part of CCR Title 27), expansion of the Foxen Canyon Landfill would be so expensive as to be economically infeasible. In 1995, County staff estimated that, to meet the Subtitle D requirements, a composite liner system would need to be installed as part of the expansion of the Foxen Canyon Landfill at a cost of \$250,000 per acre. A subsequent analysis determined it would be more economic to close the Foxen Canyon Landfill and convert it to a transfer station than to expand the landfill. In addition, this action enabled the County to avoid an adverse impact to sensitive biological resources (i.e., the loss of 46 mature oak trees) that would have occurred if the Foxen Canyon Landfill had been expanded.

Economic factors in addition to the cost of the liner system for expansion of the Foxen Canyon Landfill involve the County's lease agreement with the owner of the landfill property and make the expansion uneconomic. Under the current lease agreement, the County tipping fee at Foxen Canyon Landfill can be increased by only 50 cents per year for self-haul, which is not sufficient to defray the cost of the liner system that would be required for the expansion. In addition, under the current lease agreement, should the County decide to dispose of waste from outside the Santa Ynez Valley School District at the Foxen Canyon Landfill, the property owner would receive the entirety of the tipping fee for each ton of waste that originated outside this area. These two lease issues make it uneconomic to expand the Foxen Canyon landfill and/or to divert waste from Tajiguas to Foxen Canyon.

Based on the above, it is speculative whether the County Board of Supervisors would change its decision regarding closure of the Foxen Canyon Landfill. Therefore, the alternative of keeping

Foxen Canyon open to continue to accept waste from the Santa Ynez Valley (i.e., diverting it from Tajiguas as part of the proposed project) is not a feasible alternative. In addition, as discussed in Response 3-102, keeping Foxen Canyon open to divert its approximately 100 tpd of waste from Tajiguas as part of the expansion project would not be sufficient to allow for a reduction in the size of the proposed Tajiguas Landfill expansion.

Response 3-105

See Responses 3-102 and 3-104.

Response 3-106

See Responses 3-103 and 3-104.

See Final EIR Chapter 3.0 for a discussion of waste processing technologies.

Response 3-107

The commenter is correct in noting the confusion in the first paragraph of Draft EIR Section 4.2.1.3. The third sentence in that paragraph should be deleted. See Final EIR Section 4.1 for the corrected paragraph.

A permit to expand the Santa Maria Landfill within the existing landfill property was issued by CIWMB on September 28, 2001. The current permitted waste disposal capacity is 740 tpd, which provides capacity only to 2017 (Schmaeling, 2001). To provide additional capacity to 2020, a subsequent expansion would be necessary, and it would require purchase of adjacent farmland.

The City of Santa Maria's objective for the 15-year expansion of the Santa Maria Landfill is to provide sufficient time for that city to identify and select a new landfill site. The City of Santa Maria has stated it will not accept waste from outside the Santa Maria Landfill watershed (i.e., northern Santa Barbara County), as it does not want to jeopardize the 15-year life of the recent expansion. Specifically, the City of Santa Maria has indicated it will not accept waste from the Santa Ynez Valley or from southern Santa Barbara County. It is speculative to assume the City of Santa Maria might change its policy regarding receipt of waste from outside the watershed of the Santa Maria Landfill. Therefore, the suggested alternative of diverting waste that is currently disposed at Foxen Canyon to the Santa Maria Landfill rather than to Tajiguas as part of the expansion project is not a feasible alternative. Similarly, diverting waste from southern Santa Barbara County to the Santa Maria Landfill also is not a feasible alternative.

See Responses 3-100 and 3-108.

The potential further expansion of the Santa Maria Landfill would be the responsibility of the City of Santa Maria. The County of Santa Barbara would have no jurisdiction in such an endeavor. Therefore, the suggested analysis of impacts regarding further expansion of the Santa Maria Landfill is outside the scope of this EIR.

Response 3-108

See Responses 3-102 and 3-107.

As stated in Draft EIR Section 4.2.1.3 (page 4-11), the Santa Maria Landfill has a permitted daily capacity of 740 tpd and a current waste disposal rate of 375 tpd. As further stated, "*At the current waste disposal rate of 375 tpd, the expansion provides capacity to 2017.*" The addition of waste from the Santa Ynez Valley (109 tpd) (see Draft EIR Section 4.5.1) would increase the waste disposal rate at the Santa Maria Landfill to approximately 484 tpd, thereby decreasing the life of the landfill by approximately 20 percent. The primary impact of receiving waste at the Santa Maria Landfill would be an increase in the daily waste tonnage at the landfill and the reduction of the projected life of the landfill. As a result, the Santa Maria Landfill would not be able to provide 15 years of capacity to its waste disposal service area or 15 years of disposal capacity for the Tajiguas waste from the Santa Ynez and Cuyama Valleys. This would be inconsistent with the purpose of the proposed project, which is to provide 15 years of additional reliable and cost-effective municipal solid waste disposal services for the residents of southern Santa Barbara County, and the Santa Ynez and Cuyama Valleys.

Draft EIR Section 4.2.1.3 also notes that:

*"... a moderate increase in vehicle miles traveled would be required to dispose of waste generated in the Santa Ynez Valley at the Santa Maria Landfill rather than at the Tajiguas Landfill. This increase in vehicle miles would have the potential to result in increased waste disposal costs, vehicular emissions and other transportation-related impacts."*

A location for a new in-County landfill has not yet been determined. Therefore, the date of opening a new landfill ready to receive waste is speculative.

Response 3-109

See Responses 3-102, 3-107 and 3-108.

Response 3-110

See Responses 3-103, 3-107 and 3-108. Also see Final EIR Chapter 3.0 - Waste Processing Technologies for additional information.

Response 3-111

For discussions of a landfill configuration smaller than the proposed project, the commenter is referred to Draft EIR Section 4.2.4 - Reduced Project Alternative.

Under existing policies of the Santa Barbara County Board of Supervisors and the United States Air Force, it is not feasible to dispose of waste from the Tajiguas Landfill in either the Foxen Canyon Landfill or the Vandenberg Air Force Base Landfill. The commenter is referred to Draft EIR Sections 4.2.1.1 - Foxen Canyon Landfill and 4.2.1.4 - Vandenberg Air Force Base Landfill.

For the purpose of this analysis, an alternative is considered infeasible if it would involve a change in policy of a governing agency. As discussed in Response 3-104, it is speculative to assume that the County Board of Supervisors will change policy to reopen the Foxen Canyon Landfill for the purpose of accepting waste from the Tajiguas Landfill.

It also is speculative to assume that the United States Air Force will change its policy and accept waste from the Tajiguas Landfill. The Air Force does not currently accept waste from surrounding municipalities. In accordance with the CEQA Guidelines (§15126.6[f][3]), "An EIR need not consider an alternative whose . . . implementation is remote and speculative."

The commenter is referred to the various environmental resource sections of Draft EIR Chapter 3.0 for discussions of potential impacts of removing and reentering waste from the southeast corner of the Tajiguas Landfill.

#### Response 3-112

The larger project alternative would avoid significant impacts of establishing a new landfill at a new location, rather than using existing resources. The County of Santa Barbara determined that a reasonable range of alternatives would be a larger project alternative and a reduced project alternative. As stated in Draft EIR Section 4.2.3 EIR, a Notice of Preparation (NOP) by the County, dated April 1, 1998, originally proposed the larger (25-year) project alternative. Subsequent to distribution of the NOP, the Board appointed a Community Advisory Committee (CAC) to identify possible alternatives to the proposed 25-year project. After consideration of CAC and public input, the Board directed County staff to modify the proposed project to consist of a 15-year capacity expansion of Tajiguas.

#### Response 3-113

For discussions of a landfill configuration smaller than the proposed project, the commenter is referred to Draft EIR Section 4.2.4 - Reduced Project Alternative. At the time a new landfill facility was to be opened, a Board of Supervisors decision would be required to determine whether to fill at Tajiguas or to build out only a fraction of the proposed project.

For a discussion of project objectives, see Responses 3-1 and 3-2.

For a discussion of waste processing technologies, see Final EIR Chapter 3.0.

Also see Responses 3-91 and 3-114.

#### Response 3-114

The commenter's suggested landfill configuration with an overall slope of 2:1, rather than the overall slope of 2.4:1 as proposed in this comment, is not feasible. As stated in Draft EIR Section 2.2.1 (page 2-5), the overall 2.4:1 slope is attained by constructing 2:1 waste slopes with horizontal benches (at least 15 feet wide) every 40 to 50 vertical feet. The commenter is incorrect in the assertion that the Draft EIR states that, based on the slope stability analysis, the Tajiguas Landfill could be built with an overall slope of 2:1.

The discussion of Liner and Waste Slopes in Draft EIR Section 3.2.3.2.3 (pages 3.2-29 and 3.2-30) states that preliminary stability analyses for the proposed project indicate the minimum required factor of safety can be ". . . *achieved with an engineered buttress fill (or equivalent stabilizing feature) placed along the west toe of the refuse fill in the lined areas.*" This conclusion is based on the overall slope of the Landfill described above, with 2:1 waste slopes

and horizontal benches every 40 to 50 vertical feet, for an overall slope of 2.4:1. This does not mean the Landfill would be stable with an overall waste slope of 2:1.

Based on the discussion of Cut Bedrock Slopes in Draft EIR Section 3.2.3.2.3 (page 3.2-29), bedrock cut slopes would be stable at a 2:1 gradient, even though:

*“... portions of cut slopes within moderately to extremely weathered materials ... could become unstable (i.e., not meet established stability criteria) if inclined steeper than 2:1.”*

This does not mean that the waste slopes would be stable if they were constructed with an overall slope of 2:1.

Further, Draft EIR Section 3.2.3.2.3 (page 3.2-30) addresses the proposed vertical expansion that involves placing waste over a portion of the existing Landfill. Where there is a vertical expansion over a portion of the existing Landfill, the slope will be 2.5:1 and stabilized with an engineered buttress. The slope will not be 2:1 as suggested in the comment.

To lessen biological impacts associated with the size of the Landfill footprint, it would be necessary to reduce the footprint of the Landfill. As described above, it is not possible to construct a landfill with an overall slope of 2:1. Therefore, a reduction in the landfill footprint would result in a landfill with the same overall slope as the proposed expansion, but because of the reduced footprint, it would be a smaller facility, with correspondingly less airspace.

Although such a facility might have 10 years of capacity, there is no guarantee that a new regional landfill would be operational at the completion of those 10 years.

As noted in Draft EIR Section 1.4, the basic project objective is to provide 15 years of waste disposal capacity to allow for the siting and development of a new in-County regional landfill, not 10 years, as referenced in the comment.

#### Response 3-115

The commenter is correct in noting that out-of-County disposal alternatives would avoid impacts associated with disturbance of new ground, including aesthetic and biological impacts. Although not so noted in the comment, impacts to cultural resources also would be avoided. The rationale for the analysis in Draft EIR to focus on air quality impacts is provided in Section 4.3 (page 4-59) as follows:

*In one key respect, out-of-County landfills differ markedly from one another and from the proposed project: haul distances. For the waste generated in southern Santa Barbara County, the haul distance for the waste would vary significantly, depending on the landfill to which the waste would be transported.*

The conclusion then follows that the out-of-County analysis will focus on mobile source emissions in comparing the proposed project to alternative landfills. The analysis of out-of-County waste disposal alternatives is provided in the Draft EIR in response to public interest in out-of-County disposal as an alternative to the proposed project.

There is no statement in the Draft EIR to support the commenter's opinion that out-of-County waste disposal alternatives require expansion of the existing South Coast Transfer Station or construction of a new transfer station. Draft EIR Section 4.3.1 (page 4-60) provides the following:

*For this analysis, it is assumed that 550 tpd of waste would be (sic.) to be processed at the South Coast Transfer Station and then transported via transfer truck to an alternative landfill. The remaining 950 tpd of waste would be either direct-hauled by collection trucks to an alternative landfill or to an out-of-County Transfer Station via collection trucks. This waste then could be transferred to transfer trucks for disposal at an out-of-County landfill. There are two existing out-of-County transfer stations that are sufficiently close to make this approach potentially feasible – the Gold Coast and Del Norte transfer stations in Ventura County (see Figure 4-1).*

It is not productive to provide an analysis of an expanded South Coast Transfer Station when such a project could not be permitted, based on previous analysis that led the Board of Supervisors to the conclusion stated in both the Draft EIR (Section 4.3.2; page 4-63) and this comment, i.e., that expansion of the South Coast Transfer station would be a “disfavored land use for the site and could not be constructed without inordinate delays and expense”.

Out-of-County disposal alternatives were not dismissed; they are discussed in Draft EIR Section 4.3 (pgs. 4-58 through 4-69).

The County has not identified a specific site on which it plans to build a new transfer station. Potential locations are described and evaluated in Draft EIR Section 4.3.2 (pages 4-63 through 4-67) in accordance with the CEQA requirement to “. . . include sufficient information about each alternative to allow meaningful evaluation, analysis and comparison to the proposed project” (CEQA Guidelines §15126.6[d]). As stated in Draft EIR Section 4.3.2, the three locations discussed on page 4-65 are the three locations that were not eliminated from consideration in the Citizens' Advisory Committee (CAC) siting study, the entirety of which is incorporated by reference in the Draft EIR. The three locations are briefly described, and potential impacts are provided. None of these locations has been determined a potential site for a new transfer station by the County at this time. Further evaluation of these three locations and other possible locations is provided in Draft EIR Sections 4.3.2.1.4 and 4.3.2.2 (pages 4-66 and 4-67).

#### Response 3-116

The commenter is correct in citing an EIR statement from Draft EIR Section 4.3.3 (page 4-68) that, “. . . development of a rail haul capability for municipal solid waste would be possible.” However, the commenter has taken the statement out of context. To be accurate, the comment should acknowledge that the statement refers to what might occur at the Del Norte Transfer Station in the City of Oxnard. As noted in the Draft EIR, the Del Norte Transfer Station is on property adjacent to a rail spur. Also, the City of Oxnard is in Ventura County. The Santa Barbara County Board of Supervisors has no jurisdiction over activities in Ventura County. It is not possible to evaluate a speculative, although “possible” activity in Ventura County, a different jurisdiction, as an alternative to a proposed project in Santa Barbara County. As a result, such activity is not a feasible alternative to the proposed expansion of the Tajiguas Landfill.

See Response 3-121.

The commenter is referred to Final EIR Chapter 3.0 - Waste Processing Technologies.

Response 3-117

Comment noted. See Final EIR Chapter 3.0 - Waste Processing Technologies.

Response 3-118

Comment noted. See Final EIR Chapter 3.0 - Waste Processing Technologies.

The commenter is referred to Draft EIR Section 4.3.2 for a summary of the 1999 CAC study to identify potential sites for a new transfer station/materials recovery facility in the South County.

Response 3-119

Comment noted. See Responses 3-1 and 3-2.

Response 3-120

Comment noted. See Final EIR Chapter 3.0 - Waste Processing Technologies.

Response 3-121

The commenter's assertion that the No Project alternative may result in the particular impact of people conducting illegal dumping or burning trash in their yards is too speculative for evaluation. Therefore, in accordance with CEQA Guidelines Section 15145, there will be no further discussion of this speculative impact.

The No Project alternative has nothing to do with the curbside collection of solid waste at residences, businesses and institutions throughout Santa Barbara County. Such collection of municipal solid waste will continue, even if the No Project alternative is adopted by the County Board of Supervisors.

What is certain about the No Project alternative is stated in Draft EIR Section 4.5 (page 4-76), as follows:

*"Under the No Project alternative, the expansion of Tajiguas would not occur, and the landfill would be closed upon expiration of its current permit, expected to be in 2005. Santa Barbara County would continue to generate waste, and this waste would continue to require disposal."*

Draft EIR Section 4.3 addresses out-of-County waste disposal alternatives. Considering the potential disposal of waste at a location other than the Tajiguas Landfill, Section 4.3.1 describes and evaluates a variety of potential out-of-County waste disposal sites, some of which may be feasible, some of which may not be feasible, and some of which are outside the scope of this EIR. As evaluated in Section 4.3.1, only one of the out-of-County landfills provides a feasible option for disposal of the waste that will continue to be generated and otherwise would go to Tajiguas for disposal. Draft EIR Section 4.3.2 describes the status of ongoing efforts to site a new South coast transfer station/materials recovery facility. Section 4.3.3 addresses the potential to haul municipal solid waste by rail to an out-of-County disposal site.

Based on the information provided in these and other sections of Draft EIR Chapter 4.0, the conclusion, as stated under the No Project alternative in Draft EIR Section 4.5 is that:

*“Under the No Project alternative, the waste would be diverted to an out-of-County landfill, either by truck or by rail.”*

The commenter is incorrect in stating that a particular statement from Draft EIR page 4-79 “is inaccurate and contradicts statements on page 4-76 and 4-77.” The statements cited in the comment are not contradictory, as they arise from discussions of different subjects. The statement from page 4-79 refers specifically to one aspect of the No Project alternative, which would require that waste currently located above 400 feet msl in the southeast corner of the Tajiguas Landfill be disinterred from the Tajiguas Landfill, loaded into haul trucks and transported from Tajiguas to another landfill.

The statement from pages 4-76 and 4-77 does not refer to disposal of waste from the southeast corner of the Tajiguas Landfill. Rather, it refers to the most likely scenario under the No Project alternative – that waste generated in southern Santa Barbara County and the Santa Ynez and Cuyama Valleys, rather than going to Tajiguas for disposal, would be transported to the Chiquita Canyon Landfill in Los Angeles County.

As presented in Draft EIR Section 4.3.3, rail haul of municipal solid waste is not a feasible option at this time. As stated in Section 4.3.3, no potential site for a new in-County transfer station with rail haul capability has been identified, the direct impacts of constructing such a facility cannot be determined, and *“The establishment of an appropriate loading facility, plus the required contracting and permitting, would be separate projects subject to environmental analysis in compliance with CEQA.”* Further, as discussed in Section 4.3.3, the two potential rail-haul landfills in Southern California are not operational at this time, and their future is speculative. Of the other rail-haul landfills in the Southwest United States, only the Butterfield Landfill in southwest Arizona accepts out-of-state municipal solid waste by rail.

#### Response 3-122

The commenter is correct in stating that other landfills, through the CEQA process, have resolved operational impacts. However, the commenter fails to note the other aspects of the discussion as it appears in Draft EIR Section 4.6 – Environmentally Superior Alternative (pages 4-80 and 4-81):

*... Compared to the proposed Tajiguas expansion, the No Project alternative would eliminate potentially significant impacts of developing the proposed project at Tajiguas as related to biological and visual resources, but would not eliminate significant air quality impacts from mobile emissions. The No Project alternative would require waste to be transported greater distances for disposal than to the proposed project at Tajiguas. These increased transport distances would result in offsite mobile emissions greater than would occur with the proposed project. Therefore, the No Project alternative necessarily involves environmental trade-offs among different resources and is not necessarily environmentally superior to the proposed project.*

Response 3-123

The alternative to leave the waste associated with the southeast corner modification in place is not currently feasible under existing zoning and the existing Coastal Land Use Plan and Coastal Act, even though it would be environmentally superior to leave the waste in place. The waste removal is required to bring the facility into compliance with existing zoning and the Coastal Land Use Plan and Coastal Act. As noted in previous Responses, the Coastal Policies do apply to any activities, including waste placement, above the 400-foot elevation in the Coastal Zone (see Response 3-5). Leaving the waste in place is not feasible under current zoning because expansion of the landfill above 400 feet is not an allowed use under the AG-II zoning designation in the Coastal Zoning Ordinance. Findings for consistency currently cannot be made with either the Coastal Zoning Ordinance, Coastal Plan policies or the California Coastal Act.

It is current policy of the County Board of Supervisors to close Foxen Canyon Landfill and convert it to a transfer station. It is speculative to assume that the Board would change this policy. Similarly, the possibility of the U.S. Air Force changing its policy also is speculative. These are policy decisions and, therefore, both comments are outside the scope of this analysis.

Potentially significant impacts associated with the southeast corner modification relocation to the Tajiguas Landfill Expansion project include Health and Safety and Fire. Transporting the waste to Santa Maria and several other in-County disposal sites would have similar impacts in addition to impacts to transport the waste as described in the Draft EIR Section 4.7.

The commenter is referred to the various environmental resource sections of Draft EIR Chapter 3.0 for discussions of potential impacts of removing and reinterring waste from the southeast corner of the Tajiguas Landfill.

Response 3-124

See Responses 3-1 through 3-123.





3A

February 7, 2002

Kathy Kefauver  
Santa Barbara County  
Public Works Department  
Solid Waste and Utilities Division  
109 E. Victoria Street  
Santa Barbara, CA 93101

RE: SUPPLEMENTAL COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT  
FOR TAJIGUAS LANDFILL EXPANSION PROJECT: 01-EIR-5

Dear Kathy:

The Environmental Defense Center (EDC) submits the following comments and new information regarding the Tajiguas Landfill Expansion Draft EIR (01-EIR-5) as a supplement to our December 14, 2001 letter on behalf of our client, the Surfrider Foundation's Santa Barbara Chapter. As previously stated, the draft EIR has many shortcomings. It contains insufficient evidence and analysis to conclude that there are no significant water quality impacts. The mitigation measures proposed would not mitigate significant impacts to the maximum extent feasible and do not address biological contamination in the groundwater near the landfill. Alternative, less environmentally impacting technologies described in the EIR are not considered actual alternatives to the project. Additionally, the project objectives are too narrow and as a result, feasible less damaging alternatives are dismissed without adequate justification. We are writing to augment our December 14, 2001 comments regarding ongoing and project-related impacts to water quality with the County's water quality monitoring results for the Tajiguas Landfill dated October and December 2001. (Attachment 1)

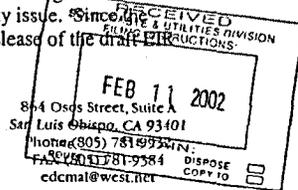
**New Information Indicates Baseline Conditions are not Accurately Reflected in the draft EIR and that the Water Quality Impact Assessment is flawed as a Result.**

The County's recently obtained water quality results indicate that the ground and surface water in and near the landfill is impaired by coliform and enterococcus bacteria. The high levels of pathogen-indicator bacteria in Pila Creek immediately below the landfill and in the groundwater closest to the landfill (i.e., the GLCRS) may be relevant to the level of project-specific or cumulative water quality impacts caused by the proposed expansion of the landfill. The bacteria results were not obtained by the County until after the draft EIR was released in September 2001 and therefore neither the existing polluted condition of the groundwater around the landfill nor its relevance to the impacts of the project are discussed in the draft EIR. Section 3.3.2.2.4, under Groundwater Quality and Section 3.3.3.2 on groundwater quality impacts do not even mention bacteria as a groundwater quality issue. Since the polluted groundwater baseline condition was unknown prior to the release of the draft EIR,

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Kathy Kefauver  
February 7, 2002  
Page 2 of 3

and thus is not presented therein, the draft EIR's impact assessment is based on an incorrect baseline condition.

Specifically, the County was not aware of the bacteria in the groundwater when it released the draft EIR, or, if it was, the information was not included in the draft EIR. Therefore, since the County portrayed the current landfill operation as not polluting the groundwater, it concluded that expanding the landfill would similarly not cause bacteria to enter the groundwater. However, the recent groundwater quality results show that the groundwater immediately down-gradient from the landfill (e.g., in the GLCRS) is contaminated with bacteria. Thus, the landfill is a likely or at least potential source of the bacteria, and expanding the landfill could result in groundwater quality impacts related to bacteria that are not considered in the draft EIR.

According to the CEQA Guidelines, "An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published. ... This environmental setting will normally constitute the baseline physical conditions by which the lead agency determines whether an impact is significant." (CEQA Guidelines Section 15125)

In this case, the draft EIR, using an inaccurate baseline groundwater quality condition concluded that there would be no significant impacts to water quality from expanding the landfill. However, this conclusion is not based on accurate information since the recent results show there is bacteria in the groundwater captured in the GLCRS. Expanding the landfill could exacerbate this bacterial pollution of the groundwater. The September 2001 draft EIR did not anticipate that 2419 MPN/100 ml of Total Coliform was accumulating and would be recorded in Monitoring Well 15 on October 31, 2001. The EIR could not have predicted that 16,000 MPN/100 ml of Enterococcus bacteria would be found in the GLCRS on 12-3-01.<sup>1</sup> This new information about the existing significant water quality problems has great bearing on the environmental review in the EIR. Now that bacterial groundwater contamination has been recorded in the GLCRS, the LLCRS and MW 15, the environmental review must address whether or not the landfill is the direct and/or indirect source of the contamination. It must determine if expanding the landfill would add to the severity and/or duration of this significant impact. The draft EIR does not undertake this analysis because it uses an unpolluted baseline groundwater condition that we now know to be inaccurate.

<sup>1</sup> While there are no numerical water quality standards for bacteria in groundwater, according to the Santa Barbara County Environmental Health Department, agricultural and other water wells from which water with bacteria in it is pumped should be disinfected. There is not supposed to be any coliform bacteria in groundwater. Standards for bacteria for recreational contact with ocean water have been set to protect beach-goers from illness caused by pathogenic bacteria. Some bacteria levels in the groundwater near the Tajiguas Landfill exceed ocean water standards by greater than an order of magnitude. For instance, the ocean water standard for Enterococcus is 104 MPN / 100 ml and the level recorded on 12-3-01 in the groundwater captured in the GLCRS was 16,000 MPN / 100 ml. Fecal Coliform was recorded at 5,000 MPN / 100 ml on 12-3-01 in the GLCRS and the ocean water recreational contact standard is 400 MPN / 100 ml.

Kathy Kefauver  
February 7, 2002  
Page 3 of 3

**Conclusion**

New information illustrates that the baseline water quality conditions in the draft EIR are no longer accurate and that the groundwater near the landfill is grossly polluted with bacteria. Surfrider believes that bacteria in the GLCRS, LLCRS and MW 15 is a result of the landfill. This new baseline water quality information is pertinent to the draft EIR's assessment of impacts to water quality. The draft EIR's conclusion of no significant impacts to water quality was based in part on a portrayal that the baseline groundwater was not polluted. Since it is now known that groundwater is polluted with bacteria, the impact assessment must be augmented to determine the actual source of the bacteria, which, based on the high levels of bacteria in the GLCRS, appears to be the landfill. Previously undetected significant groundwater pollution at the landfill exists. Therefore, expanding the landfill may perpetuate or worsen these significant impacts. Under CEQA, the lead agency has a duty to analyze the proposed project's effect in light of the new information.

Thank you for your attention to the submittal of this new information.

Sincerely,



Brian Trautwein  
Environmental Analyst

cc: Surfrider Foundation, Santa Barbara Chapter



CREEK ENVIRONMENTAL LABORATORIES, INC.

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Page 1

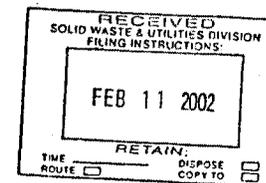
Maggie Bach  
SB County Public Works Dept.  
Solid Waste & Utilities Dept.  
109 East Victoria  
Santa Barbara, CA 93101

Log Number: 01-C9884  
Order: 13949  
Project: Tajiguas  
Received: 12/03/01

REPORT OF ANALYTICAL RESULTS

SAMPLE DESCRIPTION	SAMPLED BY	SAMPLED		MATRIX	
		DATE @ TIME			
48" Drain in Creek	J. Schaefer	12/03/01@10:40	Aqueous		
ANALYTE	RESULT	+ R.L.	UNITS	METHOD	ANALYZED
Chlorine Residual, Total	Not Detected	0.2	mg/L	SM4500G	12/03/01
Coliform, Fecal, 25-Tube MPN	30,000	2	MPN/100ml	SM 9221E	12/03/01
Coliform, Total, 25-Tube MPN	> 160,000	2	MPN/100ml	SM 9221B,C	12/03/01
e. Coli, 5-Tube MPN	30,000	2	MPN/100ml	SM 9223B	12/03/01
Enterococcus	160,000	2	MPN/100ml	SM 9230B	12/03/01

\* R.L. - Reporting Limit. 'RESULTS' reported as "Not Detected" means not detected above R.L.



CREEK ENVIRONMENTAL LABORATORIES

  
Lab Director, Orval Osborne



# CREEK ENVIRONMENTAL LABORATORIES, INC.

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Maggie Bach  
SB County Public Works Dept.  
Solid Waste & Utilities Dept.  
109 East Victoria  
Santa Barbara, CA 93101

Log Number: 01-C9886  
Order: I3949  
Project: Tajiguas  
Received: 12/03/01

Page 3

### REPORT OF ANALYTICAL RESULTS

SAMPLE DESCRIPTION	SAMPLED BY	SAMPLED		MATRIX	ANALYZED
		DATE @ TIME	UNITS		
GLCRS	J. Schaefer	12/03/01@11:05		Aqueous	
ANALYTE	RESULT	* R.L.	UNITS	METHOD	ANALYZED
Chlorine Residual, Total	Not Detected	0.2	mg/L	SM4500G	12/03/01
Coliform, Fecal, 25-Tube MPN	5,000	2	MPN/100ml	SM 9221E	12/03/01
Coliform, Total, 25-Tube MPN	5,000	2	MPN/100ml	SM 9221B,C	12/03/01
e. Coli, 5-Tube MPN	2,400	2	MPN/100ml	SM 9223B	12/03/01
Enterococcus	16,000	2	MPN/100ml	SM 9230B	12/03/01

\* R.L. - Reporting Limit. 'RESULTS' reported as "Not Detected" means not detected above R.L.

CREEK ENVIRONMENTAL LABORATORIES

Lab Director, Orval Osborne

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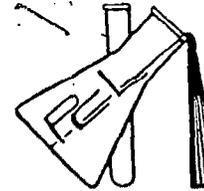
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Solid Waste

(805) 882-3601

p. 2

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# PAT-CHEM LABORATORIES

Page 1 of 1

Customer: County of Santa Barbara  
109 E. Victoria  
Santa Barbara CA, 93101

Attention: Cesar Castillo  
Report Date: 06-Nov-01 14:05  
Subject: Tajiguas

Project/P.O.#: 8500918

PARAMETER	METHOD	MOST PROBABLE NUMBER	RESULT	NOTE
MW-3 (0111021-01) Collected: 01-Nov-01 By Bach/Castillo				
Enterococcus	SM 9230B	<2.0 MPN/100 ml	ABSENT	
Total Coliforms	SM 9223B	345 MPN/100 ml	PRESENT	
E. Coli	SM 9223B	<1 MPN/100 ml	ABSENT	
Fecal Coliforms	SM 9221	<2 MPN/100 ml	ABSENT	
MW-15 (0111021-02) Collected: 01-Nov-01 By Bach/Castillo				
Enterococcus	SM 9230B	<2.0 MPN/100 ml	ABSENT	
Total Coliforms	SM 9223B	2419 MPN/100 ml	PRESENT	
E. Coli	SM 9223B	2 MPN/100 ml	PRESENT	
Fecal Coliforms	SM 9221	<2 MPN/100 ml	ABSENT	

Comments: Sample(s) analyzed per EPA Methods for Chemical Analysis of Water and Waste (EPA-600/4-79-020).

Respectfully Submitted,

Pat Brueckner  
Laboratory Director

11/6/01

CORPORATE OFFICE: 11990 Discovery Ct. • Moorpark, CA 93021 • (805) 532-0012 • FAX (805) 532-0016



**Document 3A**  
**Environmental Defense Center Supplemental Comments**  
**February 7, 2002**  
**Response to Comments**

Response 3A-1

Monitoring and analysis of surface water and groundwater samples is an ongoing program at Tajiguas Landfill. Each time additional samples are collected, it cannot be claimed that "new information" exists which invalidates the baseline conditions evaluated in the Draft EIR.

This comment claims that results of bacteria sampling and analysis from the groundwater leachate collection and recovery system (GLCRS) are new information and indicate that groundwater is polluted with bacteria from the landfill. The GLCRS has been monitored for bacteria since March of 1999, and these data are considered in the baseline characterization of the site. The most recent semi-annual monitoring report submitted to the RWQCB that was referenced in the Draft EIR is dated January 2001 (Santa Barbara County, 2002b). This report includes seven quarters of bacteria sample results for this location.

The samples collected on December 3 through 5, 2001, were the result of a special sampling event that was designed and witnessed by the Environmental Defense Center, Heal the Ocean, and Surfrider. The SWUD accommodated the sampling requests of these agencies. Trained staff from two separate laboratories were onsite to collect samples, test for chlorination of samples and properly transport the samples to their respective laboratories. The laboratory results were sent to a third party. Representatives of the concerned groups witnessed the collection of the samples.

The results of the special sampling event confirm previous sampling results and interpretations that indicator bacteria are present in surface water of Pila Creek, are not present or are found in low concentrations in groundwater samples, and that the GLCRS and liner leachate collection and recovery system (LLCRS) samples show the influence of surface water inflows by having intermediate concentrations of bacteria when sampling followed a storm event.

The GLCRS is influenced by surface water runoff by both the rising water level and higher bacteria concentrations following storm events. Thus, the bacteria concentrations in the GLCRS cannot be interpreted as an indication that "groundwater near the landfill is grossly polluted with bacteria." Monitoring well MW-4 is located immediately down-gradient from the GLCRS and is a more appropriate indicator of possible impacts to groundwater quality from the landfill. Sample results from the December 3, 2001, sample of MW-4 and from MW-15 (located approximately 1,500 feet further down-gradient) show the concentrations of indicator bacteria to be non-detected in results from one laboratory, and at insignificantly low concentrations from the second laboratory. The commenter was involved in the design of this sampling event and understands the difference between GLCRS samples and monitoring wells. The results show no bacteria contamination in groundwater.

An earlier November 1, 2001, sample result indicated 2,419 most probable number (MPN) of total coliform bacteria detected at MW-15. This result is likely due to sample cross-contamination during collection of the sample from the well, which is located in the creek bed. The 2,419 MPN concentration detected at MW-15 is considerably less than the 10,000 MPN standard for ocean water quality.

See related Responses 1-9, 1-10, 1-11 and 3-37.



# THE LAND TRUST FOR SANTA BARBARA COUNTY

• preserving natural lands and our agricultural heritage •

December 14, 2001

Ms. Kathy Kefauver  
Solid Waste and Utilities Division  
Santa Barbara County Public Works Department  
109 East Victoria Street  
Santa Barbara, CA 93101

RE: Tajiguas Landfill Expansion Project Draft EIR, October 2001

Dear Ms. Kefauver:

As you may know, the Land Trust acquired the 782-acre Arroyo Hondo Ranch on October 17, 2001, using a variety of public and private grants and community donations raised during our public campaign that started in November 2001.

There is now a change in use underway in Arroyo Hondo – from a private ranch to a natural and historic preserve under non-profit ownership. A permanent deed restriction (attached) now provides for use of the property only for public benefit, including management to protect the wildlife habitat, cultural, historic and scenic values of the property, and compatible public access for recreation, education and scientific uses. I have also attached a resolution adopted by the Land Trust board which describes the vision and purposes of the Arroyo Hondo Preserve.

The Land Trust has begun developing a preliminary management plan for the preserve, working with a team from the UCSB Bren School of Environmental Science and Management. They have gathered and are currently analyzing available information about all of the resources of Arroyo Hondo, which can be made available for use in completing this EIR.

The Final EIR should be updated to reflect this change in status and reference in the document. Based on our review of the DEIR under this changed circumstance, we believe that some additions or revisions are needed to consider potential impacts and necessary mitigation measures in the following areas.

### SECTION 3.3 WATER RESOURCES:

Apparently, the county has not monitored water quality in Arroyo Hondo. As a general comment, the EIR should consider the need for future ground and surface water quality monitoring.

4-1

4-2 *TLC has requested the info about this well*  
Figure 3.3-5 There is a third water well not shown on this map, drilled in 1997. We can provide GPS coordinates and well data.

4-3 P. 3.3-18 The final paragraph on this page suggests the existence of east-west trending "cross-strikes" that may indicate lateral groundwater flow from Canada de la Pila to the adjacent watersheds from the Vaqueros aquifer. Is this limited to the Vaqueros? Is more information available about this movement of water on the perimeter of the watershed and it's potential to carry any subsurface contamination across watersheds?

4-4 Section 3.3.2.2.4 Water Quality: The Land Trust is very concerned that the surface water quality impacts at the Arroyo Quemado lagoon and ocean outlet disclosed in this EIR are mirrored to the west at Arroyo Hondo. No surface water quality monitoring appears to have been done at Arroyo Hondo. We request that the EIR include a full discussion of the expansion project's impact, and appropriate mitigation for, water quality impacts on Arroyo Hondo Creek.

4-5 Arroyo Hondo should present useful data in further understanding the impact of current and extended/expanded landfill operation. Based on the observations of the prior landowner, discussion with knowledgeable biologists and our own site visits, we believe that the contamination of the Arroyo Hondo lagoon and ocean water, from a huge concentration of birds attracted to the Tajiguas landfill, is a significant adverse impact that requires further analysis and mitigation. We understand that the County has received an independent consultant's report on the bacteria source in Arroyo Quemado watershed. The results of this study should be incorporated or used to better disclose and direct mitigation recommendations.

### SECTION 3.4 BIOLOGICAL RESOURCES

4-6 We do not believe that the mitigation measures for nuisance birds are adequate to say that the impacts are mitigated. The current/proposed Tajiguas bird management program may reduce biological, health and other risks on the landfill property, but it does so primarily by sporadically scattering the birds to the adjacent watersheds, where they create biological and water quality detrimental impacts that are neither fully disclosed in this draft EIR, nor adequately mitigated by the measures recommended.

Given that lower Arroyo Hondo is confirmed habitat for three state and federally listed species (Southern steelhead, tidewater goby, red-legged frog), the report should fully evaluate the biological impacts and need for mitigation of the bird problem. The expansion/ extension of landfill operations at Tjiguas will prolong these current effects, as well as expose an often polluted pond and beach to the human visitors who will come to visit the Arroyo Hondo Preserve as part of the Land Trust's current and future public access program.

4-7 Section 3.4.3.3.1. Impacts to Sensitive Plant Species. This section presents a number of Class I impacts due to loss of coastal woodland, sage and chaparral communities. Consideration should be given to partial mitigation by offsite enhancement/restoration in Arroyo Hondo. There are tremendous habitat enhancement and restoration opportunities

in areas of Arroyo Hondo disturbed by past landslides, abandoned orchard operations, and invasive-invested riparian areas.

#### SECTION 3.6 NUISANCE

4-8 Page 3.6.2.3 The odors section should consider the potential for members of the public hiking on the Arroyo Hondo east rim trail, bordering the landfill site, to be exposed to odors. There will be more people on this trail in the future than has occurred when the ranch was in private ownership, generally on weekends and during the spring-fall. More information about trail locations and likely use scenarios can be provided upon request.

#### SECTIONS 8.0 AND 9.0

4-9 Similarly, the noise and visual impacts should be evaluated from the standpoint of increased visitor use of Arroyo Hondo, especially hikers on the upper trail. Also, the use of noise, especially propane cannons, should be avoided on weekends when they will be most bothersome to the Land Trust and its guests.

#### SECTION 4.0 ALTERNATIVES

We believe the EIR gives only a cursory review to potentially feasible alternatives related to advanced waste reduction, diversion and reprocessing technologies. Section 4.0, rather than developing feasible alternatives to conventional landfill, has focused almost exclusively on either the expansion of Tajiguas or alternative landfill options.

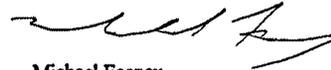
4-10 The EIR has not adequately evaluated the feasibility or potential to reduce the environmental impacts of future landfilling at Tajiguas and/or transporting solid waste to other landfills. No serious consideration is given to waste disposal through alternative technologies such as conversion technology (i.e. composting, anaerobic digestion, gasification, ethanol producing technologies, fuel cells, expanded reuse, reconditioning and recycling, etc.). No facts are given to justify the dismissal of such alternatives as not available during the project time frame. The EIR should present an conceptual alternative based on a strong commitment to an advanced waste reduction strategy using current or innovative technologies, coupled with the smallest expansion of landfilling needed to meet the 15 year county and state mandated capacity horizon. Information about the comparative capital outlay, operation and closure costs for this alternative, and how it compares in environmental impact and benefit should be provided. Absent that, we do not believe this is a complete environmental report in that it has not considered what likely would be the Environmentally Superior Alternative.

Alternative technologies are available and have been implemented throughout the world as well as in California. We believe the Tajiguas EIR should reflect the County's commitment to recycle, reduce and reuse, and to establish the County's leadership in not only meeting the minimum requirements of AB939, but to go far beyond them. Whatever waste can be diverted from the landfill, and used productively, represents pollution prevented and time added to the landfill's limited life span.

The EIR should also consider how these environmentally superior processes and technologies could mitigate some of the major impacts including reductions of air quality impacts of the expansion, transportation impacts, and bird-generated pollutant which apparently results in stream and shoreline water pollution at Arroyo Quemada and Arroyo Hondo.

We appreciate your consideration and response to our comments. Please contact me if you need additional information about our plans for Arroyo Hondo.

Sincerely,



Michael Feeny

# EXHIBIT "B"



THE LAND TRUST FOR SANTA BARBARA COUNTY  
• preserving natural lands and our agricultural heritage •

## Grant Deed Restriction for Arroyo Hondo Preserve

This Grant Deed is specifically subject to the following restrictions in perpetuity:

1. The real property shall be used for: (a) preservation, protection, restoration and management of the wildlife habitat, cultural resources, historic ranch structures and scenic values of the property; (b) compatible, non-discriminatory, public access opportunities such as hiking, non-motorized recreational riding, camping, picnicking, retreats, arts activities, outdoor education and ecological research; (c) retaining the limited existing and historic agricultural use in a manner compatible with preservation of the wildlife habitat, cultural, historic and scenic resources.
2. Facilities and improvements including agricultural planting, but exclusive of unpaved roads and trails, to support any of the above uses shall be limited to a cumulative maximum total of 24 acres.
3. The real property may not be further subdivided, developed, transferred or otherwise used for any private residential, commercial or industrial purpose, or used as security for any debt.
4. Any transfer of the real property shall only be to a qualified non-profit or government organization with sufficient financial capacity to own and manage the property pursuant to the restrictions enumerated in this Grant Deed; and that any such transfer, or any modification to this deed restriction, is subject to the approval of the California Coastal Conservancy, California Department of Transportation, California Wildlife Conservation Board, and the County of Santa Barbara.
5. The essential terms and conditions of the following grant agreements are incorporated herein by reference: State Coastal Conservancy Grant Agreement No. 00-096; County of Santa Barbara Coastal Resource Enhancement Fund Grant Agreement No. BC02-066; California Transportation Commission Environmental Enhancement and Mitigation Program Grant Agreement No. EEM-2001(118); and California Wildlife Conservation Board Grant Agreement No. 1014DM.
6. If the existence of the grantee or subsequent owner of the property ceases for any reason, or if any of the essential grant terms and conditions are violated, then the grantee or subsequent owner shall be required to reimburse the above grant funds, or the right, title and interest in the real property shall automatically vest in the State of California, as specifically provided in the above referenced grant agreements.

## Resolution of the Board of Trustees of The Land Trust for Santa Barbara County

### Arroyo Hondo Preserve Guiding Principles

It is resolved by the Board of Trustees that, if the Land Trust succeeds in acquiring the Arroyo Hondo Ranch, we intend to establish the Arroyo Hondo Preserve based on these initial guiding principles:

1. To protect Arroyo Hondo as a natural and historic preserve by a permanent deed restriction. The non-profit Land Trust for Santa Barbara County intends to own and manage Arroyo Hondo for the foreseeable future.
2. To develop a preserve stewardship plan that has as its foremost goal preservation of the extraordinary historic, cultural, natural and scenic resources of Arroyo Hondo, and to implement management practices that conserve its value as habitat for a diversity of native wildlife.
3. To provide for non-discriminatory, safe and enjoyable public access, carefully designed to protect natural and cultural resources, respect the value of the canyon as wildlife habitat, and guard the serenity of experiencing a walk in Arroyo Hondo. The management plan will include specific measures to control the timing and numbers of visitors, and the type of activities permitted in the preserve.
4. To provide opportunities at the preserve for casual hiking, picnicking and other public day use; for outdoor education programs for schools and other visitor groups from throughout Santa Barbara County; and for on-going ecological research.
5. To develop the Land Trust's resources and expertise to manage and provide careful stewardship for Arroyo Hondo, and to finance this primarily by raising an endowment fund from grants and community donations during the land acquisition campaign.
6. To consult with public agencies, nearby landowners, various specialists, community organizations and interested individuals in developing a management plan.
7. To continue raising funds for management, conservation, education and outreach activities at the Arroyo Hondo Preserve through grants, events and donations.

Approved March 12, 2001 by unanimous vote of the trustees present.

*Christina McGinnis*  
Christina McGinnis, Secretary



**Document 4**  
**The Land Trust for Santa Barbara County**  
**December 14, 2001**  
**Response to Comments**

Response 4-1

The County is not aware of any water quality data, including data on bacterial concentrations, for the Arroyo Hondo watershed or adjoining ocean discharge area. A recently completed study found that bird species are major contributors to bacterial contamination of surface water and ocean water at Arroyo Quemado (URS, 2001b). This study was designed and conducted in cooperation with several local environmental organizations, as well as the residents of the Arroyo Quemado community.

See Response 3-40.

The County is not aware of any comparable bacterial testing data for the Arroyo Hondo watershed, lagoon or adjoining ocean discharge area. It is not required (and not possible) to develop mitigation measures for an issue that has not been substantiated and for which there is no evidence on record. To date, there is no indication that surface or groundwater monitoring related to the Tajiguas Landfill is necessary in the Arroyo Hondo watershed. See Response 4-3.

Response 4-2

Comment noted.

The GPS coordinates, as provided under separate cover by the Land Trust of Santa Barbara County for the third well on the Arroyo Hondo property, are 34.3802944 and -120.1415598. Draft EIR Figure 3.3-5 has been revised to show the third well. Please refer to Revised Figure 3.3-5 in Final EIR Section 4.4.

Response 4-3

As discussed in Response 2-13a, the movement of groundwater across watershed divides is unlikely to occur. The possible occurrence of lateral groundwater flow across watershed boundaries considered in the Draft EIR addressed the Vaqueros Formation and possible eastward flow. The Vaqueros Formation is bounded on the south by the nearly impermeable Rincon Formation. Flow from the landfill across watershed boundaries to the west is not likely because the drainage of Pila Creek lies between the landfill and the western watershed divide. Also, there is an intervening watershed, Cañada de la Huerta, between Cañada de la Pila and Arroyo Hondo. Cañada de la Huerta was the site of an oil and gas processing plant. The site currently is undergoing remediation.

Response 4-4

See Response 4-1.

Response 4-5

See Responses 3-40, 3-41 and 3-42.

Response 4-6

See Responses 3-40, 3-41 and 3-42.

The Tajiguas Landfill Bird Management Plan would reduce or eliminate the attraction of the Landfill to the birds and, therefore, effectively mitigate the Landfill's contribution to any pressure the birds may exert on other natural resources in the area. If Tajiguas causes elevated bird populations, then these birds could have an impact on nearby areas, including the preserve. The purpose of the Bird Management Plan is to prevent birds from being attracted to the landfill, such that bird populations will be no greater than they would be even if the landfill were not present. The birds would continue to be attracted to recreational areas, picnic areas, campgrounds, rest stops and other locations along the Gaviota Coast where human activities have the potential to provide easy food for the birds.

Response 4-7

Comment noted.

Mitigation Measure BIO-7 has been revised to replace habitat as it is removed over the course of developing the Landfill expansion. The preference is to revegetate onsite in Cañada de la Pila. However, if revegetation cannot be accommodated on the Landfill site, the County would move to Arroyo Quemado on the County-owned Baron Ranch to accomplish the required revegetation.

See Response 3-59.

Response 4-8

Arroyo Hondo came into preserve status during the public review period for the Tajiguas Landfill Expansion Project Draft EIR. Odors along the ridgeline separating Cañada de la Huerta and Cañada de la Pila, and the ridgeline separating Arroyo Hondo and Cañada de la Pila are part of existing conditions for the area due to the presence of the Landfill. Continued odors emanating from the landfill are possible throughout the remaining life of the existing landfill (until 2006) and through the closure period (30 years) even if the Landfill Expansion is not approved. The proposed Landfill Expansion does incorporate additional odor control measures that currently are not in use at the facility. These additional measures should reduce odor impacts compared to existing conditions.

Response 4-9

As discussed in Response 4-8, Arroyo Hondo came into preserve status during the public review period for the Tajiguas Landfill Expansion Project Draft EIR. Noise is also an ambient condition at the Landfill and is associated with current operations. Noise from the Landfill could be expected to occur throughout the life of the existing Landfill (2006) and Landfill closure period (30 years), even if the Landfill Expansion is not approved.

Ambient noise from the Landfill would continue with the proposed expansion. The Draft EIR identified sensitive noise receptors surrounding the Landfill, but the preserve has not added

additional noise sensitive receptors as defined by the County's Threshold and Guidelines Manual (i.e., residential development, hospitals, commercial lodging facilities, or care facilities). As shown on Draft EIR Figures 3.9-2 and 3.9-3, noise levels from operations for either the Front Canyon configuration or Back Canyon configuration of the proposed expansion project will not exceed 60 dBA on the Arroyo Hondo Preserve and, therefore, does not represent a significant impact to the preserve. Further, there would be no waste disposal operations on Sundays.

The intervening canyon of Cañada de la Huerta is located between the Arroyo Hondo Preserve and the Tajiguas Landfill. Arroyo Hondo and Cañada de la Pila are separated by a ridge north of the existing Landfill footprint. Currently, the ridge parallels the soils borrow area, and the existing Landfill footprint is visible from this point further to the south. As explained in Response 3-85, much of the proposed Landfill expansion area is currently disturbed by the soil borrow area. Additional areas of new disturbance have been minimized; therefore, the change in visual character with the proposed expansion would not be significantly different from the current Landfill and borrow site configuration. The Landfill expansion will be a continuation of the existing Landfill.

The proposed Landfill expansion has been public information since the initial Notice of Preparation was released in April 1998. The Draft EIR was released in October 2001, and the Land Trust for Santa Barbara County purchased the Arroyo Hondo Ranch in October 2001.

#### Response 4-10

The alternatives discussion provided in Draft EIR Chapter 4.0 was prepared in accordance with the CEQA Guidelines (§15126.6) as follows:

*"An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible."*

The EIR is not required to identify project alternatives that use a combination of the waste disposal technologies described in the Draft EIR to select feasible alternatives to a conventional landfill.

The purpose of the proposed project is to provide 15 years of disposal capacity for the residual solid waste remaining after implementation of the various ongoing waste diversion programs by the County of Santa Barbara and the cities within the County. As a result of this program, the County diversion rate has increased from 40 percent in 1998 (year) to 57 percent in 2002. Further, the County continues to evaluate potential means of diversion and to recommend to the Board of Supervisors changes in procedures and policies to facilitate implementation of such measures. The County will continue its program to find additional means to increase the diversion of solid waste.

See Final EIR Chapter 3.0 for a discussion of waste processing technologies.



5

**GAVIOTA COAST CONSERVANCY**

2099 Refugio Road - Goleta, Ca. 93117 - USA  
Phone 9688406 - Email bhazard@ccs.com

December 14, 2001

Kathy Kefauver  
Santa Barbara County  
Public Works Department  
Solid Waste and Utilities Division  
109 E. Victoria Street  
Santa Barbara, CA 93101

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR TAJIGUAS LANDFILL  
EXPANSION PROJECT: 01-EIR-5

Dear Ms. Kefauver:

The Gaviota Coast Conservancy is a non-profit environmental organization which focuses on issues related to the Gaviota Coast. As the Tajiguas Landfill is on the Gaviota Coast we have been carefully concerned about the proposed expansion. The following are our comments concerning the Draft Environmental Impact Report (DEIR).

GENERAL COMMENTS

5-1 On page 1-18 the DEIR states; "The following are examples decisions the Board may select;" and goes on to describe three scenarios two of which allow approval of an expansion to year 2020. The Board of Supervisors redefined the Project in August of 1999 to limit the expansion to "no more than 15 years" or until a new regional landfill could be operational if sooner than 15 years. Later that year the Board approved a 5 year expansion in order to allow continued waste disposal while completing this EIR and subsequent permitting. As a consequence this EIR should limit it's description to an expansion that does not go beyond the 2015 date contemplated by the Board and necessary to complete the new regional landfill.

It is not the role of the consultant to modify the project description. Any larger or smaller expansion should be only included in the 'Alternative' section of the DEIR. Any new landfill that may be proposed by the County will be subject to an EIR and that document will determine whether a new landfill will have larger impacts than the continued operation of the Tajiguas Landfill beyond 2015.

5-2 On page 1-24 the DEIR states that; "Tajiguas is currently in compliance with these operating permits." This refers to the California Regional Water Quality Control Board, Waste Discharge Requirements (WDR) Order No. 93-69.

On page 5 of the WDR, A. 10 it states: "Discharge of wastes within five feet of the highest anticipated elevation of underlying ground water, including the capillary fringe, is prohibited." (a. refers to Title 23, Chapter 15)

In a letter dated March 3, 1998 to Ron Cortez, Director, Santa Barbara Solid Waste and Utilities, signed for Roger Briggs, Executive Officer of the CRWQCB Region 5 it states;

"LANDFILL EXPANSION"

"The Boards basic position regarding any landfill expansion is that the landfill owner/operator must demonstrate how the landfill will be operated to protect water Quality and in compliance with Waste Discharge Requirements (WDRs) before the expansion may be approved. This includes returning the landfill to full compliance with it's current WDRs (e.g. for Tajiguas, a short term and long term plan and implementation for containing the ground water plume, a long term plan and implementation for fully remediating the groundwater plume and successful erosion controls may be required, among other things) and continuing landfill management which prevents future violations. To elaborate on this, the following is a description of how compliance with some requirements of Board Order No. 93-69 must be maintained over the life of the Landfill."

Prohibition A 10 - "Discharge of wastes within five feet of the highest anticipated elevation of underlying ground water, including the capillary fringe, is prohibited."

"This Prohibition not only requires evaluation of existing groundwater depth, but also ground water depth after the landfill is constructed. Depending on geologic conditions, ground water elevation could increase as landfilling occurs above. A demonstration that groundwater (and the capillary fringe) will never be less than 5 feet from waste is required."

In another letter to Mr. Cortez from the CRWQCB, dated May 5 1998 concerning the Notice of Preparation for the Tajiguas Landfill, signed for Roger Briggs the following was stated;

"1. FIVE FOOT SEPARATION FROM GROUNDWATER: An investigation to determine whether the Landfill is or will be within five feet of underlying groundwater needs to be performed. Documentation regarding how waste was placed over the original alignment of Pila Creek needs to be reviewed. If documentation does not exist or if there is reason to believe waste is within five feet of groundwater, then an investigation of the buried alluvial zone of Pila Creek should be performed. You should also consider whether the increased height will cause groundwater to be pulled up into waste-containing areas."

In another letter to Mr. Cortez from the CRWQCB, dated June 19, 1998, NOTICE OF VIOLATION, TIME SCHEDULE FOR COMPLIANCE, TAJIGUAS CLASS III LANDFILL, SANTA BARBARA COUNTY, signed for Roger Briggs the following was stated on page 4;

"By April 30, 1999 submit a study and proposed action covering the following areas:.....Analysis focused on isolating the Landfill from surface or subsurface inflow, along with a means of measuring success of recommended measures."

In reviewing the Technical Studies supplement to the DEIR, Tajiguas Landfill Monitoring Well Installation Report by ARCADIS Geraghty Miller it is clear that much of the lower portion of the landfill is fully saturated with water. In reviewing the PPT Profile Cross Section it is clear that the lower portion of the landfill is fully saturated. In reviewing boring records of the gas extraction wells it is clear that most if not all have standing water in the casings at levels consistent with those in the monitoring and extraction wells as well as levels of water and gaseous water found by the PPT probes.

Clearly the Landfill is acting as an earth berm dam holding back inflow from numerous springs as located by investigating old aerial photos as described in the ARCADIS Report. Water has likely been collecting behind the berms from the beginning of the time of landfill construction. The Declaration of Mr. Robert Cady (1999), former landfill manager, details the springs encountered during construction of the landfill. It is apparent that the level of saturation is at least 100 feet or more higher than the bottom of the landfill. Therefore the level of groundwater beneath the landfill is not separated from trash but in the trash itself. Trenches dug adjacent to the access road at the level of the standing water in the waste mass also filled with water. While this ground water may be artificially raised to the impoundment created by the Landfill berms and waste mass it is never the less ground water. Therefore the landfill is not in compliance with it's WDRs regardless of the fact that the CRWQCB was not apprised of this landfill condition until the release of the DEIR. Had the CRWQCB been given timely notice of this condition there is no doubt based on the letters quoted from above that the landfill would have been sited for non-compliance.

It must also be noted that VOC contaminants are still found in MW 4 which is beyond the "point of compliance" and is a continuing violation. The fact that the Landfill is in "Corrective Action" for this offsite plume (and has been for many years) does not mean it is in compliance. In fact the landfill operators and the CRWQCB have not been able to agree on where to measure 'background' water quality which should be the standard against which potentially affected water is measured. For 10 years or more the County has incorrectly referred to "drinking water standards" when reporting monitoring results.

Unfortunately drinking water standards are not as comprehensive and are not necessarily the same as 'Constituents of Concern' or 'Monitoring Parameters'. There are many chemicals and pollutants such as Dioxan that routinely show up in monitoring wells below the landfill but have no listed maximum standard under the drinking water standards. So they are essentially ignored yet we know they are not chemicals likely to be found in background water samples. Please see the GeoSlov Report for specifics on this issue.

#### SPECIFIC COMMENTS BY DEIR SECTIONS

#### 2.0 PROJECT DESCRIPTION

2.8.6. There is no mention of the proposed and required (by the CRWQCB) down canyon sedimentation basin. The newly redistributed landfill slopes (benchfill) and the proposed 26 acres of disturbance on the West Slope Borrow Area will all drain

unimpeded into Pila Creek and the ocean as now planned. This is in direct violation of the June 19, 1998 CRWQCB letter that further states;

"By April 30, 1999, submit a final design and construction schedule for construction of an out of channel sedimentation basin (s) capable of intercepting all stormwater flows generated by the landfill that are not already contained by the sites northern sedimentation basin(s).....The completion date for the basin shall be no later than November, 15, 1999."

#### 2.10.2 LITTER;

The DEIR states that "During periods of high winds.....If necessary, the landfill would be closed, and waste vehicles would be diverted to a transfer station." Given the inherent windy condition of this landfill and given that the wind encountered at higher elevations will be stronger it is crucial that the reality of a by-pass transfer station that either can store several days of trash or can access another landfill be demonstrated as existing. Simply hoping they may be there is small comfort if in fact they need to be used.

#### 3.1.2 EVALUATIONS OF ENVIRONMENTAL IMPACTS;

"If the County approves the Project then the Tajiguas Landfill would continue to operate through the year 2020." Again the Board approved a project that would end by 2015, not 2020.

#### 3.2.3.2.3 Slope Failure;

"The results indicate that, for the 100-year average return period event, the peak horizontal ground acceleration at the site would be 0.21 g." This calculation is included in the Technical Studies supplement, SLOPE STABILITY EVALUATION PROPOSED RECONFIGURED FRONT FACE AND STOCKPILE SLOPES by GeoLogic Associates, September 2001. Yet in the 1988 Expansion EIR for the Tajiguas landfill the acceleration was projected to be 0.39g for the same return period. In the letter to Chris Wilson, County of Santa Barbara, dated November 12, 1999 from GeoLogic Associates titled TECHNICAL MEMORANDUM TAJIGUAS LANDFILL SANTA BARBARA COUNTY, subject, REVISED DYNAMIC STABILITY ANALYSES, it states "Revised dynamic stability analyses were then performed using the updated MPE site acceleration of 0.34 g....." Clearly the correct g number is not 0.21 short of some new information to the contrary. It also should be known that slope stability was not calculated taking into account the fact that the landfill is partially full of water. The effect both of the weight of this water (head) on the berms and the condition of the berms themselves (saturated) must be interred into any calculation concerning slope stability. New calculations based on the 'new' information contained in the Arcadis Report must be done.

#### 3.2.3.2.6 Differential Settlement;

It must be shown how the differential settlement where the existing waste pile meets the Vaqueros Sandstone Formation will impact the liner that is proposed in this area. As the

waste pile shrinks and the sandstone remains unmoving great stress will likely be put on any liner in place. This needs to be addressed and is not. It must be noted that the Vaqueros Sandstone is the primary source of potable water on the Gaviota Coast. It is used by ranches, State Parks, and the local school. It's impairment would be catastrophic. How the proposed 200 feet of waste to be piled on this aquifer will be kept separated from it needs to be explained in great detail.

### 3.3 Water Resources;

5-9 Please refer to the Report prepared by GeoSolv for Surfrider, Heal the Ocean, and the Gaviota Coast Conservancy.

#### 3.4.3.3.2 Impacts to Sensitive Wildlife Species and Habitats:

5-10 **Red Legged Frog:** The Red Legged Frog is a Federally listed endangered specie. As part of it's breeding instinct and needs it often travels from one watershed to others nearby. This migration is essential for genetic diversity. It is not likely that any frog that leaves the back canyon sedimentation ponds and travels east will survive the intense construction taking place within a few feet of the ponds. The proposed mitigation is in part to "develop a final habitat management plan." This is not an appropriate mitigation. The EIR may use prior certified EIR's or studies but can not rely on future studies to develop mitigation's. It may very well prove to be impossible to protect the viability of the Red Legged Frog in Pila Creek. This study must be a part of this DEIR and included for review and comment.

#### 3.6.3.2.2 Birds

5-11 **Health and Safety:** The DEIR states "Birds may be carriers of viral, bacteria, and parasitic pathogens that may be spread to humans, through direct contact with blood, tissues, feathers, and discharges (solid waste and secretions) from infected birds, and indirectly, by humans creating in dust particles from the dried droppings of infected birds. Also, increased numbers of birds that are concentrated in an area become a human health and safety concern when their numbers become too great to be supported by an area." The continued high bacterial test results from the local beach at Arroyo Quemada indicate that either a groundwater pathway exists from the landfill to the beach and lagoon and/or that the flocks of seagulls that feed off the landfill garbage are defecating on the beach and in the creek and lagoon, or both. The proposed mitigation with regard to the seagulls is to "provide a Bird Management and Monitoring Plan to the LEA. This again is an avoidance of a real mitigation that should be part of this DEIR. It cannot be determined if in fact there are additional measures not now being used that can reduce or eliminate this impact. This very well may be a Class 1 impact based on the lack of mitigation's available. The decision makers must have clear descriptions of a proposed mitigation prior to taking final action.

#### 3.7.3.4.3 Borrow Area;

5-12 The excavation of soils from both the undisturbed East and West slopes within the Coastal Zone is a "New Project" and was not considered in the original Landfill design or the subsequent expansion EIR in 1988/89. It is not necessary to properly close either

the existing Landfill structure or the back canyon expansion. Suitable synthetic fabric/clay cover material is available to provide the necessary impermeable finish cover material. The stripping of soil down to bedrock to provide finish cover simply enlarges the area of the canyon that is highly disturbed in order to save money at closure. In any case this component of the project will require a Coastal Development Permit.

### 3.8 VISUAL RESOURCES

5-13 As a general comment it would appear that the line of site points picked for analysis were not chosen because of their potential to be impacted by the expansion. Points along US 101 should be chosen for analysis because they have the most accessibility in terms of the traveling motorist's views of the expansion. This section needs to be reworked looking at the expansion from the most critical view points.

### 3.9 NOISE

5-14 The DEIR does not consider the effect of blasting in the back canyon on sensitive receptors in the newly created Arroyo Hondo Nature Preserve. This pristine canyon is held in trust by the Santa Barbara County Land Trust and will be managed as a nature preserve. The serenity and rural character of the canyon will be seriously affected by the years of blasting that will occur in the back canyon area of the Landfill. This potential impact will also affect hikers and others in the adjacent Los Padres National Forest. Particularly those using the Camino Cielo jeepway that connects to Gaviota State Park at Los Cruces. This is a potentially Class 1 impact with no available mitigation's.

### 3.10 TRAFFIC

5-15 The DEIR concludes that the existing at grade intersection can be modified to accommodate safely the increased traffic from the proposed expansion. Yet when the Chevron Gaviota Gas and Oil Processing Facility was permitted by the County it was required to build a complete highway interchange due to anticipated problems with the existing at grade crossing which was subsequently closed. Yet the daily traffic to and from the Landfill is far greater than that caused by the Chevron project. They same traffic problem was identified with the Exxon Gas and Oil Project at Los Flores Canyon. There the at grade crossing was closed and traffic was forced to use either the El Capitan or Refugio interchanges. It would seem the County has a different standard for projects other than it's own. Consideration of all traffic northbound to the landfill using the Refugio Interchange to turn North and enter the Landfill from the South lane while South bound traffic exiting the Landfill should travel North and use the Mariposa Overpass to turn around and travel South should be made. The dangerous at grade crossing could then be closed. Also given the very steep approach to US 101 by vehicles leaving the landfill provisions should be prescribed for a method to stop vehicles that have experienced brake failure. Typically this is done using a diversion to a sand trap.

### 3.11 AIR QUALITY

5-16

The DEIR fails to analyze the impacts of continued hauling of waste to the Landfill in small packer trucks as opposed to the use of larger truck-trailer vehicles. The larger 18 wheel trucks can haul 3 to 4 times the load of a packer truck with no substantial increase in emissions. When the Foxen Canyon Landfill closes it is anticipated that packer trucks now using that landfill will direct haul to Tajiguas. In order to reduce the impacts to already existing air quality problems (non attainment) in the area the EIR should specify that all waste hauled to the landfill must go through a transfer station.

5-17

In conclusion the Gaviota Coast Conservancy would like to make the comment that the super saturated condition of the Landfill must have been known to the operator for several years. At least when installing the gas extraction wells there must have been concern for the standing water in the wells. Yet no word of this was given to either the decision makers, the CRWQCB, or the public. A great deal of money has been spent on this DEIR and related studies. Well over one million public dollars at last report. Fees to the ratepayer have recently been assessed which amount to a 30% surcharge on the tipping portion of their bill. Much effort and money has been spent by environmental groups concerned with current and future problems associated with the Landfill. In light of the fact that expansion cannot happen until the Landfill is brought into compliance with it's WDRs, specifically the five foot separation rule, it is very troubling that facts seem to have been withheld. A great deal of time has been lost that could have gone towards finding a safe method of waste management for Santa Barbara County.

Bob Hazard



Chair, Conservation Committee  
Gaviota Coast Conservancy

**Document 5**  
**Gaviota Coast Conservancy**  
**December 14, 2001**  
**Response to Comments**

Response 5-1

See Responses 3-2 and 3-3.

Response 5-2

The comments submitted under 5-2a, b, c and d, responded to below, are issues over 5 years old. The following responses summarize correspondence between the Central Coast Regional Water Quality Control Board (RWQCB) and the Solid Waste and Utilities Division (SWUD) to correct the cited violation and address compliance with the Landfill's Waste Discharge Requirements (WDRs). The complete correspondence record is available for review at the SWUD offices.

Response 5-2a

See Response 1-6 for a complete discussion of the 5-foot separation issue.

The WDRs are summarized in Correspondence 1 (Table 1, Response 1-6). This response refers to the chronology of correspondence between the RWQCB and the SWUD from March 3, 1998, through the present as Correspondences 2 through 53. Table 1 lists all correspondence and summarizes the issues.

The March 3, 1998, letter from the RWQCB to Ron Cortez of the SWUD provided comments to the SWUD on an Erosion Control Plan that was required by the RWQCB in previous correspondence in letters during 1997. The Erosion Control Plan was required to address and prevent excess sediment from coming off the landfill during the 1997-1998 El Niño year. Currently, SWUD is required to prepare a yearly Stormwater Pollution Prevention Plan (SWPPP) prior to the rainy season. The SWPPP describes erosion control measures for the affected areas of the Landfill. These measures are implemented and maintained throughout each rainy season.

A second comment in this letter referred to requirements for the Landfill Expansion Project, one of which, as the commenter notes, is demonstration that the Landfill will be operated to protect water quality and be in compliance with the WDRs, including an "... evaluation of existing groundwater depth, but also after the landfill is constructed." It would appear, however, that because the RWQCB's comments come under the heading of "Landfill Expansion," demonstration of these requirements would have to be completed for the Tajiguas Landfill Expansion project. The required evaluation has been included in the Technical Studies by Arcadis, Geraghty and Miller, GeoSyntec and URS Corporation and are summarized in Draft EIR Section 3.3-1. Ten years of monitoring data have shown that site improvements have translated to effective environmental controls on potential migration of pollutants off site.

In this same letter, the RWQCB recommended pursuing the "Back Canyon expansion" because it "... may be a better location for an expansion in terms of controlling possible water quality concerns such as erosion and for minimizing impacts on the watershed." Other recommendations included

considering rail haul and siting a new landfill as alternatives to continued landfilling at the Tajiguas site, maintaining the natural channel of Pila Creek, and demonstrating that nuisance conditions would be mitigated with any proposed expansion.

The configurations proposed as the "project" for the Tajiguas Landfill Expansion are proposed to expand into the back canyon and have avoided disturbing the natural channel of Pila Creek. Best Management Practices to control litter and dust have been implemented since 1998 and would continue as part of the operating procedures for the Landfill expansion as included in Mitigation Measures NUI-1, NUI-3 and AQ-3 of the Draft EIR. The alternatives addressed in Section 4.0 of the Draft EIR include rail haul and siting a new landfill at various locations.

#### Response 5-2b

The May 5, 1998, letter to Mr. Cortez from the RWQCB is the RWQCB's "official" response to the Notice of Preparation (NOP) prepared for the Tajiguas Landfill Expansion Project EIR. An investigation of the groundwater table elevation in the area of the landfill expansion was accomplished as required in the RWQCB's NOP letter. The landfill expansion north of the existing waste prism will be placed on a liner that is a minimum of 5 feet above the highest anticipated groundwater level, in compliance with the California Code of Regulations (CCR) Title 27, Article 3, Section 20240(c). This information is provided in Draft EIR Section 3.3.3.2.

#### Response 5-2c

The April 19, 1998, letter to Mr. Cortez was a violation issued to the SWUD requiring timelines for implementing various components of work plans previously submitted to the RWQCB by the SWUD. Additional requirements for erosion control also were required. See Response 1-6 for a more detailed discussion of this letter.

#### Response 5-2d

The Tajiguas Landfill Monitoring Well Installation Study by Arcadis Geraghty & Miller does not indicate that the landfill is saturated with water. Inconsistent water levels in these wells indicate discrete, isolated, areas of "perched" water. Currently, the Benchfill project at Tajiguas requires removing the cover material from the existing 3:1 waste fill slopes at the Landfill until trash is exposed or nearly so. Additional trash is filled at a 2:1 slope, filling a narrow wedge along the benches. As operations have progressed, no water has been encountered on the lower benches.

The landfill slopes are not acting as an earthen berm dam holding back inflow from springs. The landfill slopes are not thick enough or engineered to function to contain water. In addition, if 100 feet of saturated trash and soil were present, water would be exposed due to the pressure exerted on the landfill face by the water. No evidence of this condition has been observed.

The RWQCB has been aware of the groundwater issue at the landfill since at least March 15, 2000, when the Gaviota Coast Conservancy (GCC) raised the issue with the RWQCB in their letter. The RWQCB has been given timely notice of this condition and has been in contact with the SWUD regarding the issue as documented in the June 30, 2000, letter from SWUD. The Landfill was in existence prior to the 5-foot separation requirements, as are several existing landfills throughout the state. Title 27 allows for a 5-foot separation between the trash and groundwater or an engineered

alternative. The Tajiguas Landfill has numerous environmental controls in place to control runoff and migration of groundwater from the site, as described in Draft EIR Section 3.3. See Response 1-6 for an expanded description of these controls.

#### Response 5-3

As described in Responses 2-16 and 2-17, groundwater at the site is routinely monitored and analyzed for a wide range of chemical compounds. As described in the Draft EIR (Groundwater Quality, page 3.3-42), the RWQCB sets the testing parameters for the site as specified in the Monitoring and Reporting Program (MRP) 93-69 for Tajiguas Landfill. In setting these parameters, they consider the types of contaminants typically associated with landfills. Current testing requirements include testing for common gasoline constituents, including benzene, toluene, ethylbenzene, xylenes, and the oxygenate MTBE. In addition, there is routine analysis for many other compounds, including chlorinated solvents and their breakdown products, 1,4 dioxane, metals, common pesticides, and general mineral constituents. Additional testing has not been required by the RWQCB because the testing in place is sufficient to evaluate impacts from the Landfill on site groundwater.

The commenter states “. . . drinking water standards are not as comprehensive and are not necessarily the same as Constituents of Concern or Monitoring Parameters.” The analytical testing program at the site is comprehensive and tests for both “Monitoring Parameters” and for “Constituents of Concern” as defined by the RWQCB in MRP 93-69, and which are based on the constituents listed in 40 CFR, Part 258, Appendices I and II.

As stated in the Draft EIR (page 3.3-43), specific compliance levels for VOCs at the Tajiguas Landfill do not exist. The County compares the analytical results of the comprehensive sampling to drinking water standards as a useful benchmark because regulators commonly reference these standards. Maximum Containment Levels (MCLs) are established by the Federal/State EPAs after lengthy testing and evaluation of health effects. Most compounds routinely detected at the site have MCLs and may be considered as indicators of the magnitude of impact for those compounds that do not have MCLs. The MCL for drinking water is a very conservative indicator of the magnitude of groundwater impact because groundwater in the monitoring wells is not used for drinking. However, based solely on VOC data from the monitoring well network, the groundwater present downgradient of the Landfill would be suitable as a drinking water source. This is further indication that groundwater impacts from the Landfill are not significant.

#### Response 5-4

Plans for the “down canyon sedimentation basin” have gone through several iterations and is now referred to as the “sedimentation structure”. The sedimentation basin was initially discussed as a basin in Pila Creek south of the landfill. However, to avoid potentially significant environmental impacts to the creek, the location of the basin was changed to County-owned agriculturally zoned parcel to the southwest of the Landfill. It was then discovered that the County could not be issued a Coastal Development Permit for the basin at this location because of inconsistencies with the County’s Coastal Zoning Ordinance, Coastal Plan and the Coastal Act.

The next iteration occurred in 2000, a sedimentation control structure was proposed south of the Landfill, in the area of the existing shop. The structure would collect surface water runoff coming from the southern landfill slopes prior to entering Pila Creek. This project is exempt from CEQA and

County permitting since it is to improve operations associated with the original Landfill under 400 feet msl in the coastal zone (see Response 3-5). The planned new down-canyon sedimentation control structure is discussed on Draft EIR pages 3.3-15 and 3.3-16, as well as on page 5 of the surface water technical report (URS, 2001a). This planned structure will act to capture coarse sediment that may be entrained in surface water runoff draining from those portions of the existing landfill and proposed expansion area which do not flow north into the existing out-of-channel or in-channel retention basins.

Subsequent to issuance of the referenced June 19, 1998, RWQCB letter, the SWUD has been in regular communication with the RWQCB regarding the location, design and construction schedule of this planned sedimentation control structure. Based upon these communications, a revised construction schedule has been identified and approved by the RWQCB, thus the June 19, 1998, letter is no longer applicable. Current plans call for the down-canyon sedimentation control structure to be constructed by October 2002.

#### Response 5-5

The provision to close the landfill and divert waste vehicle to a transfer station is based on the operational history of the Tajiguas Landfill. There are provisions in the permits for both the Foxen Canyon Landfill and the Santa Barbara Transfer Station to hold waste during periods of high winds at Tajiguas.

#### Response 5-6

See Responses 3-2 and 3-3.

#### Response 5-7

See Response 2-18.

#### Response 5-8

It is not clear from the comment which differential settlement the commenter is concerned about. Differential settlement of the Landfill mass will induce stresses in the cover system and potentially along the side slope liner interface. The cover and liner systems are designed to accommodate these stresses and the accompanying strains.

With regard to the Landfill cover system, significant settlement (including differential settlement) is, in fact, anticipated in the post-closure period. In response to this condition, the County is required to develop, fund and implement a stringent post-closure maintenance plan intended to maintain the performance of the final cover system, in light of this anticipated settlement, over the long term.

With regard to the liner system, the composite liner itself will be placed on bedrock or controlled compacted soils constructed on bedrock. As a result, the liner is unlikely to experience differential settlement due to consolidation of the underlying materials.

Settlement of the waste mass can induce stresses on the side slope liner by creating a "drag" along the liner interface. As a result of these forces, the side slope liner design includes a low strength interface above the flexible membrane liner so that any resulting displacement will occur above the primary containment system and would not threaten the water quality protection characteristics of the liner system as a whole.

In light of the above, it is concluded that the integrity of the liner system is not likely to be compromised as a result of differential settlements.

Response 5-9

See Responses 2-1 through 2-46.

Response 5-10

The mitigation measure described in the Draft EIR was incorrect. The mitigation has been revised to require a California Red-Legged Frog (CRLF) Management Plan (see Final Table 1-2 and Final EIR Section 4.2.2). The CRLF is known to occur in the two in-channel sedimentation basins north of the Landfill in Pila Creek. There are 3 years of survey data to support these findings in the Biological Assessment prepared as a technical study to support the Draft EIR evaluation. Since CRLF are known to be present, the Draft EIR correctly states (Section 3.4) that the Landfill expansion would have significant impacts on the population because of changes in operation of the basins for water and habitat conservation. However, the area east of the two in-channel sedimentation basins is currently highly disturbed by Landfill activities associated with excavating soil borrow material for cover at the Landfill. No potential migration pathway would be disrupted, because the landfilling activities currently do not provide vegetative cover to serve as refugia for any migrating CRLFs in this area.

See Response 3-51.

The CRLF Management Plan and Sedimentation Basin Work Plan has been developed and is being reviewed by the U.S. Fish and Wildlife Service and California Department of Fish and Game, trustee agencies. It does not defer mitigation since the plan incorporates all requirements of Mitigation Measure BIO-8. The plan requirements, timing and monitoring are included in the plan.

Also, refer to the last three paragraphs of Response 1-10.

Response 5-11

See Responses 3-12, 3-40 and 3-41. The Draft EIR correctly identifies transmission of pathogens from birds to humans via the air. Available information, and confirmation by Santa Barbara County Environmental Health Services, confirms that transmission of zoonoses (diseases that are transmissible from animals to humans) via aquatic medium is unlikely. Salinity and low temperatures in the ocean environment adversely affect the viability of these bacteria.

Response 5-12

The east slope of Cañada de la Pila has been disturbed by past grading activities associated with the original Landfill. The slope west of the existing Landfill footprint is also comprised of the Rincon Formation, which produces clay-rich soils ideal for capping the Landfill at closure. The Rincon Formation and its applicability to capping the Landfill that was associated with the Landfill expansion in 1988 was evaluated in 87-EIR-8 and is discussed on Page V-15 and V-16 of that document.

See Response 3-82.

As stated in the Draft EIR (Section 1.6.2.5), Landfill closure would occur with or without approval of the proposed Landfill expansion project. The Rincon Formation provides the appropriate material

necessary to close either the existing Landfill, should the proposed Landfill expansion not be approved, as well as the proposed Landfill expansion project.

See Response 3-5 for an explanation of permitting requirements associated with the Landfill.

Response 5-13

As stated in Draft EIR Section 3.8.2.2, sensitive viewsheds are identified as land uses with potential line-of-site views to the landfill. These areas include the entrance to the Arroyo Quemada residential community, along coastal Highway 101, and directly offshore. The representative locations included in Draft EIR Section 3.8, including those along Highway 101, were selected because they are locations from which different observers may be able to see the landfill. These are areas that also represent locations from which the landfill may be most visible. In response to Comment 5-13 the view from a coastal viewpoint west of the landfill also was evaluated. New Figures 3.8-15 and 3.8-18 show the view from this scenic area noted as Viewpoint 6 and 7 and Revised Figure 3.8-1 (see the revised and new figures in Final EIR Section 4.4). As shown in these figures, neither the existing Tajiguas Landfill nor the proposed expansion can be seen from this location.

Response 5-14

See Response 4-9.

Noise at the landfill is an existing baseline (ambient) condition. The distance between the Landfill and the Los Padres National Forest is approximately 1.25 miles. Sound level diminishes as distance from the source increases. The distance and intervening topography would reduce noise emanating from the Landfill to less than 60 dB(A) at the northern site/forest boundary. The commenter is referred to Draft EIR Figures 3.9-2 and 3.9-3.

Response 5-15

See Responses 3-81 and 3-95.

For trucks exiting the Landfill, sight distance is over 500 feet on U.S. Highway 101 northbound and U.S. Highway 101 southbound. There are no traffic safety impacts associated with the proposed project as documented in the Traffic Study prepared by Associated Transportation Engineers (2001) for the project as a Technical Study to the Draft EIR.

Response 5-16

The comment is incorrect. Draft EIR Section 3.11 – Air Quality analyzes the air emissions and resulting air quality impacts of transport of municipal solid waste, green waste and dirt to the Tajiguas Landfill. These analyses are based on current and proposed future average and peak daily tonnages, and on the type of vehicle (e.g., haul trucks, transfer trucks) and number of vehicles trips that will be generated by the Project.

Draft EIR Sections 3.11.3.2.2 and 3.11.3.2.3 address the increase in emissions from the mix of vehicles shown in Draft EIR Table 3.11-9, which shows the projected mix of packer trucks and transfer trucks over the life of the project. The table includes the numbers and types of trucks for hauling municipal solid waste, green waste and dirt. The quantified emissions associated with the vehicle types are shown in Draft EIR Tables 3.11-10 and 3.11-11.

The comments suggested requirement for all waste hauled to the Tajiguas Landfill to first go through a transfer station would be a policy decision to be made by the County Board of Supervisors and the various cities that transport municipal solid waste to the Landfill. Such a policy decision would have its own environmental, siting and regulatory issues that are beyond the scope of this EIR.

Response 5-17

Many of the commenter's issues are in reference to the *existing* landfill rather than the proposed *expansion* project. The existing Tajiguas Landfill is in compliance with the WDRs, the RWQCB has been aware of the groundwater issues at the facility for many years, and all historical documentation on the existing facility is available at the SWUD and permitting agencies for public review. The Gaviota Coast Conservancy (GCC) has reviewed the SWUD files in the past.

The data do not support the commenter's conclusion that the Landfill is "super-saturated" (see Response 1-6). The presence of pockets of water in the landfill has been known by the RWQCB since 1993 when the WDRs were issued and in 1998 when the WDRs were found to be adequate and did not require revision (see Responses 1-6 and 1-13 for a Correspondence history). The GCC provided letters to the RWQCB on March 15, 2000 (Correspondence 43 [References to Correspondence can be found in Table 1 of Response 1-6]) and May 25, 2000, and to the Santa Barbara County Grand Jury on June 21, 2000 (Correspondence 46) with the concerns outlined in this comment letter.

The RWQCB asked the SWUD to respond to the GCC letters on June 30, 2000 (Correspondence 47). The SWUD responded to GCC's concerns and requested any additional information the GCC could provide on the presence of groundwater or springs beneath the *existing* landfill.

On October 27, 2000, the RWQCB responded to the GCC concerns and attached the SWUD response letter of June 30, 2000. To date, the GCC has not provided additional information to SWUD. The correspondence record cited in this response was obtained from the RWQCB, and is on file and available for public review at the SWUD offices. To date, the GCC has not provided information to support the claims in this comment.

See Response 1-6.





**Surfrider Foundation**  
**Santa Barbara Chapter**  
 (805)899-BLUE(2583)

6

December 10, 2001

Kathy Kefauver  
 Santa Barbara County  
 Public Works Department  
 Solid Waste and Utilities Division  
 109 East Victoria Street  
 Santa Barbara, CA 93101

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re; Draft Environmental Impact Report for the Proposed Tajiguas Landfill Expansion Project, 01-EIR-5

Dear Kathy,

The Santa Barbara Chapter of Surfrider Foundation is a non-profit environmental organization dedicated to the protection and enjoyment of the world's waves, oceans, and beaches for all people, through conservation, activism, research and education.

The Santa Barbara Chapter is represented by the Environmental Defense Center and will submit comments on behalf of Surfrider. GeoSolve will also be submitting comments on the Draft EIR on behalf of Surfrider, Heal the Ocean and the Gaviota Coast Conservancy.

6-1

Surfrider agrees with EDC's comments about water quality issues at the unlined landfill less than a half mile from the beach and are very concerned with the proposal to expand this site for another 15 years.

6-2

Surfrider has concerns over section 3.10 Traffic. The expansion of Tajiguas Landfill is proposed without any substantial alteration to the intersection at Highway 101. The Chevron plant to the West was required to construct on and off ramps and an overpass, despite the significantly less traffic than at the landfill. The proposed Arco Golf Course near Naples was required to direct traffic west to the off ramp at Dos Pueblos Ranch to eliminate any traffic crossing oncoming lanes. The County of Santa Barbara has exempted themselves from this very expensive but important detail of safety on Highway 101. The fact that there will be an increase of traffic as the demand for landfill space will increase. The traffic from the North County will also increase as the population increases in the Santa Ynez to Lompoc Valleys.

The fact that Foxen Canyon Landfill will be closed in approximately 2 years, and will be transferring its trash to Tajiguas, adds to the traffic concerns at the intersection of Highway 101. The traffic of trash trucks will then be coming

from both the North and the South and converging and crossing at the entrance of the Landfill and crossing oncoming traffic.

6-3

The possibility of failed brakes as a truck leaves the landfill road needs to be addressed also. What kind of emergency measures would be applied with no emergency off ramp like the Transfer Station has?

6-4

Section 4.0 is the Alternative section. Surfrider is very concerned that a Materials Recovery Facility (MRF) was not even listed as a possible alternative in this section. The long term success of our trash crises has got to address the fact that we need to reduce the amount of our waste and a MRF, wet and dry, would go along way to recycling more of our waste.

The alternatives section addresses other programs which the county is involved in and the draft EIR lists Source Reduction, on page 4-2 as an element of the County's program. This is the most important solution to the current and future trash crises. Thru education and MRF's we could drastically cut the volume and waste of our precious resources. Waste Reduction is the most sensible alternative and long range solution.

6-5

Surfrider is concerned with the desire of the Santa Barbara County Solid Waste to expand this environmental disaster which is so close to the beach on the beautiful Gaviota Coast.

Thank you for allowing Surfrider an opportunity to comment on this very important issue.

Sincerely,

*Keith Zandona*  
 Keith Zandona  
 Chapter Chair  
 Santa Barbara Chapter  
 PO Box 60021  
 Santa Barbara, CA 93160



**Document 6**  
**Surfrider Foundation**  
**December 10, 2001**  
**Response to Comments**

Response 6-1

See responses to the Environmental Defense Center's comments 3-1 through 3-124.

Response 6-2

As stated in the ATE Traffic Study (ATE, 2001) included as a technical report to the Draft EIR and summarized in Draft EIR Section 3.7, the accident rate reported for the study area segment of U.S. Highway 101 is well below the state average. Without factual data, no conclusion that the project access is or will be unsafe can be made.

See Responses 3-81 and 5-15.

Response 6-3

The trucks hauling waste to the Landfill would undergo proper maintenance and adhere to speed limits – practices that currently occur with existing Landfill operations. Improvements to project access as discussed in the ATE Traffic Study (ATE, 2001) included as a technical report to the Draft EIR and summarized in Draft EIR Section 3.7, would provide efficient and safe site access without the need for extensive modifications. The Santa Barbara County Traffic Division concurs with the proposed site access modifications.

See Response 3-81.

Response 6-4

The commenter is referred to Draft EIR Section 4.3.2 – New South Coast Transfer Station/Materials Recovery Facility.

See Final EIR Chapter 3.0 for a discussion of waste processing technologies.

Response 6-5

Without substantiating evidence, a determination of “environmental disaster” is subjective and represents the opinion of the commenter.



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7

Linda Smith  
5 Arroyo Quemada Ln  
Goleta, CA 93117  
(805) 968-3077

Regarding the Tajiguas Landfill Expansion

I have lived next to the landfill for 26 years now, and of course I am of mind that it should never have been here in the first place. I have witnessed a great deal of the problems that living next to a dump can offer.

But, with all the reasons listed and heard of so far as to why not expand the dump, I am sure that it will happen, as only politics perhaps can answer why.

7-1 There is one area that I really want to discuss now. I and only a handful of other residences have been witness to the history of PilaCreek over the last years. Did you know that the creek on occasions comes out a rust color? Or that you can smell the creek from hundreds of feet away? What is in the water at these times?

Years ago, I took samples of the water and turned it in to be analyzed. The county did not do a chemical breakdown, but rather they said they conducted a bacterial count. This creek has its moments, and other times it is probably fine. Unless the creek is tested at the times it is most likely contaminated for chemicals, it will not show up.

7-2 If you walk on the beach, you will see hundreds of seagulls at all the creek entries to the sea, all but Pila Creek. Why is that? Now tell me if you would eat the fish that eat the bottom creatures near Pila Creek. And tell me if you would drink the boiled water of that creek.

7-3 Years ago, I had the unfortunate trial to have gone in the ocean near the creek, being the dumb person I was at the time. When I went under water, my eyes stung to such a great degree that I could not open them due to the pain for several hours. Hence forth, I or anyone in the family does not go in the sea water when Pila Creek is going off. This saddens me so much that we live in such beauty, and yet such pollution. I ask why. Are humans that dumb, or what???? Why take a beautiful place and destroy it and the inhabitants around it?

When I first moved here, and I went for a hike in the back country, behind the dump there was a typical beautiful Santa Barbara canyon. I saw deer, a bob cat, and even a bear. On the ridge there was a most magnificent boulder carved with four caves. My mind took me back to the days before man, and I was sad.

7-4 I did some research into the trash problem, as I too contribute to the landfill. I talked to the president of at the time Wheelabrator and the like. There are better solutions to be sure. I would love for our county to be the one to be an environmental leader, not just on paper, not just for inspections, but for real.

7-5 SO, please, have the creek tested many many times during the flow periods. I would be very glad to do this chore of collecting. I live right here, and I know when the creek is in need of a check up. I would like to know the creek is being checked for CHEMICALS Would you follow through on this???? PLEASE!!

A CONCERNED CITIZEN WHO LOVES THIS LAND AND CREATURES

Linda Smith

Linda Smith

Dec 8, 2001



**Document 7**  
**Linda Smith**  
**December 14, 2001**  
**Response to Comments**

Response 7-1

The County has sampled and analyzed surface water in Pila Creek on a regular basis. Sampling results are regularly submitted to the Regional Water Quality Control Board. The County has no direct knowledge of incidents during which the creek turns a rust color or contains an odor strong enough to be detected at some distance. Absent specific data or evidence regarding these statements, the County has insufficient information to respond further. As a general matter, coloration and odors do not necessarily result from contamination. Many natural processes within a watershed may result in such conditions. For example, coloration may be influenced by sediment load or natural mineral concentrations in surface water, and odors may result from decaying natural organic matter (vegetation or algae) or mineral content. Routine periodic sampling and testing of surface water in Pila Creek is performed in accordance with the landfill's various operational permits. To date, these sampling data indicate the surface water in Pila Creek to be in compliance with the state and federal guidelines contained in the Landfill permits.

Residents are encouraged to report to the County any unusual colors or smells emanating from the creek. In the event of such incidents, the County will gather water quality and observational evidence, and will attempt to determine whether the phenomenon is traceable to the landfill or to some other source. At present, however, the County possesses only uncorroborated anecdotal evidence of such incidents and, therefore, cannot speculate about the nature of these incidents or their potential causes.

Response 7-2

As correctly identified in the comment, sea gulls are typically abundant along the shoreline in the area of the Landfill. While there exist no studies to document their specific numbers or their behaviors in this area, there are several factors that may influence the local sea gull population. Foremost among them is the fact that Pila Creek is an ephemeral creek, meaning that it supports flow to the ocean only during a portion of the year. In addition, Pila Creek does not have a lagoon at the mouth, as do Arroyo Hondo and Arroyo Quemado. One possible reason that sea gulls may congregate at creek mouths is that these locations offer a source of fresh drinking water not offered by the lagoons. In so far as Pila Creek is dry during the majority of the year, it does not provide a reliable source of fresh water for local bird populations, and thus may not represent an attractive location for them.

Local marine life supports a robust fishing and shellfish industry in the Santa Barbara Channel, and it is common to see commercial and recreational fishermen harvesting marine animals along the Gaviota coast, including the area near Tajiguas Landfill. These products are distributed widely and consumed by members of the local Santa Barbara community, as well by people in distant markets, and the distribution and sale of these products are controlled, in part, by the local health department. It is reasonable to expect that this agency would issue an advisory if there were health concerns or specific cases of illness associated with consumption of marine animals

from this area. Other than routine seasonal advisories on shellfish harvesting (which are common statewide), the SWUD is not aware of any health warnings being issued regarding consumption of marine animals from this area.

Due to the potential presence of naturally elevated mineral concentrations, as well as water-borne parasites (e.g., *Cryptosporidium parvum*, *Entamoeba histolytica* and *Giardia lamblia*) in virtually all surface water bodies, local health departments nationwide would advise never to drink untreated stream water, whether from a pristine natural area or an urbanized environment.

#### Response 7-3

Due to the passage of time, it is not now possible to determine what may have been responsible for the event described in the comment. Natural ocean water salinity typically causes a stinging or burning sensation in the eyes, particularly following immersion or extended contact with seawater, and individuals may have varying tolerance to this exposure. Whether this event was attributable to salt water, or to some other substance, cannot be determined. Residents are encouraged to report promptly any future unusual events so that the County can obtain information regarding the nature of the event and determine its likely cause.

#### Response 7-4

There are many potential waste management strategies to reduce the amount of municipal solid waste requiring disposal at the Tajiguas Landfill. Santa Barbara County and its cities are continuing their efforts to increase source reduction, recycling and composting. The current diversion rate is approximately 57 percent, which exceeds the 50 percent source reduction and diversion requirement of AB 939. However, even with increased diversion, there still will be a need to dispose of residual waste. The proposed project is the means by which the County will meet its requirements for environmentally safe land disposal for this residual waste for up to 15 years.

See Final EIR Chapter 3.0 for a discussion of waste processing technologies.

#### Response 7-5

As discussed in Response 7-1, the SWUD performs routine periodic sampling and testing of surface water in Pila Creek in accordance with the Landfill's various operational permits. The testing under these programs includes a wide variety of monitoring parameters, including organic chemicals. The monitoring parameters included in this routine testing are summarized on Draft EIR page 3.3-25. Moreover, over the past 4 to 5 years, additional sampling and testing, beyond that required by regulatory agencies, has been performed by SWUD to evaluate the occurrence of bacteria in Pila Creek. Based upon the fact that available data indicate the creek to be in compliance with the required monitoring parameters, there currently are no plans to increase the frequency of routine water quality monitoring in Pila Creek. The commenter and others are encouraged to report any observations they may have regarding the water quality of Pila Creek so that the County may collect additional data.

Monitoring results may be posted on the Public Works, Solid Waste and Utilities Department web page in the future.

December 12, 2001

Mark A. Schleich, Deputy Director  
Solid Waste and Utilities Division  
Public Works Department  
123 East Anapamu Street  
Santa Barbara, California 93101

Re: County Landfill

Dear Mr. Schleich,

With regards to the EIR on the feasibility of expanding the County Landfill at Tajiguas, I recommend that the EIR be expanded to contain a thorough study of the chemical composition of the water flowing from Canada de la Pila creek. Such a study should be done with the same level of expertise as the recently completed DNA study of Arroyo Quemada Creek, but must include laboratory tests for contamination that might be present due to chemicals, heavy metals, pesticides, etc. that could be sourced at the landfill.

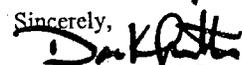
As I have stated many times in the past, the thousands of sea birds who feed at the landfill and then congregate at the mouth of Arroyo Quemada creek, seldom visit the mouth of Pila Creek. The only ones I have seen there in over 25 years of living at Arroyo Quemada, quickly fly away after tasting the creek water, except a few which have died near the creek. That creek water often flows with an orange color and smells like chemicals. There has only in recent years been any attempt to limit hazardous wastes from entering the landfill. Even now, there is a strong likelihood that homeowners dispose of paint, batteries, fertilizers, etc. in their trash cans which are picked up by BFI or Marborg and taken to the landfill. These toxic wastes are quite likely to enter the creek water and flow to the ocean, as well as entering the groundwater. Such pollution must be traced and contained before the landfill is considered environmentally safe.

Your recent conclusion in the News-Press that "there is just no evidence that the landfill is contributing to water pollution" is premature. From the Arroyo Quemada study we have learned that, in fact, it is the sea birds that have created 80% of the bacterial contamination of Arroyo Quemada Creek and the ocean. These birds, which in the last five years have increased their numbers dramatically, are fed at the landfill and then fly down to Arroyo Quemada creek for a drink of unpolluted water.

It is fortunate that scientific research has proven that avian contamination does not pose a health hazard for humans. However, it remains that the landfill is the indirect source or cause of that pollution, and should be held responsible to mitigate the problem. The increase of the bird population is a direct consequence of the increased levels of garbage at the landfill. Whether or not the landfill is also responsible for contributing to the contamination of Pila creek needs to be explored in a rigorous scientific study before the landfill should be considered for expansion.

I respectfully request that you continue pursuing the causes of pollution in the area near the landfill. It is only through such studies that the environment, as well as the humans, marine life and other beings that inhabit it can be safe from the threat of contamination which could threaten their health and well being.

Sincerely,



Dan K. Smith, Ph.D.  
Resident, Arroyo Quemada Lane

cc: Gail Marshall  
Brian Trautwein, EDC  
Heal the Ocean

8-1



**Document 8**  
**Dan K. Smith**  
**December 12, 2001**  
**Response to Comments**

Response 8-1

See Responses 7-1, 7-2 and 7-5.

Available data for Pila Creek have been evaluated to assess whether or not the Landfill has contributed organic chemicals and/or metals to surface water in the area. The findings of this evaluation are presented in Draft EIR Section 3.3.2.2.4 and Section 3.3.1 of the Surface Water Technical Report (URS, 2001a) and do not indicate such an impact

As indicated in the comment, current waste management practices limit the potential for hazardous materials to be deposited into the Landfill. The Landfill expansion will be designed with state and federally mandated liquid control systems to prevent the opportunity for toxic wastes to enter Pila Creek and flow to the ocean. Available data from the downgradient monitoring wells indicate that such facilities for the existing Landfill are effective. Moreover, available surface water monitoring data indicate that the landfill is not contributing chemicals to Pila Creek.



9

G I L D E A R E S O U R C E C E N T E R  
C O M M U N I T Y E N V I R O N M E N T A L C O U N C I L

Ms. Kathy Kefauver  
Solid Waste and Utilities Division  
109 East Victoria St.  
Santa Barbara, CA 93101

December 7, 2001

Dear Ms. Kefauver

9-1 The Community Environmental Council has reviewed the Draft Environmental Impact Report for the Tajiguas Landfill Expansion Project. Based on our review, the EIR is inadequate in developing the most reasonable alternatives to the project as required by the California Environmental Quality Act (CEQA). We conclude that Section 4.0, rather than developing feasible alternatives to conventional landfill, has focused almost exclusively on either the expansion of Tajiguas or alternative landfill options.

9-2 While we agree with the report's findings that out-of-county disposal is not a feasible alternative for several compelling reasons, including air quality impacts, we are disappointed in the EIR's failure to assess alternatives to landfill utilization. The EIR is not adequately assessed alternative technologies as a means of minimizing the impacts of future landfilling at Tajiguas and obviating and/or minimizing the need for transporting solid waste to a new, or an out-of-county landfill. We base this conclusion on our long-standing involvement and expertise in pioneering environmentally benign alternatives to landfill utilization.

9-3 Section 4.4.2.2 states that "composting remains a feasible option for the diversion of waste. However, neither composting alone, nor together with other alternative waste technologies that may be economically and technologically feasible in the future, would completely eliminate the need for landfill capacity for the residual waste that will require disposal." The implication of this statement is that composting isn't an option that can be implemented in the near future. The County has conducted numerous composting feasibility studies and many local governments, working with the private sector, have developed successful composting programs that go well beyond the current composting programs now offered by this County. A composting program to handle green and food waste could be easily implemented within a two-year period and this could reduce the use of the landfill at Tajiguas and the attendant environmental impacts of the proposed expansion.

9-4 Section 4.4.4 states that other technologies "may become available in the future and be applicable to County needs." The implication is that diversion methods such as conversion technology (i.e. anaerobic digestion, gasification and ethanol producing technologies) are not currently available, and therefore, are outside of the timeframe of feasibility as alternatives within the framework of the EIR. This is not the case, as we hoped we had demonstrated by a report we published nearly two years ago entitled "Conversion Technologies and Materials Management in the 21<sup>st</sup> Century," several copies of which were made available to the County at that time. (Another copy is included with this letter. CEC has also published many other reports in its long history as an originator of alternatives to inefficient and harmful solid waste practices, and those are also available to the EIR consultants.)

9-5 As one example of an alternative technology, gasification technology is available and utilized in a number of locales. The know-how exists to co-locate a gasification facility, material recovery facility and a composting facility. Together, these facilities could successfully produce compost material to sustain local agriculture and horticulture, produce a considerable amount of "green" electricity — perhaps as much as 10 megawatts — while reducing the use of heavy equipment (and associated air quality impacts) currently required for handling such waste at the landfill. There are other benefits of such a system of waste management: the numbers of birds attracted by the landfill (and their subsequent water quality impacts) would be significantly reduced, as would the potential surface and groundwater pollution problems stemming from degrading organic and hazardous materials within the landfill.

9-6 CEC believes that an expanded chapter on project alternatives is required to comply with CEQA. The EIR must thoroughly examine the possibilities for composting and various conversion technologies at the Tajiguas Landfill. A competent cost/benefit analysis on all feasible alternatives to landfill disposal should also be included in the EIR; we are persuaded that such analysis will demonstrate that several alternative technologies are economically possible and available now, especially if the avoided costs of locating a new landfill are included. Without these expanded analyses, we do not believe the EIR can claim to identify an "Environmentally Superior Alternative."

9-7 We believe the Tajiguas EIR should reflect the County's commitment to recycle, reduce and reuse, and to establish the County's leadership in not only meeting the minimum requirements of AB939, but to go as far beyond them as possible. Whatever waste can be diverted from the landfill, and used productively, represents pollution prevented and time added to the landfill's limited life span.

9-8

Santa Barbara County has an opportunity to set an example in finding 21<sup>st</sup> Century solutions for 20<sup>th</sup> Century problems related to solid waste practices, and the future of Tajiguas is pivotal in this. We ardently urge that Section 4.4 of the EIR be significantly bolstered to reflect the County's commitment to environmental quality and long-term economic thinking.

Sincerely,

Laurence L. Laurent,  
CEO

cc: Mr. Michael Brown, County Administrator (for distribution to the Board of Supervisors and Public Works)

Mr. James Armstrong, Santa Barbara City Administrator (for distribution to City Council and Public Works)

attachment: "Conversion Technologies and Materials Management in the 21<sup>st</sup> Century"

SEMINAR PROCEEDINGS

Conversion Technologies and Materials  
Management in the 21st Century

GILDEA RESOURCE CENTER  
COMMUNITY ENVIRONMENTAL COUNCIL

**CONTENTS**

**Seminar Proceedings**

**Conversion Technologies and Materials  
Management in the 21st Century**

*December 2-3, 1999*

**Authors:**

Sigrid Wright, Community Environmental Council  
Leslie Meyer, Community Environmental Council

**With:**

Kay Martin, PhD.  
Paul Relis

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## About the Seminar

The following paper summarizes a discussion held December 2-3, 1999, at the Community Environmental Council's Gildea Resource Center in Santa Barbara, California. The objective for the roundtable meeting was to creatively explore fundamental questions relating to sustainable materials management in the 21<sup>st</sup> Century, and the potential role of new conversion technologies in processing portions of the solid waste stream into renewable and environmentally benign fuels, chemicals, and sources of clean energy. Participants in the discussion — a listing of which appears at the end of this report — represented a broad spectrum of government agencies and industries.

The Colloquy was sponsored by the Wendy F. McCaw Foundation, and by MSW Management Magazine, the official trade publication of the Solid Waste Association of North America. It is intended as the first in a series of seminars that address how government policies and functions may need to change to anticipate, catalyze, and respond to technological advances that enhance environmental protection, resource conservation and recovery, and economic development.

7.

## EXECUTIVE SUMMARY

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*Many participants felt that the public would readily accept a vision of capturing energy from landfills, or creating new fuels from garbage — while at the same time protecting air quality, water quality, and national security interests.*

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8.

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Over the last decade, California's landmark recycling legislation, AB 939, has done much to transform the solid waste system — increasing the state's diversion rate from 11 percent to 33 percent. But while this law has addressed many of the public's concerns of 10 years ago, in recent years new and unanticipated issues connected with the waste management industry have emerged. Air pollution has been linked with recycling and waste transportation, landfills have been identified as a major source of greenhouse gases, and growing population (and waste) is a serious concern for many communities.

Intertwined and complex environmental concerns like these call for holistic solutions that consider a problem from a broader perspective. This may require thinking of the waste management industry as being comprised not of solid waste "janitors," but of materials managers, in which society's waste becomes an asset rather than a liability.

Such an approach to waste management can be advanced by the inclusion of "conversion" or "transformation" technologies that convert waste into other processes and products, while at the same time remaining sensitive to such environmental issues as air and water quality. Unlike the waste-to-energy plants of a decade ago, which often emphasized mass burn incineration, today's leading technologies offer unprecedented opportunities to divert a major portion of U.S. waste by converting it to other uses. These include harnessing and enhancing the natural methane produced at landfills, converting rice straw and other materials to ethanol, and essentially creating hundreds of other valuable products out of trash.

This seminar focused particularly on the role that conversion technologies can play in shaping a sustainable future for California. As such, participants noted opportunities for the conversion technology industry beyond the realm of waste management. For example, one product of conversion technologies — ethanol — could replace the fuel additive methyl tertiary butyl ether (MTBE), which is being phased out in California due to its risk as a groundwater pollutant. In addition, the increase in domestic supplies of bio-based fuels could address national security concerns by alleviating U.S. dependence on foreign oil. In fact, some seminar participants compared the potential shift from oil to bio-based fuels with the shift from coal to oil a century ago.

As with any new industry, there are challenges. Seminar participants confirmed that financing is a major barrier in the conversion industry, particularly when trying to establish a first project. They also expressed concern about retaining consistent access to feedstock. And, because these technologies can be classified as either energy processing plants or solid waste facilities, they discussed the need for streamlining regulations and permitting procedures.

But perhaps the biggest topic of discussion was how conversion technologies fit in with California's current recycling infrastructure. Participants grappled with such difficult questions as whether AB 939 should be amended

so that conversion technologies are given credit for waste reduction under the law's 50 percent mandate, or whether new legislation should be crafted to encourage municipalities to go further than 50 percent. While some urged for the flexibility to assist those communities struggling to meet the current mandate, others envisioned a time when conversion technologies could spur people towards diverting 70 or 80 percent of their waste, or more.

Although participants agreed that conversion technologies are largely unknown to the public, this lack of attention was seen more as an opportunity than a barrier. Many felt that the public would readily accept a vision of capturing energy from landfills, or creating new fuels from garbage — while at the same time protecting air quality, water quality, and national security interests. This vision, in turn, could create a passion for conversion technologies that might be as great or greater than the public demand that brought about recycling. Said one participant: "people might be ready for an alternative to landfills."

As a follow-up to this seminar, participants recommended the following actions:

- Evaluate at the state level the potential for conversion technologies in California.
- Specifically, evaluate how these technologies fit in with AB 939.
- Pursue a data modeling project with the U.S. EPA.
- Encourage the California Pollution Control Financing Authority to gear funding toward conversion technologies.
- Expand awareness of conversion technologies within the environmental community.
- Engage the public in a discussion of how conversion technologies could support a vision of a sustainable future.
- Investigate the permitting process.
- Explore legislative measures.

9.

## ISSUES

California State Assembly bill AB 939, the state's landmark legislation to divert 50 percent of solid waste from landfill, is now ten years old. Over the past decade, AB 939 has transformed California's solid waste system through the implementation of hundreds of recycling programs. These programs represent a massive capital investment in an infrastructure now capable of collecting and processing up to 20 million tons annually, or nearly half of all the solid waste generated in the state.

Although California has fallen short of the mandate to divert 50 percent of its waste by the year 2000 (as of 1998 the statewide rate was 33 percent), the growth of recycling and the increase in waste prevention programs are nonetheless remarkable. California was diverting only 11 percent of its solid waste in 1990, with 40 million tons being disposed of in landfills. By 1996 this number had fallen to 32 million, even as the state's population increased by some four million.

AB 939 was driven by three primary concerns: 1) a projected shortfall in landfill capacity; 2) the fact that California had the highest per capita waste generation rate in the U.S.; and 3) a desire to protect natural resources from depletion. Another important factor that drove AB 939 involved waste incineration. The late 1980s were a period of great controversy over proposed waste incineration projects in the San Francisco Bay Area, Los Angeles, and San Diego County. These proposed facilities generated strong political opposition. All were eventually abandoned. Apart from perceived air pollution concerns, opponents of this technology argued that if large-scale waste incinerators were approved, little if any progress would be made on waste prevention and recycling.

A decade later the landfill shortfall has receded, per capita waste generation is down, recycling has progressed with its resource saving impacts, and new waste incineration project development is nonexistent.

As yesterday's concerns have largely been answered over the past decade, new and unanticipated issues regarding waste management have emerged. A 1998 U.S. Environmental Protection Agency (EPA) study points to landfills as a major source of greenhouse gases and thus a contributor to the growing concern over global warming. In response to this threat, President Clinton recently issued an Executive Order calling for the use of biomass, including biomass from municipal sources, as a potential resource for producing green fuels and chemicals. Following on the Executive Order, EPA Secretary Carol Browner stated that the U.S. should be tapping these potential sources of energy in lieu of sending such large amounts of waste to landfills, where the waste generates greenhouse gases.

Traffic congestion is another concern complicating waste management in our state. Over the past decade California's urban population has grown by more than five million. The state's transportation infrastructure is being overwhelmed by population growth. Waste management and recycling are transportation intensive industries that both impact and are impacted by traffic congestion. It is reasonable to assume that moving waste and materials around

10.

California will only become more troublesome and expensive.

Another facet of the transportation problem is the growing concern over the air pollution impacts of the diesel engine — the distribution and transportation workhorse of our economy, including the waste and recycling industries. The U.S. EPA, the California Air Resource Board, and the South Coast Air Quality Management District are encouraging alternatives to the diesel engine or technologies that reduce the health and safety risks of diesel emissions. This focus on the diesel engine comes at the same time that the State has made the decision to ban methyl tertiary butyl ether (MTBE) as a fuel additive. California is aggressively pursuing ethanol produced from various sources — including municipal waste — to provide an alternative to MTBE.

Post recycled municipal biomass (PRMB), or that portion of the wastestream that cannot be feasibly recycled, constitutes most of the 20 million tons of material now destined for landfill. With the technological advances of the past decade, it may be possible to capture a major portion of this waste and convert it to green fuels, chemicals, and fertilizers through hydrolysis, pyrolysis, anaerobic digestion, or gasification. Ethanol- and hydrogen-powered fuel cells could also be the products of such conversion processes. From the standpoint of long term environmental protection and value added, these conversion technologies, linked with waste prevention and recycling, represent a much more environmentally benign management system than continuing to send more than half of our waste to landfills.

Ironically, the very law that has done so much to change waste management practices over the past decade is a barrier to advancing environmentally sound conversion technologies. AB 939's definition of "transformation" makes no distinction between minimal or no combustion-based transformation technologies and incineration. This may have made sense when the state was interested in promoting waste prevention and recycling and there was fear over pollution by incineration technologies. However, with a vast network of recycling and source reduction programs in place and a decade of rejection of proposed incineration facilities, lumping conversion with incineration doesn't make sense. Why would California want to retard the development of technologies that could convert a major portion of waste destined for landfills to green energy and chemicals, while sequestering greenhouse gases? If California could indeed be a greener state, at the same time becoming more self-reliant for its fuels and chemicals as a result of conversion processes, why shouldn't it move to create incentives for these technologies?

The challenges of this seminar were to explore the opportunities and barriers to conversion technology and to determine how these technologies could effect the state's integrated waste management system and its future energy and chemical needs. How proven are conversion technologies? To what extent are they consistent with sustainable development objectives? What impact could they have on greenhouse gases and other air emissions? And is the development of these technologies consistent with the hierarchical framework of AB 939, which prioritizes waste prevention and recycling?

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*As yesterday's concerns have largely been answered over the past decade, new and unanticipated issues regarding waste management have emerged.*

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## BACKGROUND

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*The number of European plants applying anaerobic digestion technologies to municipal waste has increased 750 percent in the past nine years.*

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For the purposes of this seminar, "conversion" or "transformation" technologies are defined as technologies that convert one material or product to another — such as rice straw to ethanol. These newer processes differ from the waste-to-energy plants of a decade ago, which often emphasized mass burn incineration, and were usually limited to creating on-site electrical energy. Today's leading technologies include acid hydrolysis, enzymatic hydrolysis, high solids anaerobic digestion, gasification, and landfill gas recovery. The resulting products range from transportation fuels to literally hundreds of industrial chemicals with widespread applications.

Over the past decade, major strides have been made in the commercialization of conversion technologies — in particular, those directed toward biomass fractions of the waste stream. Research and development of these technologies are international in scope. For example, the number of European plants applying anaerobic digestion technologies to municipal waste has increased 750 percent in the past nine years, including 10 new plants brought on line in 1998. In the U.S., the Department of Energy has focused its attention and research dollars on biotechnologies that convert cellulose biomass into a broad spectrum of products currently derived from petroleum. Several of these new industrial plants, called "biorefineries," are now in the project financing and development phase, and are anticipated to be operational within the next three years. Following are the types of technologies represented by industry participants at the seminar.

### Acid Hydrolysis

This technology uses various biomass feedstocks such as agricultural residues, purpose-grown crops, paper, wood debris, and green wastes for sources of cellulose material. Acid is used in either dilute or concentrated form as a catalyst to hydrolyze the cellulose into sugar, which can then be fermented and distilled into ethanol and a number of different specialty or commodity chemicals.

Having developed a pilot plant in Southern California that utilized this technology, Arkenol is now turning its attention to a full-scale facility in Sacramento, which has obtained permits and is now in the financing stage. This facility will use rice straw to produce up to 12.6 million gallons a year of ethanol, as well citric acid and ZSM zeolites. In addition, Arkenol is pursuing projects in Europe, South America, Africa and Asia.

Other companies comprising the so-called "big three" of U.S. biorefinery developers include BC International, which is building ethanol plants in Jennings, Louisiana and in Chester and Croville, California; and Masada Resource Group, which is developing a combined material recovery facility/ethanol plant in Middletown, New York. Additional developers of waste-to-ethanol acid hydrolysis technologies with proposed full-scale plants include Genahol and Biofine.

### Enzymatic Hydrolysis

This process involves steps similar to those of acid hydrolysis, converting cellulosic waste (mostly paper) into soluble sugars with the help of enzymes. After being removed of any plastics, the solid waste feedstock is mixed with enzymes and water to produce a liquid slurry. The enzymes then digest the organic and cellulosic waste to produce sugars, which can be fermented into ethanol. According to a recent analysis by the Department of Energy's National Renewable Energy Lab, enzymatic hydrolysis has considerable commercial potential, but its development will be constrained in the near-term by the high cost of cellulose enzymes.

Pure Vision is actively pursuing commercialization of the enzymatic hydrolysis process with its Bioseptic technology (a term indicating the biological separation of feedstock). To avoid the high cost of purchasing enzymes commercially, the company is exploring ways to mass-produce enzymes on-site. Pure Vision believes the technology will be compatible with various waste streams, including restaurant and fast-food waste, and hospital, clinical, and postal waste. With the potential to work with many industries, Pure Vision hopes to develop Alternative Resource and Energy Parks — eco-industrial areas where companies and technologies can work in unison to transform waste into resources.

A Canadian Firm, Iogen, has recently joined with Petro-Canada — that country's second largest petroleum refining and marketing company — to jointly fund and develop a biomass-to-ethanol plant employing a proprietary enzymatic hydrolysis technology. A demonstration and full-scale plant will be developed adjacent to Iogen's existing facility in Ottawa, which produces enzymes for other industrial and manufacturing uses.

### Anaerobic Digestion

High solids anaerobic digestion was developed with more than 10 years of research by the National Renewable Energy Laboratory (NREL). This technology uses special high-temperature microorganisms to break down organic waste in an enclosed vessel, or "digester." The resulting products are compost, liquid fertilizer, and a methane-rich fuel gas.

Pinnacle Biotechnologies has been collaborating with NREL to operate an anaerobic composting plant in Orange County, California. The fully permitted pilot demonstration plant has been operating on and off since early 1997. With a three-ton-per-day capacity, the plant uses sorted and shredded refuse along with food processing waste. Because the technology can be easily integrated into waste disposal systems, Pinnacle hopes to site its technology at transfer stations, landfills, and municipal material recovery facilities. Researchers estimate optimal feedstock load of a full-scale facility at around 300 tons per day — enough to service the needs of at least 170,000 people.

A form of anaerobic digestion is also being pursued in special "bioreactor" cells at landfills. (See Bioreactor Cells below.)

13.

### Gasification

Using heat to convert solids into synthesis gas, this technology can produce an energy source for steam production, heat processing, and electricity generation. It can also produce various chemicals, and hydrogen to power fuel cells. Unlike other technologies, this process can use plastics, as well as crop remnants, wood wastes, municipal solid waste, and paper mill sludge. These materials are fed into a reactor that uses high temperatures to gasify the solids. Due to its air-starved environment, pyrolysis (or decomposition of matter in the absence of oxygen and presence of heat) occurs. Once cleaned, the resulting product is a combustible, energy-rich gas.

One company specializing in gasification technology is Primenergy. With 15 years of operational experience, the company manufactures custom-made gasifiers in a range of sizes, from those requiring 24 tons of feedstock per day to 1,000 tons per day. The availability of feedstock normally determines the operating capacity. Primenergy has also been working on developing by-products from the nutrient-rich ash that results from the gasification process. In late 1998, Primenergy introduced a commercial grade fertilizer made from poultry litter ash.

### Landfill Gas Recovery

In order to convert municipal solid waste into a valuable resource, some landfill operators are currently using advanced technologies to harness and enhance the natural methane produced during decomposition. The gas produced at landfills is approximately 50 percent methane and 45 percent carbon dioxide. Once captured, the methane, or natural gas, can be used to generate electricity, heat, or steam. Direct use of the gas through pipes linked to nearby facilities requires minimal processing and only minor alterations to existing combustion equipment. The gas can also be used in fuel cells, or as an alternative transportation fuel in vehicle fleets for landfill equipment, refuse collection vehicles, buses, mail trucks, taxis and other vehicles.

In an effort to support these technologies, the U.S. EPA has created the Landfill Methane Outreach Program (LMOP). Formed as part of President Clinton's Climate Change Action Plan, this program educates local government and communities about the opportunities and advantages of landfill gas recovery. EPA regulations under the Clean Air Act direct many landfills to collect the gas, giving them the option of flaring it off or becoming a Landfill Gas To Energy (LFGTE) facility. Of the more than 6,000 landfills in the United States, about 270 are LFGTEs. EPA estimates that nearly 700 more landfills could become methane providers and help produce enough electricity for an additional three million homes.

California alone has 56 LFGTE projects, with another 43 listed as candidate sites. In the Los Angeles County Sanitation Districts, five LFGTE projects can generate more than 23 million standard cubic feet of methane per day (mmscf/d). The combined output of all of California's LFGTEs is about 154 mmscf/d.

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Specific case studies illustrate the validity of methane as a successful energy provider and pollution preventer. By using landfill gas to produce steam at its facility, Ajinomoto Pharmaceutical Company has prevented enough pollution from entering the environment to equal the benefits of taking more than 23,000 cars off the road. Lucent Technologies saved nearly \$100,000 a year by fueling its boilers with landfill-derived methane instead of fossil fuels. In cooperation with the EPA, ONSI Corporation developed technology to convert landfill gas into energy for 100 homes in Groton, Connecticut.

**Bioreactor Cells**

In order to accelerate the decomposition of solid waste — and therefore the production of methane — some landfill operators are exploring the use of bioreactor cells. Unlike conventional landfill practices that strive to keep the waste dry, bioreactors focus on creating an optimal environment for the microbes that break down organic material. In traditional landfills, this decomposition process — or stabilization — usually occurs after the landfill is closed, or very slowly during its operating life. Bioreactors used in active landfills allow for more rapid sedimentation of the waste, providing more room for additional materials. At the same time production of methane is more predictable in bioreactor landfills and can be harnessed more effectively for energy needs.

Bioreactors can use either aerobic or anaerobic processes. The Columbia County Baker Place Road Landfill near Augusta, Georgia, is an example of an aerobic bioreactor that incorporates air flow into its process. As a test site for the technology, this landfill has seen a dramatic increase in biodegradation. This approach has also resulted in decreased Biological Oxygen Demand, fewer leachate metals, and decreased organics contamination.

Another noteworthy demonstration project is Yolo County's Central Landfill near Davis, California. Termed "enhanced or controlled" landfilling, this process involves anaerobic bioreactors that rely on the recirculation of leachate. As an experimental site, the landfill supports two large cells, both constructed in 1993. In Spring 1995, each cell was filled with nearly 9,000 tons of curbside garbage. One cell serves as a bioreactor, receiving recirculated leachate and liquid additions, while the other functions as a control site to mimic the conditions in a conventional, dry landfill.

Project engineers hope to demonstrate that landfilled waste can be stabilized in five to 10 years. At the same time, they strive to optimize gas generation for energy recovery purposes. So far, the enhanced cell has produced approximately 45 percent more gas than the control cell. In addition, from May 1996 to June 1998 the waste in the enhanced cell settled 46 inches, while settlement in the control cell was only 11 inches.

**DISCUSSION**

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*One company saved nearly \$100,000 a year by fueling its boilers with landfill-derived methane instead of fossil fuels.*

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*Sustainable decisions about waste management would incorporate objectives of pollution prevention, resource conservation, renewable energy, and the creation of wealth.*

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**Defining sustainable waste management**

**A**s noted earlier in this paper, the waste management industry faces a number of challenges today that it did not anticipate a decade ago. Waste disposal is now recognized as being deeply intertwined with other environmental issues, such as air and water quality, global warming, and land use. From the outset of this seminar, participants were asked to consider these interconnected factors in their discussion about conversion technologies, and to frame their discussion within the overarching context of "sustainability." Because this word can mean many things to different people, participants began by sharing their perceptions of the meaning of "sustainable."

To some, sustainable meant "holistic" — or able to look at a larger picture. Sustainable decisions about waste management, for example, would incorporate objectives of pollution prevention, resource conservation, renewable energy, and the creation of wealth. Under this definition, a conversion technology or other waste management solution would need to address not only waste disposal, but also such issues as air quality or traffic congestion.

This idea of holistic decision making was used in discussions throughout the two-day seminar. For example the group asked: Is a biomass plant in the Midwest or South America considered "sustainable" if it requires a purpose grown crop, for which pesticides are used or a rainforest logged?

Other seminar participants suggested that "sustainable" indicates a closed loop system, in which balance is created over time. Like a biological system, a sustainable society would use no more resources than it produces, and would leave no waste. Thus, sustainable waste management practices would encourage using and reusing resources, and would discourage waste in the form of pollution or the inefficient use of energy. At several points during the seminar, participants applied this "closed loop" concept to various topics — for example, pointing out that the U.S. has created a non-sustainable hydrocarbon based economy rather than a sustainable carbohydrate economy by emphasizing finite oil resources over biomass or other renewable resources.

One participant suggested that sustainability be seen as a journey rather than an endpoint. Pointing out that virtually all human activity makes some kind of footprint, she cautioned against embracing a "magic bullet" technology that might solve one set of problems while creating others. Rather, sustainable waste management decisions should be based on as much information as possible and might even be in a constant state of revision as new information becomes available. This approach to problem solving was discussed by a representative from U.S. EPA, who introduced a new life cycle analysis tool that can help communities weigh the environmental and economic costs and benefits of different waste management options. (See p. 15.)

### A holistic approach to waste management

When considering the options available for disposing of solid waste, many communities find it difficult to determine the most effective, sustainable way to manage their refuse. A new study shows that some wastes may be better suited for recycling, others may prove more valuable when converted to energy. Similarly, a disposal option that may make sense in rural Central Valley may not make sense in an urban area faced with water or air quality problems.

In an attempt to assist with this decision-making process, the U.S. EPA in collaboration with the Department of Energy and various stakeholders, has created a life-cycle analysis tool that helps decision makers evaluate their choices. By incorporating site-specific data from particular communities, the EPA's working model outlines the full costs of any particular decision — including the economic costs and the environmental costs associated with energy use and pollution emission. With special attention given to objectivity and credibility, the EPA's Life Cycle Inventory (LCI) database is designed to present information without making recommendations or judgments. In this scheme of thinking, no one waste management method truly prevails over the rest.

At the time of this seminar, the EPA was beginning to test the LCI through specific case studies. While the conversion technologies are not currently a part of EPA's project, they could be incorporated as a future model enhancement. Examples of current case studies include:

- The Great River Regional Waste Authority in Iowa is determining whether an effective 50 percent recycling scenario can be achieved in this very rural area where backyard burning is common and much of the waste never makes it to the curb. The LCI is helping decision makers compare the benefits of various collection options from an integrated system to one that uses various collection methods.

- Gwinnett County, Georgia, is using the database tool to compare NO<sub>x</sub> emission levels between a collection service that includes yard waste and a service that does not. As a region in severe non-attainment status for air quality, this county is particularly interested in the LCI's findings that emissions can be reduced by 11 percent when trucks are not collecting yard waste.

- Officials in Toledo, Ohio — also known as the Glass City — are using the life cycle tool to develop a 15-year solid waste management plan with a particular interest on glass recycling. The LCI allows decision makers to discover more cost-effective and environmentally benign options when compared to existing plans.

### How do conversion technologies fit in with AB 939?

As California reaches the 10-year anniversary of this landmark legislation, seminar participants were asked to reflect on what AB 939 has accomplished, and where it has failed. In particular, participants discussed the law's tacit assumption that communities should relax their diversion efforts after reaching 50 percent. Members who had been involved with the original creation and adoption of the law asked: "Were we not thinking big enough a decade ago?"

One of the more prickly questions centered on whether AB 939 should be amended so that transformation technologies are given credit for waste reduction under the first 50 percent, or whether new legislation should be crafted that encourages municipalities to go further than 50 percent. Under current AB 939 rules, transformation technologies — which are defined as incineration, pyrolysis, distillation, gasification, and biological conversion (other than composting) — can count for up to 10 percent of the 50 percent diversion requirement if they meet several conditions. One of these conditions states that a facility must have been permitted by 1996 in order to count toward AB 939. Because this language excludes some technologies, as well as plants built in the last few years, it is seen as a barrier by industry. (Subsequent to the seminar, legislation was introduced that would allow conversion technologies to count as "transformation" and waive the 1996 rule.)

One representative from the California Integrated Waste Management Board (CIWMB) noted that his concern was in helping communities reach the original 50 percent mandate — a goal that for some municipalities has proved difficult to attain. As this seminar was meeting just before the January 2000 deadline, he said, the CIWMB was entering the next level of AB 939, in which jurisdictions were beginning to petition for extensions. Rather than punish these communities with fines for failing to reach 50 percent, he asked, why not offer them incentives by allowing conversion technologies to count toward that goal?

However, one representative from an environmental group who had helped craft AB 939 a decade ago was reluctant to make changes that he perceived could weaken recycling efforts. "This experiment in recycling is not yet 10 years old," he said. "I'm not ready to sell off the first 50 percent. Let's start taking steps beyond 50 percent, and put the same energy into conversion technologies that we put into getting AB 939 10 years ago."

Another participant noted that the formation of AB 939 was driven not so much through markets, but by the public's sudden demand for alternatives to traditional waste management. "The question is: Will the public have the same passion for these technologies that they had for recycling?" he asked. "I'd like to see if we can sell people on the vision of reaching not just 50 percent diversion rates, but 70 or 80 percent. Here on Santa Barbara's South Coast, people might be ready for an alternative to landfills."

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*One government representative asked: Rather than punish communities with fines for failing to reach 50 percent, why not offer them incentives by allowing conversion technologies to count toward that goal?*

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## Could ethanol replace MTBE?

As noted earlier, conversion technologies can result in a number of products, including fuels. Many discussions at the seminar focused on one of these fuels — ethanol — and on potential biomass-to-ethanol technologies.

Of particular interest was the role that ethanol may play in the future as an oxygenate for reformulated gasoline. Fuel oxygenates help curb air pollution emissions such as ozone and carbon monoxide. Currently, ethanol serves as an oxygenate in eight percent of all reformulated gasoline, while methyl tertiary butyl ether (MTBE), the most widely used oxygenate, is used in 85 percent of reformulated gasoline. However, as a result of recent revelations about MTBE's risk as a groundwater pollutant, in March, 1999, Governor Gray Davis signed an Executive Order calling for the phasing out of MTBE in California by the end of 2002.

Because the Clean Air Act of 1990 requires reformulated gasoline sold in certain smoggy areas of the country to contain an average of two percent oxygen by weight, another oxygenate would need to be employed in order to meet this mandate. Several factors suggest that ethanol could serve as this alternative; among them, the fact that the California Air Resources Board (CARB) has validated ethanol as an efficient oxygenate, and that ethanol poses less risk to water contamination due to its biodegradability.

Despite this, however, several seminar participants expressed concern that the two percent oxygenate standard might be eliminated, thus reducing the demand for ethanol. This concern stemmed from proposed legislation by Rep. Brian Bilbray (R-CA), which would lift the mandate in order to motivate a quicker phaseout of MTBE. Advocates claim that air quality could be protected through new and existing pollution control measures, and that by eliminating the oxygenate mandate, industry will have greater flexibility and can be more cost-effective in the fuel blending process. The bill, H.R. 11, is supported by Governor Davis, CalEPA, CARB and other agencies.

Oil companies are leading the pressure against regulators to ease the oxygenate requirement in exchange for more immediate voluntary reductions in the use of MTBE. Governor Davis has requested that the U.S. EPA grant the state a waiver from the oxygenate mandate in order to keep California's oil industry competitive. Since this is the first request of its kind, the EPA is investigating whether its authority extends to granting such waivers.

Some seminar participants worried that these moves to eliminate the oxygenate mandate would signal a decreased demand for ethanol since no oxygenate would be required by law. One participant made the strong assertion that "if the two percent mandate goes away, the ethanol industry is as good as gone." Others, however, contended that it is a mistake to concentrate on the fate of the mandate and instead suggested focusing on the increasing popularity of ethanol as both an oxygenate and an octane booster for premium gasoline, two percent mandate or not. These latter opinions are shared by CARB, which maintains that the use of ethanol is inevitable in California.

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## Creating new fuels in an oil-based world economy

Any discussion about converting waste to energy must eventually grapple with the barriers presented by the nation's current energy system. At several points during the seminar, the group discussed the reality of creating new fuels and energy systems in an oil-based economy. As one participant noted, deeply entrenched technologies, false costs, subsidies and other artificial boundaries distort the ability to move in new directions.

While the group acknowledged the pervasiveness of the oil (or "carbon") economy, some participants compared a potential shift from oil to new fuels with the shift from coal to oil a century ago. As one person noted, coal was the fuel used by most of the U.S. in the late 1800s until the U.S. military discovered that oil was easier to transport. Although the first technological advances toward oil were expensive, the niche developed gradually — and then suddenly.

Another seminar participant commented on Brazil's success with ethanol, which costs approximately 30 cents a gallon without subsidies in that country. Brazil's emphasis on ethanol was spurred by a scarcity of oil and an abundance of land, which allowed the country to dedicate a portion of its sugar cane industry to growing feedstock for ethanol production.

Virtually all participants recognized that a similar shift in the U.S. could only occur if it were a government priority. This interest could be sparked by national security concerns and an effort to reduce our nation's dependency on imported oil, which currently comprises 50 percent of the U.S. oil needs, and is expected to rise to almost 75 percent by the year 2020. With the advancement of new technologies, however, this dependence on foreign oil could dramatically decrease as domestic supplies of bio-based fuels increase.

Political support for such an idea was underscored in 1999 by a Presidential Executive Order and comments by his chief staff. (See p. 19.) Proclaiming that "biomass is to the next century what petroleum was to this century," the Clinton administration estimates that by 2020, ethanol produced from biomass could replace 348 million barrels of imported oil.

A presentation at the seminar by a representative from the National Renewable Energy Laboratory (NREL) confirmed the government interest in bio-based fuels. Funded and guided by the U.S. Department of Energy, NREL has been conducting renewable energy research since 1977. Of the nearly 50 energy related issues that NREL is contracted by the Federal government to study, projects regarding conversion technologies and biomass derived fuels are among its top priorities. The agency is directed to focus on high-risk, high-payoff projects by conducting research into areas that industry may be unable to pursue alone. While NREL strives to advance science, its ultimate goal is to help transform the world of alternative energy by promoting the commercialization of new technologies.

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*"Biomass has the potential to be the renewable resource of the 21<sup>st</sup> Century. Its use as a substitute for petroleum has the potential to usher in a whole new industrial revolution."*

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## The effect of the Presidential Executive Order on the industry

On January 1, 1999, President Clinton issued Executive Order 13123, "Reviving and Promoting Biobased Products and Bioenergy." With the goal of stimulating the research and early adoption of technologies needed to make biobased products and energy cost competitive with natural and fossil fuels, the Executive Order calls for policy actions and a coordinated effort from a collection of governmental agencies. It also outlines the Clinton administration's goal to foster basic research and development of biobased technologies, as well as to provide incentives to those in the private sector.

In addition to the need for such a policy, the Executive Order highlights the benefits of biobased products: "celebrating our ability to reduce dependence on imported oil, decrease air and water pollution, increase flood control, and curb the emission of greenhouse gases."

A cabinet-level council was created to implement the Executive Order's policy goals. The council is comprised of the Secretaries of Agriculture, Commerce, Energy, and the Interior, as well as the Director of the Office of Management and Budget, the Administrator of the Environmental Protection Agency, the Assistant to the President for Science and Technology, the Director of the National Science Foundation, the Federal Environmental Executive, and the heads of other applicable agencies. The Council is responsible for preparing an annual strategic plan that will outline specific goals for the development of biobased technologies. Working groups have already been formed, and the Council will submit its first strategic plan to the President by Spring 2000.

The Executive Order also established an Advisory Committee on Biobased Products and Bioenergy, as well as a National Biobased Products and Bioenergy Education Office. Administration representatives have requested increases in the budget to move the technology forward, and they are also looking for shifting budget resources from other areas. It is the administration's intent, however, that industry take a strong position in supporting this shift financially. A tax incentive package has been sent to Congress, but government does not expect to pay for all the new technologies.

## BARRIERS

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*"Investors are fond of saying  
'we'd be very interested in  
funding your second plant.'"*

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## Financing

As with many new technologies, participants in this seminar confirmed that financing was a major barrier in the conversion industry, particularly when trying to establish a first project.

"It's a chicken and egg problem," said one participant. "Investors are looking for reliable, real-world data on a technology's performance and cost, but no one is willing to take that first risk and invest." This is particularly true for technologies such as gasification in which "you need \$50 to \$100 million just to get in the ball game," said an industry representative. Said another: "Investors are fond of saying 'we'd be very interested in helping you fund your second plant.'" This problem is compounded when investors ask for 20-year supply contracts — far beyond the best franchise agreements of seven to 10 years.

While a few participants noted that demonstration plants can help work out some of the initial costs and uncertainties, others commented that pilot plants present their own set of challenges. Said one industry representative: "How do you go from financing a plant that processes three tons a day, to one that can handle a real-world 300 tons a day?"

One participant suggested that industry representatives investigate financing programs with the California Pollution Control Financing Authority (see p. 21). Others called for some kind of driver, such as tax credits or rebate mandates. Pointing to the wind and solar power industries in California in the 1980s, one participant noted that "massive tax credits encouraged people to try these technologies, and to experiment. This provided an opportunity to learn from the technology and to make mistakes."

But a policy analyst disagreed that tax credits are the solution, saying that such incentives "may have destroyed the photovoltaics and solar thermal industries by allowing for the development of inefficient technology. When the tax credits ended, consumers were left with products that can't be serviced." Instead, she urged the group to remember its previous discussion about sustainability: "If you view sustainability as some kind of blessed technology, you may yield policies that prescribe certain fix-it solutions," resulting in stranded investments, she said.

Financing programs for conversion technologies

A solution to the financing burden may be the California Pollution Control Financing Authority (CPCFA), whose main duty is to provide financial assistance to promote pollution prevention among the state's many industries. Established under the State Treasurer's Office, the CPCFA helps industries comply with state and federal environmental standards by financing capital outlay for new or improved equipment and facilities. Projects that curb pollution or control waste are eligible for financial incentives through two CPCFA programs.

Small Business Pollution Control Loan Fund Financing Program

This program offers loans to qualifying small businesses that plan to acquire, construct or install pollution control, resource recovery or waste disposal facilities in California. Examples of eligible projects include materials recovery facilities (MRFs), landfills, and waste-to-energy facilities.

The loans have lower interest rates than conventional credit and usually have an extended payback period, ranging from 41 months to 520 months. They may be used for capital costs such as the construction of buildings, the purchase of equipment and machinery, and the hiring of architects and engineers. Financing usually takes between three and six months.

To fund the loans, the CPCFA sells tax-exempt bonds on behalf of the small business. The CPCFA also pays for transaction charges, penalty of credit fees, and other expenses related to the issuance of the bonds. In Contra Costa County, for example, the CPCFA reimburses West County Resource Recovery, an integrated waste management company, \$18 million for bond issuance costs. To date, the CPCFA has assisted more than 200 businesses with this program.

California Capital Access Program (CalCAP)

This program provides loans for projects that would otherwise fall just shy of conventional loan approval. Financial institutions maintain the flexibility to negotiate loan terms such as interest rates, maturity date, and premium, and at the same time enjoy a near guarantee against default due to a loss of revenue. The loans are guaranteed by the CPCFA. Because the CPCFA contributes funds to this account in proportion to the amount of businesses that participate, the lender's account is augmented each time a new loan is approved.

Qualifying small businesses must be located in California, have operations that impact the environment, and be included in the Standard Industry Classification list. The maximum loan amount is \$2.5 million, with few stipulations regarding how it can be spent. Rather than limiting the use of loans to specific environmental compliance technologies, CalCAP allows the funds to be used for a variety of purposes, from land acquisition to capital improvements to construction of new buildings. To date, CalCAP has offered more than \$300 million to more than 2,000 borrowers.

Access to feedstock

One concern brought up during the seminar was the degree to which conversion technologies might compete with materials used by conventional composting and recycling systems, such as organic waste and paper. Although this seminar aimed to address products and processes that utilize the annual 20 million tons of non-recoverable waste in California, some participants worried that certain technologies might compete for higher value, source separated materials when demand is high.

Although virtually all participants agreed that access to feedstock was not currently an issue, they were divided about whether it could pose problems in the future. Some pointed out that the technologies being discussed at this seminar would be commercialized only incrementally over the next decade, during a period when continued growth and improvement in most composting, recycling, and waste prevention practices could be expected. Others suggested that it would be difficult to predict the impact on feedstock until conversion facilities play a more significant role in the solid waste field. One person noted that while access to feedstock may not be a problem in California today, the situation two or three years from now is more unknown.

Several participants, however, pointed out that conversion technologies can actually complement, rather than compete with, the recycling industry by helping to revitalize and expand existing markets for recovered materials. For example, increased demand for low-grade materials, such as mixed or contaminated paper products, could serve to bolster the market demand for other grades.

The real competition for feedstock, one participant noted, is with landfills. As the biggest consumers of green waste and low-grade biomass, landfill operators stand to lose the most by conversion technology commercialization. This is intensified by the trend toward corporate consolidation of the waste industry, since vertically integrated companies that are invested in landfills have no incentive to divert. Concerns about consistent access to feedstock were underscored by the fact that almost all conversion technologies — whether gasification, ethanol production, or methane generation — tend to be capital-intensive, therefore requiring long-term contracts with feedstock providers.

*"It's not about trying to cram another bale of cardboard into the current system. We need to create new markets."*

## Public perception

As noted earlier, incineration projects, with or without energy recovery, were similarly regarded in the late 1980s and were disliked for their perceived contributions to air pollution and their potential to discourage recycling and source reduction. A massive political backlash eventually led to the demise of those projects in California.

Some seminar participants worried that today's conversion technology industry could meet a similar fate. This could be brought on by public fears and misperceptions about the new technological processes and products. Strong public opposition could also form if people felt that conversion technologies were weakening the recycling industry. One participant noted that a major barrier to promulgating conversion technologies is the public's "adherence to recycling at all costs."

Other participants, however, commented that the public is mostly unaware of this new industry — which could, in fact, present more opportunities than barriers. Several people noted that widespread support could be engendered for conversion if the public understood and became passionate about the idea of new technologies helping to resolve not just one, but many environmental issues. As one participant said: "Make the case that a community could create fuel for its transportation fleets, improve its air quality, and reduce the need for landfills."

Others suggested highlighting the industry's potential to address national energy and national security concerns. This could be framed similar to the call to action during the 1970s and 1980s, which resulted in the development of wind and solar energy projects.

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*Conversion facilities may experience additional regulations because of their classification under law. Depending on the amount of waste a facility converts, it may be classified as either a processing plant or a solid waste facility.*

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## Permitting Issues

The permitting process was another major obstacle discussed at the seminar. In California, potential conversion technology projects must endure a stringent review before their construction can be approved. Because the process requires substantial time and financial investments, potential builders are faced with the risk of huge investments without the guarantee that their projects will pass. One participant described the challenge his company encountered when seeking approval for a biomass-to-ethanol plant. Even before the company could approach investors, it had spent \$3 to \$4 million in hiring engineers and conducting appropriate studies.

While such expenses are common to any construction project in California, conversion facilities may experience additional regulations because of their classification under law. Depending on the amount of waste a facility converts, it may be classified as either a processing plant or a solid waste facility. Each type has its own regulations and permitting procedures, with the latter enduring more rigorous standards. Seminar participants stressed the importance of clarifying these definitions and streamlining the permitting process. One person advocated a more holistic, rather than linear, process in order to cut down on the time required.

In response to this suggestion, another participant recommended using the California Energy Commission's permitting process as a model. While everyone agreed that environmental standards should not be compromised during the permitting process, a streamlined approach was seen as favorable. Participants suggested that the CIWMB, CalEPA, and the California Energy Commission work together to develop a fast-track permitting process similar to the Energy Commission's mandated one-year siting process (see box). With jurisdiction over thermal plants that produce at least 50 megawatts of energy, the California Energy Commission oversees projects involving geothermal, nuclear, coal, and biomass technologies. Seminar participants felt that the type of permitting structure allowed by this agency could create greater stability for conversion technologies and could generate more interest by innovators and financial investors.

RECOMMENDATIONS

**The California Energy Commission's one-year permitting process**

The California Energy Commission's one-year permitting process was seen as a possible model by seminar participants. The review process itself consists of three main phases: preliminary review, data adequacy determination, discovery analysis, hearings, and decision. The bulk of time is spent on the middle phases. Approximately 11 months are dedicated to the discovery and analysis of the permit and data adequacy stages, combined generally take about one month and do not count in the mandated one-year period. In this process, the California Energy Commission is both rigorous and consistent, but is also careful to avoid duplication and regulatory uncertainty.

From 1974 to 1995, the California Energy Commission approved all but one of 77 proposed projects. In doing so, it strives to maintain a balance between business and public interests, environmental quality, and the well-being of community members. In addition to an independent staff of technical experts in the fields of environmental science, public health and safety, and energy, the agency appoints two commissioners to each project. These commissioners have the responsibility of overseeing the various hearings, workshops, and other proceedings involved.

As follow-up to this seminar, the following actions were recommended:

1. *Evaluate at the state level the potential for conversion technologies in California.* Seminar participants from CalEPA agreed to take the lead on bringing together staff of the California Integrated Waste Management Board (CIWMB), the California Air Resources Board, and the California Energy Commission to study how these technologies could impact California. The agencies might then develop a collaborative report to the legislature.
2. *Specifically, evaluate how these technologies fit in with AB 939.* Representatives from the CIWMB agreed to look at the potential impact of conversion technologies on specific programs developed in AB 939, such as waste prevention and recycling for paper, plastics, and organics. The agency would also evaluate the "10 percent rule" -- a restriction that was debated among seminar participants.
3. *Pursue a data modeling project with the U.S. EPA.* A representative from U.S. EPA agreed to provide a cost estimate of a project using the agency's new Life-Cycle Inventory. Seminar facilitator Kay Martin volunteered to pursue funding opportunities for this idea. Participants from NREL and Arkenol volunteered access to their data.
4. *Encourage the California Pollution Control Financing Authority to commit funding toward conversion technologies.* The CPCFA provides financial assistance to industries purchasing pollution prevention equipment and facilities. In recent years, however, the portion of CPCFA's funds geared toward Materials Recovery Facilities, transformation plants and transfer stations has decreased. A representative from Californians Against Waste offered to meet with the State Treasurer's Office, which oversees the CPCFA, to encourage the agency to clarify and increase the funding for conversion technologies.
5. *Expand awareness of conversion technologies within the environmental community.* Representatives from the Community Environmental Council suggested convening a meeting with members of the environmental community to form a shared vision of the role that these technologies can play in eliminating waste. This meeting would specifically address the environmental community's conflict over whether AB 939 should be amended to facilitate conversion technologies.

- 6. *Engage the public in a discussion of how conversion technologies could support a vision of a sustainable future.* Representatives from the Community Environmental Council volunteered to explore funding options for a project that would inform the public how conversion technologies could help improve air quality, reduce global warming, provide new fuels, and reduce the reliance on landfills. This outreach project would be designed to spark an interest in conversion technologies similar to the public's call for recycling that led to the passage of AB 939 a decade ago.
- 7. *Investigate the permitting process.* Seminar participants from CalEPA, CIWMB, and the California Energy Commission agreed to meet within their own agencies and then together to discuss a streamlined approach to permitting. This action is made easier by Governor Davis' encouragement of inter-agency cooperation.
- 8. *Explore legislative measures.* Seminar participants expressed interest in such measures as tax incentives, ethanol subsidies, and guaranteed ethanol markets (such as through public fleet requirements for flexible fuel vehicles). No resolution was made on pursuing these items.

**PARTICIPANTS**

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Ralph Chandler	California Integrated Waste Management Board
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Gene Taylor	Taylor Energy
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**Document 9**  
**Gildea Resource Center**  
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**Response to Comments**

Response 9-1

The County of Santa Barbara has an ongoing active and successful program to evaluate means to increase diversion of municipal solid waste that otherwise requires disposal at a landfill. As a result of this program, the County diversion rate has increased from 40 percent in 1998 to 57 percent in 2002. Further, the County continues to evaluate potential means of diversion and to recommend to the Board of Supervisors changes in procedures and policies to facilitate implementation of such measures. The County will continue its program to find additional means to increase the diversion of solid waste.

The commenter is correct in stating that Draft EIR Chapter 4.0 – Alternatives to the Proposed Project has focused on either the expansion of Tajiguas or alternative landfill options. These are addressed in response to the CEQA Guidelines, Section 15126.6[a], as follows: “An EIR shall describe a range or reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project . . .” The project objectives are stated in Draft EIR Sections 1.4 – Project Objectives and 4.1.2 – Project Objectives, as follows:

- *Provide approximately 15 years of additional reliable and cost-effective municipal solid waste disposal services for the residents of southern Santa Barbara County (County) and the Santa Ynez and Cuyama Valleys.*
- *Meet the minimum 15-year County disposal capacity requirements of the California Integrated Waste Management Act, Assembly Bill 939 (CIWMA [AB 939]) and the goals of the County's Integrated Waste Management Plan (CIWMP).*
- *Provide a well-managed municipal solid waste disposal facility to maximize the control necessary to assure the safe disposal of solid waste generated in southern Santa Barbara County and the Santa Ynez and Cuyama Valleys for an additional 15 years over currently permitted limits.*

As further stated in Section 1.4, this action will:

- *Meet the Board of Supervisors' policy directive of August 3, 1999, to provide adequate disposal capacity at the Tajiguas Landfill to allow for the siting and development of a new in-County regional landfill, a process to be completed as soon as possible, a process that may take up to 15 years to complete.*

Based on the above, the purpose of the Alternatives discussion in Draft EIR Chapter 4.0 is to address alternative disposal scenarios for waste that is generated in southern Santa Barbara County and the Santa Ynez and Cuyama Valleys.

The commenter is referred to Final EIR Chapter 3.0 for a discussion of waste processing technologies. The purpose of the various measures described is to increase the amount of waste that could potentially be diverted from the waste stream that requires disposal. Waste that cannot

be diverted will continue to require disposal at an appropriate landfill. The purpose of the proposed project is to provide a location for disposal of this residual waste that cannot be diverted from the waste stream.

Response 9-2

The commenter is referred to Draft EIR Section 4.4 - Alternative Disposal Technologies and to Final EIR Chapter 3.0 - Waste Processing Technologies.

See Response 9-1.

Response 9-3

While a composting program that would include other organic components of the waste stream (such as food waste) along with green waste would result in increased diversion of the waste stream, it also would involve various related environmental and technical considerations. These include, but are not limited to, dust, odor and siting issues. It is speculative as to whether a composting program to handle green and food waste could be easily implemented within a 2-year period.

See Final EIR Chapter 3.0 - Waste processing technologies for additional discussion of composting.

Response 9-4

We have reviewed the referenced report provided with the comment: *Conversion Technologies and Materials Management in the 21<sup>st</sup> Century*. Based on our review, the conclusions of the report are inconsistent with the commenter's assertion, i.e., that the report demonstrates conversion technologies are currently available within the time frame to be feasible as an alternative to the proposed project.

Further, the report does not modify the conclusion in Draft EIR Section 4.4, that developing technologies hold promise for the future, although there are many obstacles to be overcome to enable them to be considered part of long-term planning to meet the waste disposal needs of Santa Barbara County. As described in Draft EIR Section 4.4.3, facilities for alternative technologies require high capital investment. They also have the potential for environmental impacts, so they are not particularly popular among community leaders. Potential impacts include air emissions, odor, visibility, traffic, noise and dust.

As described in Final EIR Chapter 3.0, the County currently is diverting 57 percent of its waste stream for recycling and is mulching its green waste. This indicates that more than one-half of municipal solid waste is being diverted from landfill disposal. Also, there is a cogeneration plant at the Tajiguas Landfill that produces electricity from landfill gas. The plant produces approximately 3 megawatts of electricity per hour, sufficient to serve 2,250 to 3,000 homes.

The attached *Conversion Technologies* report mentions a variety of processes in use at locations within and outside the United States. The specifics required to determine the potential fit (feasibility of implementation) of these processes in Santa Barbara County are not provided in

the report. The potential to develop one or more of these processes within the time frame of the proposed project (2005 through 2020) also is not provided.

The report does note there are barriers to timely implementation of one or more of the conversion technologies. These barriers interfere with their potential development as an alternative to the proposed project. As provided in the report, these barriers include:

- **Financing.** The report states: “. . . participants . . . confirmed that financing was a major barrier in the conversion industry, particularly when trying to establish a first project. . . This problem is compounded when investors ask for 20-year supply contracts – far beyond the best franchise agreements of 7 to 10 years.”
- **Access to Feedstock.**
  - Competition with conventional composting and recycling systems
  - Competition with the landfill industry
  - Need for long-term contracts
- **Public Perception.**
  - Air pollution
  - Interference with recycling
- **Permitting Issues.** The report states: “In California, potential conversion technology projects must endure a stringent review. . . and because the process requires substantial time and financial investments, potential builders are faced with the risk of huge investments without the guarantee that their projects will pass.”

Although the above barriers are not insurmountable, the time necessary to provide resolution of the issues is greater than the time available to provide an alternative to the proposed project.

See Final EIR Chapter 3.0 - Waste Processing Technologies.

#### Response 9-5

Comment noted. The commenter is referred to Final EIR Chapter 3.0 for a discussion of Waste processing technologies.

Although the commenter asserts that the landfill is the source of surface and groundwater pollution, this assertion is not supported by evidence. The commenter is referred to discussions of surface water quality and groundwater quality in Responses 2-5, 2-13b, 2-16 and 3-37.

#### Response 9-6

Comment noted. See Response 9-1.

The commenter is referred to Final EIR Chapter 3.0 - Waste Processing Technologies.

As they evaluate and recommend solid waste management strategies, SWUD includes cost-benefit analyses as part of their staff reports to the County Board of Supervisors. In the future, when technologies or policy changes are recommended by SWUD, such cost-benefit analyses will likely continue to be included.

The proposed project is to provide for disposal of that portion of the solid waste stream that is residual after diversion has occurred.

Response 9-7

Comment noted. See Final EIR Chapter 3.0 - Waste Processing Technologies.

Response 9-8

Comment noted. The commenter is referred to Final EIR Chapter 3.0 - Waste Processing Technologies.

See Response 9-1.

10



CITIZENS PLANNING ASSOCIATION OF SANTA BARBARA COUNTY, INC.  
916 Anacapa Street, Santa Barbara, CA 93101  
805-965-3979 • fax 805-965-3970  
http://www.citizensplanning.org • info@citizensplanning.org

December 13, 2001

Kathy Kefauver  
Solid Waste and Utilities Division  
109 East Victoria Street  
Santa Barbara, CA 93101

RECEIVED	
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Dear Kathy Kefauver:

This is from the Citizens Planning Association's Comprehensive Planning Committee.

The section on Alternatives is inadequate and requires a completely different approach.

Comparison of alternatives on the basis of haul distances (ONLY mobile emissions) is invalid.

The proposed project possesses 4 categories of Class I impacts, while at least two alternatives are shown to eliminate all Class I impacts except mobile Air Quality. These alternatives are indicated as possessing higher mobile air quality impacts than the proposed project. However, when both mobile and on-site sources are examined together, the two alternatives may be shown as superior to the proposed project.

10-1

As an example of the importance of on-site sources, examination of page 3.11-45 for the proposed project average case shows that on-site NO<sub>x</sub> is 185% of off-site. The same page shows that on-site PM<sub>10</sub> is 945% of off-site. Similar observations can be made for other cases on pages 3.11-38 and 3.11-46.

The analysis further ignores the effects of different success rates of AB939 diversion. Increased diversion causes some increased mobile emissions as more recyclables are hauled to the LA basin and less are sent to Tajiguas. Diversion at MRFs on the way to Chiquita Canyon reduces the tonnage hauled to the landfill.

10-2

The analysis should be revised to treat differing impacts as long hauls pass through various air basins. This will change the ranking of Mesquite and Eagle options.

10-3

The analysis further overestimates mobile emissions by focusing on the peak permitted capacity instead of the average waste stream. Long haul mobile sources can become even better alternatives as the waste stream becomes smaller.

10-4

Properly done, the Draft EIR is likely to show the Chiquita Canyon (no project) option as superior to the proposed project in all aspects. It is also likely to show that the Mesquite and Eagle options are superior to Puente East as eventual follow-on options.

10-5

The Draft EIR does not compare the mobile emissions from the hauling of waste to Tajiguas to emissions of collection. Are emissions from hauling incidental to both on-site and collection? If so, why should the EIR analysis imply the alternatives be screened on the basis of mobile emissions only?

10-10

Morgan Slater  
Program Coordinator for Citizens Planning Association



**Document 10**  
**Citizens Planning Association of Santa Barbara County, Inc.**  
**December 13, 2001**  
**Response to Comments**

Response 10-1

Onsite emissions related to transport and disposal of the municipal solid waste at Tajiguas would be similar at any other landfill location in the region. Therefore, regional impacts of these emissions also would be the similar. The longer transport distances for the alternative landfills in the region would produce higher offsite mobile emissions.

The County Board of Supervisors will ultimately decide whether to approve the project in light of, among other things, the environmental trade-offs involved. The Board will thus determine whether the significant, unavoidable impacts associated with the project are acceptable in light of the relative regional air quality benefits of the project in comparison to other, more distant landfills. Balancing the impacts of a project at a particular location versus the impacts of a project at another location, is a function that must be performed by local elected officials. The purpose of the EIR is to identify those impacts so that officials can make a reasoned decision about how to strike an appropriate balance.

With respect to NO<sub>2</sub> and PM<sub>10</sub> emissions, the commenter is correct that the landfill will cause an increase in NO<sub>2</sub> and PM<sub>10</sub> concentrations. These increases also would occur at another landfill. The EIR identifies mitigation to ensure that the public does not have access to areas that may exceed applicable ambient air quality standards.

Response 10-2

The Draft EIR accounts for the current history and expected growth for the Tajiguas Landfill in the receipt of green waste, dirt, and transfer station alternative daily cover (ADC), and in the outbound transport of green waste (see Draft EIR Table 3.11-9). Other recycling activities that take place at transfer stations or other locations are not part of the proposed project and so are not analyzed in the Draft EIR.

Response 10-3

Alternatives, including potential use of future landfills, such as Eagle Mountain or the Mesquite Regional Landfill, that would include rail haul of solid waste do not require detailed analysis of air quality impacts in each air basin affected by offsite transport as part of the alternatives analysis for the proposed Tajiguas Landfill expansion project. As discussed in Draft EIR Section 4.3.3, the much longer transport distances to these landfills, including the portion within Santa Barbara County, would result in offsite emissions being much higher than for the proposed project (i.e., approximately 14 times more offsite mobile emissions than the proposed project), while onsite emissions would be similar at any other landfill locations.

Response 10-4

Annual average and peak daily offsite mobile emissions are given equal treatment in the air quality impact analysis as shown in Draft EIR Tables 3.11-6, 3.11-7, and 3.11-10 through

3.11-15. Annual average offsite mobile emissions, which are based on the transport of the average daily tonnage of solid waste to the Landfill rather than the peak daily tonnage, are used to determine long-term impacts, including the following:

- Criteria pollutant annual average concentrations are compared with ambient air quality standards.
- Noncriteria pollutant annual average concentrations are used to compute carcinogenic and chronic noncarcinogenic health risks.

#### Response 10-5

The Draft EIR correctly discusses that onsite emissions would be similar at the proposed project site to those at Chiquita Canyon, Mesquite, Eagle Mountain or other landfill locations in the region. Tajiguas and Chiquita Canyon are close enough (i.e., 76 miles) so that onsite emissions at either would have approximately the same regional air quality impacts. In contrast, offsite transport of Tajiguas waste to Chiquita Canyon would require an additional 55 miles (76 miles includes the 21 miles that waste is transported to Tajiguas from the existing Santa Barbara Transfer Station). Therefore, compared to the proposed project, disposal at the Chiquita Canyon Landfill would result in at least double the offsite emissions and their impacts. These increased offsite emissions would impact Ventura and Los Angeles Counties as well as Santa Barbara County.

#### Response 10-6

Mobile emissions associated with the collection of waste are constant, for all alternatives, both in magnitude and location. These mobile emissions will continue to occur with or without the project because the waste still will be collected. Onsite emissions are constant in magnitude, but differ as to site location. After local collection at the sources (residences and commercial businesses), transport distances and associated emissions will differ between alternatives. It is precisely these differences in transport distances and emissions that lead to the alternatives having greater air quality impacts than the proposed project.



Gray Davis  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH  
State Clearinghouse



Steven A. Nissen  
DIRECTOR

Document Details Report  
State Clearinghouse Data Base

December 17, 2001

Kathy Kefauver  
County of Santa Barbara, Public Works Department  
Solid Waste and Utilities Division  
109 East Victoria Street  
Santa Barbara, CA 93101

Subject: Tajiguas Landfill Expansion Project  
SCH#: 1998041003

Dear Kathy Kefauver:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on December 14, 2001, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

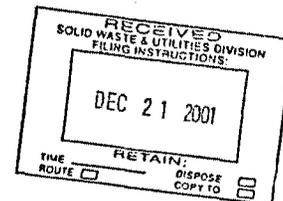
This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

*Terry Roberts*

Terry Roberts  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency



1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044  
916-445-0613 FAX 916-323-3018 WWW.OPR.CA.GOV/CLEARINGHOUSE.HTML

SCH# 1998041003  
Project Title Tajiguas Landfill Expansion Project  
Lead Agency Santa Barbara County

Type EIR Draft EIR  
Description The proposed project is to expand the existing Tajiguas Landfill to extend useful life an additional 15 years of additional waste disposal capacity.

Lead Agency Contact

Name Kathy Kefauver  
Agency County of Santa Barbara, Public Works Department  
Phone 805 882-3614 Fax  
email  
Address Solid Waste and Utilities Division  
109 East Victoria Street  
City Santa Barbara State CA. Zip 93101

Project Location

County Santa Barbara  
City Santa Barbara  
Region  
Cross Streets Highway 101  
Parcel No. 081-150-019, 081-150-026  
Township 5N Range 31W Section Base SBBM

Proximity to:

Highways 101  
Airports  
Railways Southern Pacific  
Waterways Arroyo Quemado, Canada de la Pila, Arroyo Hondo  
Schools  
Land Use Landfill and borrow area; AG-II-100; AG-II  
Landfill; northern portion: AG-II-100; AG-II  
southern portion: AG-II-320; Local Coastal Plan AG-II

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Coastal Zone; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Public Services; Recreation/Parks; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Conservation; Department of Fish and Game, Region 5; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 5; Integrated Waste Management Board; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Board, Region 3; Department of Toxic Substances Control; Native American Heritage Commission; State Lands Commission

Date Received 10/23/2001 Start of Review 10/23/2001 End of Review 12/14/2001

Note: Blanks in data fields result from insufficient information provided by lead agency.



**Document 11**  
**Office of Planning and Research**  
**December 17, 2001**  
**Response to Comments**

Response 11-1  
Comment noted.





## California Integrated Waste Management Board

Linda Moulton-Patterson, Chair  
1001 I Street • P.O. Box 4025 • Sacramento, California 95812-4025 • (916) 341-6000  
www.ciwmb.ca.gov



Gray Davis  
Governor

Winston H. Hickox  
Secretary for  
Environmental  
Protection

December 14, 2001

Kathy Kefauver  
Santa Barbara Public Works, Solid Waste and Utilities Division  
109 East Victoria Street  
Santa Barbara, CA 93101

Subject: SCH #98041003: Notice of Completion (NOC) for a Draft Environmental Impact Report (DEIR) for the Tajiguas Landfill Expansion Project (Solid Waste Facility Permit [SWFP] #42-AA-0015) in Santa Barbara County.

Dear Ms. Kefauver:

The California Integrated Waste Management Board (CIWMB or Board) Environmental Review Section (ERS) staff has reviewed the environmental document (ED) cited above, and offers the following description and analysis of the proposed project based on ERS staff's understanding of the project. If the CIWMB project description varies substantially from the project as understood by the Lead Agency, ERS staff requests notification of any significant differences prior to certifying the Final Environmental Impact Report (FEIR).

### PROJECT DESCRIPTION

The County of Santa Barbara Public Works, Solid Waste and Utilities Division, acting as Lead Agency, has prepared and circulated a DEIR in order to comply with CEQA and to provide information to, and solicit consultation with Responsible Agencies, in support of a Solid Waste Facilities Permit (SWFP) revision for proposed changes in the permitted landfill boundary, and permitted waste footprint, increase the permitted maximum elevation, increase design capacity, change in hours of operation, and revise the estimated closure date. The proposal may require other federal, state, and local approvals. The primary purpose of the proposed project is to provide additional landfill capacity to allow for approximately 15 additional years of solid waste disposal beyond the current estimated closure date of 2005-2006.

The Tajiguas Landfill is located approximately 26 miles west of the City of Santa Barbara on the Gaviota Coast at 14470 Calle Real, APNs 081-150-019, -021 and -026 in the Gaviota area, 3<sup>rd</sup>, Supervisorial District in Santa Barbara County. The facility is located in the Canada de la Pila on 497 acres. Most of the properties adjacent to the landfill site are used primarily for agriculture or open space. The property to the west was used for processing petroleum and natural gas products. Immediately south of the landfill site are U.S. Highway 101, the Union Pacific Railroad tracks, and the Pacific Ocean. The southern portion of the site is within the California Coastal Zone.

California Environmental Protection Agency

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December 14, 2001  
Kathy Kefauver  
Santa Barbara Public Works, Solid Waste and Utilities Division  
Tajiguas Landfill  
Page 2

### Existing SWFP

The facility is currently permitted as a Class III non-hazardous, municipal waste landfill as per the November 18, 1999 SWFP under the following limitations:

- Permitted Tons per Operating Day: 1500 tons per day
- Permitted Vehicles per Day: 128
- Total Permitted Area: 240 acres
- Permitted Waste Disposal Area: 78 acres
- Design Capacity: 15,100,000 cubic yards
- Maximum Landfill Elevation: 500 ft. above Mean Sea Level (MSL)
- Estimated Closure Date: 2006
- Days and Hours of Open to the Public: Monday/7:00 a.m.-5:00 p.m.; Tuesday-Saturday/7:00 a.m.-4:00 p.m.; closed holidays.
- Days and Hours of Cover and Compaction Operations: Monday/7:00 a.m.-6:00 p.m.; Tuesday-Saturday/7:00 a.m.-5:00 p.m.; closed holidays

### Proposed Changes

According to the DEIR the proposed project will require revision of the SWFP in order to implement changes in the permitted landfill boundary, and permitted waste footprint, increase the permitted maximum elevation, increase design capacity, change in hours of operation, and revise the estimated closure date. The specific changes are relative to several design options/considerations as follow:

#### Front Canyon Option

- Permitted Tons per Operating Day: 1500 tons per day (No change from current SWFP)
- Permitted Vehicles per Day: Increase from the permitted 128 to 184 vehicles per day over the estimated life of the project
- Total Permitted Area: 240 acres plus 3-5 acres may need to be included in the total permitted area from adjacent county owned land to allow for disturbance as a result of the construction of a perimeter access road.
- Permitted Waste Disposal Area: 134 acres.
- Design Capacity: 23,320,000 cubic yards.
- Maximum Landfill Elevation: 660 ft. MSL.
- Estimated Closure Date: 2020.
- Days and Hours of Open to the Public: Monday and Tuesday/7:00 a.m.-5:00 p.m.; Wednesday-Saturday/7:00 a.m.-4:00 p.m.; closed holidays.
- Days and Hours of Cover and Compaction Operations: Monday through Saturday/6:00 a.m.-6:00 p.m.

December 14, 2001  
 Kathy Kefauver  
 Santa Barbara Public Works, Solid Waste and Utilities Division  
 Tajiguas Landfill  
 Page 3

#### Back Canyon Option

- **Permitted Tons per Operating Day:** 1500 tons per day (No change from current SWFP).
- **Permitted Vehicles per Day:** Increase from the permitted 128 to 184 vehicles per day over the estimated life of the project.
- **Total Permitted Area:** 240 acres plus 3-5 acres may need to be included in the total permitted area from adjacent county owned land to allow for disturbance as a result of the construction of a perimeter access road.
- **Permitted Waste Disposal Area:** 159 acres.
- **Design Capacity:** 23,320,000 cubic yards.
- **Maximum Landfill Elevation:** 700 ft. above MSL.
- **Estimated Closure Date:** 2020
- **Days and Hours of Open to the Public:** Monday and Tuesday/7:00 a.m.-5:00 p.m.; Wednesday-Saturday/7:00 a.m.-4:00 p.m.; closed holidays.
- **Days and Hours of Cover and Compaction Operations:** Monday through Saturday/6:00 a.m.-6:00 p.m.

#### Southeast Corner Modification

The Coastal Zone Boundary on the landfill was redefined in recent years. As a result, it was discovered that approximately two years of waste was placed above the 400-foot elevation in the Coastal Zone. In order to correct this inconsistency, the southeast corner of the landfill would be modified to allow all of the waste above the 400-foot elevation in the Coastal Zone to be removed and relocated to an area that is within the proposed landfill expansion area. The estimated volume of material to be relocated within the landfill as a result of this modification is approximately 720,000 cubic yards.

#### CIWMB ROLE AS A RESPONSIBLE AGENCY

The CIWMB will be a Responsible Agency for the environmental review of this proposed project, and for concurrence on the SWFP revision. The CIWMB operates in cooperation with local government to assure protection of the public health, safety and the environment from the potentially detrimental effects of improper solid waste management. The CIWMB concurs in the issuance, or revision of a SWFP with Local Enforcement Agencies (LEAs) to assure that a solid waste facility operates in a manner consistent with all applicable laws and regulations.

#### CIWMB CEQA REVIEW

As a Responsible Agency under CEQA, CIWMB ERS staff's review and comments on an ED are intended to assist the Lead Agency in developing an ED that will be as complete and adequate as possible for use by the Lead Agency and all Responsible Agencies. ERS staff's comments are intended to help decision-makers 1) identify potential impacts from proposed projects;

December 14, 2001  
 Kathy Kefauver  
 Santa Barbara Public Works, Solid Waste and Utilities Division  
 Tajiguas Landfill  
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2) determine whether any such impacts are significant; and 3) ascertain whether significant impacts can be mitigated to a level of insignificance in compliance with the CEQA statutes and guidelines.

When evaluating the adequacy of an ED for purposes of SWFP concurrence, ERS staff must compare the design and operation of the facility as described in the proposed SWFP with the project as described and evaluated in the ED.

When performing the initial review of a CEQA document, such as a DEIR or Negative Declaration during the circulation process, the first analysis ERS staff must make is to evaluate whether or not the proposed CEQA document clearly describes all phases of the project and assesses all potential primary and secondary impacts to the environment and/or public health and safety that could occur if the project is implemented.

When the proposed SWFP is received by the CIWMB along with the citation of evidence of CEQA compliance by the LEA, the second analysis performed by ERS staff is to evaluate whether or not the CEQA evaluation in the cited ED supports the requested specifications, revisions, and/or conditions of the proposed SWFP. For instance, does the ED clearly describe and assess the potential air quality, water quality, geological impacts, traffic, noise, dust, vector and other health and safety impacts that can be associated with the proposed solid waste facility or changes in design and/or operation? When this type of information is included and addressed in the ED, the SWFP concurrence process is greatly facilitated.

After comparison of the cited CEQA document with the proposed SWFP, ERS staff makes a recommendation to the CIWMB regarding the adequacy of the CEQA document for CIWMB SWFP concurrence purposes. The Board members of CIWMB make the final determination of the adequacy of the CEQA document for SWFP concurrence.

#### ERS STAFF QUESTIONS AND COMMENTS

ERS staff has reviewed the DEIR and offer the following comments or items to include or address in the FEIR. As indicated by the following questions and comments, ERS staff will need clarifying information in order to complete our review of this document as a Responsible Agency.

#### Response to Board Comments

The Lead Agency must provide a copy of its responses to the Board's comments at least ten days before certifying the Final Environmental Impact Report. Refer to Public Resources Code (PRC), Section 21092.5(a).

December 14, 2001  
Kathy Kefauver  
Santa Barbara Public Works, Solid Waste and Utilities Division  
Tajiguas Landfill  
Page 5

Regulatory Compliance

12-5

ERS staff believes that the Lead Agency should indicate and include a comment regarding the status of compliance with the requirements on page 1-26, Section 1.7.2.1 Solid Waste Management as related to the Tajiguas Landfill and proposed expansion in the Final EIR.

Onsite Water and Wastewater

12-6

Page 2-28 of the DEIR, Section 2.6.1 Water and Section 2.6.2 Sewage and Wastewater Disposal discuss these issues. The Final EIR should include a discussion of the state and/or local regulatory requirements of both onsite water and wastewater disposal and how the facility will comply with those provisions.

Closure Plan

12-7

Please be advised that the CIWMB has prepared draft solid waste regulations that may require the preliminary closure plan to be approved prior to the issuance of a revised SWFP.

Site Capacity and Estimated Closure Date

12-8

It is the understanding of ERS staff that the project is primarily intended to provide additional waste disposal capacity at Tajiguas Landfill and extend the estimated closure date of the Tajiguas Landfill by an additional 15 years over that contained in the current SWFP (November 18, 1999). In the event that the portion of the proposed project that includes modifying the southeast corner of the landfill is not deemed necessary and therefore is not performed, it is understood that the landfill would have an additional air space capacity of approximately 720,000 cubic yards available. However, CEQA analysis of environmental impacts has not been performed for traffic volumes, maximum daily tonnages, or estimated landfill closure beyond the 15-year extension analyzed in the DEIR. Accordingly, in the future, any request to revise any of these parameters above those stated in the DEIR would likely require additional environmental review and analysis.

Total Permitted Area

12-9

Please note that the proposed area of disturbance for the perimeter access road and drainage system improvements located on the county owned Baron Ranch will need to be added to the Tajiguas Landfill permitted landfill boundary. On page 2-21, second paragraph, line 6 of the DEIR the acreage of this area of disturbance is indicated to be 5 acres. On figure 2-7, this same area is indicated to be 3 acres in the legend for the figure. On Table 2-2 this same area is listed as containing 5 acres under the heading Borrow Areas, Other Disturbance. Please rectify these inconsistencies in the FEIR.

December 14, 2001  
Kathy Kefauver  
Santa Barbara Public Works, Solid Waste and Utilities Division  
Tajiguas Landfill  
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Climate, Rainfall and Leachate Production

12-10

On page 3.3-3 of the DEIR, in Section 3.3.2.1.1. Climate, it is indicated that rainfall averages between 16-29 inches per year depending on elevation. The DEIR also states "Year-to-year variations can be significant. Annual precipitation in any given month or year may range from less than one-third to much more than the average rainfall." It should be indicated in the Final EIR how the facility has coped with leachate production in very high rainfall events as well as very high rainfall years. Please explain what back-up provisions are being proposed/provided in the event of excessive leachate caused by high rainfall events/years.

Mitigation Measures

Traffic

12-11

On page 3.10-15 of the DEIR, Mitigation Measure TRAF-1, states, "A permanent stop sign and speed dots shall be installed and maintained at the landfill exit to Highway 101." Please indicate what agency is responsible for installing the stop sign and speed dots. Is the location of the stop sign and speed dots on County owned right of way, Landfill owned right of way, or in right of way owned by CalTrans or some other entity? Please include documentation that demonstrates that the entity responsible for the right of way where the stop sign and speed dots are to be located are in agreement to the installation and maintenance of them.

On page 3.10-15 of the DEIR it states that the Solid Waste Utilities District (SWUD) "shall designate personnel to monitor and implement traffic safety measures. Implementation of this measure shall be reported to the LEA on an annual basis." Please explain how the LEA would have authority over traffic control items installed in a right of way. Again, as indicated above, please describe what other entities would be involved in the implementation of this mitigation measure due to their jurisdiction over the affected right of way.

Air Quality

12-13

Page 3.11-30, AQ-3, h., includes "Monitoring PM10 at the landfill boundary." Please explain if this monitoring plan has been reviewed and approved by the Santa Barbara County Air Pollution Control District (SBCAPCD) or other responsible agency regarding air quality issues. Will air quality monitoring reports be submitted to the SBCAPCD for their review and approval? What other responsible agencies will receive these air quality monitoring reports?

MITIGATION REPORTING OR MONITORING PROGRAM (MRMP)

Mitigation measures have been included in the ED, which are considered necessary to offset potential environmental impacts. This is a determination that was made by the Lead Agency. The operator and the Lead Agency should consider the following information:

Public Resources Code, Section 21081.6, states that the Lead Agency should submit a MRMP at the time of local adoption of the Environmental Impact Report or Mitigated Negative Declaration.

December 14, 2001  
Kathy Kefauver  
Santa Barbara Public Works, Solid Waste and Utilities Division  
Tajiguas Landfill  
Page 7

This should identify the environmental impacts associated with the proposed project, identify mitigation measures to reduce impacts to a less than significant level, identify agencies responsible for ensuring the implementation of the proposed mitigations, and specify a monitoring/tracking mechanism. The MRMP is also required to be made a condition of project approval. Section 21081.6 (b) also requires that "A public agency shall provide the measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures."

The MRMP should also indicate that agencies designated to enforce mitigation measures in the MND have reviewed the MRMP and agreed that they have the authority and means to accomplish the designated enforcement responsibilities.

SUMMARY

ERS staff thanks the Lead Agency for the opportunity to review and comment on the DEIR.

ERS staff requests copies of any subsequent environmental documents including, copies of public notices, and any Notices of Determination (NODs) for this project. If the document is adopted during a public hearing ERS staff request a ten-day advance notice of this meeting. If the document is adopted without a public hearing, CIWMB staff request a ten-day advance notification of the date of the adoption and project approval by the decision-making body.

If you have any questions regarding these comments, please contact me at (916) 341-6730.

Sincerely,

  
Steven L. Hooper  
Environmental Review Section  
Permits Branch  
Permitting and Enforcement Division  
CIWMB

cc: Scott Morgan  
State Clearinghouse  
P.O. Box 3044  
Sacramento, CA 95812-3044

Sue O'Leary, Supervisor  
Environmental Review Section  
Permitting and Enforcement Division

December 14, 2001  
Kathy Kefauver  
Santa Barbara Public Works, Solid Waste and Utilities Division  
Tajiguas Landfill  
Page 8

California Integrated Waste Management Board

Suzanne Hambleton, Supervisor  
Permitting and Inspection Branch, Region 3  
Permitting and Enforcement Division  
California Integrated Waste Management Board

Willy Jenkins  
Permitting and Inspection Branch, Region 3  
Permitting and Enforcement Division  
California Integrated Waste Management Board

**Document 12**  
**California Integrated Waste Management Board**  
**December 14, 2001**  
**Response to Comments**

Response 12-1  
Comment noted.

Response 12-2  
Comment noted.

Response 12-3  
Comment noted.

Response 12-4  
Comment noted. A copy of the Final EIR, with these responses, will be sent to the California Integrated Waste Management Board at least 10 days prior to Final EIR certification.

Response 12-5  
The Tajiguas Landfill currently is in compliance with all permits listed in the Draft EIR. No notices of non-compliance have been received.

Response 12-6  
Onsite water is available to the existing Landfill and would continue to be available to the proposed Landfill expansion as explained in Draft EIR Section 3.3. The County of Santa Barbara Environmental Health Services (EHS) regulates sewage and wastewater disposal. The method and design of the system would be subject to review and approval by EHS. The EHS would ensure compliance with applicable codes.

Response 12-7  
Comment noted.

Response 12-8  
Comment noted.

Response 12-9  
The County acknowledges that the 5 acres of disturbance for the perimeter access road and drainage system improvements on the County-owned Baron Ranch will need to be added to the Tajiguas landfill permitted boundary. This would be accomplished as part of the Solid Waste Facility Permit process with the LEA and CIWMB.

The legend on Draft EIR Figure 2-7 has been changed to reflect these 5 acres. See Revised Figure 2-7 in Final EIR Section 4.4.

Response 12-10

Through a recent land exchange with Aera Energy, the Tajiguas Landfill has acquired water tanks on the western ridge of Cañada de la Pila. The total capacity for storage of water and leachate collected from the GLCRS is 680,000 gallons. Prior to each rainy season, the tanks are drained, in preparation for an increase in pumping and water volumes during the winter. In the past, these tanks have provided adequate capacity for water and leachate that has been pumped from the GLCRS.

Response 12-11

The stop sign will be located within Caltrans right-of-way. The SWUD will coordinate with Caltrans for installation and maintenance of the sign. The speed dots will be located north of the stop sign, within the Tajiguas Landfill access road, which is a Santa Barbara County right-of-way. Mitigation Measure TRAF-1 in Final EIR Section 4.2.2 has been modified to clarify that the County will install the stop sign and speed dots.

Response 12-12

The authority to enforce this condition will be changed from the LEA to Santa Barbara County Public Works. See Mitigation Measure TRAF-1 in Final EIR Section 4.2.2.

Response 12-13

This suggestion of revising Mitigation Measure AQ-3 has been accepted. The dust-monitoring plan will be developed and submitted to the LEA and the Santa Barbara County Air Pollution Control District (APCD) for approval. The APCD, rather than the LEA, would regulate monitoring for PM<sub>10</sub>. All other parameters listed in mitigation measure AQ-3 may be overseen by the APCD in addition to the LEA. The RWQCB will be omitted from the Plan Requirements and Timing and will be replaced by the APCD. Revised Mitigation Measure AQ-3 is provided in Final EIR Section 4.2.2 and Final EIR Table 1-2.

Response 12-14

Comment noted. The Mitigation Reporting and Monitoring Program (MRMP) is included as Final EIR Appendix C.

Response 12-15

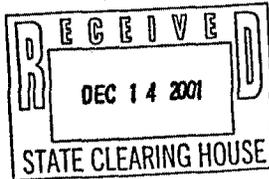
Comment noted. The public notices and Notice of Determination are in Appendix B of this Final EIR, which will be sent to the California Integrated Waste Management Board.

13

STATE OF CALIFORNIA - THE RESOURCES AGENCY

Governor  
DEPARTMENT OF FISH AND GAME

South Coast Region  
4949 Viewridge Avenue  
San Diego, California 92123  
(858) 467-4201  
FAX (858) 467-4239



clear  
12/14/01  
e



December 14, 2001

Kathy Kefauver, Project Planner  
County of Santa Barbara Public Works Dept., Solid Waste and Utilities Division  
109 East Victoria Street  
Santa Barbara, CA 93101

Draft Environmental Impact Report for  
the Tajiguas Landfill Expansion Project  
SCH # 1998041003, Santa Barbara County

Dear Ms. Kefauver,

The Department of Fish and Game (Department), has reviewed the Draft Environmental Impact Report (DEIR) for impacts to biological resources. The Santa Barbara County Public Works Department (County) proposes to expand the capacity of the Tajiguas landfill (landfill), to provide a 15-year capacity. The landfill is located about 26 miles west of Santa Barbara, and about 1/2 mile from the Pacific Ocean, north of Highway 101, in Santa Barbara County. Without, expansion, it is anticipated the landfill would reach permitted capacity by 2005 or 2006. The proposed project would result in the disturbance of 71 acres of native habitats, primarily chaparral scrub and non-native grasslands. This disturbance would include the removal of 100-150 mature coast live oak trees. Sensitive animal species potentially impacted by the project include the Federally Threatened California red-legged frog (CLRF; *Rana aurora draytonii*) and the State Special Concern Species San Diego desert woodrat (*Neotoma lepida intermedia*). Several sensitive plant species, including the Federal and State Endangered Gaviota tarplant (*Hemizonia increscens ssp. villosa*), have the potential to occur on the project site, although no listed plants species were detected during plant surveys. Mitigation measures are proposed to mitigate the loss of habitats, including an oak tree replacement program, pre-project surveys and relocation measures for sensitive plants and desert woodrat, and a Department-approved CRLF management plan.

The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Guidelines § 15386).

Ms. Kathy Kefauver  
December 14, 2001  
Page 2

Impacts to Sensitive Biological Resources

The Department generally agrees with the scope and intent of proposed mitigation measures, and recommends their full implementation. We offer the following additional recommendations:

B-1  
California red-legged frog (*Rana aurora draytonii*) - With respect to the screening of the proposed intake pipe, the 3 ft. cube screen box needs to be kept clean to maintain low water velocities across all screens. Assuming the screen box will be completely submerged during pumping activities, the wetted surface area of the box should be designed based on pump rates and targeted water velocities across the screens. Screen dimensions should be set by the size of frog larvae.

B-2  
Gaviota tarplant (*Hemizonia increscens ssp. villosa*) - Pre-project surveys should be conducted during the months when this plant is flowering sufficiently to allow its detection. Generally, this period begins in late May and lasts through the summer.

B-3  
Alternatives

It was unclear to the Department how the closure of the Foxen Canyon landfill would affect the operation and projected closure date for Tajiguas. Specifically, it was not clear to us if the projected capacity attainment date for Tajiguas of 2005 or 2006 included additional waste from the Santa Ynez Valley resulting from the Foxen Canyon landfill closure. The Foxen Canyon landfill is projected to close in 2003. If the projected closure date for Tajiguas included Santa Ynez Valley waste, then an alternative to dispose of Santa Ynez Valley waste at the Santa Maria facility, instead of Tajiguas, should extend the projected life of the Tajiguas landfill beyond 2005/2006. The DEIR should include this analysis, and we request the County provide clarification on this issue.

Thank you for this opportunity to provide comment. Please provide the Department a copy of the revised DND. Questions regarding this letter and further coordination on these issues should be directed to Mr. Martin Potter, Wildlife Biologist, at (805) 640-3677.

Sincerely,

Ms. Morgan Wehtje  
Environmental Specialist IV

From Martin Potter

to 916-323-3018

at 12/14/01 1:19 PM Pg 004/004

Ms. Kathy Kefauver  
December 14, 2001  
Page 3

cc: Mr. Martin Potter  
Department of Fish and Game  
Ojai, California

Mr. Maurice Cardenas  
Department of Fish and Game  
Ojai, California

Ms. Mary Meyer  
Department of Fish and Game  
Ojai, California

Mr. Scott Morgan  
State Clearinghouse  
Sacramento, California

**Document 13**  
**California Department of Fish and Game**  
**December 14, 2001**  
**Response to Comments**

Response 13-1

Comment noted. These requirements have been added to Mitigation Measure BIO-8 in Final EIR Section 4.2.2.

Response 13-2

Comment noted. This requirement have been added to Mitigation Measure BIO-1 in Final EIR Section 4.2.2 and Table 1-2.

Response 13-3

The Tajiguas Landfill is expected to reach capacity in 2005. The current Solid Waste Facilities Permit for Foxen Canyon identifies that the Foxen Canyon Landfill is expected to reach capacity in 2006. The Final Supplemental EIR to 90-EIR-14 that reviewed the conversion of Foxen Canyon from a landfill to a transfer station (97-SD-02) stated that the capacity of the Foxen Canyon Landfill would be reached between the years of 2004 and 2007 (Santa Barbara County, 1997b). The Foxen Canyon Landfill is scheduled to become a transfer station for the Santa Ynez Valley when its capacity is reached.

The Foxen Canyon Landfill weekly operation has been reduced from seven days of operation to five days. A portion of the waste from the Santa Ynez Valley is currently being direct-hauled to Tajiguas Landfill.

The amount of waste generated by the Santa Ynez Valley is relatively small compared to waste generated by the South Coast. The City of Santa Barbara alone produces approximately 50 percent of the waste delivered to Tajiguas. Transferring waste from the Santa Ynez Valley to Santa Maria would, therefore, result in less than one additional year of life for the Tajiguas Landfill because the waste from Santa Ynez represents a small portion of the entire waste stream. Because this alternative would not provide capacity to extend the life of the Landfill for a significant amount of time, and because it would be necessary to formulate agreements with the City of Santa Maria, *this alternative is not feasible*. The commenter is referred to Draft EIR Section 4.2.1.3 for a discussion of Tajiguas waste in the Santa Maria Landfill.





California Integrated Waste Management Board

14

Linda Moulton-Patterson, Chair

1001 I Street • Sacramento, California 95814 • (916) 341-6000  
Mailing Address: P. O. Box 4025, Sacramento, CA 95812-4025  
www.ciwmb.ca.gov



Gray Davis  
Governor

Winston H. Hickox  
Secretary for  
Environmental  
Protection

December 19, 2001

Ms. Lisa Sloan  
Santa Barbara County Public  
Health Department  
225 Camino Del Remedio  
Santa Barbara, California 93110

Review of Environmental Impact Report (EIR), Landfill Slope Stability Issues, Tajiguas Sanitary Landfill,  
Santa Barbara County, Facility No. 42-AA-0015

Dear Ms. Sloan:

In response to your request, the California Integrated Waste Management Board (Board) Closure and Technical Services Section staff have reviewed portions of the EIR for Tajiguas Landfill (release date October 12, 2001) pertinent to the landfill slope stability. Specifically, Board staff reviewed the following portions of the EIR:

- Volume I: pages 3.2-27 to 3.2-34 and pages 3.7-2 to 3.7-24.
- Volume II (Technical Studies): 9/01 Slope Stability Evaluation ( GeoLogic Associates, September, 2001), and Slope Stability Analysis (Hushmand Associates, September 17, 2001).

As a result of our review, we have concluded that the slope stability analyses included in the EIR are consistent with the analyses submitted for Board review in 1999 (Board staff had concurred with the proposed landfill slope configuration and supporting slope stability analyses in our letter of July 2, 1999). Consequently, Board staff considers the slope stability analyses included in the EIR as adequate and in conformance with all applicable slope stability standards under regulations contained in Title 27, California Code of Regulations.

Should you have any questions concerning this matter, please call me at (916) 341-6318 or Mr. Peter Janicki of my staff at (916) 341-6315.

Sincerely,

*Michael B. Wochnick*

Michael B. Wochnick, Manager  
Closure and Technical Services Section  
Permitting and Enforcement Division

cc: Mr. Michael LeBrun  
Central Coast Regional Water Quality Control Board  
81 Higuera Street, Suite 200  
San Luis Obispo, CA 93401-0397

Mr. Chris Wilson  
County of Santa Barbara Public Works Department  
123 East Anapamu Street  
Santa Barbara, California 93101

California Environmental Protection Agency

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The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web site at <http://www.ciwmb.ca.gov>.



**Document 14**  
**California Integrated Waste Management Board**  
**December 14, 2001**  
**Response to Comments**

Response 14-1  
Comment noted.





(15)

# California Regional Water Quality Control Board

## Central Coast Region



Gray Davis  
Governor

Winston H. Hickox  
Secretary for  
Environmental  
Protection

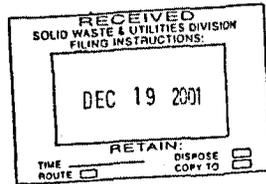
Internet Address: <http://www.swrcb.ca.gov/rwqcb3>  
81 Higuera Street, Suite 200, San Luis Obispo, California 93401-5411  
Phone (805) 549-3147 • FAX (805) 543-0397

December 18, 2001

Ms. Kathy Kefauver  
Solid Waste and Utilities Division  
County of Santa Barbara  
109 East Victoria Street  
Santa Barbara, CA 93101

Dear Ms. Kefauver:

**DRAFT ENVIRONMENTAL IMPACT REPORT, TAJIGUAS LANDFILL, SANTA BARBARA COUNTY**



15-1 Regional Board staff reviewed the *October 2001, Draft Environmental Impact Report (DEIR)* for the proposed Tajiguas Landfill expansion. Since the mission of our agency is water quality protection our review is focused on potential impacts to water quality and related sections (i.e. geology and seismic hazards). Overall, the report is well prepared in terms of addressing water quality related impacts.

However, we do have some comments pertaining to the landfill description portion of the report. These comments are not meant to be exhaustive but are meant to clarify our position in relation to these items.

15-2 Section 2.9.2 Composite Liner System – On page 2-43 the report states “ The SWRCB Resolution 93-62 also allows, where and engineering analysis shows, and the RWQCB finds, that side slopes are too steep to permit construction of a stable composite liner, then and alternative design which is not a composite system, but includes a synthetic liner at least 60-mils thick (or 80-mils thick if it is HDPE), may be used.” The intent of SWRCB Resolution 93-62 is to accommodate canyon style landfills with slopes that exceed 2:1 prior to development where slope grading to achieve 2:1 or flatter slopes would be impractical, because of very hard rock or limited space. We do not consider this condition to be applicable at Tajiguas Landfill.

15-3 Section 2.9.2 Composite Liner System – Please be aware that this Regional Board does not approve of the use of geocomposite drainage layers over bottom liners. A typical bottom liner leachate drainage layer approved by this Region, consist of sands or gravels with permeabilities of no less than 1X10<sup>-3</sup> and very low fines content (typically <10%). However, we will consider use of geocomposites on side slopes with appropriate justification.

15-4 As discussed with staff from the Solid Waste and Utilities Division, we are anticipating your permit application sometime early next year. Please be aware that a permit revision will not be considered before the Regional Board until the Final Environmental Impact Report (FEIR) has been adopted. Additionally, the revised Waste Discharge Requirements may incorporate mitigation measures beyond those contained in the FEIR.

Ms. Kathy Kefauver

2

December 18, 2001

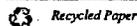
We appreciate the opportunity to review the DEIR. If you have any questions or need assistance, please contact David Athey at (805) 542-4644 or Michael LeBrun at (805) 542-4645.

Sincerely,

*Michael LeBrun*  
for  
Roger W. Briggs  
Executive Officer

File: S:\VCB\LDU\Landfills\PERMITTED SITES\Tajiguas\Letters\Draft\DEIR Review.doc

California Environmental Protection Agency



California Environmental Protection Agency





**Document 15**  
**California Regional Water Quality Control Board**  
**December 18, 2001**  
**Response to Comments**

Response 15-1

Comment noted. No specific response is required.

Response 15-2

Comment noted. A membrane-only liner system design is not proposed for the project. The liner system would be designed in compliance with RWQCB requirements.

Response 15-3

Comment noted. Project design would include a gravel Leachate Collection and Recovery System (LCRS) on the floor of the lined cell. Geocomposite drainage layers are not proposed over the over bottom liner. The final liner design will however, comply with the typical liner design approved by the RWQCB.

Response 15-4

Comment noted. A copy of the Final EIR, which includes responses to all comments, will be sent to the RWQCB.



16

Santa Barbara County  
**PUBLIC Health**  
DEPARTMENT

Environmental Health Services

225 Camino Del Remedio • Santa Barbara, CA 93110  
805/681-4900 • FAX 805/681-4901

Roger Heroux, MPA Director  
Tara Brown, MBA Assistant Director  
Elliot Schulman, MD, MPH Health Officer/Medical Director

December 14, 2001  
Kathy Kefauver

December 14, 2001

Kathy Kefauver  
Solid Waste and Utilities Division  
109 E. Victoria Street  
Santa Barbara, CA 93101

Dear Ms. Kefauver,

**Subject: Tajiguas Landfill Expansion Project  
Draft Environmental Impact Report 01-EIR-5**

Environmental Health Services has reviewed the Environmental Impact Report for the Tajiguas Landfill Expansion Project released on October 12, 2001. The project would provide 15 years of additional waste disposal capacity, and analyzes both a Front Canyon and Back Canyon Configuration at project level. The existing landfill is expected to reach its current permitted capacity in 2005. The proposed expansion would service the waste disposal needs of southern Santa Barbara County and the Santa Ynez and Cuyama Valleys until 2020.

Comments from this office as the Local Enforcement Agency (LEA) are intended to assist the Lead Agency by raising issues which need to be included in the environmental document. These comments are provided to assist you in preparing a document adequate for use by the LEA in issuing the Solid Waste Facility Permit (SWFP) for the proposed landfill. The following comments are submitted for your consideration in finalizing the draft EIR:

- 16-1 { 1. Page 1-26 Section 1.7.2.1 The discussion regarding the conflicts between AB 939 and the previous CoSWMP requirements needs further clarification. In Santa Barbara County, a CIWMP was submitted to the CIWMB in June of 1998, and was subsequently approved. In addition, expansion of the Tajiguas Landfill was identified in the Countywide Siting Element issued in March 1998, superceding the requirements of AB 2296 adopted in October 1990.
- 16-2 { 2. Page 1-40 Table 1-2, Section 3.4 First line needs correction from "in-change sedimentation basin" to *in-channel sedimentation basin*.
- 16-3 { 3. Page 2-11 Figure 2-4, Correct acreage of offsite disturbance to 5 acres from 3 acres.
- 16-4 { 4. Page 2-11 Figure 2-4, Include figure for total acreage of disturbance as indicated on Table 2-2, identifying the total 259 acres for the Front Canyon on the site plan.
- 16-5 { 5. Page 2-19 Figure 2-7, Correct acreage of offsite disturbance to 5 acres from 3 acres.

- 16-6 { 6. Page 2-19 Figure 2-7, Include figure for total acreage of disturbance as indicated on Table 2-2, identifying the total 260 acres for the Back Canyon on the site plan.
- 16-7 { 7. Page 2-28 On-site water system will require permit from Environmental Health Services under County Ordinance No. 4181.
- 16-8 { 8. Page 2-28 Section 2.6.2 The proposed on-site sewage disposal system will require a permit from Environmental Health Services under County Ordinance No. 4356.
- 16-9 { 9. Page 2-31 Table 2-3 Should be simplified for clarification. Remove the designations for Normal and Beyond Normal Operations, and remove the Monday-Saturday and Monday-Sunday rows. Fourth column first and second rows should read 6 PM to 8 PM. Last column first and second rows and under Sunday should read 24 hours. Footnote No. 2 should add statement that these hours are necessary for activities beyond normal operations. And the third footnote should state that portable lighting is provided to personnel responding to special occurrences after dark.
- 16-10 { 10. Page 3.1-11 Table 3.1-3 Make corrections to this table reflective of the cumulative impacts as described in the text of the document.
- 16-11 { 11. Page 3.2-34 GEO-1 Responsibility for monitoring the stability aspects of the construction of the landfill would be the responsibility of the Solid Waste & Utilities Division rather than the LEA as provided in the California Code of Title 27 Section 21145
- 16-12 { 12. Page 3.3-62 WR-1 The SWUD and the RWQCB rather than the LEA should be responsible for monitoring the construction of dewatering drainage systems.
- 16-13 { 13. Page 3.6-18 The southeast corner modification (SECM) portion of the project will cause greater impact to the environment than leaving the waste in place. Buried waste produces anaerobic conditions and methane gas. When the waste is exposed to the atmosphere, an explosive gas mixture is created. A source of heat such as the movement of heavy equipment could initiate combustion. The negative pressure created by the operation of a gas collection system would then draw oxygen down into the waste mass. This process may cause a long-lasting underground landfill fire. Such a fire would create odor nuisance and stability problems resulting in safety hazards. Therefore, the LEA questions the need for the SECM excavation and suggests that the best mitigation measure for such an activity would be to eliminate the SECM excavation from the landfill expansion project.
- 16-14 { 14. Page 3.6-21 NUI-2 As written, this measure requires all 12 bird control measures listed be implemented. While an enhanced bird control program may be indicated, the LEA may not find it necessary to require all 12 bird control measures concurrently. The word extermination should be replaced with depredation.
- 16-15 { 15. Pages 3.8-5, -7, -9, Figures 3.8-2, -3, -4 Key maps indicate the proposed west borrow area as the existing landfill.
- 16-16 { 16. Page 3.10-15 TRAF-1 and TRAF-2 Maintenance of a traffic control sign and observance of traffic laws are more appropriately overseen by the California Highway Patrol and Cal-Trans agencies.
- 16-17 { 17. Page 3.11-29 AQ-1 Emissions from heavy equipment would be regulated by the Air Pollution Control District (APCD) or the California Air Resources Board rather than by the LEA.

December 14, 2001  
Kathy Kefauver

- 16-18 18. Page 3.11-30 AQ-3 Monitoring for PM10 should be regulated by the APCD rather than the LEA. All other parameters listed in this measure may be overseen by the APCD in addition to the LEA.
- 16-19 19. Page 3.12-16 HS-3 Landfill gas monitoring involves the LFG collection system, the onsite structures and the landfill perimeter. The latter two elements are overseen by the LEA. However, requirements to monitor the LFG collection system fall under the purview of the APCD.
- 16-20 20. Page 3.12-16 HS-4 Requirements to monitor the landfill cap for fissures and cracks fall under the purview of the APCD. The LEA inspects the landfill monthly, and would also require repairs should such a problem be noted.
- 16-21 21. Page 3.12-17 HS-6 Occurrence of hazardous wastes must also be reported to the Department of Toxic Substances Control and/or the Protection Services Division of the County Fire Department.

If you have any questions regarding this letter, please contact me at (805) 681-4942.

Sincerely,

Lisa Sloan  
Senior Environmental Health Specialist

cc: Steve Hooper, CIWMB  
Willy Jenkins, CIWMB  
Mark Tautrim, SWUD  
Kate Sulka, PSD

David Athey, RWQCB  
Imelda Cragin, SWUD  
Vijaya Jamalakamaya, APCD

**Document 16**  
**Santa Barbara County**  
**Public Health Department**  
**December 14, 2001**  
**Response to Comments**

Response 16-1

Comment noted. Draft EIR Section 1.7.2.1, second paragraph (page 1-26), has been rewritten to clarify the discussion regarding the conflicts between AB 939 and the previous CoSWMP requirements. The revised text is provided in Final EIR Section 4.1.

Response 16-2

Comment noted. Draft EIR Table 1-2 has been changed to reflect "in-channel sedimentation basin." See Final EIR Table 1-2.

Response 16-3

Comment noted. The legend on Draft EIR Figure 2-4 has been changed to reflect 5 acres. See Revised Figure 2-4 in Final EIR Section 4.4.

Response 16-4

Comment noted. The total acreage of disturbance for the Front Canyon is 259 acres. This has been included on Draft EIR Figure 2-4. See Revised Figure 2-4 in Final EIR Section 4.4.

Response 16-5

Comment noted. The legend on Draft EIR Figure 2-7 has been changed to reflect 5 acres. See Revised Figure 2-7 in Final EIR Section 4.4.

Response 16-6

Comment noted. The total acreage of disturbance for the Back Canyon is 260 acres. This has been included on Draft EIR Figure 2-7. See Revised Figure 2-7 in Final EIR Section 4.4.

Response 16-7

Comment noted. Draft EIR Section 1.7.1, third paragraph (page 1-24), has been revised to note that the onsite water system permit and an onsite sewage disposal system permit will be obtained from Environmental Health Services, under County Ordinance No. 4181 and No. 4356, respectively. See Final EIR Section 4.1 for this text revision.

Response 16-8

Comment noted. See Response 16-7.

Response 16-9

Comment noted. Draft EIR Table 2-3 has been simplified as suggested. See Revised Table 2-3 in Final EIR Section 4.3.

Response 16-10

Comment noted. Draft EIR Table 3.1-3 has been changed to reflect the cumulative impacts described in the Draft EIR. See Revised Table 3.1-3 in Final EIR Section 4.3.

Response 16-11

Comment noted. Mitigation Measure GEO-1 (page 3.2-24) Monitoring in the Draft EIR has been revised to show that monitoring the stability aspects of landfill construction would be the responsibility of SWUD. See revised Mitigation Measure GEO-1 in Final EIR Section 4.2.2.

Response 16-12

Comment noted. Mitigation Measure WR-1, Monitoring, in the Draft EIR (page 3.3-62) has been revised to show that SWUD and the RWQCB, rather than the LEA, are responsible for monitoring the installation of the dewatering and drainage systems. See revised Mitigation Measure WR-1 in Final EIR Section 4.2.2.

Response 16-13

Comment noted. The LEA suggests that the southeast corner modification excavation be eliminated from the Tajiguas Landfill expansion project. Modification of the southeast corner is inconsistent with the Coastal Zoning Ordinance, Santa Barbara County Local Coastal Plan and the California Coastal Act.

Response 16-14

Comment noted. Mitigation Measure NUI-2, f(12), in the Draft EIR has been revised from "extermination" to "depredation." See revised Mitigation Measure NUI-2 in Final EIR Section 4.2.2 and Final EIR Table 1.2.

Response 16-15

Comment noted. Draft EIR Figures 3.8-2, 3.8-3 and 3.8-5 have been revised to reflect the correct existing landfill and borrow area boundaries. See Revised Figures 3.8-2, 3.8-3, 3.8-4 in Final EIR Section 4.4.

Response 16-16

Comment noted. Mitigation Measure TRAF-1 (page 3.10-15) in the Draft EIR has been revised to reflect that the California Highway Patrol will oversee the enforcement of traffic laws. See revised Mitigation Measure TRAF-1 in Final EIR Section 4.2.2.

Mitigation Measure TRAF-2 (page 3.10-15) in the Draft EIR has been revised to reflect that Caltrans will maintain the traffic control sign. See revised Mitigation Measure TRAF-2 in Final EIR Section 4.2.2.

Response 16-17

Comment noted. Mitigation Measure AQ-1 (page 3.11-29) in the Draft EIR has been revised to reflect that emissions from heavy equipment will be regulated by the APCD or the CARB. See revised Mitigation Measure AQ-1 in Final EIR Section 4.2.2.

Response 16-18

Comment noted. Mitigation Measure AQ-3 (page 3.11-30) in the Draft EIR has been revised to reflect that monitoring for PM<sub>10</sub> will be regulated by the APCD and that all other parameters listed may be overseen by the APCD, in addition to the LEA. See revised Mitigation Measure AQ-3 in Final EIR Section 4.2.2.

Response 16-19

Comment noted. Mitigation Measure HS-3 in the Draft EIR (page 3.12-16) has been revised to note that the LFG collection system will be monitored by the APCD, while the LEA will monitor the onsite structures and the landfill perimeter. See revised Mitigation Measure HS-3 in Final EIR Section 4.2.2.

Response 16-20

Comment noted. Mitigation Measure HS-4 in the Draft EIR (page 3.12-16) has been revised to note that the APCD will monitor the landfill cap for fissures and cracks. The LEA will inspect the landfill monthly and will require repairs, as needed. See revised Mitigation Measure HS-4 in Final EIR Section 4.2.2.

Response 16-21

Comment noted. Mitigation Measure HS-6 in the Draft EIR (page 3.12-17) has been revised to include notification of occurrences of hazardous waste to the Department of Toxic Substances Control and/or the Protection Services Division of the County Fire Department. See revised Mitigation Measure HS-6 in Final EIR Section 4.2.2.

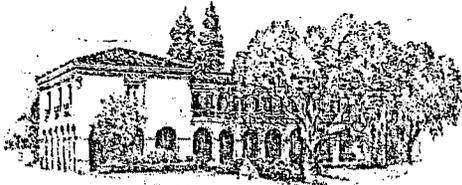


CITY OF SANTA BARBARA

17

COMMUNITY DEVELOPMENT DEPT.

Planning Division ..... 564-5470
Housing & Redevelopment Division .. 564-5461
Building & Safety Division ..... 564-5485
Director's Office ..... 564-5502
Fax Number ..... 564-5477



630 GARDEN STREET
POST OFFICE BOX 1890
SANTA BARBARA, CA 93102-1890

December 10, 2001

Kathy Kefauver, Solid Waste and Utilities Division
Santa Barbara County Public Works Department
109 East Victoria Street
Santa Barbara, CA 93101

SUBJECT: Comments on Tajiguas Landfill Expansion Project DEIR

Dear Ms. Kefauver:

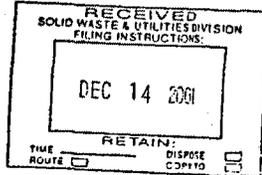
The City of Santa Barbara appreciates the opportunity to comment on this important document and project. City Community Development and Public Works Department staff have reviewed the Draft Environmental Impact Report for the proposed Tajiguas Landfill Expansion Project, and offer the following comments:

Southeast Corner Waste Relocation

The project proposes moving approximately 720,000 cubic yards (two years of South Coast waste) that was placed above the 400 foot elevation limit (above mean sea level) within the Coastal Zone to the new landfill expansion area, because it is not consistent with agricultural zoning and would require a Coastal permit. Section 3 of the DEIR identifies numerous environmental impacts associated with this waste relocation, including impacts involving geology, water resources, biological resources, nuisances (odors, litter, dust, vectors, birds), future land use, noise, traffic, air quality, and health and safety. The Section 4 Alternatives analysis (p. 4-81) states: "Alternatives to this activity are to dispose of the excavated waste offsite at another in-County or out-of-County landfill or leave the waste in place at Tajiguas." The ensuing discussion does not provide analysis of leaving the waste in place. Since this option would appear to have the potential to avoid all of the above-identified impacts as well as conserve landfill capacity, the EIR should include a comparative analysis of environmental impacts and discuss the feasibility of pursuing a zone change and Coastal permit for this option. The discussion should also clarify the specific timing and location of the recent Coastal Zone boundary refinement referenced.

Alternatives to the Project

The DEIR contains inconsistent statements about the feasibility of various alternatives and their capabilities in meeting project objectives. It is recommended that this analysis be clarified as to which alternatives are considered infeasible and for what reasons (i.e., time constraints, economic, environmental, legal, social, jurisdictional, and/or technological factors), and which alternatives would not meet project objectives and why. Given the limited remaining time to establish additional landfill



Kathy Kefauver, County SWUD
Tajiguas Landfill Expansion DEIR
December 10, 2001
Page 2 of 4

capacity, this analysis and clarification will be an important basis for making CEQA findings in association with a project decision.

In addition, even if there is not an alternative technology that could feasibly replace the project landfill expansion entirely within 3-5 years, some level of these alternative technologies (e.g., materials recovery, composting, conversion technologies) may be feasible. As such, alternative technologies should be applied to the maximum feasible extent at Tajiguas and/or other sites in conjunction with the landfill project. The EIR should identify the extent such technologies might reduce significant project impacts on air quality, transportation/ traffic, bird attraction/water quality, etc. Inclusion of such technologies should be identified as mitigation measures or refinements to the project. Potential concurrent environmental benefits of alternative technologies should also be identified, such as conservation of limited landfill space, local renewable electrical energy generation, replacement of petrochemical-based fertilizers with compost and organic materials in landscaping and agriculture, and co-utility and management of locally-generated bio-solids which are increasingly difficult and expensive to ship out of County.

Environmentally Superior Alternative

Given that the DEIR identified none of the Alternatives to the Project to be the Environmentally Superior Alternative, Section 4.6 of the DEIR should identify and discuss which of the two project options (Front Canyon or Back Canyon) is considered the environmentally superior option.

Section 1 - Executive Summary

- 17-4 P. 1-1 Please clarify the portion of 9.1 million tons associated with the recent benchfill permit.
17-5 P. 1-9 South Coast recyclables no longer go the Health Sanitation Services Materials Recovery Facility in Santa Maria.
17-6 P. 1-17 Please explain why greenwaste is included in waste disposal tonnages.
17-7 P. 1-50 Residual Class III air quality impacts should be identified as less than significant on the impact summary table.

Section 2 - Project Description

- 17-8 P. 2-1, -36 Please explain the source and basis for the assumed compaction rate of 1,195 pounds per cubic yard.
17-9 P. 2-22 Inclusion of a visual diagram to accompany discussion of benches and slope discussion is requested to clarify this information.
17-10 P. 2-28 Please clarify whether 55 acre-feet per day is the maximum allowable yield of groundwater usage.

17-1

17-2

17-3

- 17-11 [ P. 2-28 Please clarify whether the new sanitary system refers to a septic system and provide a description.
- 17-12 [ P. 2-31 Please include the number of current personnel and estimated personnel to be added in conjunction with project, as well as the total with the project.
- 17-13 [ P. 2-34 This section should include the plan to control and sort out large recyclable items from the working face (e.g., cardboard, greenwaste, white goods, carpeting, construction and demolition debris, etc.).
- 17-14 [ P. 2-36 Please explain what is meant by compaction performed on a 5:1 working face.
- 17-15 [ P. 2-38 This section should include discussion of other recyclables (i.e., what would become of a rich commercial load containing 98% cardboard) and given a more elevated profile as part of Section 2.8.5.2 considering the extensive efforts within the county and jurisdictions utilizing the Tajiguas Landfill to comply with the California Integrated Waste Management Act of 1989 (AB 939).
- 17-16 [ P. 2-40 Please explain the material to be used for the 'flexible membrane liner'.
- 17-17 [ P. 2-41 Please explain assumptions and reference location for calculations used in identifying the amount of necessary daily cover for the expansion, and clarify quantity assumed. The analysis should describe planned use of tarps or other alternative daily cover, and the resultant potential decrease in necessary soil cover tonnages.
- 17-18 [ P. 2-54 Please clarify that the demolished shop materials would be taken to a qualified construction and demolition recycling facility and not disposed of in the landfill.
- 17-19 [ P. 2-53,-54 Language describing existing operations involving litter, vectors and birds, noise, and odors should be changed from "would be" to "are" throughout these discussions.

### Section 3 - Environmental Setting, Impacts and Mitigation

#### 3.1 Introduction

- 17-20 [ P. 3.1-2 Please explain why there is repeated mention of greenwaste being disposed of at the Tajiguas Landfill. This appears inconsistent with the extensive efforts in our communities to recycle greenwaste to keep it out of landfills in accordance with AB 939.

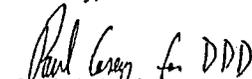
#### 3.2 Geology

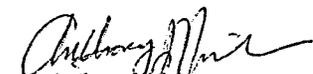
- 17-21 [ P. 3.2-29 Please explain the project impact level conclusion for the analysis that "The results indicate peak horizontal acceleration at the site would be 0.21 g."

- 17-22 [ P. 3.2-30-34 Please clarify how Mitigation Measure GEO-2 would be applied during landfill operations to avoid any significant effects to future overlying facilities.
- 3.3 Water Resources
- 17-23 [ P. 3.3-42 The discussion of groundwater quality fails to mention the recent DNA study conducted at Arroyo Quemada and its conclusions.
- 17-24 [ P. 3.3-49 There should be discussion of the data and study that provided the basis for claims that Arroyo Quemada's groundwater is of poor quality due to specified chemicals and constituents (i.e., naturally-occurring arsenic).
- 17-25 [ P. 3.3-57 Please clarify whether leachate collected by the Groundwater Leachate Collection and Recovery System would be applied as dust control only in those portions of the expansion area that overlay liners.
- 3.6 Nuisances
- 17-26 [ P. 3.6-21 (NUI-2) Has a large mobile netting or cage on wheels, covering the working face and tall enough for trucks to safely unload, been considered as a potential deterrent to gulls?
- 3.8 Visual Impacts
- 17-27 [ The redevelopment of the abandoned gas station could be added as a recommended mitigation measure to improve the professional appearance of the facility

Please contact Barbara Shelton, Environmental Analyst in the Community Development Department at 564-5470 and/or Stephen MacIntosh, Solid Waste Specialist in the Public Works Department at 897-1908 with any questions about this letter or if we can otherwise assist in this matter.

Sincerely,

  
David D. Davis  
Community Development Director

  
Anthony Disich  
Public Works Director

cc: Gregg Hart, City Council  
Dan Secord, City Council  
Maurie McGuire, Planning Commission  
Brian Barnwell, Planning Commission  
James Armstrong, City Administrator  
Peter Wilson, Deputy City Administrator  
Nina Johnson, Administrative Analyst  
Paul Casey, Assistant Community Development Director  
Bettie Hennon, City Planner  
Pat Kelly, City Engineer / Assistant Public Works Director  
Homer Smith, Principal Civil Engineer

**Document 17**  
**City of Santa Barbara**  
**December 10, 2001**  
**Response to Comments**

Response 17-1

Under current coastal zoning, the Santa Barbara County Local Coastal Plan (LCP) and the California Coastal Act (Coastal Act), the landfill is not an agricultural use as defined under the zoning ordinance, and the landfill would be in conflict with goals and LCP policies that protect and prioritize coastal resources under the LCP and Coastal Act. These priorities include recreation, agriculture and coastal-dependent development. Findings that a landfill promotes recreation, agriculture or is a coastal-dependent use could not be made. Therefore, a zoning change application to develop a new or expand an existing landfill within the Coastal Zone would likely be denied.

See Response 3-123.

Response 17-2

As stated in Draft EIR Chapter 4.0, the analysis of alternatives is based on the ability of the alternatives evaluated to meet the objectives of the proposed project and to eliminate or reduce potentially significant environmental impacts.

Please see Final EIR Chapter 3.0 for a discussion of waste processing technologies.

Response 17-3

The Draft EIR has identified and addressed the potential impacts of both the Front Canyon configuration and Back Canyon configuration at the project level (see the analysis of various topical areas in Draft EIR Chapter 3.0). The two configurations are the "proposed project" rather than "alternatives" in this EIR. Because there are tradeoffs in comparing the impacts of the two potential configurations, it will be a decision of the Board of Supervisors to determine which configuration it prefers. Such considerations may include, but are not limited to, specific types of environmental, engineering and economic factors. Because the EIR is a disclosure document, the impacts of the two configurations have been disclosed. It is not the purpose of the EIR to determine which impacts are more important or deserve greater consideration. The EIR discloses the impacts, and the decision-makers will consider both impacts and policies in choosing to approve or deny the project and, in this case, to choose either the Front Canyon or Back Canyon configuration.

Both the Front Canyon configuration and Back Canyon configuration have been analyzed in this EIR at a project level. They are not alternatives. The two configurations have been analyzed to give the decision-makers (County of Santa Barbara Board of Supervisors) flexibility to choose either configuration, but not both configurations. The impact analysis in this EIR (the EIR consists of both the Draft EIR and this Final EIR) determined that both configurations have similar impacts and similar impact levels. Therefore, neither configuration is considered environmentally superior to the other.

Response 17-4

As permitted, the Benchfill accounts for 1.5 million tons of the total approximately 9.1 million tons of solid waste currently permitted at Tajiguas.

Response 17-5

Comment noted. Reference to the Health Sanitation Services Material Recovery Facility in Santa Maria in Draft EIR Section 1.5.3 (page 1-9) has been removed from the list of facilities that accept South Coast recyclables.

See Final EIR Section 4.1 for this deletion.

Response 17-6

The Local Enforcement Agency (LEA) issues the Solid Waste Facility Permit (SWFP). The SWFP specifies the number of tons per day that are allowed to cross the scales into the Landfill. In accordance with the existing SWFP for Tajiguas, green waste is tonnage that must cross the scales and so is "counted" by the LEA as part of the daily tonnage limit, even though it is not waste. The green waste is ground at the Landfill and either is recycled for compost or other use, or is used as an approved alternative daily cover (ADC) at the Landfill.

Response 17-7

Comment noted. Draft EIR Table 1-2 has been revised to reflect that residual Class III air quality impacts are less than significant. See Final EIR Table 1-2.

Response 17-8

The assumed compaction rate of approximately 1,200 pounds per cubic yard discussed in Draft EIR Section 2.8.5.3.1 (page 2-56) is based on site records and Landfill data.

Response 17-9

The typical bench and slope configuration of the existing landfill and proposed expansion is as shown in Draft EIR Figure 2-14 (page 2-51).

Response 17-10

As stated in Draft EIR Section 2.6.1 – Water (page 2-28), the proposed project would use approximately 50 to 55 acre-feet of water per year (af/yr), not 55 acre-feet per day as reflected in the comment. Further, this water use includes surface water as well as groundwater, as described in Draft EIR Section 3.3.3.2 (page 3.3-58).

As described in Draft EIR Section 3.3.3.3 – Water Use (page 3.3-59), a water use versus water supply analysis was completed. The results showed a supply excess of 15.5 to 22.5 af/yr. As further stated in Draft EIR Section 3.3.3.3 (see page 3.3-60), the proposed project will not exceed the safe yield of the aquifer.

Response 17-11

The County of Santa Barbara Environmental Health Services (EHS) regulates sewage and wastewater disposal. The method and design of the Tajiguas system would be subject to review and approval by EHS, who would ensure compliance with applicable codes.

Response 17-12

The current number of Landfill personnel is 25. Another three persons would be added with the project. As stated in Draft EIR Section 2.8.2, there would be an average four to five contract workers, with occasional peaks of about 20 workers.

Response 17-13

The SWUD relies on curbside recycling and source separation at the Santa Barbara Transfer Station to remove recyclable items from the waste stream prior to transport to the Landfill for disposal. Measures are also taken to remove bulky items of value from the working face. These items include metal items and appliances. This process would continue with the proposed landfill expansion project.

Response 17-14

The working face can be defined as the active area of the Landfill where waste is deposited, compacted and covered. The 5:1 slope refers to a ratio of 5 feet horizontal to 1 foot vertical. That is, the slope increases or decreases one foot vertically for every 5 feet of horizontal distance. The waste is compacted as the slope is constructed.

Response 17-15

Draft EIR Section 2.8.5.2 discusses the load checking program to ensure that prohibited waste such as liquid wastes, hazardous waste, untreated medical waste, radioactive waste, burning waste, hot ashes, septic tank pumpings, waste containing more than 50 percent moisture content and liquid sewage sludge are not landfilled at the site. Most permitted waste that arrives at the Landfill is landfilled.

See Response 17-13.

Draft EIR Sections 4.4.1 and 4.4.2 discuss recycling efforts that are in effect within the County.

Response 17-16

If a flexible membrane liner is used as part of the final cover system for the Tajiguas Landfill, it would be a synthetic membrane of high-density polyethylene (HDPE) or similar synthetic material.

Response 17-17

The amounts of material necessary for daily cover were based on the existing site records and Landfill data. Alternative daily cover use and assumptions are discussed in Draft EIR Section 2.8.5.4.

Response 17-18

The materials from demolition of the scalehouse and the maintenance shop would be reused onsite or recycled through the Santa Barbara Transfer Station, as appropriate.

Response 17-19

In describing landfill operations, the language "would be" in the Draft EIR relates to the proposed expansion project. The Landfill operations measures are being implemented during the normal Landfill operation and would continue to be implemented for the proposed project.

Response 17-20

Comment noted. The reference to disposal of green waste at the Landfill in the bullet item at the top of Draft EIR page 3.1-2 is incorrect. Green waste processing is correctly described in Draft EIR Section 2.8.5.3.3.

Response 17-21

See Response 2-18.

Response 17-22

Facilities would be designed to avoid impacts presented by soils with high shrink-swell potential. Currently, the administrative offices are portable trailers, similar to portable classrooms, and are not on a permanent foundation. This type of solution avoids impacts due to expansive soils.

Response 17-23

See Response 3-40.

Response 17-24

Water in the Arroyo Quemada community is derived from the Monterey Formation that typically yields poor quality water. The water from this formation requires some type of treatment to remove the constituents that make the water unsuitable for household use (i.e. sulphur). Many residents of the Arroyo Quemada community truck in potable water for their use (Baca, 2002).

Water quality data from monitoring wells in the Monterey/Alluvium hydrologic unit is presented in Draft EIR Table 3.3-1. These data indicate naturally high concentrations of sulfate and total dissolved solids (TDS), which typically exceed drinking water standards. Additional data are available for the region (Miller & Rapp, 1968) and the Arroyo Quemado area (Clark, 1975) and indicate the water quality limitations pertaining to use of this water for domestic supplies.

Response 17-25

The leachate collected by the Groundwater Leachate, Collection and Recovery System would continue to be tested and, as appropriate, used as dust control over lined areas or unlined areas (e.g., access roads, etc.), based on the results of testing, similar to current practices.

Response 17-26

A large cage or netting is currently under study, and the feasibility of developing this bird deterrent is being considered as part of existing ongoing operations. If the county concludes that this technique is feasible, then the technique will be incorporated into the Bird Management Plan required by Mitigation Measure NUI-2. At this time, however, this technique is infeasible and speculative.

Response 17-27  
Comment noted.

The gas station is not proposed to be removed as part of the proposed project.



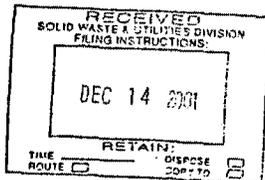


Santa Barbara County  
Air Pollution Control District

Tajiguas Landfill Expansion EIR: APCD Comments  
December 13, 2001  
Page 2 of 4

December 12, 2001

Ms. Kathy Kefauver  
County of Santa Barbara  
Public Works Department  
Solid Waste and Utilities Division  
109 E. Victoria Street  
Santa Barbara, CA 93101



RE: Tajiguas Landfill Expansion Project: Draft EIR, October, 2001

Dear Kathy:

The Santa Barbara County APCD (APCD) staff commends the Solid Waste and Utilities Division (SWUD) for proactively seeking our comments during the preparation of the DEIR. We appreciate the opportunity to provide additional comments on the air quality sections of the public draft environmental impact report (DEIR) for the Tajiguas Landfill Expansion Project. We hope you will find them helpful in carrying out your mandate under CEQA.

GENERAL COMMENTS

The APCD notes the DEIR identifies that the health-based, ambient air quality standards for NO2 and PM10 will be exceeded and also that the carcinogenic risk would exceed acceptable levels. The APCD is concerned about these unacceptably significant air quality impacts. The mitigation measures identified in the DEIR that use phrases such as "to the extent feasible", "shall be investigated" and "shall be encouraged" are inadequate and unenforceable. Please re-word the measures to be consistent with Sections 15126.4 and 15370 of the State CEQA Guidelines. Mitigation measures should focus on effective action and identify specific performance standards by which the success of the mitigation can be determined.

In light of the significance of impacts, the APCD strongly recommends that SWUD strengthen the project Alternatives Chapter and incorporate additional measures to reduce air quality impacts to the maximum extent feasible. This may be accomplished by (a) revising the project description to incorporate operational changes and/or, (b) by employing emission control strategies to the proposed and existing emissions sources. Operational changes could include reducing the use of equipment at the landfill by increasing waste diversion. Examples include implementing a combination of "pay-as-you-throw" or variable can rate systems, a materials recovery facility, a composting program for green waste and food waste, and a gasification facility. Although these are

described in the Alternatives Chapter, there is no discussion of a combination of these methods to use as an environmentally superior alternative. Examples of emission controls include: upgrading all existing internal combustion (IC) engines to current State/Federal standards; retrofitting the transfer trucks with alternative fuels such as CNG, and electrifying the green waste tub grinder IC engine. In addition, the APCD is willing to assist SWUD to offset residual emissions through our Innovative Technologies program (see Comment #11 below).

SPECIFIC COMMENTS

18-2 1. Page 1-26, Section 1.7 Regulatory Overview. Please note that the APCD has permit jurisdiction over the landfill gas collection system and possibly the green waste grinder associated with the operation of the Tajiguas Landfill.

2. Page 1-50, Table 1-2, Air Quality:

18-3 • Class I Impacts.  
• The document states that for modeling purposes, onsite emissions are treated as if the initially generated NO completely converts to NO2. However, on Page 3.11-20, the text states that the ozone limiting method was used. Please clarify which method was used to predict the NO2 concentrations.

18-4 • The document states that modeling shows pre-mitigated 24-hour PM10 concentrations will be exceeded. Since, all the other analyses are done prior to mitigation, and since the project incorporates dust control, we are unclear about why this is specifically pointed out.

18-5 • The document states that the potential carcinogenic risk (~56 in a million) would exceed the EPA and CAPCOA significance threshold. Please note that the significance threshold of 10 excess cancer cases per one million people is not an EPA or CAPCOA threshold. Rather the Santa Barbara County APCD Board of Directors adopted this threshold as part of its Air Toxic Hot Spots Act (AB-2588) program.

18-6 • Class III impacts: The document states that chronic and non-carcinogenic health risks are below significance criteria, yet mitigation measures are required and the residual impacts are significant. Please explain this and also why the other two Class III impacts caused by odor and dust would also have significant residual impacts.

• Mitigation Measures: Please note our general comment above and specific comments below.

18-7 3. Page 3.1-3, 2<sup>nd</sup> paragraph. The document lists the proposed project components. Please add the new 3 MW landfill gas generator IC engine and other equipment that are not included in the baseline.

18-8 4. Page 3.11-5, Section 3.11.1.2, Ambient Air Quality, 1<sup>st</sup> paragraph, last sentence. The document states that air quality in the SCCAB is significantly affected by transport of air pollutants from San Francisco Bay Area. We do not think this is relevant to the project area.

18-9 5. Page 3.11-13, Section 3.11.3.2. Please include all the IC engines in the listing of activities within the maximum emission scenario.

18-10 6. Page 3.11-14, 3<sup>rd</sup> full paragraph. Under the listing of onsite sources of average daily emissions here and in Section 3.11.3.2.1, the green waste grinder should be included.

18-11 7. Page 3.11-16, Mobile Source Emissions. The document states that 2001, clean diesel emission factors were used for calculating emissions from scrapers, dozers and compactors because this equipment will be upgraded by the Year 2005. This does not seem to represent a reasonable worst-case scenario if the upgrading has not been made a requirement of this project. Please indicate how this will be enforced.

18-12 8. Page 3.11-26, Section 3.11.3.4.7 Calculation of Health Effects. The document states that carcinogenic risks have been halved to reduce the 70-year analytical lifetime. The APCD strongly objects to this methodology. According to OEHHA, any project with a lifetime greater than 9 years should use the analytical lifetime of 70 years (as such the potential carcinogenic risk would be -56 in a million). Please note that ISCST3 does not always estimate higher than actual concentrations.

18-13 9. Page 3.11-29, Section 3.11.5 Mitigation Measures.

- AQ-1: Please delete "to the extent feasible". The measures listed all appear to be feasible.
- AQ-1.c. Please clarify that the replacement or additional equipment will be purchased new and that equipment will not be previously used.
- AQ-1.d. Please delete, "where applicable" to be consistent with the statement in the "Plan Requirements and Timing" Section.
- AQ-1.e. Please explain, "shall be minimized". Please identify specific performance standards by which the success of the mitigation can be determined.
- AQ-1.f. Methanol is not readily available in Santa Barbara County. Please include retrofitting of transfer trucks with CNG engines using the much-improved technology now available.

- AQ-2: Please consider that the green waste tub grinder can be electrified. This would eliminate the complicated restrictions on the hours of use and the possible need for an APCD permit. The Portable Equipment Registration for this equipment may not apply since the grinder is fixed and permanent.
- AQ-4: Please reduce the offsite impact or increase the buffer area that is owned by the County to mitigate the carcinogenic risk to a less-than-significant level.

18-14 10. Page 4-80, Section 4.6 Environmentally Superior Alternative. The Alternatives Chapter of the DEIR is inadequate. The document discusses several viable technologies that could eliminate or reduce the environmental impacts of the proposed project such as composting, a materials recovery facility and gasification and dismisses these technologies as infeasible without adequate substantiation. The DEIR should identify project alternatives that use a combination of these technologies to select the Environmentally Superior Alternative.

18-15 11. In addition to reducing the project's emission liability through mitigation measures AQ-1 and AQ-2 and pollution prevention alternatives, the APCD strongly recommends offsetting the project's significant emissions to a level of insignificance through the APCD's Innovative Technology Group programs. At approximately \$20,000 per ton of reduction, controlling agricultural boilers and other sources in the South County can offset the project's emissions. The APCD has extensive experience and is willing to assist SWUD in implementing these programs on a 100% pass-through fee basis.

Again, thank you for actively soliciting our comments. Please call Vijaya Jammalamadaka or me if we can be of further help.

Sincerely,



Dr. Ron Tan  
Senior Air Quality Engineer  
Technology and Environmental Assessment

cc: TEA Project File (County PWD: Tajiguas Landfill Expansion)  
TEA Chron File

**Document 18**  
**Santa Barbara County**  
**Air Pollution Control District**  
**December 12, 2001**  
**Response to Comments**

Response 18-1

Mitigation Measures AQ-1 and AQ-3 in the Draft EIR have been revised based on this comment. See revised Mitigation Measures AQ-1 and AQ-3 in Final EIR Section 4.2.2, Final EIR Table 1.2, and see Responses 18-11, 18-13 and 18-15. As discussed in the referenced responses, all feasible air quality mitigation measures have been incorporated into this EIR. See Response 18-13 for a discussion of the potential to convert the County's transfer trucks to use liquefied natural gas (LNG) rather than diesel, and the potential to use an electric green waste tub grinder to mitigate air emissions.

The purpose of the proposed project is to provide 15 years of disposal capacity for the residual solid waste remaining after implementation of the various ongoing waste diversion programs by the County of Santa Barbara and the cities within the County. As a result of this program, the County diversion rate has increased from 40 percent in 1998 to 57 percent in 2002. Further, the County continues to evaluate potential means of diversion and to recommend to the Board of Supervisors changes in procedures and policies to facilitate implementation of such measures. The County will continue its program to find additional means to increase the diversion of solid waste.

See Final EIR Chapter 3.0 for a discussion of waste processing technologies, their current feasibility under the scope of this EIR, and an overview of current waste diversion/reduction programs in place in the Tajiguas Landfill watershed. These programs include an existing variable can rate system, routing portions of the waste stream through existing materials recovery facilities (MRFs), and green waste grinding. In addition, as discussed in Final EIR Chapter 3.0, the County continues to evaluate other opportunities for increasing waste diversion/reduction, including such technologies as green waste and food waste composting, plus various conversion technologies, such as gasification. However, as discussed in Final EIR Chapter 3.0, there are various development and implementation considerations associated with waste processing technologies, and it is speculative as to whether these technologies could be implemented within the time frame of the Tajiguas expansion. Therefore, the implementation of one or a combination of waste processing technologies is not a feasible alternative to the proposed expansion project. Since waste processing technologies do not represent a feasible alternative to the proposed project, they cannot be considered an environmentally superior alternative.

Response 18-2

Comment noted. Draft EIR Section 1.7.2.2 has been revised to note that SBCAPCD has permit jurisdiction over the landfill gas collection system. See Final EIR Section 4.1 for this revision. It is noted that the green waste grinder is not a permanent engine at the Tajiguas site, but is mobile and is transported to and from the site according to need. The mobile grinder currently is not covered by the SBCAPCD Authority to Construct/Permit to Operate.

Response 18-3

The short-term nitrogen dioxide concentration is modeled subject to the ozone limiting method. See Final EIR Table 1-2 for correction of the inconsistency between Draft EIR Table 1-2 and Draft EIR Section 3.11 (page 3.11-20).

Response 18-4

The ground-level concentrations of PM<sub>10</sub> and other criteria pollutants are computed with the application of the mitigation measures included in the Draft EIR. See Final EIR Table 1-2 for the correction of the inconsistency between Draft EIR Table 1-2 and Draft EIR Section 3.11.

Response 18-5

Comment noted. The mention of EPA and CAPCOA has been deleted from the sentence. See Final EIR Section 4.1 and Table 1-2 for this revision.

Response 18-6

Comment noted. Class III impacts were inadvertently marked "Significant" in Draft EIR Table 1-2; the table has been revised to correctly show that these impacts are "Less Than Significant." Draft EIR Table 1-2 has been revised so that the wording in the mitigation measures for the first Class III impact on non-carcinogenic health risks has been changed to read "None required." See Final EIR Table 1-2 for these revisions.

Response 18-7

Comment noted. The first bullet list on Draft EIR page 3.1-2 and the similar list on Draft EIR page 3.1-3 are not intended to be comprehensive lists of existing and projected emitting sources, respectively. These lists are intended only to show the average and peak magnitudes of existing and projected municipal solid waste flows and associated vehicle counts for the Tajiguas Landfill.

Response 18-8

Comment noted. Draft EIR Section 3.11.1.2 (page 3.11-5) has been revised to note the lesser contribution by transport from the San Francisco Bay Area. See Final EIR Section 4.1 for this revision.

Response 18-9

Comment noted. The second paragraph from the bottom of Draft EIR page 3.11-13 is a listing of activities, not air emitting equipment. The activities accomplished by IC engines are included in the listing of activities.

Response 18-10

Comment noted. Draft EIR page 3.11-14 and Draft EIR Section 3.11.3.2.1 have been revised to include the green waste grinder. See Final EIR Section 4.1 for the revisions.

Response 18-11

Comment noted. The use of the California Year 2001 diesel emission factors for this air quality analysis in Draft EIR Section 3.11 is the reasonable worst-case scenario because the SWUD equipment replacement plan will accomplish the necessary upgrading. Mitigation Measure

AQ-1 in the Draft EIR has been revised accordingly. See revised Mitigation Measure AQ-1 in Final EIR Section 4.2.2 and Final EIR Table 1-2.

Response 18-12

Written OEHHA documentation does not preclude the use of a shorter than 70-year exposure lifetime in health risk assessments. Good professional judgment was used to choose 35 years as a reasonable overestimate for a project that can generate the relevant carcinogenic noncriteria pollutants for only 20 years. Even if 70 years were used in the assessment, the maximum carcinogenic risk at a residence would only increase from 0.19 in one million, as reported in the Draft EIR (see Draft EIR Tables 3.11-23 and 3.11-24), to 0.38 in one million. This increased risk also would be less than significant.

Response 18-13

Comment noted. As discussed in this response and in Response 18-1, all feasible air quality mitigation measures have been incorporated into this EIR. Mitigation Measure AQ-1 in the Draft EIR has been revised to omit "to the extent feasible." See revised Mitigation Measure AQ-1 in Final EIR Section 4.2.2 and Final EIR Table 1-2 for the revised mitigation measure. Clarification is not needed for Mitigation Measure AQ-1 (c) in the Draft EIR. The designation of "new" vs. "used" is irrelevant because the purchased heavy-duty diesel-powered equipment will comply with federal and California diesel standards that are in force at the time of purchase by SWUD.

Mitigation measure AQ-1 (d) in the Draft EIR has been revised to omit "where applicable." See revised Mitigation Measure AQ-1 in Final EIR Section 4.2.2 and to Final EIR Table 1-2.

Mitigation Measure AQ-1 (e) in the Draft EIR has been revised as follows:

The maximum number of scrapers operating simultaneously shall be limited to four.

This limitation is consistent with the computation of emissions in Draft EIR Section 3.11 - Air Quality and Draft EIR Section 3.11.3.4 - Health Risk Assessment.

See revised Mitigation Measure AQ-1 in Final EIR Section 4.2.2 and Final EIR Table 1-2.

Mitigation Measure AQ-1 (f) in the Draft EIR is unenforceable and, therefore, has been deleted. The analysis in the Draft EIR did not consider the use of alternative fuels. The findings and conclusions of the analysis are unaffected because emissions were not calculated on the basis of using alternative fuels. See revised Mitigation Measure AQ-1 in Final EIR Section 4.2.2.

Based on the comment regarding AQ-1(f), SWUD has evaluated the feasibility of retrofitting the existing County-owned diesel-powered transfer trucks to use an alternative fuel (liquefied natural gas [LNG]) or to purchase replacement transfer trucks that use LNG as an air emissions mitigation measure for the proposed project. While LNG-fueled internal combustion engines suitable for use in transfer trucks are available, the potential applicability of LNG-fueled transfer trucks must be considered in the context of various factors. The factors for consideration include the following:

- Transfer trucks are heavy-duty, diesel-fueled tractor-trailers designed to carry loads of approximately 20 to 24 tons of solid waste, typically over substantial highway distances between a transfer station and a landfill. The factors of substantial highway distances and heavy loads lead to the potential to use LNG as an alternate to diesel.
- Compressed natural gas (CNG) is not a suitable alternative fuel for transfer trucks as it does not have sufficient energy density to allow operation of a transfer truck over a reasonable distance between refuelings.
- There are few LNG fueling stations around the nation; specifically, Santa Barbara County has no LNG fueling stations and only one CNG fueling station. The location of this CNG fueling station at the Southern California Gas facility on East Montecito Street is inappropriate for use by large heavy-duty tractor-trailer trucks.
- If a specific situation can be defined in which the transfer trucks would not need to travel long distances before reaching an LNG fueling station, then the alternative of an LNG-fueled transfer truck would be possible. Recently-developed LNG-fueled heavy-duty truck engines (e.g., Mack E7G series) provide sufficient power, torque and reliability to compete with diesel-fueled transfer trucks.
- Notwithstanding the availability of LNG-fueled heavy-duty truck engines, the biggest challenges to implementation of LNG as an alternative fuel for transfer trucks to support the proposed Tajiguas expansion project are siting, public acceptance, environmental review and approval, and permitting of an LNG fueling station. The LNG fueling station would require its own CEQA analysis.

Based on these factors, SWUD has determined that APCD's suggested mitigation measure of retrofitting existing County-owned diesel-powered transfer trucks to use LNG or to purchase/replace transfer trucks that use LNG as part of the Tajiguas expansion project is not feasible at this time. The County will continue to work with APCD to explore the technological and economic feasibility of using alternative fuels for landfill equipment and transfer trucks during the life of the Tajiguas Landfill expansion.

Regarding the comment on Mitigation Measure AQ-2, the Morbark Model 1400 green waste tub grinder can be electric powered. The feasibility of using an electric rather than a diesel-powered green waste tub grinder at Tajiguas as an air emissions mitigation measure for the proposed project has been evaluated by SWUD. While electric-powered tub grinders are available, the potential applicability of their use at Tajiguas must be considered in the context of the County's overall green waste mulching program. Factors for consideration include the following:

- Depending on operational requirements, green waste is stockpiled at the Santa Barbara Transfer Station, and at the Tajiguas and Foxen Canyon landfills. The size of the tub grinder used by the County is capable of processing approximately 110 to 120 tons of green waste per hour.

Tajiguas currently receives approximately 30 tons of green waste per day. As part of the expansion project, Tajiguas may receive up to 145 tons of green waste per day. Based on these tonnages and on the processing capacity of the tub grinder, it is more efficient to batch-process stockpiled green waste periodically (e.g., four or five times a month) rather than on a daily basis. The County has a contract with a tub grinder operator to bring a trailer-mounted portable diesel-powered tub grinder to its sites (Santa Barbara Transfer Station, Tajiguas and Foxen Canyon landfills) on an as-needed basis.

- The County is evaluating the potential economic and operational advantages of purchasing its own portable tub grinder for use at the Santa Barbara Transfer Station, and the Tajiguas and Foxen Canyon landfills on an as-needed basis. To provide operational flexibility for the three sites, this tub grinder would be diesel-powered.
- The existing green waste stockpile and processing pad at Tajiguas is at a fixed position north of the existing landfill footprint. However, as part of the expansion project, the green waste stockpile and processing pad will require periodic relocation as the phased construction and operation of the landfill expansion proceeds. Therefore, while it would be feasible to construct an electrical power line and connection to a fixed green waste processing pad to support a portable electrical tub grinder, it is not practicable to do so for the Tajiguas expansion project. As the location of the green waste stockpile and processing pad will be changed several times over the life of the expansion project, it could be necessary to construct a new power line to each new location.
- Construction of a new power line would require excavation, with potential impacts to biological and cultural resources. Depending on the location of the line, there also could be visual impacts. Depending on the capacity of the existing electrical service lines at Tajiguas and on the various locations for the green waste stockpile and processing pad as part of the expansion project, the periodic construction of a new electrical power line has the potential to result in significant impacts to biological, cultural and visual resources.

Based on these factors, SWUD has determined that APCD's suggested mitigation measure of using an electric tub grinder for the processing of green waste as part of the Tajiguas expansion project is not feasible. Mitigation Measure AQ-2 was developed to reduce peak daily emissions from diesel-powered engines and is included in the EIR for the proposed project. As stated in AQ-2 (see Final EIR Table 1-2), to mitigate the air emissions from the periodic use of a portable diesel-powered tub grinder at Tajiguas, the use of the tub grinder shall be coordinated with the use of scrapers onsite to reduce peak daily air emissions. Through this mitigation measure, the air emissions associated with the periodic use of a diesel-powered tub grinder are mitigated.

Regarding the comment on Mitigation Measure AQ-4, the buffer area does not need to increase. It is already sufficiently large to encompass potential carcinogenic risks greater than 10 in one million based on a 70-year lifetime (see Response 18-12).

#### Response 18-14

The alternatives discussion provided in Draft EIR Chapter 4.0 was prepared in accordance with the CEQA Guidelines (§15126.6) as follows:

*"An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible."*

See Response 18-1. As discussed in Final EIR Chapter 3.0 (Section 3.6 - Conclusions), it is speculative whether an alternative that uses a combination of waste processing technologies could be implemented within the time frame of the project. Therefore, such an alternative is not feasible, is not considered an alternative to the proposed project, and cannot represent an environmentally superior alternative. Further, a specific alternative that uses a combination of waste processing technologies is not required to be analyzed as an alternative to the proposed project.

See Final EIR Chapter 3.0 for an expanded discussion of waste processing technologies.

#### Response 18-15

Comment noted. The SWUD and APCD investigated potential opportunities to have SWUD finance emission reductions from other sources in Santa Barbara County, using the APCD's Innovative Technology Program. The APCD evaluated proposed project emissions compared to baseline and to the limited emission reduction opportunities that still exist in the County. The opportunities are limited after 15 years of applying the Program to sources such as diesel marine vessel engine upgrades and agricultural irrigation pump diesel engine conversions to alternative fuels. The APCD concluded that, outside of repowering the specific equipment associated with the proposed project, the APCD does not have a feasible existing emission reduction program that could provide sufficient emission reductions in the vicinity of the Landfill to substantially "offset" the project's emissions increase. Therefore, the offset program proposed by the APCD is infeasible at this time. The SWUD and APCD have committed to continue an ongoing dialogue that will focus on looking for additional ways to reduce onsite emissions.

19



# CITY OF LOMPOC

VALLEY OF FLOWERS

December 12, 2001

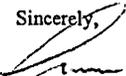
Kathy Kefauver  
Solid Waste and Utilities Division  
109 East Victoria Street,  
Santa Barbara, CA 93101

Dear Ms. Kefauver:

I am attaching the City of Lompoc's comments on the Draft Environmental Impact Report for the Tajiguas Landfill Expansion. The Lompoc City Council heard this item at its December 4, 2001 meeting and voted 4-1 to submit the attached comments.

Thank you for the opportunity to comment.

Sincerely,

  
Stacy L. Lawson  
Senior Environmental Coordinator

Attachment:

## Comments on the Draft Environmental Impact Assessment for the Tajiguas Landfill expansion.

19-1

1. We understand that the Coastal Zone requirements limit the height of the fill to 400 feet above sea level. However, we are concerned that the amount of disturbance, cost, and odor associated with the relocation of the previously placed waste material will be substantial. Opening up this area of waste may adversely affect landfill workers by exposing them to decomposed waste and may create a situation in which surface water contamination would occur. We urge the County to seriously consider an amendment or exception to the County's Local Coastal Program which would allow this small area of waste already deposited to remain. It is not clear from the DEIR why the 400-foot limit was imposed on this site. If it is because of visual impacts, how have these been evaluated and quantified? If it is for structural reasons, where is the evaluation of the need for structural changes? If it is to ensure that minimal amounts of waste are placed in the Coastal Zone, how will the impacts of this waste mass differ from those created by the adjacent waste, which will be placed at a height greater than 400 feet? Allowing this waste to remain in place will alleviate potential impacts related to odor and water quality and will not take up necessary space provided by the landfill expansion.

19-2

2. After review of the surface and groundwater information, as well as the information regarding the ongoing concerns regarding contamination of ocean waters, one issue is a concern. It appears that flow of coliform contamination in the landfill's watershed is approximately the same as that of other similar watersheds in the area, during the winter months. The source of this contamination is not identified. Given the fact that this watershed does not have septic tanks (referenced as a concern in adjacent watersheds) or cattle grazing adjacent to the creek, what are the potential sources of this contamination? This should be discussed in more detail.

19-3

3. In relation to the statements regarding artesian wells being located under the existing landfill material and flowing through that material, as well as the saturated trash findings in the drilling logs, no discussion of the specific impacts of the addition of material over and above the existing landfill material is made. Will the water simply have more material in through which to percolate or is there some reason why the water would not encounter the new material. One possibility is that the material will be placed at an elevation above the artesian well sources. If this is to be argued, is there a difference in the impacts between the front and back canyon options? One way to ensure that the expansion does not create an adverse impact beyond the existing condition may be to require that an impervious layer be placed between the new and old landfill material. In addition, a detailed discussion of where this water goes when it either flows through the waste or is pumped out should be included. If the water is contained and reused, this should be clearly stated and detailed.

4. There are several areas where clearly necessary mitigation is described, but is not identified as mitigation. Even when mitigation has been incorporated into a project description, it must still be identified as mitigation. An example is found on page - 3.2-29, Natural Slopes Adjacent to Landfill Components. This paragraph states "Grading and

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SOLID WASTE & UTILITIES DIVISION	
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19-4

drainage improvements and construction controls (i.e. limiting the size of exposed cut areas, diversion of storm water run-off away from potential landslides, identification of areas for drainage and other controls by geologic observations during initial excavation) will minimize the impact of shallow landslides." It concludes, "As a result, this potential impact is potentially adverse but not significant. No mitigation is required." This conclusion is incorrect, as the previous sentence identified the mitigation that resulted in the finding of non-significance.

19-5

5. In general, while significant impacts associated with both the front and back canyon expansions are identified, the City of Lompoc is concerned that the impacts of a hasty decision regarding refuse disposal, necessitated by a reduction in the proposed expansion or by denial of the proposed expansion, would be greater than those that will result from the proposed project. The county needs a minimum of 15 additional years of landfill life to select, secure and permit its next landfill facility. The City would like to suggest as well, that serious consideration be given to combining the front and back canyon options to ensure maximum utilization of this existing landfill resource.

**Document 19**  
**City of Lompoc**  
**December 12, 2001**  
**Response to Comments**

Response 19-1

See Response 3-123.

Response 19-2

Bacteria are ubiquitous in the environment, and birds are a potential source. Bacteria are used as an indicator that disease-causing organisms may be present. For surface water quality, sampling is done for three types of bacteria: total coliform, fecal coliform and enterococcus.

Total coliform contains coliforms of all types. Total coliform originates from many sources such as soil, plants, animals and humans. Fecal coliform and enterococcus are found in the fecal matter of mammals and birds (i.e. warm-blooded animals, including humans). Fecal coliform is included in the count for total coliform. Enterococcus is not included in the count for total coliform.

A recent DNA Study in the Arroyo Quemado watershed indicated that the bacteria present are originating from seabirds, most notably seagulls. Although DNA testing has not occurred in Pila Creek, birds are attracted to the landfill, similar to Arroyo Quemado. Therefore, it is conceivable that the sources of coliform bacteria in Cañada de la Pila are likely from the seagulls attracted to the Landfill. In addition, domestic dogs have been sighted in the watershed, as well as wild animals. These animals also could be sources of bacteria in the watershed.

The County of Santa Barbara Environmental Health Services recommends avoiding contact with ocean and creek water until at least 3 days after a stormwater runoff event. Water sampling after a storm event usually indicates high bacteria levels in the ocean and creeks. Environmental Health Services recommends avoiding contact with ocean water 50 yards on both sides of a creek mouth area at all times. For additional information, visit the Environmental Health Services web site at [www.sbcphd.org/ehs/oceanmn.htm](http://www.sbcphd.org/ehs/oceanmn.htm). Pila Creek and Arroyo Quemado respond the same as other South Coast creeks, with high bacteria levels following storms. For data and bacteria level trends in South Coast streams, please visit the Project Clean Water web site at [www.countyofsb.org/project\\_cleanwater/default.htm](http://www.countyofsb.org/project_cleanwater/default.htm).

Potential sources of indicator bacteria in the Pila Creek watershed are described and discussed on Draft EIR page 3.3-41.

Response 19-3

See Response 3-33.

Response 19-4

Mitigation measure accepted. A new mitigation measure that specifies limiting the size of exposed cut areas, diversion of stormwater runoff away from potential landslides, and identification of areas for drainage measures has been added. See new Mitigation Measure GEO-3 in Final EIR Section 4.2.1 and Final EIR Table 1-2.

Response 19-5

Comment noted. The City of Lompoc suggests combining the Front Canyon configuration and Back Canyon configuration to ensure maximum utilization of the existing landfill resource at Tajiguas.

Kathy Kefauver County of Santa Barbara Solid Waste Division 10/10/01  
Re: Tajiguas Expansion Project

I am writing you in response to the Tajiguas Expansion Project. We need to expand Tajiguas, not simply as a "dump", but as a Natural Resource Facility. Tajiguas has great potential as a site where we collect the natural resources we're sending there to be thrown away; wood, metals, plastics, doors, sinks, toilets, fixtures, and especially green waste. Instead of just digging a bigger hole, why not "convert" the Tajiguas waste dump to the Tajiguas Natural Resource Facility?

Over the years there are probably millions of tons of resources in Tajiguas we could have recycled; compost, aluminum, glass, roadways, affordable structures, building materials; the list is endless. I've urged the Contractors Association to recycle all reusable materials. We have pollution and the need for expansion because we've not been willing to change our lifestyle. It seems that in our nation of plenty, waste has been a sign of affluence; we're so wealthy, we can "afford" to waste. And over the years we've choked our landfills with materials that do not belong there.

20-1 We are being mandated through AB 939, and now have the opportunity to develop a Green Waste Diversion Program. Every year we landfill thousands of tons of green waste we could be converting to compost; this would reduce the load that feeds expansion. There is such a program at the landfill in Petaluma, called Sonoma Compost. At the entrance to the landfill site, wood, branches, lawn clippings and other green material are diverted to an on-site grinding/screening/composting process. I have attached letters from Paul Paddock who has offered to help us develop a similar program. I invite Paul Paddock to meet with us.

In section 1.5.2 of the draft EIR, "Regulatory Efforts to Reduce Solid Waste Generation mandates that counties prepare County Integrated Waste Management Plans "that reduce the volume of solid waste" through, 1. Source reduction, and 2. Recycling, reuse, and composting. In section 4.4.2.2 of the EIR, the engineering firm states "Composting remains a feasible option for the diversion of waste". I urge us to think in new ways to solve our chronic landfill problem, to see this as an opportunity to improve our future, and encourage us to also develop our own successful composting and recycling program.

Sincerely,  
*James Smallwood*  
James Smallwood  
POB 1101  
Santa Barbara, CA. 93102

-962-9953

Cc: Board of Supervisors, Santa Barbara City Council, U.S Rep Lois Capps, State Sen. Jack O'Connell, Assemblywoman Hannah-Beth Jackson

1.5.2 REGULATORY EFFORTS TO REDUCE SOLID WASTE GENERATION

AB 939 required counties to prepare County Integrated Waste Management Plans (CIWMPs) and to reduce the volume of solid waste being landfilled. Specifically, AB 939 required a 25 percent diversion of solid waste being landfilled by 1995 and a 50 percent diversion by 2000, to be accomplished through source reduction, reuse, recycling and composting. AB 939 also required cities and counties to prepare Source Reduction and Recycling Elements (SRREs) to demonstrate how these waste diversion mandates would be achieved.

In implementing AB 939, the CIWMB, in cooperation with cities and counties, promotes the following waste management practices, listed in order of priority:

- \* [ ] Source reduction.
- [ ] Recycling, reuse, and composting.
- [ ] Environmentally safe transformation (e.g., waste-to-energy).
- [ ] Environmentally safe land disposal.

The CIWMPs are to indicate how the counties and their cities will meet the waste stream diversion goals mandated by AB 939. The CIWMPs must contain specific descriptions of source reduction, recycling and composting activities, as well as efforts to educate the public about source reduction and recycling goals. The plans also must specify funding and provisions for special waste handling, and for household hazardous waste collection and disposal. Local efforts to manage solid waste are overseen by CIWMB, which actively seeks to find ways to support and assist the cities and counties. The CIWMB also is authorized to impose penalties for noncompliance with AB 939.

In 1997, Senate Bill (SB) 1066 was approved to authorize the CIWMB to grant local jurisdictions one or more single- or multiyear time extensions (up to 5 years) from the 50 percent waste diversion requirements of AB 939. The 1997 act enables CIWMB to grant jurisdictions an alternative to the diversion requirement of AB 939, provided the jurisdiction applies for such alternative, can demonstrate that it has made a good faith effort to attain the required diversion, and has demonstrated progress in achieving waste diversion. Provisions of the act terminate in 2006.

Cities and counties are required to annually report ongoing waste management activities and demonstrate compliance with AB 939, which is the responsibility of local jurisdictions. Santa Barbara County and its cities have adopted SRREs as required by AB 939. As a result, waste undergoes source reduction and recycling prior to the residual material being transported to Tajiguas or another landfill for disposal. Depending on the community, these source reduction and recycling programs may include one or more of these or other measures:

- Curbside recycling.

Santa Barbara Contractors Association  
Re: Recycling Materials/Resources

3/11/00

Scott Armstrong, President  
Tom Thomson, 1<sup>st</sup> Vice President  
Peter Grim

A recent presentation given by Joe Campanelli detailing the building of his new office emphasized the value and use of "recycled" materials; reusing gates, sinks, wood, windows, and other materials. As I've thought about this, some basic ideas have emerged.

- \*The importance of diverting "trash" as resource materials from landfill.
- \*Using diverted landfill resource materials for construction and reuse.
- \*The benefits to the environment and the community.

**HOW:**

1. Several construction companies could "hire" at least one person each to form a "Resource Materials Recovery Crew".
2. That this crew is networked with local contractors, architects, and interior designers.
3. The crew would "recover" sinks, wood, windows, iron, appliances, and other materials from local job sites, and remodels from specially assigned "dumpsters" located at job sites.
4. These materials would be collected, and inventoried at a local yard.
5. This yard space could be "donated" by local government; eg, a portion of the city maintenance yard located near the entrance of the city dump.
6. Contractors and architects would use this inventory resource for local building projects.
7. The yard could also be open to the public on Saturdays to "buy" oak flooring, sinks, gates, windows, and other materials inventoried there.
8. A part-time person would be hired to manage the yard.
9. Sales from the yard to local contractors would be accrued and billed on a monthly basis.
10. City government could offset costs through available grants.

This idea could be considered for merit and possible implementation.

James Smallwood, member

962-9953

The 1,500 tpd maximum permitted disposal rate for Tajiguas under the proposed project is based on the waste generation and source reduction and diversion projections for the County and its cities and assumes compliance with AB 939. Waste transported to Tajiguas for disposal consists of postrecycled residual waste, reflecting the AB 939 diversion programs implemented by the communities from which the waste originates.

**4.4.2.2 Composting**

Composting is the biological decomposition of the organic portion of municipal solid waste under controlled conditions. The decomposition is carried out long enough so that the end-product is a stable, nuisance-free material that can be stored and used for land applications, such as fertilizer or soil amendment. Materials that are capable of being composted include yard trimmings, leaves, food products, biosolids and certain paper products.

The County is conducting an ongoing evaluation of composting concepts that may be economically and technologically viable in the near future. Composting remains a feasible option for the diversion of waste. However, neither composting alone, nor together with other alternative waste technologies that may be economically and technologically feasible in the future, would completely eliminate the need for landfill capacity for the residual waste that will require disposal.

**4.4.3 WASTE-TO-ENERGY**

Conversion technologies for municipal solid waste residuals may at some point in the future provide a way for local jurisdictions to attain the 50 percent state-mandated diversion level. The process of converting waste to energy utilizes waste as fuel to produce power or other usable energy by-products. The process used to generate power from waste is similar to the process used for energy generation from other, more typical, fuels (oil, natural gas). The fuel is burned to provide heat that is used to generate steam, which then is used to turn a turbine and power a generator. Other applications include using the steam for direct uses, such as space heating.

According to some researchers, the process of converting waste to energy is potentially capable of reducing waste stream volumes by 80 to 90 percent (Brown, Vence & Associates, 1989). However, only four waste-to-energy facilities presently exist in California, and only 110 exist



November 6, 2001

To:  
Jim Smallwood  
Natural Systems  
FAX 805 962-9953

From:  
Paul Paddock  
Sonoma Compost  
FAX 707 664-1943

Re: Sonoma County Organic Recycling Program

Dear Mr. Smallwood,

We appreciate your interest in the Organic Recycling Program conducted by Sonoma Compost. We wish you success in your efforts to enhance your county's waste reduction efforts while improving your local soils and environment.

I am faxing you a copy of our latest newsletter regarding the Organic Recycling Program. The Program is operated at our County's Central Landfill on behalf of the County of Sonoma and its cities.

The Organic Recycling Program is clearly the most significant factor in the County's waste diversion efforts to date. Since 1993 we have diverted over 510,000 tons of yard trimmings and wood waste from our local landfill. The yardwaste is converted to compost and mulches while the woodwaste is utilized for mulches, bio-fuel and alternative daily cover at the landfill.

In addition to diversion credits, there are other benefits which make this one of the most popular programs our local government is involved in. These benefits include:

- 1) A variety of affordable compost and mulch products that are utilized by backyard gardeners, organic farmers, grapegrowers, professional landscapers and public agencies.
- 2) All materials produced are sold at a profit and sales revenues are shared with local government.

3) The Program provides a tangible example of "closing the recycling loop locally". Residents can see that the yard and woodwaste they set out at the curb is directly and locally converted to a beneficial use.

4) Through Sonoma Compost's public education program, the public has learned that compost and mulches provide beneficial alternatives to chemical fertilizers, herbicides and pesticides.

5) Local farmers have gained a greater respect for our County's valuable topsoil and use mulches to suppress weeds and control soil erosion on steep hillside vineyards.

6) Local schools are closely involved in the organic recycling program. Students come to the compost facility to observe the conversion of waste organic materials to valuable humus. They also receive donated compost for use in their school gardens. Finally, the students take the recycling and soil conservation message home to share with parents and siblings.

In closing, I would like to extend an invitation to you and your local decision makers to visit our site and learn first hand what a successful Organic Recycling Program can do for your County, your recycling efforts and your local environment.

Cordially,

Paul Paddock,  
Sonoma Compost Co.



California Environmental Protection Agency

# NEWS RELEASE

Integrated Waste Management Board

**Attn: Environment Editors**

For Immediate Release  
April 9, 1997  
97-033

Contact: John Frith  
Lanny Clavecilla  
(916) 255-2296  
cpa@gra.ciwm.ca.gov

## SONOMA RECYCLING COMPANY FIRST IN STATE TO EARN COMPOST QUALITY RECOGNITION

PETALUMA -- A recycling company in Sonoma County has earned the first official seal of approval in the state for its yard waste compost product, using product guidelines developed by an alliance of groups, including the California Integrated Waste Management Board.

"This event marks a significant step in California's march towards 50 percent waste diversion by the year 2000," said Waste Board Member Paul Relis at a ceremony today heralding the achievement. "Compost produced from lawn and garden trimmings and other organic wastes from communities around California is expected to play a key role in escalating the state's level of waste diversion. By keeping this valuable 'urban harvest' of organic materials out of our landfills, we can preserve their capacity and return what would have been a waste into valuable soil amendments for our gardens and farms."

The California Compost Quality Council officially awarded its first Certificate of Verification to the Sonoma Compost Company at Sonoma County's central landfill on Meacham Road. The certificate makes it possible for buyers to purchase from a registered supplier soil conditioners that have passed a rigorous set of quality requirements. Sonoma Compost operates the program on behalf of the county and its cities. The Council is made up of farmers, compost producers, agriculturists, landscapers, university professors, soil researchers, and recycling advocates. Organizations participating in the Council include the California Landscape Contractors Association, the California Department of Food and Agriculture, Caltrans, the California Certified Organic Farmers, the National Composting Council, and the Waste Board.

Registration of Sonoma Compost Company provides an independent verification of the quality and safety of their product. The quality seal is a symbol consumers can look for when purchasing compost products.

The Sonoma Compost Company was required to pass site inspection visits, maintain strict quality control over its product, and comply with stringent State composting guidelines limiting the presence of pathogens and trace elements in such products. In addition, registered compost producers are required to disclose information on their composting methods and product's organic matter, salinity, feedstock additives, particle size, bulk density, pH levels, and moisture content.

(more)

ALL THE DIRT THAT'S FIT TO PRINT



Volume III, Number I

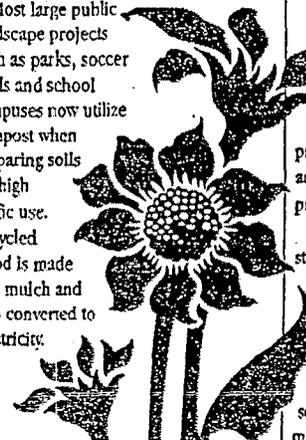
Fall Edition

## Compost, Mulch Use Grows & Grows

Production and use of compost and mulches made from recycled organics has surged dramatically since the state mandated organic recycling. According to the California Integrated Waste Management Board, over 6 million tons of compostable yard trimmings were diverted from the state's landfills last year.

Closer to home, Sonoma County residents have diverted over 508 thousand tons of yard trimmings and wood waste from our local landfill since 1993. These valuable organic materials were converted to compost and mulches used by a growing list of backyard gardeners, organic farmers, grape growers and landscapers.

Most large public landscape projects such as parks, soccer fields and school campuses now utilize compost when preparing soils for high traffic use. Recycled wood is made into mulch and also converted to electricity.



## Sonoma Compost Goes to School



Students from Penngrove Elementary School water newly planted garden boxes amended with Sonoma Compost.

Since implementing the Organic Recycling Program, Sonoma Compost has been very involved with local schools. We conduct field trips, provide compost at discount prices for school landscaping projects and donate a considerable amount of material to school garden projects.

A field trip to our 20 acre site gives students an opportunity to see the huge amount of organic matter being diverted from the County landfill.

They'll see this material being ground, formed into 500 foot windrows, turned, aerated and screened. They'll also be exposed to the math and logistics involved with

compost facility. Finally, they'll learn about the lab tests that insure our compost meets state requirements.

Perhaps the most beneficial aspect of the tour is that students see the natural process that converts grass, brush and tree trimmings into valuable humus that can rebuild our valuable topsoil.

For information on field trips, special school pricing or how schools qualify for donated materials, please call Paul at (707) 664-9113.

### MORE INSIDE:

• Compost Program Update

• Affordable Feed

• FAQ's

• Vineyard Notes

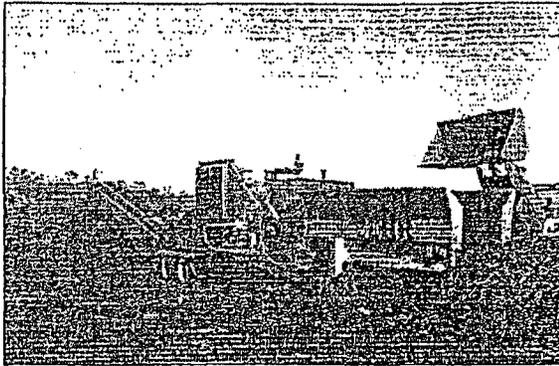
## Compost Program Update

As most readers know, the Sonoma County Waste Management Agency has decided to keep the existing Organic Recycling Program at the County's Central Landfill, until at least 2005. In late 1999, due to space constraints at the landfill, the Agency was forced to consider relocating the Program to some other site. As it turned out, finding a site that met current environmental standards was not possible in the timeframe the Agency had to work with. About the same time, Sonoma Compost was asked by Empire Waste Management to take over the yard and wood waste sorting and grinding operations at the landfill.

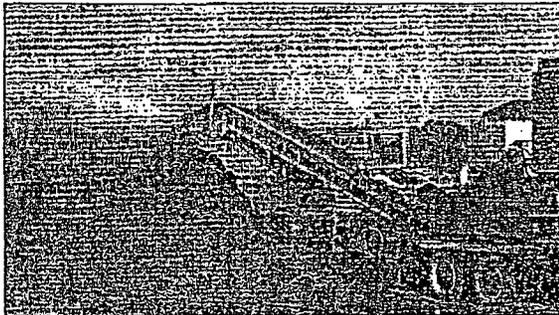
*By controlling all aspects of compost operations, Sonoma Compost is working to improve both product quality and availability.*

In a related development, the Agency decided Sonoma Compost should continue operating the program through June 2005. Sonoma Compost agreed to cover the balance of the County-owned compost site with concrete that will provide a year-round operating surface and protect local water quality.

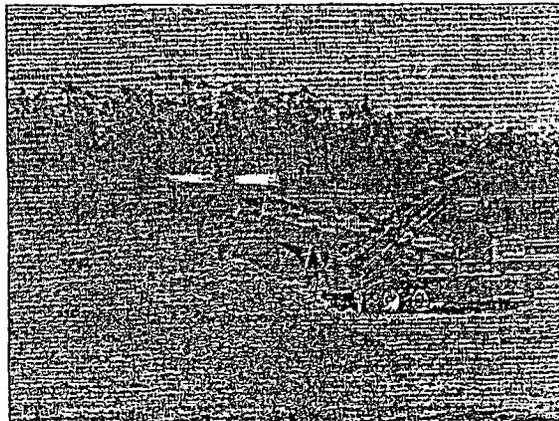
By controlling all aspects of compost operations, Sonoma Compost is working to improve both product quality and availability. To accomplish this goal, we've acquired a large horizontal grinder, two new loaders, a new screening system and new trucks. In addition, we've hired seven new



Sonoma Compost's new, 100 ton-per-hour yard and woodwaste grinder.



Ground yard trimmings exiting the grinder. Steam indicates the material is already decomposing and generating enough heat to kill weed seeds.



## Yes, We Deliver

Sonoma Compost will be happy to arrange delivery of up to 40 yards of compost or mulch per load. Of course, we'll also load *your* vehicle, whether you have a small pickup or a large truck.

The cost per yard of delivered material can be minimized by ordering in full truckload quantities, since hauling costs are the same, whether a truck is half full or loaded to the top.

*At Sonoma Compost, we'll do everything possible to minimize the expense of getting material to you.*

Although we can often schedule deliveries within a day or two, lead times can be considerably longer during our busy spring and fall seasons. For this reason we always advise customers to call early to insure timely delivery.

There's No Such Thing As Free Delivery! Although some soil dealers advertise free delivery, one doesn't have to be a rocket scientist to understand that there really is no such thing. There are real and significant costs involved in trucking bulk materials and these costs are obviously included in the cost of the material if no delivery charge is made.

At Sonoma Compost, we'll do everything possible to minimize the expense of getting material to you. You can save money by using your own truck. If we arrange delivery for you, the charge for short hauls is less than for long ones.

**The Bottom Line:** When buying any soil product, ask what the total cost per cubic yard of the delivered material is, including any required sales tax.

## Sonoma Compost Product News

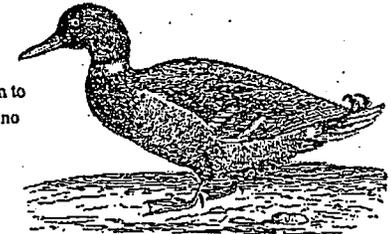
### Low Cost Mulches Getting Great Reviews

While our compost has always received most of the attention, we're finding that more and more of our customers are raving about our mulches made from recycled organics.

Early Mulch is a terrific product that can add bulk organic matter to soil, conserve moisture, minimize erosion, and suppress weeds. As it slowly breaks down, it provides a modest input of nutrients to the soil. It's sold Coarse or Screened and is used by farmers, professional landscapers and backyard gardeners.

Vineyard Mulch is used for weed and erosion control, moisture retention and to improve soil organic matter. Growers especially like that it allows them to rely less on chemicals that have no secondary benefits.

Mallard Mulch is a new product. Sonoma Compost is blended with a combination of composted duck manure and rice hulls. It is especially good for improving the structure and workability of heavy clay soils.



### Affordable Fuel -- Recycled Firewood Sales Heat Up

For our wood burning friends, we're diverting wood from our grinding operation that's appropriate for firewood. Most comes from trees that have come down or were in danger of coming down in a storm. The firewood is a mix of wood species, including, pine, fir, eucalyptus, apple and acacia. Some is dry, some is still green.

Firewood is \$1.10 per cubic foot or \$140 per cord. (1 cord = 128 cubic feet) Customers load their own vehicles. To get the most wood for your money, we urge that you stack firewood tightly when placing it into your vehicle.

Call for availability; because of high energy costs, this affordable fuel is in great demand and we're sometimes sold out.

### Good News On Path Mulch Pricing

Since taking over the grinding operation, we've been able to produce and market our popular Path Mulch at about half the price previously charged.

Path Mulch is a decorative "walk-on mulch" made from recycled wood. Its uniform sizing, long life and pleasing appearance have made it one of our best selling products. The fact that it's not made from virgin forest products makes it especially attractive to environmentally friendly landscapers and backyard gardeners.

Call 707-664-9113 for details or to schedule a delivery.

# You Wanted to Know... Answers to Frequently Asked Questions

## Is Sonoma Compost free of weed seeds?

Sonoma Compost undergoes a thorough thermophilic composting process that meets all State composting requirements. Decomposing organic matter is exposed to temperatures of at least 131 degrees for an extended period of time. During this time it is turned at least 5 times. As a result, virtually all weed seeds are destroyed.

To insure that our process has resulted in weed seed free compost, we randomly select batches of compost ready for sale and send them to a state certified soils lab where weed seed germination tests are conducted. The results have consistently shown Sonoma Compost to be free of weed seeds.

Interesting Note: Occasionally, a customer will report that weeds started growing after an application of compost. When we investigate, we usually find that the gardener or landscaper has also fertilized heavily and applied water to soils that hadn't been cultivated for some time. The resulting weed growth is usually due to a dormant seed bank in the soil that has been given perfect conditions in which to germinate.



## Can compost help my adobe soil?

Adobe type soils, like those found in Santa Rosa, Rohnert Park, Cotati and Petaluma are generally heavy, sticky when wet, and rock hard when dry. Most gardeners will testify that they're very difficult to work.

Such soils however, can be transformed into productive, easy to work soils with a little patience, know how, and a generous application of composted organic matter. You might consider adding some gypsum as well for particularly difficult soils.

Helpful Hints: Adobe soils won't be transformed overnight. Wait for the right time of year. If you try to work with the soil when it is either too wet or dry, you will likely become discouraged and may never want to set foot in your garden again!

When conditions are just right, usually sometime in the late spring, work about six inches of compost into your soil. An option is to apply an equal amount of mulch to the surface in the fall. Before planting, let the soil and the compost or mulch work together for several months. Your patience should be rewarded with a soil that is healthier, more productive and most importantly, easier to work!

And don't forget, this isn't a one-time affair. Each time you add more organic matter to your soil and allow the soil structure to improve, you'll be rewarded with better growing conditions and less work.

## What is that white stuff?

Those who compost on their farm or in their backyard often ask what the white, spider weblike material is on their compost pile.

The answer is actinomycetes. Actinomycetes are higher form bacteria that are responsible for the fresh, earthy smell associated with maturing compost. Actinomycetes are especially important in the formation of humus.

While they are decomposing animal and vegetable matter, actinomycetes liberate carbon, nitrogen, and ammonia, making nutrients available for growing plants.

# Heard It Through the Grapevine... Hillside Mulch Research Results

Preliminary results indicate that soil loss in hillside vineyards can be reduced by up to 95% with an application of Sonoma Compost's "Vineyard Mulch." Sonoma Compost and its research co-operators have been studying soil erosion in steep vineyards since 1999 and Vineyard Mulch was developed specifically for this purpose.

According to Will Bakx, Sonoma Compost's soil scientist, "The data indicate that Vineyard Mulch effectively reduces soil loss while suppressing weeds and conserving soil moisture and heat. As it slowly breaks down, Vineyard Mulch also provides a modest input of nutrients and soil organic matter."



Vineyard Mulch in place beneath vines on steep hillside vineyard. Research shows soil loss from erosion is reduced by up to 95% with properly applied mulch.

*Sonoma Compost and its research cooperators have been studying soil erosion in steep vineyards since 1999 and Vineyard Mulch was developed specifically for this purpose.*

The Mulch trials are being conducted on vineyards owned or managed by Iron Horse Vineyards, Everett Ridge Vineyards, Beringer Vineyards and Walsh Vineyard Management. Research cooperators include The Napa Resource Conservation

District, Sotoyome Research Conservation District, U.C. Cooperative Extension Services in Sonoma and Napa Counties, Sonoma County Farm Bureau, the City of Napa and Napa Garbage Service. Initial funding was provided by the California State Integrated Waste Management Board.

For more information on this research, call Will Bakx at (707) 664-9113.

## Compost/Mulch Use In Vineyards Grows, Too

As sustainable practices gain greater

acceptance in the grower community, the use of high quality compost and mulche have increased, too.

Growers use compost in new and existing vineyards to improve soil structure and provide needed nutrients and microorganisms. Mulches are used to suppress weeds and control soil loss on steep hillside vineyards.

Although we're gearing up for our biggest fall season ever, projections indicate demand may still exceed supply. Please place orders now to insure delivery.



# Sonoma Compost – High Quality and Organic!

We're proud to have been founding members of the California Compost Quality Council. We were the first compost facility in the state to make our facility open to CCOG inspectors who

certify that our operations meet their rigorous requirements.

We're also extremely pleased that our compost qualifies for use by organic growers.

# UPDATE

American Society of Landscape Architects • Northern California Chapter • June/July 1994

Knowledgeable landscapers have long recognized the benefits of building healthy soils through the application of properly composted organic matter. Often however, such material is hard to find or prohibitively expensive.

After 4 years of research and a year long pilot project, high quality compost and mulches made from 100% recycled organic materials are now available at realistic prices through a joint program involving the County of Sonoma, local cities and a well established composting company.

Sonoma Compost is currently diverting about 120 tons of landscape trimmings per day from the Sonoma County waste stream. That figure is expected to increase since the City of Santa Rosa just began diverting organics to the program, "If not composted, this very significant volume of clean organic matter would otherwise be landfilled," said Will Bakx, Research Director for Sonoma Compost.

The organic feed stock is collected from local landscapers and backyard gardeners and consists of grass clippings, tree trimmings, brush and clean wood. The materials are ground, moistened and composted in windows that are 18 ft. wide, 7 ft. high and 250 ft. in length. They are turned and aerated frequently to make oxygen available to the naturally occurring micro-organisms that

decompose organic matter into valuable humus. No inorganic ingredients or starters are utilized.

Used as a soil amendment or mulch, the product promotes healthy soils by introducing beneficial nutrients, micro-organisms and organic matter into soils. Soil structure and water holding capacity are generally improved in sandy soils and in heavy clay soils, the added organic matter tends to improve drainage and make oxygen more available to the root zone.

This compost is an excellent soil amendment or mulch, particularly well

dock added. The material has been approved for use on certified organic farms.

Users include several cities, schools, a business park, a golf course, arborists and a number of businesses in the landscape design and construction industry. Paddock indicates that he is actively soliciting feedback to determine how the program and product specs can be made most useful to the landscaping community.

The material is available directly from Sonoma Compost as well as from Sequoia Landscape Materials in Santa Rosa.

## Regional Composting Program Makes Affordable, High Quality Soil Amendments Available

suited for a number of landscaping applications," according to Bakx. Independent lab tests indicate the presence of a number of important nutrients and minerals. And rather than depleting soils of nitrogen after several months, as some fortified products do, fully mature compost releases its nutrients over a more extended period," said Bakx.

"The reaction the product is receiving is very positive," according to Paul Paddock, the program's marketing director. "Progressive landscape architects and contractors are always excited to find that simple, composted landscape trimmings can look, feel, smell and perform this well. These people really understand and appreciate why it makes sense to utilize this beneficial material," Paddock added.

The composting operation is located on a closed portion of the Sonoma County Central Landfill. A Demonstration Compost

Garden is under construction at the site to show the public the beneficial uses of compost and mulches in a variety of local conditions and applications.

Those in the landscaping community are invited to call (707) 578-5459 to arrange for a tour of technique workshop. ♦

Boat capsizes, spills 19 into sea; child dies

B3

The Press Democrat

# EMPIRE NEWS

B

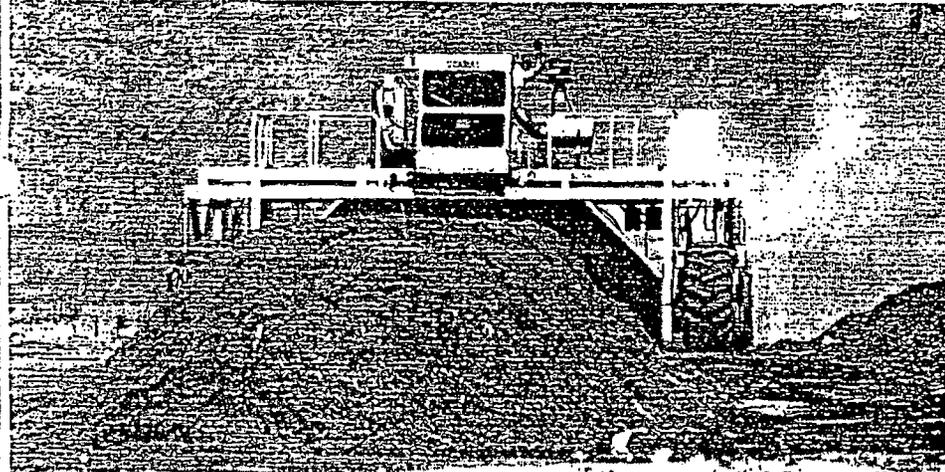
Santa Rosa, California. Tuesday, September 6, 1994

## RECYCLING RICHES



Rows of garden scraps and wood chips are being turned into soil at Sonoma County compost facility.

# Mining black gold



Compost turner churns over pile, gathering material from the outside and piling it in the middle. Steam is liberated in the process.



Wood chips and garden scraps are added to the wood pile which will be turned and composted.

## Farmers rave over fertile compost

By TIM TRENKLE Staff Writer

Lawe clippings from the grand homes along Santa Rosa's MacDonald Avenue are enriching the soil at Perry Kozlowski's berry farm in Forestville, a farm-city partnership focusing national attention on Sonoma County. It's not maple and lawn clippings that Kozlowski enriches; rather, it's bioberry and raspberry bushes that a dark, rich compost teeming with nutrients and beneficial organisms.

Farmers such as Kozlowski call it black gold. And it's coming from the county dump.

"I'm really impressed with the compost's rich, dark color and what it's doing for our berries," said Kozlowski, member of one of

"Ah smell this. Isn't this beautiful stuff?"

SON SCIENTIST WILL BAKX, SONOMA COMPOST

Sonoma County's best-known farming families.

As part of the county's energetic composting project, lawn clippings and yard trimmings from cities and rural residences throughout Sonoma County are getting

another life as compost in berry patches, vineyard orchards, vegetable gardens and backyard flower beds.

The Sonoma County compost operation, a partnership between government and private enterprise, is one of the largest organic recycling programs in the United States.

Overseeing the transformation from yard debris to valuable compost is Will Bakx, a soil scientist at Sonoma Compost, which operates every day a week on 22 acres at the central Sonoma County Landfill off Meacham Road near Petaluma.

Bakx, 30, and related to The Netherlands, talks about his compost the way a child envisions over the creation of a machine. See Gold, Page B3

# THE PRESS DEMOCRAT

Santa Rosa, California

Michael J. Parman, Publisher  
Bruce W. Kyse, Executive Editor  
Robert L. Swofford, Managing Editor  
Peter Golis, Editorial Director



## Compost project a profile in success

Goodness knows we make the case often in this space: Government ignores problems, government is ineffective, government costs too much.

That's why it is so important — and reassuring — to read stories such as staff writer Tim Tesconi's Tuesday report on Sonoma County's composting project.

Because of a state law requiring cities to reduce their contributions to the waste stream by 25 percent by 1995 and by 50 percent by 2000, cities all over California have moved aggressively into recycling.

Sonoma County is ahead of the pack with its composting effort. Yard debris from 70,000 households in Santa Rosa, Rohnert Park, Healdsburg, Cotati, Windsor and Petaluma is collected curbside in separate containers, hauled to a 22-acre site at the central county landfill off Meham Road near Petaluma, and turned over to the loving care of Will Kaxx, a soil scientist, who supervises a four-month transformation.

Writes Tesconi: "During that four months, the organic garden waste from yards is sorted, shredded, moistened, screened, piled, tossed, aerated, tested and sifted. Everything but taster in the quest to create the richest, blackest humus. The final product is basically free of weed seeds, pathogens and pesticide residues — all destroyed during the carefully monitored composting process when temperatures reach more than 140 degrees Fahrenheit for 10 days and longer."

This nutrient-rich organic material is prized by farmers and landscapers, thereby enhancing and supporting our agriculture-based economy. Also, against the cost of building a new landfill, recycling is money in the bank.

Other jurisdictions are scouting out the Sonoma County operation, which means the lessons learned here will spread economic and environmental benefits to other parts of the state and nation.

This experience proves that our contentious society is capable of using the power of laws, sought by activists, to steer private industry into more enlightened practices. Then, working with governments that manage to cooperate with one another, everyone creates a success.

The goal must be to bring this same "win-win" attitude to other endeavors.

**Document 20**  
**Letter from James Smallwood**  
**October 10, 2001**  
**Response to Comments**

Response 20-1

Comment noted. Draft EIR Section 4.3.2 discusses the County's efforts to site a new South Coast Transfer Station/Materials Recovery Facility.

See Final EIR Chapter 3.0 for a discussion of waste processing technologies.



21

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December 14, 2001

By Hand

Kathy Kefauver  
 Sr. Environmental Engineering Planner  
 County of Santa Barbara Public Works Department,  
 Solid Waste and Utilities Division  
 109 East Victoria Street  
 Santa Barbara, California 93101

Re: Review of Draft Environmental Impact Report  
 Tajiguas Landfill Expansion Project

Dear Ms. Kefauver:

On behalf of Hatch and Parent's clients who own property impacted by the proposed expansion of the Tajiguas Landfill ("Landfill"), I submit the following comments to the draft environmental impact report ("DEIR"). The DEIR is inadequate because it fails to provide sufficient justification for any expansion of the Landfill and disregards viable options including environmentally superior alternatives.

Introduction

The DEIR and the Landfill expansion project description fail to provide evidence that expansion of the Landfill is necessary to be in compliance with AB 939. To the contrary, the DEIR states that "with the diversion programs that have been implemented by the County and its cities under AB 939, plus the capacity at Tajiguas, Sant Barbara County, as a whole, has the required 15 years of disposal capacity." (DEIR, page 1-10.) The DEIR suggests that agreements for disposal with the City of Lompoc and Santa Maria would be required but presents no evidence that this would be difficult or cost prohibitive. Also the DEIR provides no comparative analysis of the environmental impacts due to transportation to those North County locations compared with the DEIR proposed project or the other project alternatives in the DEIR.

SB 283910 v1: 006094.0002

SOLID WASTE & UTILITIES DIVISION  
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 DEC 14 2001  
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Kathy Kefauver  
 December 14, 2001  
 Page 2

The DEIR states that the current transfer stations and exiting landfills have sufficient permit capacity to meet the AB 939 requirements and accommodate the No Project alternative. If the County has met its AB 939 obligation, the DEIR should more thoroughly analyze the No Project alternative. The only issue raised in the No Project analysis is the possible air quality impacts from further trips to North County landfills. The analysis stops short of comparing this impact to the numerous impacts in Chapter 3 of the DEIR. A quick review of the extensive list of impacts in Chapter 3 of the DEIR would indicate the air quality impacts of trucks going to the other landfills is slight at best.

21-2

1. The DEIR fails to adequately analyze the Environmentally Superior Alternatives. The discussion at Section 4.6 of Environmentally Superior Alternatives is inadequate. (DEIR page 4-80.) At best it fails to provide any analysis of the numerous recycling, composting, and alternative energy production possibilities raised by numerous comment letters including the Community Environmental Council December 7, 2001 letter. This DEIR discussion provides only one environmental impact for the No Project alternative, air quality. There is no discussion or analysis of the possible air quality impacts versus the water quality, nuisance (smell, noise, visual, vectors and birds), biological resource, and other impacts included in the Landfill expansion project.

21-3

2. Baron Ranch South Coast Transfer Station alternative is inappropriate. The inclusion of the Baron Ranch as an alternative location for development of a new South Coast Transfer Station is inconsistent with the purposes underlying the purchase of the Ranch. The DEIR executive summary states that "The ranch was purchased by the County in January 1991 specifically to provide a buffer for the landfill operations at Tajiguas." (DEIR Section 1.2, page 1-2, emphasis added.) Now the County proposes to eliminate this buffer area and instead consider creation of an environmentally impacting project. The proposed purpose of the new South Coast transfer Station would be to collect waste that currently goes to the Landfill and then transport it to an out-of-County disposal facility. However there are also composting and recycling features to the Station that would have unknown impacts on the Baron Ranch and surrounding properties.

21-4

The Baron Ranch should not be considered for any development or placement of structures related to the disposal of the Landfill waste or location of a transfer station. Any future discussion of a location for a South Coast Transfer Station should not include the Baron Ranch.

3. Impacts and Mitigation Measures are inadequate. DEIR Section 3 provides an inadequate analysis of the Landfill expansion impacts on the environment and surrounding properties. As an example, I provide an overview of a few of those impacts which should be given greater review and analysis before a decision to proceed with the expansion occurs:

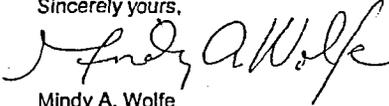
SB 283910 v1: 006094.0002

21-1

- 21-5 • **Geology:** Mitigation measures should be proposed to minimize the Landfill expansion sedimentation effects on the Canada de la Pila watershed. (DEIR Sec. 3.2.)
- 21-6 • **Water Resources:** The expansion of the Landfill may increase the potential for contamination of water supplies in the surrounding areas. The DEIR provides insufficient evidence to show that such contamination has been and will be prevented. (DEIR Sec. 3.3.)
- 21-7 • **Biological Resources:** Under the expansion proposal, approximately 71 acres of habitat are proposed for destruction and while revegetation is proposed, the mitigation measures are not sufficient to justify expansion of the Landfill. There are substantial impacts revealed within the DEIR on the sensitive species in the area, for example the red-legged frog, San Diego woodrat, mountain lions, ring tails, California horned lark and other birds. The proposed disturbance of the Landfill grassland, chaparral, coastal sage scrub and oak woodland areas is not justified by the explanations in the DEIR. (DEIR Sec. 3.4.)
- 21-8 • **Nuisances:** The explanation of the mitigation under this section suggests the measures are either "required by regulation, permit requirements, or normal procedures for existing landfill operations." (DEIR Sec. 3.6.5, page 3.6-20.) If these measures are/were sufficient to address the impacts discussed in this section why would the problems and impacts still persist? The numbers of vectors and "nuisance" birds in the area is not sufficiently mitigated. The odors from waste transport to the Landfill and exposed waste at the Landfill working face are not remedied by the current measures and therefore will not aid in mitigation in if the Landfill is permitted to expand. If the current mitigation measures are not effective under the existing layout of the Landfill why is the DEIR relying on them to respond to expanded Landfill issues? (Sec. 3.6.)
- 21-9 • **Visual Resources:** The DEIR view examples do not reveal what the visual impacts will be while the Landfill is still processing the waste in the front and/or back canyon areas. Instead they provide views of after the vegetation has been completed and mitigation steps are completed. (Sec. 3.8 and Fig. 3.8-1.) What will it look like for the next 20 years while the waste is being compiled at those locations?
- **Traffic:** The proposed expansion would result in an increase from an average of 137 to 180 total vehicle trips per day added to the projected

- 21-10 } 40,000 average daily traffic on Highway 101. (Sec. 3.10.) Several comment letters have raised the issue that the highway access is unsafe at the Landfill access location. The proposed signage and stop sign are not aggressive enough measure to provide safe access.
- 21-11 • **Air Quality:** The DEIR states that several ambient air quality standards will be exceeded. (Sec. 3.11)
- 21-12 } **Conclusion**  
The Baron Ranch should not be considered as an alternative location for a new South Coast Transfer Station because that development would be inconsistent with the declared "buffer" purpose behind the County's purchase of the property. The DEIR stops short of developing and exploring environmentally superior alternatives to the proposed Landfill expansion and further research should be done to develop better alternatives. The DEIR fails to provide mitigation measures that eliminate or minimize Landfill expansion impacts on the environment and neighboring properties.

Thank you for this opportunity to comment on the DEIR. Please retain my name and address on your list for all noticing pertaining to this subject.

Sincerely yours,  
  
Mindy A. Wolfe  
For HATCH AND PARENT

MAW:mth

**Document 21  
Hatch and Parent  
December 14, 2001  
Response to Comments**

Response 21-1

The commenter is correct. As a whole, Santa Barbara County has the required 15 years of disposal capacity, but the following sentence that follows in Draft EIR Section 1.5.3 (page 1-10) is needed to provide accuracy:

*“However, a portion of this capacity is remote from the South County and reflects remaining capacities of the City of Lompoc and City of Santa Maria Landfills.”*

Draft EIR Sections 4.2.1.2 and 4.2.1.4 address the potential for disposal of Tajiguas waste at the Lompoc and Santa Maria Landfills. As described in the Draft EIR, disposal of Tajiguas waste in the Lompoc Landfill is not feasible. The Santa Maria Landfill has the ability to accept an additional 365 tpd of waste, with the consequence of decreasing the useful life of the landfill to less than 15 years. Further, as stated in Draft EIR Section 4.2.1.3:

*“... a moderate increase in vehicle miles traveled would be required to dispose of waste generated in the Santa Ynez Valley at the Santa Maria Landfill rather than at the Tajiguas Landfill. This increase in vehicle miles would have the potential to result in increased waste disposal costs, vehicular emissions and other transportation – related impacts.”*

Response 21-2

The commenter is incorrect in the assertion that, “The DEIR states that the current transfer stations and existing (*sic.*) landfills have sufficient permit capacity to meet the AB 939 requirements and accommodate the No Project alternative.” To the contrary, Draft EIR Section 1.5 (page 1-7) states, “... even with meeting the source reduction and recycling requirements of AB 939, additional disposal capacity will be required in southern California in general, and in Santa Barbara County in particular, to support current and future populations.” Further, Draft EIR Section 4.2.1 (page 4-5) states that, “... there is not currently sufficient capacity in the County to accept waste that would go to Tajiguas during the 15-year life of the proposed project.”

The commenter is incorrect in the assertion that, “The only issue raised in the No Project analysis is the possible air quality impacts from further trips to North County landfills.” The No Project alternative does not analyze air quality impacts from trips to North County landfills. It evaluates air quality impacts of trips to out-of-County transfer stations and either Chiquita Canyon landfill or the Eagle Mountain or Mesquite Regional landfills.

The existing North County landfills are addressed in Draft EIR Section 4.2.1. As discussed in the Draft EIR, neither the Lompoc Landfill (Section 4.2.1.2) nor the Vandenberg Air Force Base Landfill (Section 4.2.1.4) would accept waste from southern Santa Barbara County. Further, pursuant to a policy decision by the County Board of Supervisors, the Foxen Canyon Landfill (Section 4.2.1.1) is programmed to close about the time the proposed project begins. As a result,

none of these landfills is a feasible destination for waste from southern Santa Barbara County. The Santa Maria Landfill (Section 4.2.1.3) has additional capacity of approximately 365 tons per day (tpd) over its current average disposal rate. Therefore, it does not have the capacity to accept the 1,500 tpd of waste that is permitted for disposal at Tajiguas. As a result, the Santa Maria landfill also is not a feasible destination for waste from southern Santa Barbara County.

In considering impacts of transporting waste for disposal in the Chiquita Canyon Landfill, Draft EIR Section 4.3.1.3 states the following:

*"Under this alternative, emissions would occur in Santa Barbara, Ventura and Los Angeles counties. These three counties are nonattainment for PM 10 and ozone. Therefore, vehicular emissions that are in excess of County or State thresholds would constitute a significant impact. Because vehicular emissions from this alternative would be additive to existing nonattainment conditions in Ventura and Los Angeles counties, they would constitute a significant air quality impact."*

The CEQA Guidelines (§15126.6[c]) state that, *"Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are . . . inability to avoid significant environmental impacts."* As stated above, transport of waste to the Chiquita Canyon Landfill would result in a significant air quality impact.

The commenter is incorrect in the assertion that air quality impacts of trucks going to the other landfills is slight at best. For example, in discussing the Santa Maria Landfill, Draft EIR Section 4.2.1.3 states:

*"Based on the increased distance that waste would be transported prior to disposal, transportation-related emissions would be approximately three times greater if waste generated in the South County were hauled to the Santa Maria Landfill rather than to the Tajiguas Landfill."*

As discussed in Draft EIR Section 4.5.1, under the no project scenario, although a portion of Tajiguas waste might go to the Santa Maria Landfill (approximately 109 tpd), the remainder would be transported to the Chiquita Canyon Landfill. Based on the approximate 76-mile distance to the Chiquita Canyon Landfill (see Draft EIR Table 4-2), transport of the remainder of Tajiguas waste to that landfill would result in significant air quality impacts. As a result, potential air quality impacts associated with the No Project alternative would be significant.

Further, in considering impacts of transporting waste by rail for disposal at the Eagle Mountain or Mesquite Regional landfills, Draft EIR Section 4.3.3 (page 4-69) states the following:

*"There would be additional emissions from rail transport to either Eagle Mountain (a distance of 345 miles) or Mesquite (a distance of 355 miles). Based on these distances, with rail haul to Eagle Mountain, emissions would be approximately 14 times those associated with the proposed project. Rail haul to Mesquite also would result in emissions approximately 14 times those associated with the proposed project. These emissions would occur in nonattainment air basins. Therefore, this alternative does not reduce or eliminate significant mobile emissions impacts compared to the proposed project."*

Based on the above, transport of waste to the Eagle Mountain or Mesquite Regional landfill would result in a significant air quality impact.

Response 21-3

The CEQA Guidelines (§15126.6[e][1]) require the specific alternative of “no project” to be evaluated, along with its impact. Draft EIR Section 4.5 addresses the No Project alternative.

Draft EIR Section 1.6.5 states:

*“ . . . the no project alternative is not environmentally superior. Further, no other alternative was determined to be environmentally superior to the proposed project.”*

The commenter’s criticism of the Draft EIR for failing to analyze alternative energy production possibilities raised in other letters that comment on the Draft EIR is noted.

See Draft EIR Section 4.4 for a discussion of alternative disposal technologies. See Final EIR Chapter 3.0 for a discussion of waste processing technologies.

Response 21-4

The commenter is incorrect, as the Draft EIR did not identify the Baron Ranch as a potential location for a new transfer station. Rather, the discussion in Draft EIR Section 4.3.2.1.1 illustrates the complications of the use of the Baron Ranch as a location for a transfer station.

Potential locations of a new transfer station are described and evaluated in Draft EIR Section 4.3.2 in accordance with the CEQA requirement to “. . . include sufficient information about each alternative to allow meaningful evaluation, analysis and comparison to the proposed project” (CEQA Guidelines §15126.6[d]). As stated in Draft EIR Section 4.3.2, the three locations discussed on page 4-65 are the three locations that were not eliminated from consideration in the Citizens’ Advisory Committee (CAC) siting study. The three locations are briefly described, and potential impacts are provided. None of these locations has been determined a potential site for a new transfer station. The County does not propose to utilize the Baron Ranch location for a transfer station. Instead, the discussion illustrates the complications of the use of the Baron Ranch as a location for a transfer station.

Response 21-5

Measures to protect water quality by minimizing the Landfill Expansion sedimentation effects on Pila Creek have been included as part of the project description and are summarized in Draft EIR Section 3.3.2.2.4. The use of Best Management Practices has been incorporated into the project description. These measures would avoid impacts to geology; no additional mitigation is necessary.

Response 21-6

See Responses 1-6, 1-11, 2-4, 2-6 and 2-7.

Response 21-7

Biological resources were inventoried and impacts assessed in the Biological Assessment prepared as a Technical Study to support the Draft EIR. The results of this study are summarized

in Draft EIR Section 3.4.3. The proposed Landfill design has avoided the riparian corridor along Pila Creek and has been located in the disturbed borrow area north of the existing Landfill. The Landfill design minimizes impacts to biological resources to the extent feasible by expanding into previously disturbed areas or areas on the fringes of undisturbed areas. However, all impacts are not avoidable.

See Responses 3-48b, 3-49, 3-50, 3-51 and 3-52.

#### Response 21-8

Mitigation Measure NUI-4 provides methods to adequately mitigate nuisances associated with increased waste generation over the life of the Landfill expansion to a less than significant level. These measures are derived from state and federal regulations, existing landfill permits and good landfill engineering practices, and they have proven to be effective at comparable waste management facilities. Many of these measures have not previously been required of current Landfill operations. To the extent that odor problems have been encountered in the past, these measures will address those problems, as well as avoid potential odor problems associated with the landfill expansion.

#### Response 21-9

As discussed in Draft EIR Chapter 2.0 - Project Description, the landfill working face (i.e., the area receiving waste on any given day) is kept as small as possible (i.e., approximately 100 feet wide) and is covered each day. As landfilling progresses, the daily working face is constantly changing location. Areas that will not receive additional waste within 180-days or prior to the rainy season are covered with additional soil and revegetated for erosion control and dust control. As a portion of the landfill reaches its final elevation and contours, that portion of the landfill is permanently closed with a final cover that includes revegetation.

Through the above process, the portion of the landfill that does not have some type of vegetation (i.e., either as part of erosion control and dust control, or as part of landfill closure) is kept to a minimum. In addition, due to the canyon topography of the landfill site, it is only when the working face is near the southern-most edge of the landfill that the working face will be visible. New Figures 3.8-21 through 3.8-24 provide examples of how the working face will appear from Viewpoints 4 and 5 when it nears the southern-most edge of the landfill (see Revised Figure 3.8-1 in Final EIR Section 4.4).

#### Response 21-10

See Responses 6-2 and 6-3.

#### Response 21-11

In regard to the impacts analysis provided in the Draft EIR, the commenter is incorrect in asserting that, "DEIR Section 3 provides an inadequate analysis of the Landfill expansion impacts on the environment and surrounding properties." Draft EIR Section 3.11 – Air Quality provides extensive analysis of potential air quality impacts in 31 pages of text, plus 24 tables and 16 figures. In addition, Appendix E, Air Resources, provides the following:

- Applicable Laws, Ordinances Regulations and Standards
- Fugitive Dust Study Final Report

- Green Waste Tub Grinder
- Santa Barbara Average Temperature
- Extract From Source Test Report for Emissions Testing of LFG-Fired Engine and Engine/After-Burner (Flare) at the Tajiguas Landfill
- References – Landfill Gas Collection Efficiency (Reference extracts)
- Assumptions on Baseline Conditions and Proposed Project
- Tables Supporting Air Quality Impact Analysis
- Air Quality-Related References

It is correct that, based on the modeling assumptions and programs utilized for the Air Quality analysis, some ambient air quality standards for PM<sub>10</sub>, NO<sub>x</sub> and ROC will be exceeded. This is noted in regard to the analysis of activities at the landfill, as provided in Draft EIR

Section 3.11.3.2:

*“Proposed project emissions are estimated by using current mobile equipment emission factors and the minimum permitted LFG collection rate. This approach will overestimate impacts because mobile equipment is likely to become cleaner in the future, and because the efficiency of the LFG collection system will likely exceed 60 percent”* (page 3.11-12).

For onsite emissions, Draft EIR Section 3.11.3.2 addresses the emission factors associated with mobile equipment and landfill gas, again noting assumptions that effectively arrive at conservative, “worst case” emission rates:

*“Proposed project emissions are estimated by using current (higher) mobile equipment emission factors and the maximum permitted landfill gas collection rate. This approach overestimates emissions because mobile equipment will emit less as stricter Tier 2 and Tier 3 emission standards are applied.”*

Further, to provide a “worst case” analysis, as stated in Draft EIR Section 3.11.3.2, *“Air quality impacts from the proposed project were analyzed for ten scenarios of activity to determine the maximum impact scenario.”*

In the discussion of offsite emissions (related to haul trucks and transfer trucks), Draft EIR Section 3.11.3.2.3 notes that offsite daily mobile source emissions would not increase as much as shown in Table 3.11-14 (which shows that NO<sub>x</sub> exceeds its significance threshold). This is because, with each passing year, the actual mix of onroad vehicles will include newer models with more controls and, therefore, fewer emissions. This reflects how assumptions have been used to provide a worst-case scenario.

Draft EIR Section 3.11.3.3.2 notes that:

*“The emissions of NO<sub>x</sub> by mobile source exhaust and stationary source combustion of landfill gas are treated by the dispersion modeling as if the initially generated nitric oxide (NO) completely converts to NO<sub>2</sub>. In reality the extent of conversion of high, short-term concentrations of NO is limited by the concentration of ozone actually available near the source.”*

Draft EIR Section 3.11.3.2.3 concedes that, based on the assumptions and modeling, the significance threshold for NO<sub>x</sub> is exceeded. Even so, the Draft EIR further notes that the project is consistent with the 1998 Clean Air Plan, as follows:

*“Although exceedances of the significance threshold for increased offsite mobile source NO<sub>x</sub> emissions could occur, the 1998 Clean Air Plan accounts for the current and future emissions of Tajiguas (SBCAPCD, 1998). Hence, proposed project emissions, including the amounts that exceed the significance thresholds, are consistent with the plan as required by the significance criteria in Section 3.11.3.1.”*

In the discussion of PM<sub>10</sub>, Draft EIR Section 3.11.3.3.2 points out that:

*“The exceedances shown . . . are based on the maximum scenario emissions and worst meteorology found by the model in the 365 days used as input. In reality, such exceedances would be expected to occur infrequently or not at all because the worst meteorological conditions only exist occasionally, and the model overestimates the ground level concentrations that result from the specified emission rates. Hence, operations would not need to be modified on a regular basis to actually avoid producing the modeled result.”*

Based on the above, although some of the modeling shows that standards for PM<sub>10</sub>, NO<sub>x</sub> and ROC are exceeded on some occasions, the case is overstated for purposes of arriving at worst case results to the extent that actual exceedances may be occasional, rather than regular, occurrences.

Appropriate Mitigation Measures AQ-1 through AQ-5 are included in the EIR to reduce to the extent feasible the significant unavoidable adverse impacts to air quality from the proposed project. However, as discussed in Draft EIR Section 3.11- Air Quality, even with implementation of these mitigation measures, the proposed project would result in significant unavoidable adverse impacts to air quality. A statement of overriding considerations will be required if the County Board of Supervisors decides to approve the project.

#### Response 21-12

Comment noted. See Response to Comment 3-1 for a discussion of how the proposed project responds to project objectives and directives provided by the Santa Barbara County Board of Supervisors. See Final EIR Chapter 3.0 for a discussion of waste processing technologies.

The commenter is incorrect in stating that, “The DEIR fails to provide mitigation measures that eliminate or minimize Landfill expansion impacts on the environment and neighboring properties.” Feasible mitigation measures for each environmental resource area analyzed in Draft EIR Chapter 3.0 are provided in the following sections of the Draft EIR:

- 3.2.5 Geology
- 3.3.5 Water Resources
- 3.4.5 Biological Resources
- 3.5.5 Cultural Resources
- 3.6.5 Nuisances
- 3.7.5 Land Use
- 3.8.5 Visual Resources

- 3.9.5 Noise
- 3.10.5 Traffic
- 3.11.5 Air Quality
- 3.12.5 Health and Safety

The County has identified all feasible mitigation of which it is aware to address these impacts. The commenter does not propose additional mitigation measures to address these impacts and, therefore, this EIR cannot respond to such proposed mitigation.



Ms Kathy Kefauver, Senior Engineering Planner  
 Santa Barbara County Department of Public Works  
 Solid Waste & Utilities

Dec. 14, 2001

Subject: Tajiguas Landfill EIR

22-1

I find the Tajiguas Landfill EIR to be thorough and informative. Impacts of expanding the landfill at the current site are pointed out and mitigation, as needed, should achieve the goal of extending the life of the landfill for 15 years without adverse effects. The County continues to serve the community's solid waste disposal needs well by operating the landfill in an environmentally sound manner.

22-2

Perhaps the most politically sensitive issue with regard to the expansion of the landfill is the concern for ocean pollution at the mouth of Arroyo Quemada Creek. In this regard, the subject EIR, along with a 1998 report by Arturo Keller, Ph.D., School of Environmental Science and Management, UCSB, clarify the situation in a way that some environmental activists in the community are unwilling or unable to understand or accept. Namely, the landfill is near the front of the Pilas Creek watershed whereas the ocean pollution is occurring at the mouth of Arroyo Quemada Creek, which is a separate watershed to the east of Pilas Creek watershed. Therefore, any surface water runoff is from separate watersheds. Regarding groundwater, the Keller report indicates that while some trace organic contaminants have been detected in the groundwater at the monitoring wells directly below the landfill, the amounts are below U.S. EPA Maximum Concentration Level standards. Furthermore, because of the slow downgradient movement of the groundwater and the slower movement of the pollutants, any further downgradient movement of the pollutants will be detected "years or decades before it becomes a health issue", thus leaving sufficient time for corrective action. In this regard, the Keller report points out that the County has already been collecting and removing groundwater from a collection trench at the base of the landfill and using it for dust control in normal landfill operations. He recommends that collection and storage capacity be increased to deal with the higher leachate flows during the rainy season. Perhaps these recommendations have been put in place since Keller's 1998 report.

22-3

It should also be noted that with the requirement to fine the expanded landfill, any future leaching of pollutants would be limited to that from the existing volume of landfill. That is, the leaching situation would be self-limiting.

22-4

Further clarification of the Arroyo Quemada pollution situation is in a recent report released by the County Public Health Department. As reported in the December 7-13 issue of the Valley Voice, the Public Health Department report indicates that the pollution is from sources such as seabirds, birds native to the watershed, natural wildlife such as raccoons, house pets and humans. The determination of pollutants was based on DNA testing methods. With regard to the seagulls, it should be noted that as scavengers they are typically attracted to trash. However, moving the landfill to a remote site will not necessarily remove the seagull problem. The Gaviota Coast was presumably so named for the abundance of gulls in the area—gaviota means seagull in Spanish.

22-5

It was recently reported in the Santa Barbara News Press that the County Public Works Department received national recognition for its total solid waste disposal program. I am confident that the County will continue operating in an environmentally responsible manner with regard to solving the community's solid waste disposal needs and will continue to do so under current regulatory standards at an expanded landfill at the Tajiguas site. I hope the "other EIR", that is the "Economic Impact Report", will be as thorough and will carry significant weight in any final decision regarding the Tajiguas site.

*Otto Schleich*

Otto Schleich  
 657 Wakefield Road  
 Goleta, CA 93117  
 (805) 964-5883



**Document 22**  
**Otto Schleich**  
**December 14, 2001**  
**Response to Comments**

Response 22-1  
Comment noted.

Response 22-2  
Comment noted.

As noted by the commenter, Pila Creek and Arroyo Quemado are two separate and distinct watersheds. The surface water from these two creeks does not intermingle (see Draft EIR Section 3.3.2.2.2).

As noted by the commenter, the Dr. Arturo Keller report (Keller, 1998) made several recommendations to address collection and storage capacity to deal with higher leachate flows during the rainy season. Since 1998, the capacity of the groundwater leachate collection and recovery system has been expanded, and the north groundwater management system (intercepts water flowing toward the landfill), horizontal de-watering well system (3 wells, each approximately 200 feet long captures leachate), and the leachate liner collection & recovery system (collects water from the lined portion of the landfill) have been installed. Recently, the County obtained the water tanks on the ridge west of the landfill. These storage tanks provide 680,000 gallons of storage capacity for leachate collected from the systems described previously (Draft EIR Table 3.3-4). The environmental control systems at the existing Landfill and the lining of the new waste footprint of the Landfill expansion would continue to provide the necessary leachate controls from the existing Landfill. The areas of new waste placement for the proposed Landfill *expansion* would be on a liner system approved by the RWQCB.

See Response 3-33.

Response 22-3  
Comment noted. The unlined Landfill footprint would not be increased by the Landfill expansion. Waste that is part of the expansion and is placed outside the existing Landfill footprint would be placed on a liner system approved by the RWQCB.

Response 22-4  
Comment noted. See Response 3-40.

Response 22-5  
The Tajiguas Landfill was presented the Solid Waste Association (SWANA) Silver Award in 2001 for the facility, systems and programs that exemplify excellence in solid waste management that is worthy of recognition.

SWANA's mission is to advance the practice of environmentally and economically sound management of municipal solid waste in North America. SWANA's Excellence in Solid Waste Management Awards Program is intended to recognize and encourage the development of environmentally and economically sound solid waste management programs that go above and beyond the "call of duty" in their programs.

Other comments noted.

23

Santa Barbara County, Public Works Dept. 12-4-2001  
Solid Waste and Utilities Division  
Attn: Kathy Kefauver  
109 East Victoria St.  
Santa Barbara, Ca 93101  
Subject: Draft Environmental Impact Report --Tajiguas Landfill Expansion Project  
(01-EIR-5)

Thank you for the opportunity to review the two volume draft Landfill Expansion EIR and to hear your comments at the Lompoc forum.

23-1  
It appears that a thorough analysis of the proposed site and site options has been made. The mitigation plans seem reasonable; and the unmitigatable impacts are reasonable tradeoffs for the benefits that the expanded landfill will bring to the people of the south county. Cost versus environmental impacts is a very important consideration. The least expense to the taxpayers is the main concern in any future landfill expansion. The present site is the lowest cost alternative. The Grand Jury has stated for the past two years that the present landfill is designed for 65 more years of use to the community. We only hope that the County will do nothing that will limit this time-frame. Future landfills should also be located near the source of trash in the south county. Any other landfill will cost more to develop and cost more to deliver the trash and impact the environment.

Thank You.  
Justin and Ann Ruhge  
Lompoc, Ca.  
805-7379536



**Document 23**  
**Justin and Ann Ruhge**  
**December 4, 2001**  
**Response to Comments**

Response 23-1  
Comment noted.



24

November 21, 2001

Dear County Board of Supervisors,

24-1 When you vote on the expansion of the Tajiguas Landfill, remember that you are risking the lives of all those who swim in our ocean. And you are forcing the local fishermen out of work, due to your approval of increased ocean pollution. And you are causing the death of an unknown number of sea creatures.....and humans.

24-2 Find a desert location. Best of all, recycle MORE of our garbage, as the

Europeans have done for centuries.

24-3 Vote NO, on the expansion of Tajiguas, unless the above stated, so simply does not interrupt your conscience or your sleep.

I appreciate your time, and deep concern to 'clean-up' and not magnify our already polluted Santa Barbara Ocean .

Sincerely,



Gail Elbek  
380 N. San Marcos Road  
Santa Barbara, CA 93111



**Document 24**  
**Gail Erbek**  
**November 21, 2001**  
**Response to Comments**

Response 24-1

Comment noted. The project as proposed incorporates design features and mitigation measures to avoid the discharge of pollutants to Pila Creek or the ocean. The discharge of pollutants to Pila Creek or to the ocean would constitute a significant impact, requiring mitigation.

See Responses 7-2 and 7-5 regarding potential impacts to marine life.

Response 24-2

On August 3, 1999, the County of Santa Barbara Board of Supervisors directed the SWUD to review a 15-year expansion at the Tajiguas Landfill site on August 3, 1999. In Draft EIR Section 4.0, alternatives to the 15-year expansion project are discussed. The alternatives include out-of-County alternatives. Disposing of waste at an alternative out-of-County site transfers environmental impacts to that site. The severity of the impacts is dependent on the resources that would be found at the alternative site.

In addition, beyond environmental issues, disposing of waste out-of-County would result in significantly increased transportation costs, tipping fees that are beyond local control and, although waste is shipped out-of-County, the County remains liable for the waste disposed. This means that, if any future cleanup is required of a facility where County waste is disposed, the County is liable for the costs of the cleanup of its portion of the waste. The County would have no input to the environmental controls implemented at the site to avoid potential problems, and no control over the costs for potential cleanup.

Waste processing technologies are discussed in Final EIR Chapter 3.0.

Response 24-3

Comment noted.



25

Public Works Department  
County of Santa Barbara  
109 E. Victoria St.  
Santa Barbara, Ca.93101

Attn. Kathy Kefauver

October 30, 2001

Dear Ms. Kefauver,

25-1 [ As the representative of the Dibblee Trust, Rancho San Julian, and the Dibblee family holdings at Rancho Palos Colorados, the Heirs of M.D.Poett's Los Yridises ranch also part of Rancho San Julian, Lompoc, Ca. we wish to express our wholehearted approval of the 15 year expansion of the Tajiguas Landfill program being considered by the Co. Planning Commission.

Yours truly,



Harold Poett  
4148 La Venta  
Westlake Village  
Ca.91361



**Document 25  
Harold Poett  
October 30, 2001  
Response to Comments**

Response 25-1  
Comment noted.



26

12-06-01

Kathy Kefauver  
Solid Waste & Utilities Division  
109 E. Victoria St.  
Santa Barbara, CA 93101

Dear Ms. Kefauver:

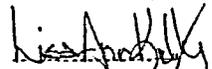
November 7, 2001 I attended the public meeting re; the dEIR on the expansion of the Taiguas landfill. I did not submit oral or written comments at that time.

Since then, my family and I have had time to read through the dEIR, <sup>and</sup> discussed our readings. I am sending this letter to you today to express our profound opposition to the expansion of the Tajiguas landfill.

26-1 [ We feel that the dEIR is extremely deficient in that it ignores the obvious fact that the present landfill is causing the pollution of Pila Creek and the Arroyo Quemado. To blame outrageously high bacterial counts and ocean contamination on seagulls is ludicrous. The dEIR glosses over and oooh-pooohs (pur intended) the contamination of groundwater caused by Tajiguas landfill.

We support a more in-depth look at the TRUE source of Arroyo Quemado being designated the most polluted beach in the U.S.

Sincerely,



Lisa Ann Kelly & Family (4 of us)  
1724 Olive Avenue  
Santa Barbara, CA 93101-1021  
phone/fax: (805)569-1714



**Document 26**  
**Lisa Ann Kelly & Family**  
**December 6, 2001**  
**Response to Comments**

Response 26-1

A summary of water quality and testing is summarized in Draft EIR Section 3.3.2.2.4, and analysis of impacts is discussed in Draft EIR Sections 3.3.3.1 and 3.3.3.2. The impacts were found to be less than significant based on the information and technical studies that support the Draft EIR discussion. The County is unaware of any data indicating that the landfill is producing bacteria that is polluting Arroyo Quemado. Available studies indicate Arroyo Quemado is in a separate watershed than the landfill, meaning that the pollution in Arroyo Quemado is not coming from the landfill.

See Responses 2-11, 22-2 and 7-5.



**KATHY KEFAUVER - Tajiguas Landfill Expansion Project DEIR**

**From:** COURT EILERTSON  
**To:** CRAGIN, IMELDA  
**Date:** 10/30/2001 10:06 AM  
**Subject:** Tajiguas Landfill Expansion Project DEIR  
**CC:** Eaton, Rob; MCGOLPIN, SCOTT; SCHLEICH, MARK; STEWART, BRET

Imelda,

The Traffic Section has reviewed the above referenced draft EIR, and offers the following comments:

- 27-1 1) The traffic impact study prepared for the project is well prepared and we concur with the findings. The only request would be for the traffic consultant to include more recent traffic count data, as the current study, dated February 24, 2001, used 1998 data. We believe that there are sufficient gaps in the traffic stream that will accommodate project generated trucks onto US 101, even with the addition of updated traffic counts. With the addition of updated traffic count data, we believe this will bolster the defensibility of the document.
- 27-2 2) The median improvements shown on Figure 3 (of the Traffic Study) to the US 101/Tajiguas access should work well to improve the turning radii for project related truck traffic.

Please let me know if you have any questions or if I may be of assistance. I'm at extension 3042.

Thanks,

Court Eilertson, Traffic Section  
Transportation Division



**Document 27**  
**Court Eilertson, Traffic Section**  
**Transportation Division**  
**October 30, 2001**  
**Response to Comments**

Response 27-1  
See Response 3-81.

Response 27-2  
Comment noted.



28

Maurie McGuire  
PO Box 846  
Santa Barbara, CA 93102

December 11, 2001

Ms. Kathy Kefauver  
Solid Waste and Utilities Division  
Santa Barbara County Public Works Department  
109 East Victoria Street  
Santa Barbara, CA 93101

RE: Comments to Tajiguas Landfill Expansion Project DEIR, October 2001

Dear Ms. Kefauver,

The Draft Environmental Impact Report for the Tajiguas Landfill Expansion Project, October 2001 (DEIR) does not adequately address the mission of the EIR and the most reasonable alternatives to, and mitigations for the project. As outlined in the Purpose of the EIR (1.6.1), under CEQA, the public and decision makers should have the benefit of full discussion of the environmental impacts that will result from the proposed project as well as alternatives to, and mitigations for such a proposed project.

Section 4.0, Alternatives to the Proposed Project, focuses almost entirely on alternative sites in the County for locating a traditional landfill similar to the existing Tajiguas facility. There are substantial and un-mitigatable environmental impacts to either expanding Tajiguas or relocating solid waste disposal. Therefore, these alternatives do not thoroughly address the mandate of CEQA.

The most promising alternatives to the proposed expansion and traditional waste disposal receive only a cursory mention in Section 4.4, Alternative Disposal Technologies, even though according to AB 939, there is a priority for "Environmentally safe transformation" above "land disposal" as an appropriate solution for waste that is not diverted (1.5.2). There is a range of alternative technologies that could preclude the need for a substantial new expansion of Tajiguas Landfill and improve or mitigate many of the current operating issues. However, according to the EIR, none of these technologies are considered viable compared to other landfill options and the expansion. Yet, there is not an adequate explanation regarding the conclusion that none of these technologies are considered feasible at this time by the EIR.

Alternative technologies are available and have been implemented throughout the world as well as in California. At the Tajiguas site, and at a combination of "satellite" sites, one possibility for alternative technologies that would be readily practical to develop would

be a complement of a material recovery facility, composting operations and a conversion technology project such as gasification. Implementation of such alternatives could reduce disposable waste by up to 80% and leave only 20% for ongoing disposal. It is possible that this combination of programs could be implemented within 3-5 years.

The EIR should also consider how these environmentally superior processes and technologies could mitigate some of the major impacts of the project, including reductions of:

- air quality impacts of the expansion
- an array of transportation impacts
- bird attracting garbage which apparently results in stream and shoreline water pollution at Arroyo Quemada and Arroyo Hondo

Further, there are environmental and economic benefits that should be addressed as additional mitigations that these technologies could provide for the project area, including:

- market grade, renewable electrical energy to improve local resource independence
- high quality compost and organic materials
- co-utility (and management) of locally generated bio-solids

The EIR should more thoroughly address the inter-related aspects of the proposed project and the opportunity for mitigations through alternative technologies. This should be incorporated in the comprehensive economic and environmental analysis including the relationship to the closure and post closure costs and impacts. Such information will help the public and decision makers to know whether or not these alternatives are viable.

Sincerely,

*Maurie McGuire*  
Maurie McGuire

28-1



**Document 28**  
**Maurie McGuire**  
**December 11, 2001**  
**Response to Comments**

Response 28-1

Project objectives are provided in Draft EIR Sections 1.4 and 4.1.2. The need for the proposed project is provided in Draft EIR Section 1.5. Environmental impacts and mitigation measures are provided for each environmental resource area analyzed in Draft EIR Chapter 3.0. The commenter is referred to Draft EIR Sections 3.2 through 3.12.

Draft EIR Chapter 4.0 addresses potential alternatives to the proposed project that would fulfill the project objectives described in Draft EIR Sections 1.4 and 4.1.2. These were developed in compliance with the CEQA Guidelines (§15126.6[a]), which state that:

*“An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasible attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible ...”*

See Final EIR Chapter 3.0 for a discussion of waste processing technologies.



JOAN LEON  
521 Amber Lane  
Santa Maria, CA 93454-8619  
Phone/fax (805) 925-4488  
Email [joanleon@juno.com](mailto:joanleon@juno.com)

November 8, 2001

Subject: Tajiguas Landfill EIR

Given the long history of operating the landfill since 1967, the county has learned of deficiencies and corrected them over the years. Several Grand Jury reports have found the landfill to be functioning well within the environmental regulations.

I understand that the proposed expansion is an interim solution, until another site for a landfill can be located and in operation, about 15 years.

I have reviewed the EIR and found many positive aspects of the proposed expansion.

- 29-1 1. The new project would correct the area within the Coastal Zone by reducing the height of fill to 400 feet above the mean sea level, thus bringing it into compliance.
- 29-2 2. Closure procedures are in place for the older part of the landfill, with monitoring for thirty years.
- 29-3 3. Water resources are being monitored and utilized with efficiency. Underground stream flows should be carefully monitored for pollution, and the placement of monitoring wells should be based on the direction of the streams.
- 29-4 4. The biological resources such as animal habitat will be affected, but they have nearby areas of similar landforms and plants in which to move. The destruction of oak trees is unavoidable, but the mitigation of ten new trees for every one destroyed will help to replace them. The monitoring and maintenance for five years should help ensure that the new trees thrive. Is there a requirement that any trees that do not survive for five years shall be replaced?
- 29-5 5. Blowing trash is a problem, but the landfill operators have many requirements in place to address that.
- 29-6 6. Visual impacts are not really a problem, because drivers on Highway 101 would have to slow down and really peer into the canyon to even know that the landfill is there. I especially like the photographs in the EIR of the before and after views of the landfill. If restoration is as complete as the pictures indicate, there should be no change to the scenes along the freeway.
- 29-7 7. Trucks entering and leaving the landfill are cause for caution by drivers already on the freeway. When trucks leave the landfill going south, the lane across the freeway is at right angles to the freeway lanes. There is a need for a gradual curve leading into the acceleration lane for trucks entering the southbound lanes, so they do not appear to be going directly into the fast lane.

Specific items in the EIR:

29-8 Page 3.3-15: New sedimentation structures will be built to capture where surface water drains south, toward the ocean. My comment: these seasonal creeks carry huge amounts of sediment into the ocean after every hard rain. When driving along Highway 101, you can see the water is muddy brown far out into the ocean from every creek draining south. If these sedimentation basins are effective, the Tajiguas area will be the only place that a creek does not carry sediment into the ocean.

29-9 Page 3.3-20: "the back canyon landfill bottom elevations will be situated above any groundwater locally present...." Since the new area will be lined, this seems a reassuring location for the expanded landfill.

29-10 Page 3.3-24: Arroyo Quemada Creek is east of the landfill, and that creek is on the California 303(d) list of "impaired waters." Since it is Pila Creek that flows through the landfill area, I wonder why it is not listed in the Basin Plan.

29-11 Page 3.3-25: "Surface water samples in Pila Creek watershed show the content is at or below regulatory thresholds." However, during storms, there are increased sediments from Pila Creek. Is this sedimentation from the landfill contents, or is it the mud that is common along all creeks that flow into the ocean? Won't this situation be corrected by the sedimentation structures described on Page 3.3-15?

29-12 Page 3.3-42: "High discharge of enterococcus concentration at Arroyo Quemada are not related to upper watershed activities...." Again, this creek does not flow through the landfill. The residents of Arroyo Quemada have septic systems. The Environmental Health Services survey in 1975 recommended that the community build a sewage disposal system or relocate the existing systems. Since this has not been done, how can the Tajiguas landfill be blamed for the water quality in Arroyo Quemada Creek and adjacent ocean?

29-13 Page 3.11-8 Air quality: The existing co-generation plant is to use methane gas to generate electricity supplied to Southern California Edison. Is this electricity sold to Edison?

29-14 In conclusion, I think the Tajiguas Landfill is being operated in an environmentally sound manner, and the county has done a good job of meeting all environmental standards. The new expansion will be located where there will be fewer impacts than any new location. The county has hired a person to find alternate methods of using technology to dispose of the waste products.

Solid waste disposal is a community service that benefits the public. In comparison, just think of all the off road vehicles at the beach in Oceano and the dunes, creating noise and air pollution. I don't think an EIR was ever done on the impacts there. With all the monitoring of Tajiguas, it is a good as a landfill can be. The EIR has pointed out all the possible impacts and I think the mitigation requirements are adequate.



**Document 29**  
**Joan Leon**  
**November 8, 2001**  
**Response to Comments**

Response 29-1

Comment noted.

Response 29-2

Comment noted. There will be a 30-year postclosure monitoring and maintenance period for the Landfill.

Response 29-3

Comment noted. In accordance with CCR Title 27 and the existing Waste Discharge Requirements (WDRs) for the Landfill, the SWUD continually evaluates site conditions and works directly with the RWQCB to determine the locations of monitoring wells at the landfill.

Response 29-4

Comment noted. Mitigation Measure BIO-3 in the Draft EIR has been revised to indicate that, if an oak tree(s) does not survive for 5 years, it shall be replaced. See revised Mitigation Measure BIO-3 in Final EIR Section 4.2.2 and Final EIR Table 1-2.

Response 29-5

Comment noted. Litter control measures currently are in place to reduce litter at the Landfill.

Response 29-6

Comment noted.

Response 29-7

Comment noted. In accordance with Mitigation Measure TRAF-2 in Draft EIR Section 3.10.5, signs will be posted along the northbound and southbound lanes of Highway 101 to caution drivers of trucks entering and leaving the landfill. As noted in Mitigation Measure TRAF-2, the sign shall be as follows: *Caution – Trucks Entering the Highway*. Regarding the southbound acceleration lane, Caltrans is the agency responsible for design of the acceleration and deceleration lanes on Highway 101 at its intersection with the Landfill access road.

Response 29-8

Comment noted. As discussed in Draft EIR Section 3.3.2.2.2 (pages 3.3-15 and 3.3-16), the sedimentation basin is designed to capture sediment from areas of the landfill where surface water runoff drains. Water will enter the structure, coarse sediment will settle, and the water will exit over a weir located along the west side of the structure.

Response 29-9

Comment noted. As discussed in Draft EIR Section 2.9.1, the bottom elevation of the landfill expansion will be situated above any groundwater that is locally present.

Response 29-10

The decision to include or exclude specific creeks in the Basin Plan was made by the Regional Water Quality Control Board.

Response 29-11

Draft EIR Section 3.3.3.1 addresses potential project impacts to surface water. As stated on page 3.3-51, “. . . no negative impacts with respect to stream flow are anticipated to result from the proposed project . . .” Further, the Draft EIR (page 3.3-52) states:

*“Actual sediment yield from the built-out landfill is expected to be significantly less than estimated actual soil loss due to the variety of erosion and sediment control measures practiced at the facility.”*

These erosion control measures include the sedimentation basins and best management practices (BMP). The sedimentation basins (in-channel and out-of-channel) capture sediment from areas of the landfill where surface water runoff drains. Water enters the basin, coarse sediment settles, and the water then exits over a weir. The use of the sedimentation basins, plus implementation of ongoing BMPs, will control sedimentation at the Landfill to levels that are less than significant.

Response 29-12

As stated on Draft EIR page 3.3-40, residents on the Arroyo Quemada community and others have suggested that the Landfill may be responsible for high bacterial counts in ocean water in the area of Arroyo Quemado Beach. However, as discussed in Draft EIR Section 3.3.2.2.4 (page 3.3-42), based upon the analysis of available data, it does not appear that bacteriological indicators of water quality found at Cañada de la Pila are related to concentrations of those indicators at Arroyo Quemado. The Draft EIR (page 3.3-42) further states that, although the two ocean discharge sites (Cañada de la Pila and Arroyo Quemado) do exhibit some bacterial indicator peaks on the same sampling date, it is likely that these high values are simultaneously driven by rainfall events in the area, which cause high indicator organism concentrations in the ocean water at both sites and are unrelated to each other. As stated in the Draft EIR (page 3.3-42), it is possible that activities within the Arroyo Quemada community related to national lagoon processes, avian roosting and/or the presence of septic system leach fields are contributing to high organisms concentrations at the Arroyo Quemada Creek discharge to the ocean.

Response 29-13

The electricity produced by the existing co-generation plant at the Landfill is sold to Southern California Edison.

Response 29-14

Comment noted.

1 SANTA BARBARA COUNTY  
2 PUBLIC WORKS DEPARTMENT/SOLID WASTE DIVISION

3  
4 TAJIGUAS LANDFILL EXPANSION PROJECT EIR  
5 PUBLIC HEARING ON THE DRAFT EIR

6  
7  
8  
9  
10  
11 REPORTER'S TRANSCRIPT OF PROCEEDINGS

12 Wednesday, November 7, 2001  
13 Santa Barbara Public Library  
14 Faulkner Gallery  
15 48 East Anapamu Street  
16 Santa Barbara, California  
17 8:49 p.m.

18  
19  
20  
21  
22  
23  
24  
25 Reported by: KELLY TAYLOR, RFR, CSR 10888

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1 Santa Barbara, California  
2 November 7, 2001  
3 --0000--

4  
5 JACKIE CAMPBELL: Welcome everyone. If  
6 people could find their seats, that would be  
7 great.

8 My name is Jackie Campbell, and I'm with  
9 the Planning and Development Department of the  
10 County. I'll be the environmental hearing officer  
11 for tonight's meeting. And the purpose of the  
12 meeting is to gather your comments on the draft  
13 environmental impact report for the expansion of  
14 the Tajiguas Landfill.

15 This is the first in a series of  
16 public-comment meetings to be held regarding this  
17 document. There'll be four other hearings  
18 throughout the county. Tonight we're meeting here  
19 in Santa Barbara. Tomorrow night we'll be meeting  
20 in Santa Maria. Tuesday, November 13th, we'll be  
21 meeting in Buellton. Monday, November 19th, we'll  
22 meet in Goleta. Then we've added an additional  
23 meeting: Wednesday, November 28th, in Lompoc.

24 The public-comment period for this  
25 document was originally stated for 45 days, which

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1 TAJIGUAS LANDFILL EXPANSION PROJECT EIR

2  
3 APPEARANCES

4 JACKIE CAMPBELL, HEARING OFFICER  
5 County of Santa Barbara  
6 Planning and Development Department  
7 123 East Anapamu Street  
8 Santa Barbara, California 93101-2958  
9 (805) 568-2000

10 MARK A. SCHLEICH, DEPUTY DIRECTOR  
11 IVELDA CRAGIN, PROJECT MANAGER  
12 County of Santa Barbara  
13 Public Works Department  
14 Solid Waste and Utilities Division  
15 108 East Victoria Street  
16 Santa Barbara, California 93101  
17 (805) 568-3000

18 ROBERT C. MASON, EIR PROJECT DIRECTOR  
19 TRC ENVIRONMENTAL CONSULTING FIRM  
20 61 Technology Drive  
21 Irvine, California 92618  
22 (949) 727-8336

23 AUDIENCE SPEAKERS

24 Brian Trautwein  
25 James Smallwood  
26 Hillary Hauser  
27 Keith Zandonia

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1 extended from its release date until November  
2 26th. We have, since that time, opted to extend  
3 the public-comment period to December 14th. So  
4 comments can be accepted up until 5:00 p.m. that  
5 day.

6 The format for tonight's meeting will be  
7 presentation from the Solid Waste Utilities  
8 Division staff members and the consultant who has  
9 prepared the environmental impact report. After  
10 the presentation of the project, I'll allow several  
11 questions, if need be, regarding clarification on  
12 the project itself. And then we'll enter the  
13 public-comment period, which will require those of  
14 you wishing to speak to fill out a speaker form.  
15 They are available in the back of the room. And  
16 then bring those to the table up here, and we'll  
17 call your names in order and allow you, you know,  
18 depending on the number of speaker slips we get,  
19 hopefully, you know, five minutes or so to give  
20 your comments.

21 Tonight's meeting is not about answering a  
22 lot of questions regarding the environmental  
23 effects of the document, nor is it about whether  
24 you are for or against expansion of the landfill or  
25 expansion of the landfill at this location.

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1 Tonight is really about hearing your comments on  
2 the draft document. Then the procedure is we will  
3 take those comments that we receive here and  
4 throughout the rest of the public-comment period  
5 and at the additional comment meetings, and we will  
6 evaluate them; we will review the document in  
7 response to those comments, make any necessary  
8 changes based on the input that you give us; we  
9 will provide written responses to all of the  
10 comments that we receive, and then we will issue a  
11 proposed final environmental impact report. That  
12 document will be considered by the County Board of  
13 Supervisors at a future meeting. That date is,  
14 right now, intended to be sometime next year,  
15 probably February or March.

16 If you'd like to be included on a mailing  
17 list for future meetings or future notice of this  
18 document, we can have you fill out a sign-up sheet  
19 at the back of the room. If you are on a mailing  
20 list now, if you received notice of this draft  
21 document, you will stay on the mailing list. So if  
22 you've already been on the notice list, you don't  
23 need to add your name again.

24 With that, I will turn the presentation  
25 over to Mark Schleich from Solid Waste Division.

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1 MARK SCHLEICH: All right. Thank you all  
2 for coming. My name is Mark Schleich. I'm with  
3 the County of Santa Barbara Public Works  
4 Department. I'm the deputy director of the Solid  
5 Waste and Utilities Division.

6 My division has put together this EIR  
7 that's currently available for public review. In  
8 addition to -- well, this is a very serious project  
9 for our community, and Solid Waste takes all of the  
10 work that we do for our community in a very serious  
11 way.

12 When I started in solid waste in 1998, our  
13 diversion rate, recycling rate, was around  
14 32 percent. And I'm happy to say that we've  
15 actually submitted a report to the Integrated Waste  
16 Management Board, the ultimate authority here, that  
17 we are actually at a rate of 57 percent. And  
18 that's due to the hard work of my division and also  
19 your hard work in helping us reaching that  
20 recycling goal.

21 Here's another project that we have that  
22 we worked very hard on, another very important  
23 project for our community to consider. And that's  
24 the expansion of the Tajiguas Landfill and to  
25 continue to provide reliable and safe solid-waste

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1 disposal services.

2 Again, I'd like to thank you for coming  
3 tonight and expressing your comments on our  
4 particular project. One point of clarification: I  
5 think, actually, we'll probably be back to the  
6 Board of Supervisors closer to the month of April,  
7 not February or March. I wish it would be that  
8 soon, but I don't see that happening.

9 This project will provide 15 years of  
10 additional landfill capacity at the existing site.  
11 It serves the entire South Coast except for the  
12 community of Carpinteria, the city of Carpinteria.  
13 It also serves the Santa Ynez Valley. That  
14 includes the Santa Ynez Valley proper as well as  
15 the city of Buellton and the city of Solvang and  
16 also the waste that's generated in the Cuyana  
17 Valley, which is beyond Santa Maria; it is disposed  
18 at this particular site.

19 I will refer to the AS-939 50 percent  
20 mandate. Like I said, we think we're at 57 percent  
21 there. There's other mandates within that  
22 legislation, requires that the County demonstrate  
23 that it has 15 years of disposal capacity. And  
24 that's another reason for this important project.  
25 This project objective is to continue.

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1 again, as I stated earlier, safe and reliable  
2 disposal of the solid waste that we generate as a  
3 community. And it will be for an additional  
4 15 years. This is in alignment and as directed by  
5 the Board of Supervisors on August 3rd, 1999. It  
6 also at that time identified an additional process  
7 of finding landfill capacity after this particular  
8 site reached its capacity through this project.

9 That's generally the overview and  
10 objectives of this project. And at this point I'll  
11 turn it over to Ivelda Cragin, who is the project  
12 manager for this project.

13 IVELDA CRAGIN: Good evening. Thank you  
14 for coming tonight. Like Mark said, this is a very  
15 important project to the residents and businesses  
16 of Santa Barbara County. And what I'm going to  
17 touch on are some of the elements of the project  
18 itself.

19 The background is that the Tajiguas  
20 Landfill has been in operation since 1967, and it's  
21 been the disposal site for municipal solid waste  
22 for Santa Barbara County. The solid waste that has  
23 been delivered to Tajiguas, as Mark has said, has  
24 been generated by the city of Santa Barbara, the  
25 unincorporated areas of the Southern Santa Barbara

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1 County, Santa Ynez and Cuyena Valleys. And since  
2 1967, the landfill has -- the actual landfill site  
3 has undergone a number of various  
4 regulatory-approved changes to the shape and the  
5 size of the landfill.

6 So what I'm going to touch on next is the  
7 proposed project. And, actually, I'd like to start  
8 with the bottom bullet.

9 There are two configurations: It's a  
10 front canyon and back canyon, two designs at  
11 project level. And they have been looked at at an  
12 equal level of analysis in this draft EIR. What's  
13 going to happen is new waste -- new waste -- this  
14 is the existing landfill footprint. I don't know  
15 if you can see that. It's kind of highlighted in  
16 red right here.

17 New waste would be placed over the  
18 existing footprint. And, if you can see, there's  
19 an orange line around here. That is the  
20 front-canyon expansion design. Here's another  
21 picture of it. Here is the -- trying to see --  
22 here is the -- better -- here is the existing  
23 landfill here. And this is the front-canyon  
24 footprint design. So some of it is on the existing  
25 landfill, and it probably extends two-thirds of the

9

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1 Landfill-gas collection system will be extended.  
2 We'll continue with surface and groundwater  
3 monitoring, continuation of nuisance monitoring and  
4 controls. We do have a southeast-corner  
5 modification of the landfill that's also analyzed  
6 in this document. The green waste pad, which is  
7 located in the back part of the site, will be  
8 relocated. A scale in the scale house will be  
9 relocated, as well as the maintenance shop. And  
10 the draft EIR also addresses the landfill closure  
11 of both the existing and the expanded areas.  
12 Okay?

13 The Board of Supervisors will have to make  
14 a decision on the EIR. And they have a couple of  
15 decisions to make. They can choose either the  
16 front-canyon or the back-canyon configuration, but  
17 they can't choose both. It's one or -- because  
18 they're both analyzed at the project level; they  
19 can pick one of the designs.

20 They also have to make a decision on  
21 whether the EIR is -- the certified EIR is adequate  
22 and complete: Did we address all of the  
23 environmental issues adequately and completely to  
24 their -- to what the California Environmental  
25 Quality Act has required? And also they make a

11

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1 input at that time in terms of what they thought  
2 were important issues to be addressed in the EIR.  
3 Those are included in this document.  
4 And then, in accordance with the  
5 California Environmental Quality Act, we did a  
6 full-range analysis of a number of topics. I won't  
7 go through them all, and I don't intend to provide  
8 any information about it. As you can see, those of  
9 you who have a draft EIR, it is very lengthy;  
10 there's a lot of detailed information in it. We  
11 encourage you to take a look at that document;  
12 review it; if you're really interested, read every  
13 page, if you have enough stamina for that. But at  
14 least take a look at the areas you may be  
15 particularly interested in and concerned with and  
16 take a look at them. That's the best way for you  
17 to get an understanding, not only of the project,  
18 but the potential effects and impacts that are  
19 associated with it. And that way you're able to  
20 provide meaningful comments to us; we can take  
21 those under consideration, address those as we  
22 prepare the final environmental document.  
23 Through our analysis, we identified  
24 impacts that were to be fully mitigated through  
25 additional measures. There were also those we

13

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1 waste-disposal options, existing landfills, and  
2 potential new landfills. We took a look at  
3 out-of-county waste-disposal options: taking waste  
4 from Santa Barbara County, either by truck or by  
5 rail, to a more distant landfill in another county;  
6 we took a look at alternative disposal or waste  
7 technologies, whether that be waste energy,  
8 increased recycling, composting.  
9 We also took a look at a larger project,  
10 looking for Tajiguas to be expanded to, in fact,  
11 operate for up to 25 years. And, likewise, we  
12 looked at a reduced alternative that would save,  
13 what happens if the landfill operates for ten  
14 years? And then, as required under the California  
15 Environmental Quality Act, we also looked at --  
16 took a look at the "no project." What does it mean  
17 if this project were not approved?  
18 Through that, one of the important aspects  
19 of CEQA is to identify the environmental superior  
20 alternative. Based upon our analysis, we  
21 determined -- we analyzed all the alternatives  
22 preparing the proposed project, and based upon that  
23 analysis, it was determined that none of the  
24 alternatives were environmentally superior to the  
25 proposed project.

15

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1 way back into what we call the back canyon.  
2 There's another design also at project  
3 level called the back-canyon design. On this  
4 photograph, here is the existing landfill; the  
5 back-canyon design sweeps further back into the  
6 back canyon. It doesn't -- it does overlap the  
7 landfill but not as high. And it's flatter and  
8 extends further back. And this board over here, if  
9 you'd like to come up after the meeting to look, is  
10 the waste footprint of the back canyon. Okay?

11 Existing on-site environmental controls  
12 will continue, such as gas collection,  
13 groundwater-monitoring systems, drainage systems;  
14 all of these things will continue into the expanded  
15 areas as part of the proposed project. Some of the  
16 other project elements that also is part of the  
17 project description is we're going to have a  
18 composite-liner system that's going to be  
19 constructed in areas outside of the existing waste  
20 footprint. So anything outside of this red  
21 boundary here that has -- that's going to accept  
22 waste will have a composite liner built underneath  
23 it.

24 We will extend our drainage system for  
25 surface water and subsurface drainage.

18

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1 decision on whether to adopt what is called the  
2 Statement of Overriding Considerations For the  
3 Significant and Unavoidable Impacts.  
4 And Bob Mason, who is our EIR consultant  
5 and project manager for his company, TRC, will go  
6 into a little more depth of the summary of the  
7 environmental document.

8 BOB MASON: Thank you, Inelda.  
9 Good evening. My name is Bob Mason with  
10 TRC out of Irvine, California. We prepared the  
11 draft environmental impact report for the County of  
12 Santa Barbara on the contract.

13 The EIR itself is prepared, as Inelda  
14 indicated, under the California Environmental  
15 Quality Act. It is considered to be a  
16 full-disclosure document. It is not a  
17 decision-making document when we prepare it. It  
18 becomes a part of the decision-making process that  
19 the Board of Supervisors will consider, along with  
20 your input and your comments.

21 Through the process of preparing the  
22 environmental impact report, there were meetings  
23 going back about a year and a half, maybe two years  
24 ago; they were called scoping meetings where we  
25 went out into the community and asked for people's

12

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1 identified that could not be fully mitigated even  
2 with applying mitigations that were available. We  
3 have identified a full range of mitigation measures  
4 as appropriate, but, again, through that we  
5 determined that there were four areas where there'd  
6 be impacts that would be considered to be  
7 unavoidable and adverse, even with the  
8 implementation of full mitigation. Those have to  
9 do with biological resources, cultural resources,  
10 visual resources, and air quality.  
11 Again, I encourage you to read the  
12 document, understand what those impacts are, why  
13 they occur. Again, the EIR is not putting a value  
14 judgment on these impacts. It's disclosure. It's  
15 to say, "Here's what's going to occur based upon  
16 the best scientific information we have." And it's  
17 really up to you, the public, to have input and  
18 then for the Board of Supervisors to consider that  
19 in making their decision.  
20 In addition to the front-canyon and  
21 back-canyon configurations that the EIR analyzed,  
22 we also took a look at a number of alternatives.  
23 And there's a lengthy alternative analysis within  
24 the document.  
25 We looked at other in-county

14

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1 With that, I'll turn it back to Inelda for  
2 some wrap-up.  
3 INELDA CRAGIN: Okay. So, I guess, how  
4 can you participate in this EIR process? The draft  
5 EIR, which -- I want to show it to you if you  
6 haven't seen it. This is the document. It's about  
7 that thick and double-sided. It's got a lot of  
8 good information about the Tajiguas project. The  
9 draft EIR and -- this is also what is called the  
10 technical studies. It's essentially the more  
11 detailed information about some of the areas, like  
12 in groundwater, air quality, traffic; these are the  
13 backup studies that support some of the findings  
14 and analysis in the EIR.  
15 Both of these documents are available for  
16 review at all city and county libraries and all  
17 County Planning and Development Department offices  
18 in Santa Barbara and Santa Maria and also at our  
19 Public Works Department, Solid Waste and Utilities  
20 Division office at 189 East Victoria Street in  
21 Santa Barbara. In the back of the room there is a  
22 blue handout that has where all the libraries and  
23 places where you can review the document are  
24 available. You can also purchase the document or  
25 copies of sections from Kimko's in Santa Barbara at

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1 the Hope Avenue location and also Santa Maria and  
2 the Alternative Copy Shop in Santa Barbara. And  
3 those locations and phone numbers are also on this  
4 blue sheet that you can pick up in the back of the  
5 room. Okay?

6 The other thing is how the EIR process  
7 works. As Jackie said, the public-comment period  
8 has been extended until Friday, September --  
9 December 14th, 5:00 o'clock p.m. A final EIR  
10 preparation will include response to any of the  
11 public comments that we receive, both verbal  
12 tonight, written, faxed to us; and even if you call  
13 us on the phone, we will accept those comments.

14 The final EIR is expected to be released  
15 in the spring of 2002. And our Board of  
16 Supervisors -- we expect the final EIR  
17 certification hearing and project decision also in  
18 the spring of 2002.

19 So your public comments are really  
20 valuable to us. It's really important to review  
21 the draft EIR and comment on the issues and items  
22 in the document. Verbal -- like I said, verbal  
23 comments will be accepted tonight at all public  
24 meetings. And please fill out one of these  
25 public-comment forms if you'd like to speak

17

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1 Just say is, if you want to learn more about the  
2 Tajiugas Landfill expansion, take a tour, come out  
3 to our site. Call us at the number shown above:  
4 Area Code (805) 892-3656. Come and see what a  
5 landfill looks like. And then also visit our  
6 Website. We have a Website that has all this  
7 information and more information on -- on the EIR  
8 and anything about our recycling programs and  
9 things that we are doing in solid waste.

10 With that, I'm going to turn the public  
11 meeting back to Jackie. And thank you for your  
12 attention and time.

13 JACKIE CAMPBELL: Thank you, everyone.  
14 Well, so far I only have two speaker  
15 slips, but I know there's a lot more of you is the  
16 room than two. So perhaps it'd be beneficial if we  
17 allowed some questions to occur. If any of you  
18 have questions about the project or the EIR, we can  
19 just do this rather informally by raising your  
20 hand, and you could ask us any questions you'd  
21 like.

22 UNIDENTIFIED SPEAKER: You refer to the  
23 "green waste pad." Can you describe that to me  
24 and what that means and what happens there?

25 JACKIE CAMPBELL: Of course I can't

19

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1 tonight -- they're in the back -- and just sign  
2 your name, and that way we can have a record. Or  
3 if you'd like to write in your comments, please do  
4 so to our Solid Waste Utilities Division. There is  
5 a document in the back of the room that gives you  
6 the address and everything on how you can do that,  
7 our fax number and our phone numbers.

8 Jackie mentioned the upcoming public  
9 meetings. I won't repeat all the dates: one  
10 tomorrow and then next week -- tomorrow in Santa  
11 Maria on the 8th and November 13th in Buellton for  
12 the Santa Ynez Valley, the November 19th at the  
13 Goleta Community Center, and the new additional  
14 meeting at the Lompoc City Hall on November 28th.  
15 All of that information is also in the back of the  
16 room. And there's a handout with the actual  
17 addresses, and then there's a "Let's Talk Trash" ad  
18 that you probably see in the newspaper too. If you  
19 forget to pick one up, and it's got maps of how to  
20 get to all of our public-meeting locations.

21 Finally, as far as the written comments,  
22 you can send them to this address. All of the  
23 information is in the handout in the back. So we  
24 really appreciate your participation.

25 And then the last thing that I'd like to

18

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1 describe any of the functions, but I'm really good  
2 with the process.

3 IREDA CRAGIN: Okay. What we have is, in  
4 our back-canyon area there is an asphalt pad, and  
5 we collect from the recycling green waste program  
6 that we have in the -- or South Coast. We have a  
7 mobile chipper that comes in, and it will chip the  
8 green waste for us. And we can use the green waste  
9 either as mulch -- and we do have a program to sell  
10 that and to provide that to -- what do you call  
11 it? What do I want to say? -- to ranches on the  
12 South Coast and also Caltrans, and the County uses  
13 it a lot for landscaping. And we also have -- we  
14 also can use it as an approved alternative daily  
15 cover for the landfill. You have to cover the  
16 waste every day to prevent any kind of, you know,  
17 harborage of vectors and flies and for disease  
18 control and safety. And there are different cover  
19 materials that are allowed, and we have approved  
20 with the program -- our regulatory agency has  
21 approved the use of our mulch as our chipped green  
22 waste as alternative cover.

23 Does that answer your question?

24 UNIDENTIFIED SPEAKER: Yeah.

25 JACKIE CAMPBELL: Any other questions on

20

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1 the project description or the document?

2 If not, we'll move into the public  
3 comments. My first speaker slip is from Brian  
4 Trautwein.

5 If you could please step to the podium and  
6 speak there.

7 BRIAN TRAUTWEIN: Thank you very much,  
8 county staff. I'm Brian Trautwein with the  
9 Environmental Defense Center. And the  
10 Environmental Defense Center is a nonprofit,  
11 public-interest environmental law firm. And we  
12 represent the Santa Barbara chapter of the Surf  
13 Rider Foundation regarding this project, the  
14 proposed expansion of the Tajiugas Landfill. And  
15 our goal is to protect water quality, both surface  
16 and groundwater quality in the vicinity of the  
17 landfill.

18 In this effort to protect water quality,  
19 we're working very closely with other groups in the  
20 community, including Heal the Ocean and the Gaviota  
21 Coast Conservancy. And our four groups have formed  
22 a coalition working, again, to protect water  
23 quality in and around the landfill.

24 Right now we're in the process of  
25 reviewing the draft EIR and its supporting

21

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1 between groundwater and the actual trash in the  
2 landfill. Instead, the landfill appears to be  
3 sitting in a virtual pool of water with no liner  
4 beneath it to prevent the groundwater from rising  
5 up into the waste mass and mixing with the trash  
6 and potentially contaminating groundwater at the  
7 site or off site.

8 And, indeed, if the landfill is sitting  
9 within up to 100 feet of groundwater, then, as the  
10 EIR indicates, then we really could almost call  
11 this "Lake Tajiugas." But I don't think we'd find  
12 fish in that lake because the water that the County  
13 has pulled from the waste mass is very dark and  
14 smelly and contaminated.

15 So this groundwater, which has apparently  
16 welled up within the landfill waste mass, may  
17 travel in various directions through the highly  
18 fractured bedrock in this foothill and mountainous  
19 terrain of the Tajiugas Landfill. And we feel that  
20 the County's current monitoring program is

21 inadequate to ensure that pollution isn't migrating  
22 through cracks in the substrate, through cracks and  
23 fractures in the bedrock to off-site aquifers.

24 That's one of our concerns with regards to  
25 the Tajiugas Landfill and water pollution. And we

23

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1 technical document. And as some of you know, we've  
2 retained a consulting firm, Geosolve, to assist us  
3 in the review of the technical issues raised in the  
4 draft EIR. These technical issues include the fact  
5 that there is groundwater in the landfill, how that  
6 affects the landfill's stability, structural  
7 stability, and how the water in the landfill could  
8 affect groundwater quality through migration of  
9 leachate or other contaminants off site to  
10 groundwater aquifers or to streams.

11 Geosolve, the consulting firm that we've  
12 retained, is the firm that worked with Erin  
13 Brokovich in her efforts to protect water quality  
14 related to PG&E operations. They made a movie out  
15 of that.

16 So with the assistance of this consulting  
17 firm, we will submit additional detailed comments,  
18 but I wanted right now to at least provide you with  
19 some preliminary comments regarding our take on the  
20 adequacy of the environmental impact report, both  
21 the legal and the technical adequacy of that  
22 document.

23 First, the EIR makes it clear that there  
24 is groundwater within the waste mass, even though,  
25 by law, there's supposed to be a 5-foot separation

22

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1 feel that by expanding the landfill that could  
2 exacerbate these problems and that the EIR does not  
3 adequately address that.

4 We're surprised that EIR doesn't find any  
5 significant impacts to water quality or geology  
6 related to this water in the landfill. And we also  
7 feel that the EIR doesn't provide any evidence or  
8 make any showing that the groundwater leachate  
9 recovery system is capturing all or even most of  
10 the groundwater that's migrating through the  
11 landfill mass, down the canyon, through the  
12 alluvial substrate in the buried creek bed that the  
13 landfill sits in.

14 The construction of the landfill exposed  
15 springs and caused more water to flow into the  
16 canyon landfill. And also the construction of the  
17 landfill essentially dammed Pila Creek and Pila  
18 Canyon, and we feel that that has forced the  
19 groundwater to well up again into the waste mass,  
20 resulting in potentially significant water-quality  
21 impacts, both on site and off site and also raising  
22 important legal issues with regards to meeting that  
23 mandatory 5-foot separation between the landfill  
24 waste mass and the groundwater.

25 We're concerned that the EIR doesn't look

24

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30-3

1 adequately at alternatives, including alternatives  
2 that may be necessary in the event Tajiguas can't  
3 be expanded because of these groundwater problems.  
4 So, again, these are preliminary  
5 comments. We do have a consultant working on the  
6 technical issues, and we're looking at the legal  
7 issues raised by the EIR as well. And we'll  
8 provide you with detailed written comments prior to  
9 December 14th.  
10 Thank you very much.  
11 JACKIE CAMPBELL: Thank you.  
12 Mr. Trautwein.  
13 Our next speaker is James Shallwood.  
14 JAMES SHALLWOOD: Good evening. Thanks  
15 for having me be able to come up here.  
16 I guess my only credential, so to speak,  
17 is that I represent advanced wastewater treatment  
18 technology using electrocoagulation. We've  
19 actually submitted E.C. as a possibility to treat  
20 the ponds at Tajiguas. That was some time ago.  
21 We've also submitted proposals for Sheffield  
22 Reservoir and, I believe, Rincon community as an  
23 alternative to conventional wastewater treatment.  
24 So I have some interest in the site. And  
25 through my business and working with farmers and

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1 with Sonoma Compost up in Santa Rosa, and I'd like  
2 to read Paul's letter. Is that permissible?  
3 "Dear Mr. Shallwood, We appreciate  
4 your interest in the Organic Recycling  
5 Program conducted by Sonoma Compost.  
6 We wish you success in your efforts  
7 to enhance your county's waste-reduction  
8 efforts while improving your local  
9 soils and environment. I'll fax you a  
10 copy of our latest newsletter regarding  
11 the Organic Recycling Program.  
12 "The program is operated on Cane  
13 Landfill, our county's central landfill,  
14 on behalf of the County of Sonoma and  
15 its cities. I've been up to this site,  
16 actually divert waste there, including  
17 wood, green waste, and other materials  
18 on site and send them to an area where  
19 they actually chip, screen, and windrow  
20 on site. So they make their own compost  
21 right there at the landfill.  
22 "The Organic Recycling Program is  
23 clearly the most significant factor in  
24 the County's waste-diversion efforts to  
25 date. Since 1993 we have diverted over

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30-A

1 having lived up in Mendocino, I'm familiar with  
2 other options and other things that have been  
3 done.  
4 About a year and a half ago I wrote a  
5 letter to the editor regarding Tajiguas and saying  
6 that we not only need to look at Tajiguas as a  
7 landfill but also a natural-resource facility. It  
8 is a potential site where we can collect natural  
9 resources; we're saying they're to be thrown away  
10 and to think about converting Tajiguas from a  
11 landfill to a natural-resource facility. It's not  
12 important what we do from this point on but how we  
13 solve the problem, in other words, reducing the  
14 load at the landfill.  
15 I want to refer to Section 4.2.2,  
16 evaluating the feasibility of recycling, reuse, and  
17 composting without reviewing other existing  
18 technologies. So the EIR basically lacks in  
19 reviewing other technologies to be able to come up  
20 with a fair assessment and stating that composting  
21 alone and not together -- no, I'm sorry --  
22 composting alone, nor together with other  
23 alternative waste technologies, may be economically  
24 or technically feasible.  
25 The other day I talked to Paul Paddock

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1 500,000 tons of yard trimmings and wood  
2 waste from our local landfill. Yard  
3 waste is converted to compost and  
4 mulches, while the wood waste is utilized  
5 for mulches, biofuel, and alternative  
6 daily cover at the landfill.  
7 "In addition to diversion credits,  
8 there are other benefits which make this  
9 one of the most popular programs our  
10 local government is involved in. These  
11 benefits include, one, a variety of  
12 affordable compost and mulch products  
13 that are utilized by backyard gardeners,  
14 organic farmers, grape growers,  
15 professional landscapers, and public  
16 agencies; two, while materials produced  
17 are sold at a profit, and sales revenues  
18 are shared with the local government;  
19 three, the program provides a tangible  
20 example of closing the recycling loop  
21 locally. Residents can see that the  
22 yard and wood waste they set out at the  
23 curb is directly and locally converted  
24 to a beneficial use; four, through  
25 Sonoma Compost Public Education Program.

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1 the public is learning compost and  
2 mulches provide beneficial alternatives  
3 to chemical fertilizers, herbicides,  
4 and pesticides; five, local farmers  
5 have gained a greater respect for our  
6 county's valuable topsoil and use and  
7 uses mulches to suppress weeds and soil  
8 erosion on steep hillside vineyards;  
9 six, local schools are closely involved  
10 in the organic recycling program.  
11 Students come to the compost facility  
12 to observe the conversion of waste and  
13 organic materials to valuable humus.  
14 We also receive donated compost for  
15 use in their school gardens. Finally,  
16 the schools -- the students take the  
17 recycling and soil-conversion message  
18 home to share with parents and siblings.  
19 "In closing, I would like to extend  
20 an invitation to you and your local  
21 decision makers to visit our site and  
22 learn firsthand what a successful organic  
23 recycling program can do in your county,  
24 your recycling efforts and your local  
25 environment.

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1 at the same time in Fiji. I just placed it.  
2 As the County knows and Public Works  
3 knows, Heal The Ocean is really violently opposed  
4 to the landfill. We represent 2000 very concerned  
5 citizens in Santa Barbara who are very concerned  
6 about ocean-pollution problems in Santa Barbara  
7 County. We don't take it very lightly that the  
8 beaches in front of the Tajiguas Landfill have been  
9 labeled by Heal The Bay as the dirtiest beach in  
10 Southern California, not "one of the," but "the  
11 dirtiest." And so to point the finger at sea birds  
12 and/or the 29 septic systems, we think, might be a  
13 big oversight.  
14 The comments here are to be directed to  
15 the draft document that we're talking about, but I  
16 must preface this by saying that Heal The Ocean --  
17 we presented this to Public Works -- that despite  
18 the fact that these draft documents say that there  
19 are no springs underneath the landfill, the former  
20 public -- the former manager of the landfill who  
21 was there when the landfill was being constructed,  
22 Robert Kedy, gave us a legal declaration that  
23 states that there are springs, natural springs,  
24 underneath the garbage. As we all know, Tajiguas  
25 is on the line. So the documents that refer to

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1 "Cordially, Paul Paddock, Sonoma  
2 Compost Company."  
3 So I would ask that the agency who  
4 drafted -- who put together this EIR contact Paul,  
5 look at other alternatives, and I will submit this  
6 to the County Board of Supervisors. And I ask that  
7 we take a serious look at this and consider a  
8 program on site to reduce the load, which is why  
9 we're having to expand now, because we haven't done  
10 these things in the past and we should be.  
11 JACKIE CAMPBELL: Perhaps you could leave  
12 us a copy of that letter.  
13 JAMES SHALLWOOD: I will.  
14 JACKIE CAMPBELL: Thank you very much.  
15 Our next speaker, Hillary Hauser.  
16 And I didn't remind you all of this  
17 earlier, but this session is being recorded by a  
18 shorthand reporter. So if you can speak clearly  
19 and not too quickly, she can get all the  
20 information in the record.  
21 HILLARY HAUSER: I'll speak very slowly.  
22 I'm Hillary Hauser, the executive director  
23 of Heal The Ocean.  
24 And, Jackie, it's good to see you again.  
25 We were at Tajiguas -- Tajiguas -- Tavaru

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1 "there are no springs," we take great issue with.  
2 So to confine the comments to the draft  
3 document -- there are two documents. They're each  
4 put high. There's an EIR; there's a technical  
5 document.  
6 What concerns us is that the issues that  
7 are raised in the technical document are not really  
8 in the EIR, specifically, the Arcadis report, which  
9 describes the water beneath the landfill; their  
10 probes in this technical report indicate that in  
11 the wells there's standing water around the  
12 250 feet above sea level; there's standing water in  
13 the wells at that level. The base of the landfill  
14 is 160 feet above sea level.  
15 So as Mr. Trautwein was referring to,  
16 there seems to be, according to what's in the  
17 technical report on that table, at least 100 feet  
18 of water at the bottom of the landfill, which could  
19 indicate that there are millions of gallons of  
20 water mixing with the trash.  
21 We are concerned about groundwater. This  
22 is why we've been working with Public Works to get  
23 testing, to get to more monitoring wells or to the  
24 monitoring wells that are there, to take spill  
25 samples. We haven't been successful in

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1 collaborating with the County on getting split  
2 samples wet, which Public Works knows resulted in  
3 some frustration for Heal The Ocean. That's why we  
4 trespassed on the landfill and vent in there with a  
5 professional tester, even though the film we made  
6 about it shows me picking up samples with a  
7 savonnaise jar. We actually vent with a  
8 professional tester and vent and tested the trench  
9 water, which is the groundwater, and vent right up  
10 to the spigot and took a sample. And the state  
11 standards for fecal coliform are 400 parts per --  
12 most probable number per 100 milliliter. Excuse  
13 me. I can't read this. So the limits are 400, and  
14 the sample that we took from the groundwater from  
15 the spigot in that tank was 240,192 most probable  
16 number.

17 So we're concerned about groundwater  
18 mixing with trash, getting down to the ocean. And  
19 in the technical report there are references by the  
20 Arcadia report to these wells that are full of  
21 water. We're concerned about stability. We're --  
22 Thank you for the extension to December  
23 14th. This isn't exactly light reading. But the  
24 coalition that Mr. Trautvein referred to is looking  
25 at everything. We wish the graphs were readable.

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1 Good to see you again, Jackie.  
2 JACKIE CAMPBELL: The next speaker, Keith  
3 Zandona.  
4 And this is the last speaker slip I have.  
5 So if there are additional speakers, please fill  
6 out the form and bring it forward.  
7 KEITH ZANDONA: Good evening. My name is  
8 Keith Zandona, I'm the chapter chair of the  
9 Santa Barbara Surf Rider. I'm not going to repeat  
10 what Brian Trautvein said because he's representing  
11 us. Surf Rider is the keeper of the coast, and we  
12 are very concerned with water quality at this  
13 landfill site.

14 Thank you, again, for the time extension.  
15 It is definitely needed with the -- this document  
16 is huge.

17 I'm going to bring up a couple other  
18 issues that weren't -- have not been defined yet.  
19 Traffic. Why is this site allowed in this document  
20 to not have to have overpasses and off-ramps, like  
21 the site at the Exxon plant had to do? Why are --  
22 why is the County exempting themselves in having a  
23 safe place to exit these trucks on a daily basis?  
24 The traffic up there is far less than it is here on  
25 a daily basis. That should definitely be

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1 We can't read the graphs that are in the Arcadia  
2 report. And they're very significant because they  
3 involve the probes. We would like to request the  
4 graphs in a readable form. We can't even read them  
5 with a magnifying glass.

6 We feel our consultants that Mr. Trautvein  
7 just referred to, Geosolve, is raising the issue  
8 of, where is the bottom of the landfill? Has it  
9 been mapped? There is a 5-foot rule. Is there --  
10 do we -- does the County need to provide a map and  
11 define this bottom of the landfill, where it is in  
12 relation to these springs, so that engineering  
13 controls can be introduced?

14 Geosolve, our hydrogeologic experts,  
15 they're going over this report, which Heal The  
16 Ocean and Gaviota Coast Conservancy and Surf  
17 Rider -- and we will have and we will submit this  
18 report to the appropriate agencies whose charge it  
19 is to regulate the landfill. And we will have that  
20 report within this time period. What concerns us  
21 greatly is in this draft EIR there is not a  
22 definitive alternative that is defined for the  
23 Tajiguas Landfill if the landfill were to be closed  
24 down. And that is, we feel, a serious omission.  
25 Thank you for giving me this opportunity.

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1 remediated in this document. And it is mitigated  
2 by saying, "Oh, we can do it by extending some of  
3 these lanes." That's not going to get it. This is  
4 a 15-year project. You got to have adequate off-  
5 and on-ramps for these trash trucks.

6 Also we need to get into waste reduction.  
7 This is -- this is ridiculous. We're putting trash  
8 in a hole. Our whole society needs to get into. If  
9 it's not recyclable, we don't buy it; we don't use  
10 it; we don't throw it away. This is a cycle we've  
11 gotten into, and we've got to get out of it now  
12 because this is going to go on. Fifteen years from  
13 now, we're going to want to go back further and  
14 deeper. We've got to change our whole attitudes  
15 towards trash.

16 We need a MRF, and we need a MRF in town  
17 that adequately sorts the stuff out. I've gone up  
18 there on the site, and I've actually seen a whole  
19 truckload of cardboard get dumped off and get  
20 buried. This stuff is not getting thrown out and  
21 recycled properly.

22 And that's basically all I have to say.  
23 Thank you.  
24 JACKIE CAMPBELL: Thank you, Mr. Zandona.  
25 Seeing no other speaker slips, then, I

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1 would at this point close this public hearing on  
2 the document; however, I believe some of the staff  
3 members can probably stick around and go over any  
4 of the aerial photographs or any of the documents  
5 that are up on the easels in the room. And thank  
6 you all for coming, and we look forward to  
7 receiving your comments. Good evening.  
8 (Proceedings concluded at 7:25 p.m.)

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## REPORTER'S CERTIFICATE

1  
2  
3 STATE OF CALIFORNIA  
4 COUNTY OF SANTA BARBARA | ss.

5  
6 I, KELLY TAYLOR, RPR, CSR 10608, Certified  
7 Shorthand Reporter of the State of California, for  
8 the County of Santa Barbara, do hereby certify that  
9 the foregoing pages are a true and correct  
10 transcript of the proceedings held on November 7,  
11 2001, in the above-entitled matter.

12 Dated at Santa Barbara, California, this  
13 23rd day of November, 2001.

KELLY TAYLOR, RPR, CSR 10608

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**Document 30**  
**Public Hearing Comments**  
**Santa Barbara Public Library**  
**November 7, 2001**  
**Response to Comments**

Response 30-1

See Responses 3-1 through 3-124.

Response 30-2

See Responses 3-1 through 3-124.

Response 30-3

Draft EIR Chapter 4.0 provides a comprehensive analysis of alternatives to the proposed project, including the rationale utilized in the analyses. The alternatives analyzed include existing in-County waste disposal facilities, potential new landfill sites in Santa Barbara County, reduced project alternative, out-of-County waste disposal facilities, potential locations for a new South Coast Transfer Station/Materials Recovery Facility, rail haul to an out-of-County disposal facility, alternative disposal technologies, the no project alternative and environmentally superior alternative.

Final EIR Chapter 3.0 provides additional discussion regarding the feasibility of waste processing technologies.

Response 30-4

Comment noted. See Draft EIR Section 4.3.2, which addresses the subject of a new South Coast Transfer Station/Materials Recovery Facility.

See Final EIR Chapter 3.0 for a discussion regarding the feasibility of waste processing technologies.

Response 30-5

Comment noted.

Response 30-6

See Response 1-8.

Response 30-7

See Draft EIR Section 3.3.2.2.4 and Response 1-6.

Response 30-8

See Responses 1-6, 1-12 and 2-1 through 2-46.

Response 30-9

Comment noted.

Response 30-10

See Responses 2-1 through 2-46.

Response 30-11

See Responses 2-1 through 2-46 and 3-1 through 3-124.

Response 30-12

See Responses 3-81.

Response 30-13

Comment noted. See Final EIR Chapter 3.0 for a discussion of waste processing technologies.

1 SANTA BARBARA COUNTY  
2 PUBLIC WORKS DEPARTMENT/SOLID WASTE DIVISION  
3  
4 TAJIGUAS LANDFILL EXPANSION PROJECT EIR  
5 PUBLIC HEARING ON THE DRAFT EIR  
6  
7  
8  
9  
10 REPORTER'S TRANSCRIPT OF PROCEEDINGS  
11  
12 Thursday, November 8, 2001  
13 County Government Center  
14 Board of Supervisors' Hearing Room  
15 511 East Lakeside Drive  
16 Santa Maria, California  
17 8:35 p.m.  
18  
19  
20  
21  
22  
23  
24  
25 Reported by: KELLY TAYLOR, RFR, CSR 10808

1

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1 Santa Maria, California  
2 November 8, 2001  
3 --00800--  
4  
5 JACKIE CAMPBELL: Good evening, everyone.  
6 Welcome to the environmental hearing on the draft  
7 environmental impact report for the Tajiguas  
8 Landfill Expansion Project. My name is Jackie  
9 Campbell. I am the environmental hearing officer  
10 for this evening's meeting. The format of our  
11 meeting this evening will be to give you a  
12 presentation of the project and to inform you about  
13 the environmental document. We'll have some time  
14 for questions about the project. If there's  
15 anything you don't understand about the project  
16 description or the process, we can answer  
17 questions. And then if anybody would like to speak  
18 and make formal comments this evening on the  
19 document, there are public-comment forms available  
20 in the back of the room. And if you could please  
21 fill one of those out with your name and  
22 information and hand it to me, I'll be able to call  
23 your name when we get to the public-comment portion  
24 of the meeting.  
25 This is the second in a series of five

3

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1 And with that, I'll turn it over to Imelda  
2 Cragin from the Solid Waste Utilities Division of  
3 the Public Works Department.  
4 IMELDA CRAGIN: Thank you, Jackie.  
5 I'm Imelda Cragin. I'm the project  
6 manager for this environmental document for the  
7 Tajiguas Landfill Expansion Project and would like  
8 to welcome all of you in participating in this  
9 public-comment meeting. This is an important  
10 project for our community and for our county,  
11 primarily for the residents and businesses because  
12 safe solid-waste management and disposal is  
13 critical. We don't have total recycling in place  
14 yet, and so trash must be managed, and this project  
15 addresses that for the southern part of  
16 Santa Barbara County, actually, most of  
17 Santa Barbara County now.  
18 County Public Works appreciates your  
19 interest and welcomes your participation. And  
20 we're glad, even though it's a small group, that  
21 you're here. I'm going to give you just an  
22 overview of some of the project objectives.  
23 Can everybody see the slides? Okay.  
24 This project is to provide 15 additional  
25 years of solid-waste-disposal services for the

5

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1 Let me go over some of the background of  
2 the project. Tajiguas Landfill has been open and  
3 in operation since 1967 for the disposal of  
4 municipal solid waste for Santa Barbara County.  
5 Solid waste has been delivered -- that's been  
6 delivered to Tajiguas Landfill is generated by a  
7 number of areas in the county: city of  
8 Santa Barbara, the unincorporated areas of southern  
9 Santa Barbara County, and both the Santa Ynez and  
10 Cuyana Valleys. Since 1967 the landfill site has  
11 undergone a number of regulatory-approved changes  
12 as to the size and the shape of the landfill to  
13 accommodate, you know, the disposal needs of the  
14 county.  
15 Our proposed project, we have two  
16 configurations. We call it the front-canyon and  
17 back-canyon configurations. And both of those  
18 projects have been analyzed at what we call the  
19 project level in the draft EIR, which means they've  
20 been analyzed in all -- a number of -- I think  
21 there are 11 different environmental-issue areas  
22 for -- as part of this document.  
23 The front canyon -- let me give you a  
24 little bit of a background. This is the Tajiguas  
25 Landfill or -- the Tajiguas Landfill waste

7

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1 TAJIGUAS LANDFILL EXPANSION PROJECT EIR  
2  
3 APPEARANCES  
4 JACKIE CAMPBELL, HEARING OFFICER  
5 County of Santa Barbara  
6 Planning and Development Department  
7 123 East Anapamu Street  
8 Santa Barbara, California 93101-2058  
9 (805) 568-2068  
10  
11 IMELDA CRAGIN, PROJECT MANAGER  
12 County of Santa Barbara  
13 Public Works Department  
14 Solid Waste and Utilities Division  
15 169 East Victoria Street  
16 Santa Barbara, California 93101  
17 (805) 568-3659  
18  
19 ROBERT C. MASON, PROJECT MANAGER  
20 IFC, ENVIRONMENTAL CONSULTING FIRM  
21 61 Technology Drive  
22 Irvine, California 92618  
23 (949) 727-9336  
24  
25 AUDIENCE SPEAKERS  
26 Joan Leon  
27 Mark Kuoppinen

2

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1 public-comment meetings that we're holding to  
2 collect public input on the draft document. We met  
3 last night in Santa Barbara, and we'll meet next  
4 week on Tuesday, November 13th, in Buellton; the  
5 following week, Monday, November 19th, in Goleta;  
6 and then one additional meeting has been added,  
7 which will occur Wednesday, November 28th, in  
8 Lompoc.  
9 The public-comment period for this  
10 document was originally scheduled at 45 days, but  
11 given the complexity of the document, we have  
12 extended that comment period to December 14th. So  
13 all public comments must be received by 5:00 p.m.  
14 on December 14th. The comments can come in the  
15 form of testimony at tonight's meeting or written  
16 comments submitted up until December 14th. We also  
17 will accept e-mails and phone calls.  
18 I don't have a lot of people in the  
19 audience tonight. So this hearing can be somewhat  
20 informal in terms of the question-and-answer  
21 portion of the meeting. And we can allow the staff  
22 to be available after we close the hearing this  
23 evening to go over any questions you may have  
24 regarding the visuals that you see around the room,  
25 the graphs or the aerial photographs.

4

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1 residents of southern Santa Barbara County,  
2 Santa Ynez, and the Cuyana Valleys. And the  
3 other -- the second objective that we have to do  
4 for this project or that we are -- I can't talk  
5 tonight. The second objective is to meet a 15-year  
6 county disposal requirement for the California  
7 Integrated Waste Management Act, and that is often  
8 called AB-939. That act actually mandates that  
9 counties recycle 25 percent by 1995 and then  
10 50 percent by the year 2000. Santa Barbara County  
11 in 1995 diverted 38 percent. So we beat our  
12 recycling rate there. And in the year 2000 our new  
13 diversion rate at this time, as sent in to our  
14 regulatory agency, is 55 percent. So we're above  
15 the target, and we're still trying to work toward  
16 doing a better job with that.  
17 The third project objective is to provide  
18 a well-managed municipal solid-waste disposal  
19 facility to assure safe solid-waste disposal for  
20 the additional 15 years. And then we also need to  
21 meet a -- the August 3rd, 1999, Board of  
22 Supervisors' policy directive to provide adequate  
23 disposal capacity at Tajiguas Landfill, and that  
24 would allow for the siting and the development of a  
25 new in-county regional landfill. Okay?

6

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1 footprint where trash has been disposed is this  
2 red -- is encompassed inside this red line. The  
3 front-canyon expansion is this orange line. I  
4 don't know if you can see that from where you're  
5 sitting. This is the waste footprint if we're  
6 going to go ahead and expand using that design.  
7 Some of it is on the existing landfill. Actually,  
8 it emphasizes being more on the existing landfill  
9 with about two-thirds of the waste footprint moving  
10 back into this area that we call the back canyon.  
11 This back-canyon area right now is utilized as a  
12 dirt borrow area. It's where we take -- we  
13 excavate out dirt to cover the trash for daily and  
14 also -- for daily cover and also other construction  
15 projects on site.  
16 The back-canyon expansion is -- actually  
17 extends out in this blue outline here. It does  
18 overlap over the existing landfill. Just not as  
19 high. But it does extend out further in the back  
20 part of the back canyon, and it's lower in  
21 elevation as far as the shape.  
22 These are two diagrams of more of the  
23 shape of the front-canyon expansion. And it's got  
24 benches, which are -- looks like a staircase going  
25 up above the landfill here and then moving out in

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TAJIGUAS LANDFILL EXPANSION PROJECT

TAJIGUAS LANDFILL EXPANSION PROJECT

1 the back. And then this is the back-canyon  
 2 design. So you can look at that closer after the  
 3 public hearing.  
 4 The existing on-site environmental  
 5 controls features that we have -- such as  
 6 landfill-gas system, our groundwater-monitoring  
 7 system, a lot of our drainage system -- those will  
 8 continue on the existing landfill and expand and  
 9 extend into the new expanded areas. Okay.  
 10 Other project elements include a  
 11 composite-liner system, and those -- a liner is  
 12 required to be placed in areas outside of what is  
 13 existing -- what we call the existing waste  
 14 footprint. So if you look at this diagram,  
 15 anything on the outside of the red that is part of  
 16 the expansion will have a liner placed before the  
 17 waste is put on -- you know, on the liner, before  
 18 the waste is actually disposed on the site.  
 19 We also will have a drainage system that  
 20 extends from the existing landfill out into the  
 21 expanded area, and that would be subsurface and  
 22 surface drainage.  
 23 A landfill-gas-collection system would be  
 24 also extended in this area. Right now we have 68  
 25 wells that collect landfill gas on our existing

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1 at project level, you pick one or the other.  
 2 They also have a decision to decide  
 3 whether they will certify this EIR as adequate and  
 4 complete; have we analyzed all of the environmental  
 5 issues adequately and completely in regards to the  
 6 California Environmental Quality Act.  
 7 Another decision that they have to make is  
 8 to decide whether to adopt a statement of  
 9 overriding considerations for the significant and  
 10 unavoidable impacts. And our EIR consultant who is  
 11 here tonight will discuss those impact areas.  
 12 And at this time I'm going to introduce --  
 13 this is Bob Mason of IRC. He's the project manager  
 14 who prepared the EIR. IRC is our environmental  
 15 consulting firm that prepared the EIR for the  
 16 Public Works Department.  
 17 And, Bob, maybe you can go into the next  
 18 area.  
 19 BOB MASON: Good evening.  
 20 Thanks, Inelda.  
 21 I'm Bob Mason. I'm with IRC. We're out  
 22 of Irvine, California. We were hired by the County  
 23 to prepare the draft environmental impact report.  
 24 The environmental impact report was prepared in  
 25 accordance with the California Environmental

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1 to make thoughtful and meaningful comments.  
 2 As I mentioned, we took a look at a number  
 3 of areas. We identified if it impacted the  
 4 significance but it could have adequate mitigation  
 5 to reduce the level of impact below a level of  
 6 significance. And in certain cases we also found  
 7 that there were impacts that were, in fact,  
 8 significant and unavoidable. We found those in  
 9 four areas under biological resources, cultural  
 10 resources, visual resources, and air quality. And  
 11 that is where Inelda was mentioning that the Board  
 12 of Supervisors, if they choose to go forward with  
 13 the project, would have to do what are called a  
 14 statement of overriding considerations for those  
 15 impacts that are significant and unavoidable. They  
 16 would have to determine that the impacts are  
 17 outweighed by other factors in order for the  
 18 project to go forward.  
 19 An important part of the environmental  
 20 impact report is the evaluation of alternatives to  
 21 what is being proposed. In this case we evaluated  
 22 a full range of alternatives, including rather than  
 23 the expansion of Tajiguas is to look at the  
 24 existing or new landfill within Santa Barbara  
 25 County to take its place. We took a look at the

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1 separate set of documents which are the technical  
 2 studies. These are the supporting documents that  
 3 have more detailed information on which the EIR  
 4 analysis was based on.  
 5 So these are available for review at all  
 6 city and county libraries and at County Planning  
 7 and Development Department offices in Santa Barbara  
 8 and Santa Maria and also at our Public Works/Solid  
 9 Waste and Utilities Division office at 189 East  
 10 Victoria Street in Santa Barbara.  
 11 The information on the libraries and the  
 12 county offices and where you can look at all the  
 13 documents for review are on this blue handout  
 14 that's in the back. You can also purchase copies  
 15 of the EIR and the technical documents at Kinko's  
 16 in Santa Barbara at the Rope Avenue location or in  
 17 Santa Maria or at the Alternative Copy Shop in  
 18 Santa Barbara.  
 19 In addition, the way the EIR process works  
 20 is the public-comment period has been extended and  
 21 will end on December 14th at 5:00 o'clock p.m.  
 22 Final EIR preparation includes responses to the  
 23 public comments that we do receive at the  
 24 public-comment meetings and also any written  
 25 comments or faxed-in comments or even comments that

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1 landfill. And the landfill gas goes to a  
 2 cogeneration plant that generates electricity. And  
 3 the plant actually makes about 3 megawatts of  
 4 energy of electricity, and that's enough for 200  
 5 to -- 2,000 to 3,000 homes, to power those homes.  
 6 We're going to continue with surface water  
 7 and groundwater monitoring, also continue with our  
 8 nuisance monitoring and our controls. There is  
 9 also a southeast corner of the landfill that is  
 10 going to be modified. And that's analyzed in the  
 11 document.  
 12 We have a green waste pad that's in the  
 13 back of the back canyon currently, and that also  
 14 has been analyzed to be relocated. We also have a  
 15 scale and scale house that may be relocated that's  
 16 been analyzed, along with the maintenance shop.  
 17 And last, but not least, we also analyze what it  
 18 would be for landfill closure of the existing  
 19 landfill and also both expansion designs.  
 20 Our Board of Supervisors have to make a  
 21 decision on this document and also need to -- make  
 22 a decision on the document and also need to review  
 23 the information. And their options are either to  
 24 choose either the front-canyon or the back-canyon  
 25 configuration but not both. Because they're both

18

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1 Quality Act that requires that projects that are  
 2 being considered for approval by the County or  
 3 other jurisdictions be evaluated to consider their  
 4 environmental impacts or their potential impacts.  
 5 Environmental impact reports are not  
 6 decision documents. They are disclosure  
 7 documents. It's to go ahead and establish what is  
 8 the existing condition and what our project may do  
 9 to a full range of environmental topical areas.  
 10 They include in-depth analysis. They include  
 11 mitigation measures to reduce the level of impact.  
 12 And rather than going into a lot of detail, as  
 13 Inelda indicated, we took a look at it topical  
 14 areas that are on the screen behind us. The  
 15 document itself -- if you haven't seen it, there's  
 16 one sitting on the counter over there. It's a  
 17 lengthy document, a lot of information. Probably  
 18 the best way for you to learn about the project is  
 19 probably to read the executive summary in the  
 20 project description. Then you may find that there  
 21 are certain topical areas that are more of interest  
 22 to you than others. So we encourage you to read  
 23 the document. That is the way for you to have the  
 24 best opportunity to understand what's going on,  
 25 understand the nature of the impacts, and allow you

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1 option of transporting waste from Santa Barbara  
 2 County to an existing out-of-county landfill. We  
 3 took a look at various alternative waste-control  
 4 technologies, waste energy, increase recycling,  
 5 composting. We took a look at a larger project:  
 6 rather than just 15 years of additional capacity,  
 7 we evaluated what would occur if Tajiguas was  
 8 expanded for 25 years. And we also took a look at  
 9 a reduced alternative, that Tajiguas would only be  
 10 permitted for ten years. And then also, as  
 11 required by the California Environmental Quality  
 12 Act, we took a look at the no-project alternative,  
 13 what occurs if Tajiguas were not to be expanded.  
 14 Based upon that analysis, we take a look  
 15 to determine what is the environmental superior  
 16 alternative. We compare each of the alternatives  
 17 to the proposed project. And based upon that  
 18 analysis, it was determined that none of the  
 19 alternatives were, in fact, environmentally  
 20 superior to what was proposed.  
 21 With that, I'll turn it back to Inelda.  
 22 INELDA CRAGIN: Well, what I'd like to do  
 23 is more of a bit of a wrap-up on how you can  
 24 participate in this EIR process. There is a draft  
 25 EIR, which I've shoved you here, and we also have a

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1 are called in to us.  
 2 Final EIR is expected to be released in  
 3 the spring of 2002. And the Board of Supervisors  
 4 final EIR certification and project decision also  
 5 will occur in the spring of 2002.  
 6 Your comments are really valuable. It's  
 7 important to review the draft EIR and comment on  
 8 the information in the document. And we will  
 9 accept all comments, verbal and written, to our --  
 10 at our office. And there is this handout in the  
 11 back that shows where our public meetings are and  
 12 also where you can write or fax your comments or  
 13 call in your comments.  
 14 Like Jackie said earlier, this is the  
 15 second of five meetings, and this information is in  
 16 the back. And then there's also a little flier  
 17 that's attached called "Let's Talk Trash," and it  
 18 has the actual maps and locations of the meetings  
 19 for your ease. Okay?  
 20 And then, finally -- oh, that's -- the  
 21 next step is just the written comments, and that  
 22 information's up there. But if you want to learn  
 23 more about our project, come out and take a  
 24 Tajiguas Landfill tour. Come out and see what a  
 25 landfill looks like. You can call our number at

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TAJIGUAS LANDFILL EXPANSION PROJECT

1 882-3688. That's our main Solid Waste and  
 2 Utilities Division office. Or visit our Website at  
 3 www.publicworks.srb.org.  
 4 And with that, I'll turn the  
 5 public-comment meeting back to Jackie.  
 6 JACKIE CAMPBELL: Thank you.  
 7 Are there any questions regarding the  
 8 project or the document?  
 9 JOAN LEON: I have a question.  
 10 What is the difference between keeping the  
 11 footprint nearer the front or the back? You said  
 12 the back would be lower. Does that mean they would  
 13 stack the trash less high in the back?  
 14 DELDA CRAGIN: Correct. There -- if you  
 15 look a little bit on this diagram here, there is  
 16 one, two, three, four -- almost, like, five levels  
 17 on the existing landfill. Where, here, it's not as  
 18 high, be about three levels or so.  
 19 So what it is is it's almost like this is  
 20 a bigger mound closer to the existing landfill.  
 21 Where this is the same volume of trash but just  
 22 more spread out.  
 23 JOAN LEON: I see. What are the  
 24 advantages and disadvantages of both? You said the  
 25 Board of Supervisors has to choose one or the

17

1 summary, which is Chapter 1 -- I think there are  
 2 copies available back at the back -- there is a  
 3 table that actually shows a comparison of  
 4 advantages, disadvantages, if you want to put it  
 5 that way; but it compares the impacts associated  
 6 with the front canyon to the back canyon. That  
 7 might be a useful tool for you to take a look at.  
 8 MARK KAUPPINEN: Is it the lesser of two  
 9 evils? Looks like the front canyon will get into  
 10 the ocean that much quicker.  
 11 DELDA CRAGIN: The overall --  
 12 JACKIE CAMPBELL: In the table it lays out  
 13 the comparison based on each of the different issue  
 14 areas that are described. So while one option may  
 15 have more impacts in the visual-resource section,  
 16 it may have fewer impacts in the back-canyon  
 17 expansion in the same category. So that goes  
 18 through each issue area.  
 19 MARK KAUPPINEN: Mentioned the supervisors  
 20 have to make the final decision. What credentials  
 21 do they have as far as, like, are they taking your  
 22 recommendations? Are they geologists or  
 23 environmental experts?  
 24 BOB KASON: They would take a look at a  
 25 number of things. One is they're obviously reading

19

1 other. What are the advantages and disadvantages?  
 2 DELDA CRAGIN: Okay.  
 3 Bob, you'll need to help me out a little  
 4 bit.  
 5 JOAN LEON: I mean, why are you offering  
 6 two configurations?  
 7 DELDA CRAGIN: Well, first of all, I  
 8 think it was mainly a response to the  
 9 scoping-meeting comments that we received from a  
 10 number of environmental and public citizens. There  
 11 was a concern -- we originally were going to have a  
 12 project like this that had more waste on the  
 13 landfill. And some people have some issues, saying  
 14 "We don't want more waste on the landfill. I  
 15 think you need to come up with a new design to  
 16 spread that out a little bit." So this is the  
 17 alternative on the configuration that was also  
 18 suggested. And that's what we did. We came up  
 19 with two different configurations essentially.  
 20 One of the things about a landfill, to  
 21 keep the landfill unit contiguous, you have to --  
 22 or to get the permit for the new landfill is you  
 23 have to have your expansion attached to the  
 24 existing unit.  
 25 BOB KASON: You'll find in the executive

18

1 the document itself. I mean, the board are elected  
 2 people; they're not experts obviously. But they do  
 3 this and take it very seriously. They also take  
 4 input from you, the public. And that's why the  
 5 comments are important, not only on the Draft EIR  
 6 in terms of asking questions or clarifications  
 7 about the analysis there, but when it goes to the  
 8 board, there will be public hearings, and that's an  
 9 opportunity for you to voice your comments, again,  
 10 issues, concerns, your recommendation. The EIR is  
 11 not a recommendation, and the staff doesn't  
 12 recommend. It is, again, a disclosure document  
 13 that is intended to try to inform, not only the  
 14 public, but also the Board of Supervisors in terms  
 15 of what are the impacts that are associated with a  
 16 decision they're going to make. They take that  
 17 into account with many other things. The EIR is  
 18 just one of the tools they use to help them make a  
 19 decision.  
 20 MARK KAUPPINEN: All right. Say this  
 21 project is fine for 15 years, or whatever. What  
 22 what? Some of the alternatives, like incinerators  
 23 or -- you know, we're running out of space.  
 24 Doesn't matter -- I mean, like, transporting into  
 25 another valley or another landfill. I mean, that

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TAJIGUAS LANDFILL EXPANSION PROJECT

1 runs into transportation costs; you're taking  
 2 contamination from one area and putting it into  
 3 another; you know, recycling and -- we're just  
 4 running out of land. We just can't go on filling  
 5 up valleys with waste.  
 6 DELDA CRAGIN: Right. Our Solid Waste  
 7 and Utilities Division is developing -- continuing  
 8 to develop and improve on our Solid Waste  
 9 Management Plan for the County. This is one --  
 10 this is actually a second step in a three-pronged  
 11 step for our solid-waste management -- for safe  
 12 solid-waste management. The first step was we had  
 13 increased or maximized the capacity of the landfill  
 14 as it stands right now by steepening the slopes and  
 15 reshaping it. And so that was what we called our  
 16 bench-fill project.  
 17 MARK KAUPPINEN: So they're working on all  
 18 the aspects?  
 19 DELDA CRAGIN: Yes. And then this is  
 20 like a second step. This expansion gives us still  
 21 safe solid-waste management until the new  
 22 technologies or, you know, improved recycling, more  
 23 joint partnerships throughout the county and  
 24 different cities in our -- you know, in our county  
 25 start to share some of these resources. And a new

21

1 regional landfill is one of the areas that the  
 2 Board had directed us to explore, but they're also  
 3 interested in exploring other technologies too.  
 4 MARK KAUPPINEN: Okay. You clarified it.  
 5 But one statistic that sticks in my mind is, like,  
 6 say, Japanese; they recycle a lot. And, say, per  
 7 capita, Japanese produce 180 tons of waste a year  
 8 whereas Americans generate 1,800 tons per person a  
 9 year. So 200 million people in the country. You  
 10 can see where that's going to add up.  
 11 DELDA CRAGIN: Our big thing is we've got  
 12 to change our behavior on how we deal with waste.  
 13 And, you know, packaging is big; also disposable --  
 14 you know, we're a disposable society. We like  
 15 speed. So it's easy to throw something away versus  
 16 thinking about, you know, choosing wisely and  
 17 recycling and looking at it as a resource. But  
 18 we're working in that direction, and Santa Barbara  
 19 County is very forward thinking, you know. So I  
 20 think we want to keep exploring these new things  
 21 and hopefully --  
 22 MARK KAUPPINEN: We just don't want to  
 23 have another Casella.  
 24 JACKIE CAMPBELL: Were there any other  
 25 questions about the landfill or the environmental

22

1 document? I did receive a speaker slip from Joan  
 2 Leon.  
 3 JOAN LEON: Yes.  
 4 JACKIE CAMPBELL: And if you'd like to  
 5 provide us comments, please, this would be the  
 6 appropriate time.  
 7 JOAN LEON: Well, I'll just stay here  
 8 since we're being casual.  
 9 JACKIE CAMPBELL: And if I could remind  
 10 you that we are recording this with a shorthand  
 11 reporter. So if you speak a little more slowly and  
 12 clearly, we can get all of the information on the  
 13 record.  
 14 JOAN LEON: Okay. Well, I'll hand in the  
 15 copy also.  
 16 I got a notice in the mail that the EIR --  
 17 the draft EIR was available. So I called the  
 18 Planning Department because they said that there  
 19 was a copy there. Well, they couldn't find it. So  
 20 I went -- there's a Public Works office that used  
 21 to be on Foster Road. They've moved. They're now  
 22 at 2500 Professional Parkway. And I don't know if  
 23 that's on your handout, the new address. Anyway,  
 24 they didn't have a copy either. So they tried to  
 25 find one. And they called Kathy Kefauver, and she

23

1 was going to mail one to me.  
 2 Well, I went to the library, and I saw the  
 3 size of the document. So I called Kathy, and I  
 4 said, "Don't mail me a copy. I'll go to the  
 5 library." So I spent a couple of hours there  
 6 reviewing the document. And I guess it wasn't  
 7 clear to me that there were two choices for the  
 8 supervisors. I know I kept reading about the front  
 9 canyon and the back canyon, but I just thought  
 10 those are -- that both of them were going to be  
 11 used.  
 12 So if my comments don't reflect that, it's  
 13 because you've cleared that up for me. But -- I'll  
 14 just sort of read this:  
 15 Given the long history of operating the  
 16 landfill since 1967, the County has learned of  
 17 deficiencies and corrected them over the years.  
 18 Several grand jury reports have found the landfill  
 19 to be functioning well within the environmental  
 20 regulations. And I was on the grand jury when we  
 21 did an environmental analysis of Tajiguas Landfill.  
 22 and we were very positive in our comments because  
 23 it was well-regulated and met the requirements.  
 24 So -- and I've toured the landfill twice before our  
 25 grand jury report and after. So we were able to

24

TAJIGUAS LANDFILL EXPANSION PROJECT

1 see the improvements there. And Ron Cortez was the  
2 Solid Waste Management director at that time.  
3 Now, I understand that the proposed  
4 expansion is an interim solution until another site  
5 for landfill can be located and in operation about  
6 15 years because I know that there is a study for a  
7 new site for landfill. But nobody wants it in  
8 their backyard. So that's going to be difficult.  
9 I think it will take all 15 years.

10 I reviewed the EIR, and I found many  
11 positive aspects of the proposed expansion. For  
12 one thing, the new project would correct the area  
13 within the coastal zone by reducing the height of  
14 fill to 400 feet above the main sea level, thus  
15 bringing it into compliance.

16 So that's the part, from that green line,  
17 south toward the ocean; that's within the coastal  
18 zone. That's the part that has to be brought down  
19 to the 400-foot level.

20 Closure procedures are in place for the  
21 older part of the landfill with monitoring for  
22 30 years. I think that's another positive.

23 Water resources are being monitored and  
24 utilized efficiently. They use that for spraying  
25 to keep the dust down. Underground stream flows

1 to even know that the landfill is there. I  
2 especially like the photographs in the EIR of the  
3 before and after views of the landfill. If the  
4 restoration is as complete as the pictures  
5 indicate, there should be no change in the scenes  
6 along the highway.

7 Just for those who haven't seen it, at the  
8 top of the page, here's the before picture; at the  
9 bottom of the page, here's the after picture, which  
10 is identical. So if that's what the restoration  
11 will look like, I think it will be adequate.

12 Trucks entering and leaving the landfill  
13 are cause for caution by drivers already on the  
14 freeway. It feels kind of threatening when you're  
15 coming along and here's a big trash truck. When  
16 the trucks leave the landfill going south, the lane  
17 across the freeway is at right angles to the  
18 freeway. So I think they need to put a gradual  
19 curve there so that, when the trucks are leaning  
20 into the acceleration lane, they don't come to a  
21 right angle and then turn.

22 Then I found some specific items in the  
23 EIR, page 3.3-15. New sedimentation structures  
24 will be built to capture where surface water drains  
25 south towards the ocean.

1 should be carefully monitored for pollution, and  
2 the placement of monitoring wells should be based  
3 on the direction of the streams because these  
4 plumes seem to change directions underground.

5 The biological resources, such as animal  
6 habitat, will be affected, but they have nearby  
7 areas of similar land forms and plants in which to  
8 move. It's too bad that the critters would have to  
9 be displaced.

10 The destruction of oak trees is  
11 unavoidable, but the mitigation of ten new trees  
12 for every one destroyed will help to replace them.  
13 The monitoring and maintenance for five years  
14 should help ensure that the new trees thrive. But  
15 is there a requirement that any trees that do not  
16 survive for five years shall be replaced? And I  
17 think there should be.

18 Blowing trash is still a problem, but the  
19 landfill operators have many requirements in place  
20 to address that. And I know that they have  
21 screens, and they have crews out there picking up  
22 the plastic bags that the wind blows around.

23 Visual impacts are not really a problem,  
24 in my opinion, because drivers on Highway 101 would  
25 have to slow down and really peer into the canyon

1 My comment is this: These seasonal creeks  
2 carry huge amounts of sediment into the ocean after  
3 every hard rain. When driving along Highway 101,  
4 you can see the water is muddy brown, far out into  
5 the ocean from every creek draining south. If  
6 these sedimentation basins are effective, the  
7 Tajiguas area will be the only place that a creek  
8 does not carry sediment into the ocean.

9 Page 3.3-26, and I quote, "The back-canyon  
10 landfill bottom elevations will be situated above  
11 any groundwater locally present," unquote. Since  
12 the new area will be lined, this seems a reassuring  
13 location for the expanded landfill.

14 Page 3.3-24. Arroyo Quemada Creek is east  
15 of the landfill. And that creek is on the  
16 California 303-D list of, quote, "impaired  
17 waters." Since it is Pila Creek that flows through  
18 the landfill area, I wonder why it is not listed in  
19 the basin plan.

20 Page 3.3-25. Quote, "Surface water  
21 samples in Pila Creek watershed show the content is  
22 at or below regulatory thresholds," end quote.  
23 However, during storms, there are increased  
24 sediments from Pila Creek. And I'm wondering, is  
25 this sedimentation from the landfill contents, or

TAJIGUAS LANDFILL EXPANSION PROJECT

1 Is it the mud that's common to all the creeks that  
2 flow into the ocean? And won't this situation be  
3 corrected by the sedimentation structures described  
4 on page 3.3-15?

5 Page 3.3-42. "High discharge of  
6 enterococcus concentration at Arroyo Quemada are  
7 not related to upper watershed activities," end  
8 quote. Again, this creek does not flow through the  
9 landfill. The residents of Arroyo Quemada have  
10 septic systems. The environmental health services  
11 survey in 1975 recommended that the community build  
12 a sewage-disposal system or relocate the existing  
13 systems. Since this has not been done, how can the  
14 Tajiguas Landfill be blamed for the water quality  
15 in Arroyo Quemada Creek and adjacent ocean? And I  
16 understand that the seagulls are the ones that  
17 pollute with all their droppings, but I'm not sure  
18 that that's all coming down in Arroyo Quemada  
19 Creek.

20 Page 3.11-8, air quality. The existing  
21 cogeneration plant is to use methane gas to  
22 generate electricity supplied to Southern  
23 California Edison. And I think you mentioned that  
24 that generates enough electricity for many, many  
25 homes. Question is, is this electricity sold to

1 hearing and just remind you all that you have until  
2 December 14th to submit comments, and feel free to  
3 contact the staff if you have any questions  
4 regarding the process. And if you are not  
5 currently on a mailing list, I believe you can sign  
6 up with our staff in the back of the room to add  
7 your name to any mailing list for future hearings  
8 on this matter. Thank you very much for  
9 attending.

10 (Proceedings concluded at 7:15 p.m.)

1 Edison, or are they just receiving the methane gas  
2 that generates the power?

3 In conclusion, I think the Tajiguas  
4 Landfill is being operated in an environmentally  
5 sound manner, and the County has done a good job of  
6 meeting all the environmental standards. The new  
7 expansion will be located where there will be fewer  
8 impacts than any new location. The County has  
9 hired a person to find alternate methods of using  
10 technology to dispose of the waste products.  
11 Solid-waste disposal is a community service that  
12 benefits the public. In comparison, just think of  
13 all the off-road vehicles at the beach and Oceano  
14 and the dunes creating noise and air pollution. I  
15 don't think an EIR was ever done on the impacts  
16 there. With all the monitoring of Tajiguas, I  
17 think it's as good as a landfill can be. The EIR  
18 has pointed out all the possible impacts, and I  
19 think the mitigation measures are adequate.

20 Thank you.  
21 JACKIE CAMPBELL: Thank you very much for  
22 your comments.  
23 Are there other speakers who would like to  
24 comment this evening?  
25 Seeing none, I will close the public

REPORTER'S CERTIFICATE

1  
2  
3 STATE OF CALIFORNIA ss:  
4 COUNTY OF SANTA BARBARA  
5  
6 I, KELLY TAYLOR, RFR, CSR 10908, Certified  
7 Shorthand Reporter of the State of California, for  
8 the County of Santa Barbara, do hereby certify that  
9 the foregoing pages are a true and correct  
10 transcript of the proceedings held on November 6,  
11 2001, in the above-entitled matter.  
12 Dated at Santa Barbara, California, this  
13 23rd day of November, 2001.

KELLY TAYLOR, RFR, CSR 10908

**Document 31  
Public Hearing Comments  
County Government Center  
November 8, 2001  
Response to Comments**

Response 31-1  
Comment noted.

See Responses 29-1 through 29-14 for responses to issues mentioned in this comment.



1 SANTA BARBARA COUNTY  
2 PUBLIC WORKS DEPARTMENT/SOLID WASTE DIVISION

3  
4 TAJIGUAS LANDFILL EXPANSION PROJECT EIR  
5 PUBLIC HEARING ON THE DRAFT EIR

6  
7  
8  
9  
10 REPORTER'S TRANSCRIPT OF PROCEEDINGS

11  
12 Tuesday, November 13, 2001  
13 Pea Soup Andersen's Restaurant  
14 Ballroom  
15 376 Avenue of the Flags  
16 Buellton, California  
17 6:48 p.m.

18  
19  
20  
21  
22  
23  
24  
25 Reported by: KELLY TAYLOR, RPR, CSR 10368

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1 Buellton, California  
2 November 13, 2001  
3 --00800--

4  
5 JACKIE CAMPBELL: Good evening, everyone.  
6 Welcome to the hearing on the draft environmental  
7 impact report for the Tajiguas Landfill expansion.  
8 My name is Jackie Campbell. I'm a planner in the  
9 Planning and Development Department of the County,  
10 and I'll be the environmental hearing officer  
11 tonight.

12 With me is Mark Schleich, the manager of  
13 the Solid Waste and Utilities Division of the  
14 Public Works Department; our staff project manager,  
15 Inelda Crasin, also from the Solid Waste Division;  
16 and a representative from our consulting firm who  
17 prepared the EIR, Caroline Trindle.

18 We'll be providing you a presentation  
19 tonight of a bit of background information and then  
20 some information regarding the expansion of the  
21 report and its assessment of impacts associated  
22 with the expansion of the landfill at its current  
23 location.

24 The hearing tonight is to accept your  
25 comments on the draft document. It is not a

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1 TAJIGUAS LANDFILL EXPANSION PROJECT EIR

2  
3 APPEARANCES

4 JACKIE CAMPBELL, HEARING OFFICER  
5 County of Santa Barbara  
6 Planning and Development Department  
7 123 East Annapolis Street  
8 Santa Barbara, California 93101-2858  
9 (805) 568-2000

10 MARK A. SCHLEICH, DEPUTY DIRECTOR  
11 MELBA CRASIN, PROJECT MANAGER  
12 County of Santa Barbara  
13 Public Works Department  
14 Solid Waste and Utilities Division  
15 103 East Victoria Street  
16 Santa Barbara, California 93101  
17 (805) 568-3000

18 CAROLINE TRINDLE, EIR ASSISTANT PROJECT DIRECTOR  
19 INC. ENVIRONMENTAL CONSULTING FIRM  
20 61 Technology Drive  
21 Irvine, California 92618  
22 (949) 727-8336

23 AUDIENCE SPEAKERS

24 (Unidentified)

25

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1 hearing to discuss whether you are for or against  
2 the project, but we ask that you restrict your  
3 comments to address the issues raised in the  
4 environmental impact report.

5 The procedure is that after the staff  
6 presentation we'll allow some questions about the  
7 project from the audience. And then after we  
8 complete questions and answers, we will ask you to  
9 fill out a public-comment form, which are  
10 available at the table at the side of the room, and  
11 hand those to me or any of the staff here at the  
12 table, and we'll call on members of the public to  
13 approach the podium and to give comments on the  
14 document.

15 This is the third in a series of five  
16 hearings that we are holding to review this draft  
17 document. We held a hearing in Santa Barbara and a  
18 hearing in Santa Maria last week. We have this  
19 hearing tonight here in Buellton. Next week we'll  
20 hold a hearing in Goleta on Monday. And on  
21 Wednesday, November 28th, we'll hold a hearing at  
22 Lompoc City Hall.

23 The public-comment period on this document  
24 has been extended to December 14th. So you may  
25 make comments that staff will respond to up and

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1 until 5:00 p.m. on December 14th. Those comments  
2 can be delivered in this public hearing or any of  
3 the future public hearings. You may submit your  
4 comments in writing up until that deadline. Or you  
5 may e-mail or phone in comments to the staff at the  
6 Solid Waste Division.

7 After all of the comments are collected,  
8 the consultant firm will go back and make changes  
9 to the document, as necessary, and respond to the  
10 comments that we receive. A proposed final  
11 environmental impact report will be released in  
12 early spring, March. And then a hearing before the  
13 Board of Supervisors on the document will be held  
14 tentatively in April.

15 With that, I'll hand the presentation over  
16 to Mark Schleich.

17 MARK SCHLEICH: All right. Thank you.

18 Thank you all for coming again. As Jackie  
19 said, this is regarding the expansion of the  
20 Tajiguas Landfill, a 15-year expansion, and review  
21 or discussion comments to the project draft EIR.  
22 It's a very important project for the residents of  
23 Santa Barbara County and our businesses. It's one  
24 of the most important projects that we at Solid  
25 Waste provide.

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1 Valley. And that also includes the City of  
2 Buellton and the City of Solvang.  
3 I referred to AB-939. One of the other  
4 caveats of that is that the County shall provide  
5 15 years -- a minimum of 15 years of disposal  
6 capacity.

7 We hope to continue to provide a  
8 well-managed municipal solid-waste disposal  
9 facility, as well as an overall system approach.  
10 Again, this project is for 15 years. Back on  
11 August 3rd, 1998, the Board of Supervisors directed  
12 that 15-year policy, as well as directing us to  
13 start development of a new in-county regional  
14 landfill. We're not here to talk about that  
15 project. We could be here all night probably for  
16 that one. We're focusing in primarily on the  
17 expansion of the existing landfill for the next  
18 15 years.

19 With that, I'm going to turn it over to  
20 our project manager, Inelda Crasin. And after her  
21 comments, we'll turn it over to our consultant for  
22 an overview of the process.

23 MELBA CRASIN: Thank you very much for  
24 coming tonight. I'm Inelda Crasin, the project  
25 manager for the landfill-expansion project EIR.

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1 One of the other bigger projects that  
2 we've been dealing with for the last decade is that  
3 of recycling and achieving the 50 percent AB-939  
4 mandate. And in 19 -- roughly three or four years  
5 ago, we were in the mid-30s as far as the  
6 state-reported diversion percentage. And due to  
7 the hard work of my staff, as well as the hard work  
8 of all of you, we have now submitted a report to  
9 the Integrated Waste Management Board that says we  
10 are recycling at least 55 percent of our waste.  
11 We're waiting for review -- that report and approve  
12 it.

13 That leads us to this important project,  
14 which is to continue to provide adequate disposal  
15 capacity for the community. This is a project that  
16 we spent the last two years in developing.

17 Again, we appreciate your interest and  
18 welcome your participation in this project. We  
19 encourage your comments and review of our  
20 document.

21 This project, again, is to provide 15  
22 years of additional solid-waste disposal capacity.  
23 It not only serves the southern Santa Barbara  
24 County, with the exclusion of the City of  
25 Carpinteria, but also serves the Santa Ynez

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1 Just to give you some background about the  
2 Tajiguas Landfill, it's been in operation since  
3 1967 for the disposal of municipal solid waste in  
4 Santa Barbara County. Solid waste, as Mark said,  
5 has been delivered to the Tajiguas Landfill from  
6 the City of Santa Barbara, the unincorporated areas  
7 of southern Santa Barbara County, recently from the  
8 Santa Ynez Valley, and then also from the Cuyana  
9 Valley. Since 1967, the landfill site has  
10 undergone various regulatory-approved changes to  
11 the shape and size of the landfill to its  
12 configuration at this time.

13 The proposed project that we're working on  
14 or that we've analyzed in this draft EIR -- and if  
15 you haven't seen the document, this is the draft  
16 EIR. We analyzed two expansion configurations: a  
17 front-canyon and back-canyon design that's been  
18 analyzed at what we call project level for the  
19 draft EIR. Project level looks at all of the  
20 different environmental-issue areas. And what I'd  
21 like to show you -- I don't know -- can you see  
22 this diagram from where you're sitting?

23 This is the Tajiguas Landfill site. The  
24 yellow boundary is our parcels, the two  
25 County-owned parcels. There are actually

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1 additional parcels around us. And you can see it  
 2 on that map. But for this discussion, I'd like  
 3 just to point out that the red area outlined here  
 4 is the existing footprint of the waste. So it  
 5 would be, like, if you placed waste in a canyon,  
 6 this would be the boundary of the waste that exists  
 7 at this time.

8 Our expansion projects -- we have two that  
 9 are being considered -- the front-canyon design is  
 10 this orange boundary. I'm not sure if you can see  
 11 it, but I'm kind of outlining the limits of it  
 12 here. That is the limits of the waste. The --  
 13 both -- the back canyon -- let me just talk about  
 14 the back canyon too -- is the purple. And the  
 15 purple goes out, further out into the back part of  
 16 the canyon and still overlaps the landfill such --  
 17 similar to the front-canyon design.

18 What I'd like to say is they both overlap  
 19 the landfill over the existing waste-disposal  
 20 area. But areas that move off, outside of the red  
 21 boundary of existing waste, would be placed on a  
 22 lined surface. That's a requirement for any  
 23 expansion outside of the current waste footprint.

24 Existing overall environmental-control  
 25 features that we have on the existing landfill.

9

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1 of the two projects. The drainage system would be  
 2 extended. Landfill-gas systems will also be  
 3 expanded into a new cell area. We'll continue the  
 4 surface and groundwater-monitoring systems that we  
 5 have. We have a number of groundwater monitoring  
 6 wells, and we do surface water monitoring too.

7 Also, the continuation of the nuisance  
 8 monitoring and control, such as litter control,  
 9 dust control. There is a southeast corner  
 10 modification part of the project that's analyzed,  
 11 looking at a piece of the landfill here that say --  
 12 that would be modified as far as shape.

13 The green-waste pad that's in the back  
 14 canyon may be relocated depending on, you know, the  
 15 phasing of the project, either front canyon or back  
 16 canyon. The scale and scale house would be  
 17 relocated, or it has been analyzed if we would like  
 18 to relocate them, and also the maintenance shop.  
 19 And also landfill closure was then analyzed for the  
 20 existing landfill and the two landfills

21 configurations that we're proposing.

22 The next slide talks about what the Board  
 23 of Supervisors needs to decide with this document.

24 Because we analyzed the front-canyon and  
 25 back-canyon designs at project level, the Board can

11

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1 We prepared the environmental impact  
 2 report in accordance with the requirements of the  
 3 California Environmental Quality Act, and this  
 4 required us to address the full range of  
 5 environmental topics as shown on the slide. Now,  
 6 this is a disclosure document. It's not a  
 7 decision-making document. It does not make  
 8 recommendations. It does identify existing  
 9 conditions, expected impacts of the project that is  
 10 proposed, and it includes appropriate mitigation  
 11 measures.

12 There is a great deal of information in  
 13 this very thick document, and we would encourage  
 14 you to address, in reference to your own questions,  
 15 those areas of particular interest to you. The  
 16 introduction in the project description provides  
 17 good summaries, and then the various resource  
 18 analyses provide a great deal of specific  
 19 information on the different issues that are  
 20 addressed.

21 In the environmental-analysis summary all  
 22 of the mitigation measures that have been  
 23 identified in the document are presented in a  
 24 summary fashion as Class 1, Class 2, Class 3, or  
 25 Class 4. Based on the analysis of the impacts, it

13

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1 superior alternative. All alternatives that were  
 2 addressed were compared to the proposed project.  
 3 And based on our analysis, it was determined that  
 4 none of the alternatives was superior to the  
 5 project as proposed in the EIR.

6 And that's all I have.  
 7 Thank you, Inelda.

8 INELDA CRAGIN: Okay. I'm going to take  
 9 the -- excuse me.

10 What I'd like to do is talk about how can  
 11 you participate in the EIR process. We prepared --  
 12 as we said, there's a draft EIR, which is this  
 13 document, and there's also a corresponding  
 14 technical-studies document. These are actual  
 15 studies that have more detail on some of the  
 16 various issue areas, such as traffic, biology,  
 17 water resources. These have more of the meat of  
 18 the analysis that were used in putting the findings  
 19 and the nit -- determining what mitigation  
 20 measures were appropriate in this EIR.

21 Both of these documents are available for  
 22 review at city -- all city and county libraries,  
 23 also at the County Planning and Development  
 24 Department Offices in Santa Barbara and Santa  
 25 Maria, at the Public Works Department/Solid Waste

15

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1 such as our landfill-gas collection system, our  
 2 groundwater-monitoring system, our drainage systems  
 3 will continue to be expanded into these new areas.  
 4 So it's not that we would ignore the existing  
 5 landfill; we still have to take care of this area  
 6 with those environmental controls and extend them  
 7 out into the new expanded cells.

8 Just a couple things about the  
 9 front-canyon and the back-canyon design is that the  
 10 front-canyon design has -- uses less of the  
 11 back-canyon area, this canyon behind the existing  
 12 landfill, but the waste is stacked much higher.  
 13 It's the same volume of waste with the two designs,  
 14 but one is a more -- I would say, more like a  
 15 pyramid shape on top of -- over a smaller amount of  
 16 area but a little bit higher, where the back-canyon  
 17 design -- this is the front-canyon design here, and  
 18 you can look at this one after the hearing. But  
 19 the back-canyon design does move towards the back  
 20 part of the landfill, but it's lower in elevation.  
 21 It's more spread out. Okay? That's one of the key  
 22 features about the two projects.

23 Other project elements are listed up  
 24 here. There is going to be, like I said, a  
 25 composite-liner system constructed for either one

18

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1 pick either one of the two configurations but not  
 2 both.

3 They also have to make the decision  
 4 whether to certify the EIR as adequate and  
 5 complete. Did it adequately address all the  
 6 environmental issues, and did -- was the analysis  
 7 complete to meet the regulations of the California  
 8 Environmental Quality Act, which is often referred  
 9 to as CEQA.

10 The Board also needs to decide whether  
 11 they wanted to adopt a statement of overriding  
 12 considerations for significant or unavoidable  
 13 impacts. And these are the impacts that are -- you  
 14 know, that are significant and you can't avoid them  
 15 with the project. And the Board of Supervisors  
 16 needs to determine whether that impact is worth  
 17 having with the project.

18 And to talk about the analysis that was  
 19 done and give more of a summary of what happened,  
 20 actually, in the document, I would like to  
 21 introduce Carolin Trindle. She's the assistant  
 22 project manager for the -- from TRC, and they are  
 23 the environmental consulting firm that prepared the  
 24 document for the County of Santa Barbara.

25 CAROLINE TRINDLE: Thank you, Inelda.

12

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1 was determined that the four areas shown --  
 2 biological resources, cultural resources, visual  
 3 resources, and air quality -- cannot be fully  
 4 mitigated, and therefore these are considered  
 5 significant and unavoidable adverse impacts. And  
 6 this is where the statement of overriding  
 7 considerations that Inelda mentioned would come  
 8 into play. The mitigation measures -- there are  
 9 mitigation measures for these four sets of impacts,  
 10 but they cannot completely mitigate for the  
 11 impacts.

12 The EIR also addressed a number of  
 13 alternatives to the proposed project: another  
 14 location for in-county waste disposal,  
 15 out-of-county waste disposal, alternative  
 16 waste-disposal technologies, a larger project which  
 17 was addressed as a 25-year project, a smaller or  
 18 reduced project which was specifically addressed as  
 19 a 10-year project, and no project. The California  
 20 Environmental Quality Act requires that we address  
 21 in the EIR what would happen if the proposed  
 22 project is not implemented and to discuss the  
 23 impacts of not doing the project.

24 The California Environmental Quality Act  
 25 also requires us to identify an environmentally

14

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1 Utilities Division at our 109 East Victoria Street  
 2 in Santa Barbara.

3 If you're interested in knowing where  
 4 these locations of the libraries are or our  
 5 offices, there's this blue handout that lists all  
 6 of the addresses so that you can get access to  
 7 these documents. Also, you can buy your own copy  
 8 or parts of the EIR, if you'd like, or the  
 9 technical studies, at Kinoko's in Santa Barbara at  
 10 the Hope Avenue location and also here in -- up in  
 11 Santa Maria and also at the Alternative Copy Shop  
 12 in Santa Barbara. And those addresses are also on  
 13 this blue flier that we have at our desk over  
 14 here.

15 It's very important to understand, kind  
 16 of, how the EIR process works so that you know how  
 17 to participate. Our public-comment period -- as  
 18 Jackie has said, we've extended it to end on  
 19 December 14th at 5:00 o'clock p.m.

20 The final EIR preparation will include  
 21 responses to all public comments that we receive.  
 22 The final EIR is expected to be released in the  
 23 spring of 2002, with the Board of Supervisors  
 24 having their final EIR certification hearing and  
 25 project decision also in the spring of 2002.

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1 So your public comments are very valuable  
 2 to us. It's important to review the document and  
 3 comment on the information in the document. Verbal  
 4 comments are accepted at these public-comment  
 5 meetings. Please direct your written comments --  
 6 you can fax them or mail them in to our Public  
 7 Works Department/Solid Waste and Utilities  
 8 Division.  
 9 The public-comment meetings -- as you  
 10 know, there were five, and we've already completed  
 11 two. We have this one tonight, and then the one  
 12 next week is on Monday, the 19th, at Goleta  
 13 Community Center in the new city of Goleta, and  
 14 also on Wednesday up here in the North County on  
 15 November 28th at Lompoc City Hall.  
 16 So information on the public-comment  
 17 meetings for you here that aren't -- there is also  
 18 a handout that has the extensions of the actual  
 19 comment period, who you can contact to mail your  
 20 comments to or fax your comments to, plus there is  
 21 a flier of maps to get to all the different  
 22 meetings. And if you want to send your written  
 23 comments -- again, it's also on this sheet --  
 24 attention to Kathy Kefauver, she's our senior  
 25 environmental planner. And you can also call our

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1 document?  
 2 UNIDENTIFIED SPEAKER: On this summary, I  
 3 guess, you pick up at the desk where it says  
 4 "comparison of the proposed project alternatives."  
 5 It doesn't list the 25- and the 18-year alternative  
 6 here. Is that --  
 7 CAROLINE TRINDLE: Does it say "larger"  
 8 project and reduced project?  
 9 UNIDENTIFIED SPEAKER: I'm sorry. I  
 10 misread that.  
 11 Okay. Related to that -- and I don't know  
 12 if that is -- where the appropriate time is to ask  
 13 this. I'm just curious as to how a determination  
 14 was made that 15 years is better than 18 and better  
 15 than 25. And if that's an inappropriate thing to  
 16 ask, then I'll not ask it, but I'm just curious.  
 17 JACKIE CAMPBELL: No, that's a fine  
 18 question to ask.  
 19 When alternatives are evaluated in an  
 20 environmental impact report, they have to be  
 21 evaluated on their ability to meet most of the  
 22 project objectives and, at the same time, their  
 23 ability to reduce impact levels lower than the  
 24 proposed project. So the 18-year project doesn't  
 25 meet the objectives of fulfilling the state

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1 requirements, the mandates for the 15-year disposal  
 2 when they made their decision in a public hearing  
 3 about what project to evaluate.  
 4 UNIDENTIFIED SPEAKER: And then that would  
 5 go from the year -- was it 2006 it would start  
 6 from?  
 7 MARK SCHLEICH: The question, I think,  
 8 is -- originally the Board started with a policy  
 9 directive of 25 years. Midstream they redirected  
 10 us to a 15-year project. That project has been  
 11 analyzed in this document based upon the running  
 12 out of the currently permitted airspace, which goes  
 13 to 2005 or '6 -- 2006.  
 14 UNIDENTIFIED SPEAKER: I have more  
 15 questions, but I don't want to dominate, so --  
 16 JACKIE CAMPBELL: Are there other  
 17 questions?  
 18 Go ahead.  
 19 UNIDENTIFIED SPEAKER: Maybe because I'm  
 20 not reading this properly, when I look at the map  
 21 here of the two options, the front canyon you  
 22 mentioned was going to have a higher fill, but it  
 23 says on the chart that the highest elevation is  
 24 668 feet and that on the back-canyon option the  
 25 highest fill is 708 feet.

21

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1 Yes.  
 2 UNIDENTIFIED SPEAKER: I didn't understand  
 3 this. You talked about choosing between one or the  
 4 other configurations on the front or the back  
 5 canyon. I didn't quite understand that. And why  
 6 can't they choose both, and what is that exactly  
 7 all about?  
 8 IHELDIA CRAGIN: Okay. There are two  
 9 designs for the same amount of waste, you know, as  
 10 far as what needs to be analyzed for a 15-year  
 11 project. And so I think what -- you don't choose  
 12 both because then it's twice as much. It's one  
 13 project or the other.  
 14 UNIDENTIFIED SPEAKER: Twice as much  
 15 what?  
 16 MARK SCHLEICH: I think maybe another way  
 17 to explain it is the Board directed us to look at a  
 18 15-year project. One of those projects emphasized  
 19 more of the waste being in the front of the canyon,  
 20 the front-canyon project; the other one emphasized  
 21 it being more in the back of the canyon. Both of  
 22 those provide 15 years.  
 23 So the board has looked at -- or this  
 24 document has analyzed the impacts of 15 years in  
 25 the front canyon or 15 years in the back canyon but

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1 office and fax comments to our number that's listed  
 2 up there or pick up a copy here. And it's  
 3 available for you to take with you and also to pass  
 4 on to other people who weren't able to come to the  
 5 meeting that are interested.  
 6 And the last thing I'd like you to just  
 7 know about is you can learn more about the Tajiguas  
 8 Landfill Expansion Project. Come and take a tour.  
 9 Come out to Tajiguas; see what the landfill looks  
 10 like. You can call our main number, and we'll  
 11 arrange that for anyone who's interested. Or you  
 12 can also visit our Website at  
 13 www.publicworks.org. And we have a lot of  
 14 information on the Website that you can also  
 15 download or read. Okay?  
 16 And with that, I'm going to turn the  
 17 hearing back to Jackie Campbell. Thank you very  
 18 much.  
 19 JACKIE CAMPBELL: Okay. So we are  
 20 recording this meeting. We have a shorthand  
 21 reporter. And if you could speak clearly and not  
 22 too fast when you make your comments or ask any  
 23 questions, we'd appreciate that.  
 24 So, to begin, are there any questions  
 25 regarding the project or the process or the

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1 requirements that the County provide 15 years of  
 2 waste disposal. And the 25-year wouldn't reduce  
 3 any of the significant effects of the 15-year  
 4 project.  
 5 UNIDENTIFIED SPEAKER: But initially --  
 6 so, I guess, the process was -- 15-year plan was  
 7 the initial plan presented?  
 8 JACKIE CAMPBELL: That is the plan that is  
 9 evaluated in this document at the direction of the  
 10 Board of Supervisors.  
 11 UNIDENTIFIED SPEAKER: I guess last year,  
 12 18 months ago, one of the options that the Board  
 13 looked at was a 18-year to shorten -- because there  
 14 was a big cry about trying to close -- move towards  
 15 an alternative. And, again, obviously, then, state  
 16 law requiring that 15-year thing forced us -- so,  
 17 in essence, that becomes the shortest possible time  
 18 in terms of keeping that facility open, meeting  
 19 state law, and also minimizing further impact.  
 20 which is why the 25-year plan wasn't looked at?  
 21 JACKIE CAMPBELL: The 25-year plan is  
 22 looked at as an alternative but only as an  
 23 alternative. The staff reviewed or prepared this  
 24 document based on policy direction given by the  
 25 Board of Supervisors, who considered the state-law

20

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1 So I guess it's semantics of sitting at  
 2 the highway looking at it. The back-canyon fill is  
 3 going to be higher, but over the actual fill space  
 4 from the ground floor to the top of the pile is  
 5 more in the front canyon. I'm a little confused  
 6 how that works.  
 7 IHELDIA CRAGIN: The canyon floor rises in  
 8 elevation. So part of the problem or using -- when  
 9 we have to say that the back canyon's going to be  
 10 at 708 feet at a maximum elevation, it's because  
 11 there's one point back here where it's right next  
 12 to our perimeter road where it would hit about  
 13 708 feet. But, remember, it's lower in elevation  
 14 down in this area.  
 15 So the waste is going to be thicker with  
 16 the front-canyon design and thinner, but because  
 17 the canyon rises in elevation of the floor,  
 18 everything is higher: it sounds like it's higher in  
 19 the back. It's a little bit of an explanation, but  
 20 that's why it looks like -- if you just read it  
 21 that way, you would think that the back canyon  
 22 would be really tall.  
 23 JACKIE CAMPBELL: So those elevations are  
 24 taken from mean sea level versus the actual height  
 25 of the waste pile.

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1 hasn't looked at the impacts of those two projects  
 2 in combination because that would be greater than  
 3 15 years.  
 4 UNIDENTIFIED SPEAKER: And why can't you  
 5 look at that? I mean --  
 6 MARK SCHLEICH: That would become, as  
 7 Jackie's saying, the 25-year alternative. And we  
 8 looked at that as an alternative. These documents  
 9 are very expensive to prepare, and to look at that  
 10 at the project level would cost a lot more money  
 11 and a lot more time.  
 12 So what we've done is elevated the front  
 13 or the back to having the detail that the Board  
 14 would approve it and go forward with and look at  
 15 the impacts in great detail. And we've created a  
 16 list of alternatives that, based on the analysis,  
 17 will have greater environmental impacts than either  
 18 of those projects. That doesn't mean they  
 19 couldn't, say, on decision day, go back and look at  
 20 both of these together or look at none of this all  
 21 together or any of the other alternatives that  
 22 we've identified.  
 23 It's more or less we had to define a  
 24 project; we had to analyze a project. We came up  
 25 with two alternatives within the same canyon that

24

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1 amount of capacity at that site, you need to  
 2 realize -- or anybody that has been to the site --  
 3 I encourage you all to come out there -- that our  
 4 landfill is primarily what I would say on the east  
 5 side of Pila Creek. The front canyon goes to both  
 6 sides of what Pila Creek used to be, and it's  
 7 rerouted around a pipe around the landfill.  
 8 In the back canyon, where most of this  
 9 additional capacity is theoretically available,  
 10 we're only expanding to the east side of that  
 11 creek. To fill that canyon to the level that  
 12 you're referring to would require significant  
 13 impact to the west side of that creek and to Pila  
 14 Creek. There is oak woodlands; there's all kinds  
 15 of things there.  
 16 So does it economically prevent that  
 17 decision? No. Is it going to be an easy project  
 18 to expand to that level? No. It doesn't prevent  
 19 this -- yeah, this project does not affect the  
 20 ability to do that in the future, if that's the  
 21 direction of the supervisors.  
 22 UNIDENTIFIED SPEAKER: Just a question,  
 23 I'm not sure how to word it properly.  
 24 But part of the old facility's not lined,  
 25 and the new facilities have to be lined. How do

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1 capacity to actually hold water. It's kind of an  
 2 interesting concept because we're in more of an  
 3 arid climate.  
 4 MARK SCHLEICH: Say, Inelda, what's the  
 5 difference between the front canyon and back canyon  
 6 as far as overlap?  
 7 INELDA CRAGIN: Well, actually, the waste  
 8 footprint can be the same for front and back.  
 9 MARK SCHLEICH: What do the diagrams  
 10 indicate? Exactly the same?  
 11 INELDA CRAGIN: That there is an option to  
 12 put both soil and -- and soil stockpile or waste on  
 13 the overlap at this time. But the front-canyon  
 14 design, I think, actually has more waste stacked on  
 15 top, so -- I'm sorry.  
 16 UNIDENTIFIED SPEAKER: One of the concerns  
 17 expressed was part of the unlined is not quite up  
 18 to the same standard and technology that we now  
 19 know is a better way to do things, and the  
 20 back-canyon alternative, then, would involve  
 21 putting less garbage on unlined stuff and more  
 22 material on lined things that we have better  
 23 control of.  
 24 INELDA CRAGIN: Essentially that's the  
 25 concept, yes. And, like I said, we also have

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1 feel the project objectives, and those are what  
 2 we're going forward with.  
 3 JACKIE CAMPBELL: In the back, did you  
 4 have a question?  
 5 UNIDENTIFIED SPEAKER: In 15 years, could  
 6 they make a decision to restudy this and do another  
 7 project there or --  
 8 MARK SCHLEICH: Tonight we're here to talk  
 9 about the expansion project in the EIR. What I've  
 10 always been told as it relates to the decisions of  
 11 current boards, boards of supervisors, they can't  
 12 prevent a future board from making a future  
 13 decision. So I don't know if that answers your  
 14 question or not. But we're trying to focus in on  
 15 tonight's EIR.  
 16 JACKIE CAMPBELL: Yes.  
 17 UNIDENTIFIED SPEAKER: In the same vein,  
 18 it's not normal to have two alternative designs for  
 19 your proposed project, and I wondered from an  
 20 engineering standpoint, why -- or from a procedural  
 21 standpoint, why you have two designs. From an  
 22 engineering standpoint, are there any pros or  
 23 cons?  
 24 INELDA CRAGIN: You want me to answer  
 25 that?

25

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1 UNIDENTIFIED SPEAKER: I'm still looking  
 2 for the ulterior motives as to why there's two  
 3 designs.  
 4 INELDA CRAGIN: We did get public  
 5 comment -- I think you were involved with our  
 6 public scoping. We did get a lot of comments of  
 7 everybody who had their opinion on what kind of  
 8 design we should have for the back or, you know,  
 9 for the expansion using the back canyon.  
 10 And there was a number -- there was a  
 11 group that said minimize the -- you know, minimize  
 12 the waste footprint and don't use the whole back  
 13 canyon. And then there was also another group that  
 14 said, no, we don't want a lot of overlap or we  
 15 don't want a lot of waste on the existing landfill;  
 16 utilize the whole back canyon and spread the waste  
 17 out and use the whole back instead of having a lot  
 18 of waste over the existing landfill.  
 19 When you boil down, you know, a lot of  
 20 those comments, that's -- when we started working  
 21 on the two options, this is what turned out, the  
 22 two designs.  
 23 UNIDENTIFIED SPEAKER: Okay. To further  
 24 the question from the gentleman in the back  
 25 relative to the fact that everybody knows there are

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1 they articulate or overlap or integrate or function  
 2 together? And would one particular option have  
 3 less impact on the existing landfill than the other  
 4 in terms of perhaps funneling water through it or  
 5 channelling water or adding percolation? Or both  
 6 or then really don't have any impact in the  
 7 existing fill?  
 8 INELDA CRAGIN: You want me --  
 9 MARK SCHLEICH: Inelda, maybe you could  
 10 give the exact acreage. But the front canyon has  
 11 more overlap of waste onto the existing and less  
 12 expansion into relatively undisturbed area in the  
 13 back. The back canyon has less overlap and more  
 14 disturbance.  
 15 UNIDENTIFIED SPEAKER: So when you go over  
 16 the existing fill, you just pile more garbage? Or  
 17 do you have to install barrier -- or is it just  
 18 you're piling more garbage on an old unlined  
 19 facility? Does that make any sense in my  
 20 question?  
 21 INELDA CRAGIN: The way -- well, one of  
 22 the things about a landfill, per se, is there is a  
 23 lot of poor space in a landfill that's dry because,  
 24 first of all, a landfill-gas system takes out a lot  
 25 of the moisture. So a lot of the landfill has

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1 environmental-control features on the existing site  
 2 where we have a down-canyon collection trench to  
 3 catch any waters that make its way down to the  
 4 bottom of the canyon and down through the old  
 5 streambed essentially. And we have a collection  
 6 trench right at the base, right at the narrow neck  
 7 of the canyon here that actually picks up the water  
 8 that comes through. And we recycle that water onto  
 9 the landfill again.  
 10 So we have mechanisms to monitor and also  
 11 manage the water in the canyon itself. But, yes,  
 12 there would be liner, like you said, on this area  
 13 outside of the red. And there would be drainage  
 14 features to try to direct water off of the existing  
 15 waste as part of the design of the new cells above  
 16 to get that water to drain towards the lined area.  
 17 UNIDENTIFIED SPEAKER: On your list that  
 18 you had of problems, it divided down to four  
 19 unmitigated problems. You have one environmental  
 20 impact report with two different designs. Does  
 21 higher on your visual resources and your air  
 22 control -- is that going to be a lot worse than if  
 23 you pushed it further back in the canyon and it was  
 24 lower for visual and air quality?  
 25 JACKIE CAMPBELL: There is a comparison

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1 JACKIE CAMPBELL: Well, on a --  
 2 MARK SCHLEICH: I heard a couple  
 3 questions. One's what one provides may be a better  
 4 engineering design from engineering principles,  
 5 economic principles. I'll let Inelda try to answer  
 6 that one; I'm not sure we have the detail for  
 7 that.  
 8 The other one might be a policy question  
 9 as to why there are two alternatives elevated. And  
 10 Inelda could probably answer that one too.  
 11 JACKIE CAMPBELL: We do occasionally  
 12 evaluate two designs in one proposal. Not often;  
 13 you're right in that. However, because this is  
 14 such a large project and there's so much public  
 15 interest and because there were several options of  
 16 how to achieve the objective, I think that the  
 17 staff looked at what were the most viable options  
 18 to meet the 15-year capacity and came up with two  
 19 that were feasible and thought, let's evaluate both  
 20 of these to a project level of detail so that the  
 21 Board of Supervisors can have some flexibility in  
 22 making this choice regarding the footprint of the  
 23 waste. But the basic objective is the same in  
 24 either case, to provide 15 years of waste  
 25 capacity.

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1 60 years' more space in that canyon, that maybe  
 2 we're not supposed to talk about that tonight  
 3 because you're talking about the 15-year project;  
 4 nevertheless, do either one of these designs  
 5 compromise the ability to use that 60 years of  
 6 additional space should some policy decision makers  
 7 in, say, 10 or 15 years decide they really want to  
 8 stay in Tajiguas?  
 9 INELDA CRAGIN: Mark, you want to take  
 10 that?  
 11 MARK SCHLEICH: Question is, Does this  
 12 design compromise future expansions or the  
 13 ability -- therefore the ability for future  
 14 decision makers to make the decision?  
 15 UNIDENTIFIED SPEAKER: Right.  
 16 MARK SCHLEICH: We have to put down a  
 17 liner under the landfill. So how much trash we put  
 18 on top of the liner is still open. I don't think  
 19 that either one, from the perspective of a  
 20 footprint impact, affect that future decision. It  
 21 may -- and I don't know the answer. It may or may  
 22 not affect the economics of expanding it. One may  
 23 be harder to put roads in and access, things like  
 24 that, into.  
 25 I think when we talk about the maximum

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1 table in the document that takes each option, the  
 2 front canyon and the back canyon, and then rates  
 3 its impact level in each of the issue areas that  
 4 was analyzed in the document.  
 5 And I don't know off the top of my head,  
 6 but I think visual was significant in both  
 7 instances, and I believe air quality was also  
 8 significant in both instances, such that either  
 9 configuration -- front canyon or back canyon --  
 10 caused the same level of impact.  
 11 UNIDENTIFIED SPEAKER: The same?  
 12 JACKIE CAMPBELL: The same level of  
 13 impact. But that doesn't mean that the heights are  
 14 the same. I think it's that the --  
 15 UNIDENTIFIED SPEAKER: -- the lower --  
 16 JACKIE CAMPBELL: -- it's taller. But we  
 17 found that to be a Class 1 impact.  
 18 And even though the back canyon puts less  
 19 material on top of the existing footprint so it's  
 20 not as high, we still found that to be a  
 21 significant visual impact. Even though it's lower,  
 22 it came to the same classification of impact  
 23 level.  
 24 UNIDENTIFIED SPEAKER: Okay.  
 25 UNIDENTIFIED SPEAKER: Related to that,

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1 the same height as the waste. So you would see  
 2 that early on as far as the visual look. But the  
 3 bench fill is fairly high already, and you're  
 4 correct; most of the visual impact you will not see  
 5 because it's behind what will be the final  
 6 bench-fill design.  
 7 MARK SCHLEICH: I think as you read the  
 8 document -- hopefully you'll read the document,  
 9 take the time to do it -- the impact -- significant  
 10 impacts have certain criteria. And, see, you need  
 11 to also understand the criteria that makes them  
 12 significant.  
 13 I think your point is, if you're driving  
 14 along 101, most of the landfill expansion will be  
 15 hidden by the existing landfill. But if you're in  
 16 a fishing boat offshore, your line of sight would  
 17 change. If you're potentially hiking East Camino  
 18 Cielo, your view may change. So it, again, gets to  
 19 be what is your perspective on a site to a --  
 20 UNIDENTIFIED SPEAKER: Were you mandated  
 21 to, sort of, put in different perspectives? I  
 22 mean, how do you -- get, kind of, lough, a fishing  
 23 boat's at 20 miles and somebody hiking here and an  
 24 airplane and --  
 25 JACKIE CAMPBELL: We're required to look

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1 Furthermore, visual impacts relate to  
 2 things like differences in color, shape, tone,  
 3 contrast with the adjacent terrain and  
 4 configurations and also should include the number  
 5 of people that see such things and the amount of  
 6 time that things are seen. And I think it's a bit  
 7 of an overstatement --  
 8 JACKIE CAMPBELL: I'm going to cut you off  
 9 here because you seem to be really making your  
 10 public comments at this point. And I had preferred  
 11 to do this as a question and answer about the  
 12 project. But when we move to the public-comment  
 13 portion, those are certainly valid points to make.  
 14 So if there are other questions that we  
 15 can answer about the project or the document before  
 16 we move to the comment section.  
 17 Yes.  
 18 UNIDENTIFIED SPEAKER: I may be out of the  
 19 loop on this whole thing. But when you say "TPD,"  
 20 is that trips per day, or does it stand for  
 21 something else?  
 22 JACKIE CAMPBELL: TPD is tons per day.  
 23 UNIDENTIFIED SPEAKER: I don't see where  
 24 it's explained anywhere in here.  
 25 MELBA CRAGIN: There is a -- at the

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1 sites required longer driving distances, which had  
 2 additional impacts to traffic and air quality, and  
 3 most of them were pristine sites that were not  
 4 disturbed and often had more impacts to biological  
 5 resources. So this is strictly an interpretation  
 6 of the environmentally superior alternative. It  
 7 may not be the socially superior --  
 8 UNIDENTIFIED SPEAKER: Just curious how  
 9 you made the determination. Are they the sites  
 10 that were also being looked at for the future? I  
 11 mean -- or it would seem to me that the future  
 12 alternatives that you're also -- the County's  
 13 looking at would be the same alternatives that were  
 14 analyzed for this project because the landfill is a  
 15 landfill. And so I'm curious how that plays out  
 16 because if it was determined it wasn't a good  
 17 environmental alternative, then how does that bode  
 18 for our search for a new landfill? Is that  
 19 saying --  
 20 JACKIE CAMPBELL: It just means that this  
 21 proposal is environmentally superior to those  
 22 proposals at this time, environmentally only. And  
 23 I think in the document, in the alternatives  
 24 chapter, there is a summary table that, just like  
 25 in the front-canyon/back-canyon comparison, there's

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1 what's the -- will the final level of the bench  
 2 filling basically block anything that happens back  
 3 there anyway? In terms of driving along the  
 4 highway, we won't see anything back there because  
 5 the bench filling will basically block your view  
 6 from that? Or on 101s -- looks like right now,  
 7 as the bench filling -- you're not going to see  
 8 what's back there anyway. Or is that not the  
 9 case?  
 10 MELBA CRAGIN: The bench fill at this  
 11 time is permitted to go up to 500 feet. But the  
 12 way -- you'd have to look in the visual-resources  
 13 section because it has really good diagrams of line  
 14 of sight looking up at the canyon. And for me  
 15 to -- I don't want to quote something wrong here.  
 16 But I could talk to you afterwards, and we could  
 17 look at it.  
 18 But most of the -- for both front- and  
 19 back-canyon designs, we would be putting waste over  
 20 the -- waste or a soil stockpile on top of the  
 21 existing landfill. And that's all stockpile.  
 22 We'll probably have a shape similar to the waste  
 23 because we have to remove dirt from the back canyon  
 24 to make space for the -- you know, the new cells.  
 25 So that stockpile essentially will start to have

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1 at the visual impacts from public-viewing  
 2 locations. So that does include the highway,  
 3 offshore, although certainly fewer people will see  
 4 it from that point; public trails within the  
 5 national forest, et cetera.  
 6 So the requirement is to assess the impact  
 7 from public-viewing locations. And the EIR does  
 8 include some photo simulations and some  
 9 line-of-sight diagrams that you can look at where  
 10 we estimate the future waste footprint and height  
 11 and project what it will look like from different  
 12 locations, public-viewing locations. So there are  
 13 some photos and some simulations in the document.  
 14 UNIDENTIFIED SPEAKER: Since we're on  
 15 visual resources and since that's one section I  
 16 decided to at least look at -- and I have named  
 17 and I have prepared documents very similar to this  
 18 one in a 21-year period of time. And I cannot  
 19 understand why one of the viewpoints is the access  
 20 road on the landfill site looking at the landfill,  
 21 particularly since you indicated the view locations  
 22 need to be from public-access points. And, indeed,  
 23 this may be a public landfill, but nevertheless to  
 24 be on a project site to look at the project is  
 25 pushing the case.

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1 beginning of each discussion --  
 2 (Unreportable discussion was held.)  
 3 MELBA CRAGIN: We can get you a copy of  
 4 our glossary of what all the abbreviations --  
 5 UNIDENTIFIED SPEAKER: It would help for  
 6 some of us that aren't in on all this all the time.  
 7 MARK SCHLEICH: Did you get the  
 8 explanation of what TPD is?  
 9 UNIDENTIFIED SPEAKER: Tons per day.  
 10 UNIDENTIFIED SPEAKER: It's your last  
 11 paragraph on this front page.  
 12 UNIDENTIFIED SPEAKER: One more question  
 13 about the alternatives and how they're -- you --  
 14 the determinations were made. On the new in-county  
 15 landfill sites, was that considered a lower --  
 16 what's the term I'm looking for? -- least optimal  
 17 alternative because of time? Not 15 years of  
 18 capacity at Tajiguas, awaiting trying to site  
 19 something that would then put you in violation of  
 20 that law? Or why was that alternative bumped down  
 21 in the hierarchy?  
 22 JACKIE CAMPBELL: In this document when  
 23 the environmentally superior alternative is  
 24 defined, it is chosen on environmental effects  
 25 only. And all of the other in-county landfill

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1 an alternatives comparison that lists their impacts  
 2 in the different issue areas so that you can  
 3 quickly look at the different sites and determine  
 4 how we came to the conclusion that this proposal at  
 5 this canyon was environmentally superior, had fewer  
 6 environmental effects or less severe environmental  
 7 effects than those alternatives. And, yes, some of  
 8 those may be the same sites that are analyzed for a  
 9 future landfill.  
 10 UNIDENTIFIED SPEAKER: And it's  
 11 inappropriate to be doing this with an eye on  
 12 what's happening? I mean, you can't look at your  
 13 alternatives in mind thinking the County's already  
 14 looking for a site, maybe doing something different  
 15 now because of that plan later, right in the long  
 16 run have less environmental consequences than this  
 17 alternative now and then looking separately at  
 18 moving later because cumulatively you're going to  
 19 have impact here and, when the new facility is  
 20 found, environmental impact on that new facility.  
 21 JACKIE CAMPBELL: It will be aerial, more  
 22 likely, than cumulative.  
 23 UNIDENTIFIED SPEAKER: But my point is the  
 24 total versus if you took that alternative now; then  
 25 all the environmental impact associated with this

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1 particular expansion plan would not happen and all  
 2 would be at the new facility. And down the road,  
 3 looking back at the total environmental impact, it  
 4 might be different. I'm not sure if I'm making  
 5 myself understood. Because -- already following  
 6 that plan in another stream somewhere else to make  
 7 a new site, those impacts are going to happen.  
 8 CAROLINE TRINDLE: That is addressed in  
 9 the alternative section, along with the timing  
 10 issues.  
 11 UNIDENTIFIED SPEAKER: Okay. Didn't have  
 12 a chance to read this yet.  
 13 CAROLINE TRINDLE: I think what your  
 14 question is is answered in there regarding timing  
 15 and impacts.  
 16 MARK SCHLEICH: It's also -- as Jackie  
 17 said, the Board's made it a serial decision because  
 18 they realized the time and effort to site a new  
 19 landfill; therefore, we needed to do this project  
 20 initially. So that's the separate -- the policy  
 21 separation and the logical steps.  
 22 UNIDENTIFIED SPEAKER: So that's one of  
 23 the reasons versus --  
 24 MARK SCHLEICH: The other question is, did  
 25 we look at the efforts that we did on a regional

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1 In other words, it seems a bit of a push  
 2 schedule-wise to think that even for the size of the  
 3 project you're looking at now, a 15-year project,  
 4 that you could develop and implement one of those  
 5 in-county landfills in five years.  
 6 MARK SCHLEICH: I think the goal of the  
 7 project is to look at alternatives that may or may  
 8 not have more environmental impacts. And the  
 9 issues of timing and permitting, while important as  
 10 far as environmental impacts, in this report as far  
 11 as the information document, weren't considered;  
 12 the timing issues were not considered.  
 13 UNIDENTIFIED SPEAKER: If decisions are  
 14 made on this project in the spring, what's going to  
 15 happen next on the regional-landfill project?  
 16 What's the schedule for that one?  
 17 MARK SCHLEICH: We put out a newsletter to  
 18 everybody that was on our mailing list. I think  
 19 you're on there.  
 20 Basically what we are doing is talking to  
 21 a couple property owners with the idea of doing  
 22 some greater on-site investigations. Before we go  
 23 on their property, we need their permission, and so  
 24 really we can't do anything until we get their  
 25 permission. And I don't expect that process to be

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1 outlined area in purple and the one in orange,  
 2 should you fill the one that you do decide on, can  
 3 you use the outer perimeter if you need it later?  
 4 Should that fill in? It's all County property with  
 5 the yellow lines, right?  
 6 DELDA CRAGIN: Correct.  
 7 UNIDENTIFIED SPEAKER: Why do you want to  
 8 stay within either an orange or a purple instead of  
 9 the whole area?  
 10 DELDA CRAGIN: Well, in order for us to  
 11 do the environmental analysis, we had to put a  
 12 boundary of where the waste would go. And our  
 13 regulatory agencies require that because after --  
 14 UNIDENTIFIED SPEAKER: Doesn't mean you  
 15 can't use the extra areas outside of one or the  
 16 other later?  
 17 DELDA CRAGIN: Well, as Mark said, our  
 18 Board -- the Board of Supervisors can, in the  
 19 future, or a future board can make a decision to do  
 20 a different project in the future. We can't  
 21 preclude that.  
 22 UNIDENTIFIED SPEAKER: So you're locked  
 23 into so many square feet? I didn't mean to talk  
 24 over you.  
 25 DELDA CRAGIN: That's all right.

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1 DELDA CRAGIN: No. If they pick the  
 2 back-canyon expansion, this is the limits of where  
 3 waste can go.  
 4 UNIDENTIFIED SPEAKER: So then you  
 5 wouldn't be able to use anything outside where the  
 6 orange border is?  
 7 DELDA CRAGIN: Outside, like in here?  
 8 No.  
 9 CAROLINE TRINDLE: That would require --  
 10 additional project would require another series of  
 11 environmental analyses.  
 12 UNIDENTIFIED SPEAKER: I thought it was a  
 13 shorter question. Sorry.  
 14 JACKIE CAMPBELL: Quick.  
 15 DELDA CRAGIN: It's okay --  
 16 MARK SCHLEICH: Great question.  
 17 UNIDENTIFIED SPEAKER: I keep hearing some  
 18 of these things, and I don't know if the EIR  
 19 addresses it. But you hear all these horror  
 20 stories of the dump polluting the ocean, and then  
 21 they say, "No, the dump isn't polluting the  
 22 oceans. It's the septic tanks at the houses down  
 23 there." And it goes back and forth.  
 24 Are we ever going to get an answer? Or is  
 25 it in this document?

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1 landfill site? Yeah, we did. We did communicate  
 2 back and forth. One significant difference between  
 3 this project and that regional landfill project is  
 4 we included the waste flow from the Santa Maria  
 5 Valley as well. And when you look at  
 6 transportation impacts, that might change, you  
 7 know -- one case we're taking everything and moving  
 8 it to a new location in the county. If it's  
 9 centrally located, it serves the entire county.  
 10 You know, maybe those impacts are offset. So it's  
 11 a different scope of project as well.  
 12 UNIDENTIFIED SPEAKER: Okay.  
 13 MARK SCHLEICH: But, yes, we did take the  
 14 work we did and share it with the EIR.  
 15 UNIDENTIFIED SPEAKER: And it's a bit  
 16 confusing in here because one of your alternatives  
 17 to the 15-year project is new in-county landfills.  
 18 And then you describe the five you studied in '93  
 19 and four of the sites that you conclude are  
 20 important from a regional-landfill standpoint.  
 21 And, yet, I don't think if one of those was  
 22 environmentally superior and somebody decided they  
 23 wanted to do it, that you could do it in the five  
 24 years you have before the existing project runs out  
 25 to get either the 15 years you're looking for now.

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1 completed until the spring. If we do get their  
 2 permission, we'll have to pay people to go out and  
 3 look at things, and that would be a Board of  
 4 Supervisor decision.  
 5 JACKIE CAMPBELL: One more question, and  
 6 then we'll move into the public-comment period so  
 7 we make sure we have enough time.  
 8 UNIDENTIFIED SPEAKER: Probably an easy  
 9 one. But how does the EIR arrive at the tons per  
 10 day -- that the tons per day are going to cover  
 11 that footprint? How is that arrived at? Is it  
 12 based on population now?  
 13 JACKIE CAMPBELL: It is based on current  
 14 waste-generation rates with a growth factor worked  
 15 into the formula. So it is based on what the  
 16 landfill accepts currently and what it has accepted  
 17 over the past several years, took an average to get  
 18 a representative sample of what the tons per day  
 19 received is, and then we took that and added a  
 20 growth factor to it out over the 15-year life of  
 21 the project.  
 22 UNIDENTIFIED SPEAKER: Ask you one more  
 23 quick question?  
 24 JACKIE CAMPBELL: Sure.  
 25 UNIDENTIFIED SPEAKER: If you've got the

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1 UNIDENTIFIED SPEAKER: So you're locked  
 2 into so many square feet, or whatever, in a certain  
 3 area only for this project?  
 4 DELDA CRAGIN: For either expansion  
 5 design, either -- the front canyon has, kind of, an  
 6 outside perimeter.  
 7 UNIDENTIFIED SPEAKER: Mandatory borders?  
 8 Either orange or purple?  
 9 MARK SCHLEICH: The EIR only analyzes  
 10 waste going in the orange or purple.  
 11 DELDA CRAGIN: Orange or purple waste.  
 12 MARK SCHLEICH: And why didn't we go  
 13 outside? Because I think we would have probably --  
 14 well, we could have if we chose to, but I think  
 15 there would have been other impacts that would --  
 16 UNIDENTIFIED SPEAKER: I just meant your  
 17 surplus around then.  
 18 DELDA CRAGIN: You're talking about these  
 19 areas? Like outside of the orange here?  
 20 UNIDENTIFIED SPEAKER: No. Between your  
 21 purple and your orange right below your finger  
 22 there, there's an area there.  
 23 DELDA CRAGIN: Yeah, there's a gap here.  
 24 UNIDENTIFIED SPEAKER: Not inside the  
 25 orange, but should you need it, could you use it?

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1 MARK SCHLEICH: You want me to answer that  
 2 one? It's Jackie's fault. No.  
 3 There's a detailed technical report,  
 4 surface-water-quality report that tries to answer  
 5 that question. Independent of the EIR, we just  
 6 concluded a DNA study on the sources, the specie  
 7 sources of the bacteria, and that's in a working  
 8 draft and should be publicly available  
 9 mid-December. We tried to get it before, and then  
 10 we tried to release it during it. It just seemed  
 11 like it was going to get confusing.  
 12 UNIDENTIFIED SPEAKER: But it will be  
 13 published, your findings --  
 14 MARK SCHLEICH: Yes.  
 15 UNIDENTIFIED SPEAKER: -- and the findings  
 16 of the other side too?  
 17 MARK SCHLEICH: So that's the two studies  
 18 that are out there.  
 19 The other point is that landfills are  
 20 heavily regulated very much so, probably more  
 21 regulated than anything. We have one of our  
 22 regulators here tonight from the local enforcement  
 23 agency. He's an arm of the California Integrated  
 24 Waste Management Board. They actually came down to  
 25 the hearing in Santa Barbara.

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TAJIGUAS LANDFILL EXPANSION PROJECT

1 We're also regulated by the Regional Water  
 2 Quality Control Board. And the issues of water  
 3 management and water-quality management typically  
 4 go to them. And I'm happy to say we have a very  
 5 good working relationship with them. And the  
 6 concerns that have been expressed, they don't  
 7 necessarily or have not found them to be of such a  
 8 concern that they would change the way the current  
 9 landfill's managed.

10 We're also managed by the Air Pollution  
 11 Control District. So if it leaves the site,  
 12 somebody's looking at us.

13 JACKIE CAMPBELL: Okay. Let's take a  
 14 five-minute break. And please fill out any speaker  
 15 slips, and then we'll move to the public-comment  
 16 portion of the meeting in five minutes.

17 (Short break.)

18 JACKIE CAMPBELL: So far I have not  
 19 received any speaker slips. Are there any  
 20 forthcoming?

21 No.

22 Seeing none, we'll close the public  
 23 hearing. But I believe the staff will stay around  
 24 and answer any questions or look at the plans with  
 25 you or can show you certain sections in the

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REPORTER'S CERTIFICATE

1  
 2  
 3 STATE OF CALIFORNIA  
 4 COUNTY OF SANTA BARBARA } ss.  
 5  
 6 I, KELLY TAYLOR, RPR, CSR 18808, Certified  
 7 Shorthand Reporter of the State of California, for  
 8 the County of Santa Barbara, do hereby certify that  
 9 the foregoing pages are a true and correct  
 10 transcript of the proceedings held on November 13,  
 11 2001, in the above-entitled matter.

12 Dated at Santa Barbara, California, this  
 13 26th day of November, 2001.

14  
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 24  
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KELLY TAYLOR, RPR, CSR 18808

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1 document, if you're looking for something in  
 2 particular that was brought up in the earlier  
 3 questions.

4 I believe everybody has the information  
 5 about how to comment and the deadlines regarding  
 6 the comments. And we'd just like to thank you for  
 7 your participation. And if you're not already on  
 8 the mailing list, you can sign up with our staff at  
 9 the table. And hopefully we'll see you at the  
 10 Board hearing in 2002 springtime.

11 Thank you for coming.

12 (Proceedings concluded at 8:00 p.m.)

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**Document 32  
Public Hearing Comments  
County Government Center  
November 13, 2001  
Response to Comments**

Response 32  
No comments.



1 SANTA BARBARA COUNTY  
2 PUBLIC WORKS DEPARTMENT/SOLID WASTE DIVISION

3  
4 TAJIGUAS LANDFILL EXPANSION PROJECT EIR  
5 PUBLIC HEARING ON THE DRAFT EIR

6  
7  
8  
9  
10 REPORTER'S TRANSCRIPT OF PROCEEDINGS

11 Monday, November 19, 2001  
12 Goleta Valley Community Center  
13 5875 Hellister Avenue  
14 Goleta, California  
15 6:35 p.m.

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19  
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21  
22  
23  
24  
25 Reported by: KELLY TAYLOR, RPR, CSR 10889

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1 Goleta, California  
2 November 19, 2001

3  
4  
5 JACKIE CAMPBELL: Good evening, everyone.  
6 Welcome to the environmental hearing on the draft  
7 environmental impact report for the Public Works  
8 Department proposed expansion of the Tajiguas  
9 Landfill. Tonight's meeting is to accept your  
10 comments on the draft document. This is one in a  
11 series of five public hearings that we've been  
12 holding throughout the county to collect public  
13 input on the adequacy of this EIR.

14 Your comments will be accepted in writing  
15 or in verbal testimony this evening. We are  
16 recording this meeting via a certified shorthand  
17 reporter. And all comments that are made in the  
18 document will be included in the final document,  
19 which will go before the Board of Supervisors for  
20 their review and certification sometime in spring  
21 2002, probably in the April range.

22 We have held meetings in Santa Barbara,  
23 Santa Maria, and Buellton. We have this meeting  
24 here tonight, and then next week we have our fifth  
25 and final public-comment meeting on the EIR in

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1 public-comment period to December 14th. So all  
2 comments must be received by December 14th at  
3 5:00 p.m. In order to be included in the proposed  
4 final document.

5 Right now I've only received one speaker  
6 slip for tonight's meeting. So if there are others  
7 of you who would like to speak, please fill one  
8 out. However, you don't need to fill one out if  
9 you'd just like to participate in the  
10 question-and-answer portion of the meeting.

11 With that, I'll turn the presentation over  
12 to Mark Schleich, the director of the Solid Waste  
13 and Utilities Division of the Public Works  
14 Department.

15 MARK SCHLEICH: Good evening, everybody.  
16 I just have some brief comments, and I'd like to  
17 thank you all for coming.

18 This is the latest of a very important  
19 project that my division's completing working on.  
20 The last one was complying with AB-939 as it  
21 relates to the recycling mandate of getting the  
22 58 percent.

23 About three years ago with all your help,  
24 or at that point, we were at about 37 percent  
25 recycling. And over the past three years with a

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1 Goleta, the city of Santa Barbara, Buellton, and  
2 Solvang; also the Cuyana Valley, which is quite a  
3 distance from here, also utilizes this facility.

4 The final objective is to continue to  
5 provide a well-managed municipal solid-waste  
6 disposal facility to ensure safe solid-waste  
7 disposal. Those are generally our objectives. And  
8 at this point I'd like to turn it over to our  
9 project manager, Inelda Crasin.

10 INELDA CRASIN: Good evening, everyone. I  
11 just want to give you a little bit of the  
12 background of Tajiguas Landfill. It's been in  
13 operation since 1967 for disposal of municipal  
14 solid waste in Santa Barbara County. As Mark said,  
15 solid waste delivered to Tajiguas Landfill is

16 generated primarily by the city of Santa Barbara,  
17 the unincorporated areas of Southern Santa Barbara  
18 County, the new city of Goleta, and the Santa Ynez  
19 and Cuyana Valleys. And since 1967 the landfill  
20 site has gone through various regulatory-approved  
21 changes to the shape and the size of the landfill.

22 Our proposed project consists of two  
23 expansion configurations. Can everybody see this  
24 diagram? We have a front-canyon and back-canyon  
25 design that have been analyzed at project level in

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1 TAJIGUAS LANDFILL EXPANSION PROJECT EIR

2 APPEARANCES

3 JACKIE CAMPBELL, HEARING OFFICER  
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5 Planning and Development Department  
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7 Santa Barbara, California 93101-2858  
8 (805) 568-2800

9 MARK A. SCHLEICH, DEPUTY DIRECTOR  
10 INELDA CRASIN, PROJECT MANAGER  
11 County of Santa Barbara  
12 Public Works Department  
13 Solid Waste and Utilities Division  
14 189 East Victoria Street  
15 Santa Barbara, California 93101  
16 (805) 568-3000

17 CAROLINE TRINDLE, EIR ASSISTANT PROJECT DIRECTOR  
18 TRC ENVIRONMENTAL CONSULTING FIRM  
19 21 Technology Drive  
20 Irvine, California 92618  
21 (949) 727-8336

22 PUBLIC SPEAKERS

23 STEVE JOHNSON

24 BOB HAZZARD

25

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1 Lompoc.

2 There are public-comment forms available  
3 on the table here to our left, and we ask that you  
4 please fill out one of these forms, clearly write  
5 your name and issues that you have, and when we get  
6 to that segment of the hearing, we will call on  
7 members of the public to make their comment  
8 statements tonight.

9 Tonight's meeting is not about whether you  
10 are supportive of or opposed to the expansion of  
11 the landfill. Tonight's meeting is merely to  
12 accept your comments on the environmental  
13 document. And what we've done is we've allowed  
14 some question and answer to occur after the staff  
15 presentations regarding the project and the  
16 document, and we've also spent time after we close  
17 the hearing answering any additional questions you  
18 may have regarding the project. We have several  
19 exhibits up around the room for your review. And  
20 if you'd like any copy of the document, Inelda will  
21 go over how you can participate in the process from  
22 here out.

23 The public-comment period was originally  
24 set at 45 days; however, given the feedback and the  
25 complexity of the document, we did extend that

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1 lot of your help, I'm happy to say we're at about  
2 55 percent. That's actually what we submitted to  
3 the Integrated Waste Board.

4 This is the next important project for my  
5 division as we move forward. It's to identify 15  
6 more years of landfill capacity for the residents  
7 of this community. Again, I appreciate your coming  
8 here tonight, and I welcome all your comments.

9 First question, why is this a 15-year  
10 project? Well, originally it was set by the  
11 policies of the Board of Supervisors on August 3rd,  
12 1999, and it was part of a larger strategy to not  
13 only find landfill capacity for the next 15 years  
14 but also provide enough time to find a new landfill  
15 site that would serve the entire county beyond the  
16 next 15 years. Also, 15 years is a requirement of  
17 the AB-939 bill, and it's required that the  
18 county -- each county in the state of California  
19 demonstrate that they have 15 years of disposal  
20 capacity within that.

21 This site provides landfill disposal for  
22 several communities, mostly for the southern  
23 portion of the unincorporated area of Santa Barbara  
24 County. But it also provides landfill capacity for  
25 the cities in this area: the new-formed city of

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1 the draft EIR. And the existing landfill -- well,  
2 here is the canyon where Tajiguas Landfill sits.  
3 The existing landfill waste footprint -- that is  
4 where waste is located on our existing permitted  
5 site -- is this red boundary here.

6 We have a front-canyon and back-canyon  
7 design, and the front-canyon waste footprint is  
8 this orange boundary here. Kind of trying to  
9 outline it. And the back-canyon design has this  
10 blue boundary here. You can come up and see this  
11 after the meeting.

12 Both designs are analyzed at project  
13 level. That means that they have gone through the  
14 environmental analysis and all environmental issue  
15 areas. And the common thing about both landfill  
16 designs are there is going to be waste placed over  
17 the existing landfill, and both designs do push out  
18 into what we call the back-canyon area of the  
19 Canada De La Pila Canyon. Okay?

20 Both designs have the same amount of  
21 waste. It's just a different configuration. And  
22 the front-canyon design actually will be closer to  
23 this landfill, the existing landfill, and have a  
24 maximum elevation of 808 feet; where the  
25 back-canyon design is more spread out, but because

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TAJIGUAS LANDFILL EXPANSION-GOLETA

TAJIGUAS LANDFILL EXPANSION-GOLETA

1 of the way the canyon is shaped, we'll have a  
 2 maximum elevation of 700 feet.  
 3 Anything outside of the red waste area  
 4 that exists now -- we'll take questions after we're  
 5 done with our presentation if you don't mind.  
 6 Any waste placed outside of the red area  
 7 here will be in a lined -- will be -- will have a  
 8 liner underneath that waste. So this area out in  
 9 here, anything outside of the red will have a  
 10 regulatory-approved liner from our different  
 11 regulatory agencies. Okay?  
 12 The existing on-site environmental  
 13 controls that occur on our existing landfill now,  
 14 such as our landfill-gas system, our  
 15 groundwater-monitoring system, a lot of our  
 16 surface-drainage management systems will all be  
 17 extended into the new expanded areas.  
 18 Now, other project elements involve, as I  
 19 said, a composite-liner construction. So as I  
 20 said, a liner -- a bottom liner, inside liner will  
 21 be placed in the areas outside of the existing  
 22 waste footprint. Drainage systems will be  
 23 extended. The landfill-gas system will also be  
 24 extended into the back canyon, continuation of  
 25 groundwater monitoring. The nuisance monitoring

9

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1 impacts. There were four areas of -- that were  
 2 significant and unavoidable for both projects. And  
 3 our environmental consultant, who put together this  
 4 draft EIR, will go into that topic in more detail.  
 5 And at this time, I'd like to introduce  
 6 Caroline Trindle. She is from TRC. She is the  
 7 assistant project manager for the environmental  
 8 consulting firm who prepared this EIR for the Solid  
 9 Waste and Utilities Division.  
 10 Caroline.  
 11 CAROLINE TRINDLE: Thank you, Inelda.  
 12 Good evening. As Inelda said, I'm the  
 13 assistant project manager for preparation of the  
 14 EIR, and I will review with you the kinds of things  
 15 that the EIR address, not the results but kind of  
 16 the approach. In accordance with the California  
 17 Environmental Quality Act -- that sounds like --  
 18 (Interruption in the proceedings.)  
 19 CAROLINE TRINDLE: The EIR evaluated a  
 20 full range of environmental topics; they're up here  
 21 on the board: geology, cultural resources, air  
 22 quality, noise. Just almost anything you can think  
 23 of. And a great deal of information was presented  
 24 in the EIR and in the attached technical  
 25 documents.

11

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1 visual resources, and air quality, there are some  
 2 impacts that cannot be fully mitigated. Therefore,  
 3 we call these significant and unavoidable impacts.  
 4 As part of the requirements of the  
 5 California Environmental Quality Act, the EIR also  
 6 evaluates alternatives to the proposed project. In  
 7 other words, in addition to the proposed project,  
 8 we said, "Okay. What if some of these other things  
 9 were to occur? What might be the impacts from  
 10 then?"  
 11 We evaluated in-county waste disposal at  
 12 other sites, out-of-county waste disposal,  
 13 alternative disposal technologies. We looked at a  
 14 larger project, which would be a 25-year project.  
 15 We looked at reduced or smaller project, which  
 16 would be a ten-year project. And we also analyzed  
 17 "no project." This is required by the California  
 18 Environmental Quality Act to look at what might  
 19 happen if the proposed project does not occur.  
 20 Also in accordance with the California  
 21 Environmental Quality Act, we evaluated or we  
 22 looked to see if there would be an environmentally  
 23 superior alternative to the project as proposed in  
 24 the EIR. We compared all of the alternatives that  
 25 were evaluated to the proposed project. Based on

13

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1 Hope Avenue location; in Santa Maria -- also at the  
 2 Alternative Copy Shop in Santa Maria. And those  
 3 locations are on the back side of that file.  
 4 For those of you who haven't seen what the  
 5 EIR looks like, let me show you a copy. This is  
 6 the EIR. It's about 3 1/2 inches thick with  
 7 double-side pages. So there's -- as Mark said, if  
 8 you are interested -- or Caroline has said, if  
 9 you're interested in certain issue areas, it's best  
 10 to look in the introduction. We do have copies of  
 11 the executive summary, Chapter 1. That gives you,  
 12 kind of, a broad overview of what the project's all  
 13 about and some of the issue areas and some of the  
 14 general information. So I would start from there  
 15 and then go -- if you want more information about  
 16 each specific environmental analysis or the  
 17 alternatives analysis, then you can go to the  
 18 various chapters.  
 19 Also associated with the EIR are the  
 20 technical studies. These are supporting documents  
 21 that have more of the nitty-gritty of some of the  
 22 different issue areas, such as, like, air quality,  
 23 biology, traffic, groundwater and surface-water  
 24 analysis. This is more of the technical data that  
 25 is summarized in the EIR. So for those of you who

15

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1 and controls will also continue. This area in the  
 2 southeast corner will also be modified on the  
 3 existing landfill. A green waste pad that is  
 4 located in the back may be relocated. It has been  
 5 analyzed in this draft EIR. The scale and scale  
 6 house also have been analyzed for relocation, as  
 7 well as the maintenance shop. And this draft EIR  
 8 also looked at the landfill closure, impacts to the  
 9 landfill closure of the existing landfill, and the  
 10 two expansion project designs.  
 11 Now, the Board of Supervisors will have to  
 12 make a decision on this project. They can choose  
 13 either the front-canyon or back-canyon  
 14 configuration but not both. They are both analyzed  
 15 at the same environmental level, and so the Board  
 16 of Supervisors can pick one or the other.  
 17 The board has to make the decision whether  
 18 to certify this EIR as adequate and complete. So  
 19 they have to determine whether the environmental  
 20 analysis was complete, did look at everything, and  
 21 the right level of analysis per the California  
 22 Environmental Quality Act.  
 23 The Board of Supervisors also has to  
 24 decide whether to adopt a statement of overriding  
 25 considerations for significant and unavoidable

18

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1 It's important to realize this is a  
 2 disclosure document. It's not a decision-making  
 3 vehicle. It does not make recommendations. It  
 4 does describe the proposed project. The EIR  
 5 identifies existing conditions and the expected  
 6 impacts of the proposed project, and it includes  
 7 appropriate mitigation measures for impacts that I  
 8 identified.  
 9 There's an awful lot of information in the  
 10 document. And if you have a particular area of  
 11 interest, we recommend that you check the  
 12 introduction and the project description and  
 13 concentrate on the area that is of particular  
 14 meaning to you if you want to provide comments or  
 15 get more involved in it.  
 16 An environmental-analysis summary is  
 17 provided in Chapter 1 of the document. It talks  
 18 about the impacts that have been addressed  
 19 throughout that whole thick volume, and it  
 20 condenses them into a list, and it also provides  
 21 the mitigation measures that were included in the  
 22 various sections of the EIR.  
 23 As Inelda mentioned, based on the analysis  
 24 in the EIR, it was determined that in the four  
 25 areas of biological resources, cultural resources,

12

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1 the analysis and all of the various environmental  
 2 parameters that have to be evaluated, it was  
 3 determined that none of the alternatives is  
 4 environmentally superior to the proposed project.  
 5 Now I will turn this back over to Inelda  
 6 for additional information on the comments  
 7 process.  
 8 INELDA CRAGIN: Okay. So how can you  
 9 participate in this EIR process? The draft EIR and  
 10 the technical studies are available at a number of  
 11 locations. They are available for review at all  
 12 city and county libraries, all Planning and -- at  
 13 County Planning and Development Department offices,  
 14 both in Santa Barbara and Santa Maria, and also at  
 15 our Public Works Department/Solid Waste and  
 16 Utilities Division at 189 East Victoria Street in  
 17 Santa Barbara. There's a handout that you can pick  
 18 up if you still have -- I'm sorry?  
 19 If you still haven't gotten a copy or  
 20 would like to review the EIR, there's a blue  
 21 document that we have that lists all the libraries  
 22 that have the EIR for review and also the two --  
 23 the different offices.  
 24 Also, you can purchase the EIR and  
 25 technical studies at the Kinko's in Santa Barbara.

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1 are more interested in real specifics, this  
 2 document, or series of documents in this one big  
 3 binder, is also available for review at the  
 4 libraries and also for purchase at Kinko's and  
 5 Alternative Copy Shop.  
 6 Okay. As Jackie said, this EIR process  
 7 starts off with this public-comment meeting today  
 8 with the draft EIR, and it's been extend until  
 9 December 14th, 5:00 o'clock. The final EIR  
 10 preparation will include responses back to any  
 11 public comments that we receive. So the EIR will  
 12 address all of those in writing, the final EIR. We  
 13 expect to release that document in the spring of  
 14 2002, and the Board of Supervisors will probably be  
 15 having their final EIR certification hearing and a  
 16 project decision also in the spring of 2002.  
 17 So your public comments are really  
 18 valuable. It's important to review this draft EIR  
 19 and comment on the information in the document.  
 20 Verbal comments will be accepted at the meetings,  
 21 all public-comment meetings, and if you could also  
 22 direct your written comments to the Santa Barbara  
 23 County Public Works Department/Solid Waste and  
 24 Utilities Division.  
 25 As Jackie says, we have one more public

16

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TAJIGUAS LANDFILL EXPANSION-GOLETA

TAJIGUAS LANDFILL EXPANSION-GOLETA

1 comment-meeting coming up, Loroc on the 28th;  
 2 that's next Wednesday at Lowoc City Hall. And  
 3 then if you would like to submit written comments,  
 4 you can pick up a filler here that has the  
 5 information about the meeting -- the public-comment  
 6 meetings and also where you can mail your comments  
 7 in or fax them to Kathy Kefauver at our  
 8 Santa Barbara Public Works Department/Solid Waste  
 9 and Utilities Division. Okay?

10 So one final thing: To learn more about  
 11 the Tajiguas Landfill Expansion Project, we'd  
 12 really encourage you to come out and see Tajiguas  
 13 for yourself. Take a landfill tour. You can call  
 14 our main number to arrange that at 882-3608. We'll  
 15 be more than happy to accommodate you. Or come --  
 16 so visit our Website at www.publicworks.org. And  
 17 there's a lot of information there about our site  
 18 and also our recycling programs and how you can be  
 19 involved in managing solid waste in the community.  
 20 Okay. With that, I'm going to give the  
 21 meeting back to Jackie.

22 JACKIE CAMPBELL: Great. Thank you very  
 23 much.

24 So at this point I would open the hearing  
 25 to answering a few questions regarding the project

17

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1 range along this side here. I don't know if you  
 2 can see that. Part of it's covered all ready. But  
 3 there is a portion here that's -- that waste is on  
 4 liner, and then this whole area out here is not  
 5 lined, lined per se -- you know, a regulatory  
 6 synthetic liner.

7 UNIDENTIFIED SPEAKER: It's on dirt.  
 8 IMELDA CRAGIN: Yeah, it's on dirt. It's  
 9 on the Rincon shale.

10 UNIDENTIFIED SPEAKER: And where will  
 11 additional landfill be put? Will it be put over  
 12 the unlined portion?

13 IMELDA CRAGIN: There will be a portion  
 14 that overlaps over the unlined portion.

15 UNIDENTIFIED SPEAKER: So it would be that  
 16 whole subcircle there essentially?

17 IMELDA CRAGIN: Yes. I should have used  
 18 this diagram. These two diagrams show -- let me do  
 19 this. I can put this here if I have this over  
 20 here.

21 Okay. This is the -- this is the  
 22 front-canyon design I talked about earlier. Can  
 23 even hold it like this. The front-canyon design  
 24 doesn't go all the way back into the back canyon.  
 25 But the front-canyon design does have an overlap of

19

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1 scale is about 12- -- let's say this is about  
 2 300 feet across here. So let's say, if the width  
 3 of the -- the existing landfill ends here. Do you  
 4 see my thumb? So this -- let's say this is the  
 5 maximum amount here. This is an approximate  
 6 design, so it's conceptual. It's about 12- --  
 7 maybe about 1,000 feet across here.

8 UNIDENTIFIED SPEAKER: So we're going to  
 9 create 1,000 feet by roughly a 3,000-foot, 200-foot  
 10 structure that is composed of solid waste?

11 IMELDA CRAGIN: This could be waste or  
 12 stockpile on here.

13 UNIDENTIFIED SPEAKER: All the way back,  
 14 though, is another 3- or 4,000 feet to the back  
 15 canyon?

16 MARK SCHLEICH: Imelda, what's the total  
 17 number of cubic yards this project has?

18 IMELDA CRAGIN: Cubic yards?

19 MARK SCHLEICH: What was quoted in the  
 20 EDN? Was it --

21 IMELDA CRAGIN: I'll have to look up the  
 22 cubic yards --

23 CAROLINE TRINDLE: It's both.  
 24 UNIDENTIFIED SPEAKER: 4.9.  
 25 CAROLINE TRINDLE: Thank you.

21

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1 east on Highway 181 --

2 IMELDA CRAGIN: If you were on Highway 181  
 3 looking at the canyon in this direction, if you  
 4 were at the Arroyo Quemada community looking up at  
 5 the landfill, I think --

6 UNIDENTIFIED SPEAKER: And also the ocean,  
 7 I think, was one, right?

8 CAROLINE TRINDLE: And if you're driving  
 9 by on 181 --

10 IMELDA CRAGIN: -- right at the  
 11 landfill --

12 CAROLINE TRINDLE: -- entrance looking  
 13 right at the --

14 IMELDA CRAGIN: -- right at the canyon.  
 15 That was one point of view. There was another view  
 16 coming southbound on the 181 looking at the  
 17 landfill in this direction, and then there was one  
 18 out at the ocean looking, like, at the whole  
 19 canyon.

20 UNIDENTIFIED SPEAKER: And just to be  
 21 clear, there was none done from the scenic  
 22 viewpoint?

23 IMELDA CRAGIN: I don't believe so. I  
 24 don't know.

25 CAROLINE TRINDLE: Which scenic

23

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1 itself or regarding the process. If there are any,  
 2 just, you can raise your hand.

3 UNIDENTIFIED SPEAKER: Just factual.

4 Could you identify just a couple things? The part  
 5 of the land -- the current landfill that is not  
 6 lined and the part that is lined, if any; that's  
 7 number one. And then could you identify the  
 8 over -- the putting on top, as to whether that  
 9 will go over any of the existing landfill that is  
 10 not lined? And then could you identify  
 11 specifically what the height increase in the --  
 12 either proposal will be with respect to the height  
 13 of the landfill above its currently projected  
 14 termination in 2005?

15 IMELDA CRAGIN: Let me see if I can  
 16 remember all of those. Okay. The first question  
 17 was -- help me out here.

18 UNIDENTIFIED SPEAKER: What is lined and  
 19 what isn't now.

20 IMELDA CRAGIN: What is lined and what is  
 21 not lined. Okay.

22 You can see in the -- you can see in this  
 23 diagram this dark area here. That is a side-slope  
 24 liner for the existing landfill. The actual  
 25 footprint that is not lined is probably in the

18

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1 about 27 acres over the existing landfill. And the  
 2 proposed maximum elevation for this, this design,  
 3 is 668 feet.

4 UNIDENTIFIED SPEAKER: And the current  
 5 projected elevation by the termination of the --  
 6 under the existing permits?

7 IMELDA CRAGIN: The top deck of this -- of  
 8 the existing landfill is at 508 feet.

9 UNIDENTIFIED SPEAKER: I think there was a  
 10 comment in the report that it would be  
 11 approximately 200 feet higher?

12 IMELDA CRAGIN: Well, if you take 508 --  
 13 668 feet minus 508, it's 160-foot difference. But  
 14 the main thing --

15 MARK SCHLEICH: What's --

16 UNIDENTIFIED SPEAKER: I guess it must  
 17 have been the 700 number? Isn't that the  
 18 back-canyon fill?

19 IMELDA CRAGIN: Well, the thing is the  
 20 668-foot maximum elevation may not be right over  
 21 the existing landfill. It may be somewhere out in  
 22 here.

23 UNIDENTIFIED SPEAKER: And the width and  
 24 depth of the additional 200 feet?

25 IMELDA CRAGIN: Well, the width is -- this

20

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1 UNIDENTIFIED SPEAKER: The tonnage is  
 2 important. But with respect to the visual impact,  
 3 we're going straight up 200 feet and straight back  
 4 4,000 feet and 1,000 across. So it'd be like  
 5 proposing a structure that was 200 feet high,  
 6 1,000 feet long, and 4,000 feet deep.

7 CAROLINE TRINDLE: And the simulated  
 8 visual impacts are shown in the EIR from public  
 9 viewpoints.

10 UNIDENTIFIED SPEAKER: Right. I just want  
 11 to make sure the group here is aware.

12 That's all.

13 MARK SCHLEICH: Okay.

14 IMELDA CRAGIN: These are also benched so  
 15 that they will look like a staircase. So it's not  
 16 a straight vertical 200-foot, you know, vertical  
 17 expansion.

18 UNIDENTIFIED SPEAKER: And what were the  
 19 scenic viewpoints that were considered in the  
 20 study?

21 CAROLINE TRINDLE: There's --  
 22 IMELDA CRAGIN: Go ahead.

23 They are in the visual section of the EIR.  
 24 but I think there was a view looking from --

25 CAROLINE TRINDLE: There's a view from the

22

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1 viewpoint?

2 UNIDENTIFIED SPEAKER: It would be this  
 3 one right here. Right here it is, right here.

4 This whole section here is a public scenic  
 5 viewpoint identified by -- right there -- the old  
 6 State Highway 181.

7 MARK SCHLEICH: Sounds like you're getting  
 8 into comments.

9 UNIDENTIFIED SPEAKER: Just wanted to make  
 10 sure, factually, there was none done from there.

11 JACKIE CAMPBELL: No.

12 IMELDA CRAGIN: Yes, Bob?

13 UNIDENTIFIED SPEAKER: While you're on  
 14 liners, I'm still unclear, even after reading twice  
 15 or three times the EIR, how the Junction, the joint  
 16 between the old landfill and the back-canyon new  
 17 landfill, is going to be lined. We've had this  
 18 discussion before, but it doesn't appear in here.

19 IMELDA CRAGIN: There is no liner between  
 20 the two. Are you talking about at this Junction  
 21 here?

22 UNIDENTIFIED SPEAKER: Yes, where the old  
 23 and new meet -- the new is going to be lined at the  
 24 bottom.

25 IMELDA CRAGIN: Yes.

24

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1 UNIDENTIFIED SPEAKER: The top of the old  
2 will be the bottom of the new. How does that get  
3 lined?

4 IMELDA CRAGIN: You don't put a liner  
5 between the -- at this boundary here, you know,  
6 because a liner -- the trash will -- differential  
7 settlement. So the liner will not necessarily  
8 work.

9 UNIDENTIFIED SPEAKER: So over the Bacaro  
10 sandstone, the primary aquifer along the Gavilota  
11 coast, there will not be a liner between the trash  
12 and the --

13 IMELDA CRAGIN: We will probably have to  
14 work with the Water Board to figure out how to  
15 drain this to -- because we do have an intermediate  
16 cover, which is, you know, 12 inches thick, a cover  
17 on here that's at least 10 of the minus 5  
18 permeability. Okay?

19 Then what we would do is the whole top  
20 deck would be tilted towards the lined area so that  
21 water or liquids would try to run in this direction  
22 and be captured through gravel or, you know, some  
23 kind of preferential drainage layer. And we would  
24 work with the regulatory agencies to ensure, you  
25 know, per their purview, what design criteria we

25

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1 Steven Johnson.  
2 STEVEN JOHNSON: What's the right way to  
3 do that? Just from here or --

4 JACKIE CAMPBELL: That's fine.  
5 STEVE JOHNSON: Let me say just for the  
6 reporter, I know you'll take it down, but I will  
7 put this in writing. I have it written, but I had  
8 no printing means available to me today.

9 I guess, to introduce myself -- and if you  
10 don't mind, I'll make this as quick as possible. I  
11 represent the Bliceu Family, which owns the land  
12 between the railroad and the ocean from the Arroyo  
13 Hondo, essentially, to this point right here, so  
14 about 1,000 feet down from the Jensen properties.  
15 I'll note that the land there is zoned rural,  
16 RR-40. It's not recognized in the study, and I  
17 would like to -- the first thing I, kind of, wanted  
18 to do is was to ask that the study recognize  
19 specifically that that land and any impact of that  
20 land which is zoned residential should be  
21 addressed. That addressment (sic) should include  
22 all drainage issues, storm overflows, groundwater  
23 pollution, and visual-impact issues including air  
24 quality.

25 I'd like to make sure that the project

27

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1 I would have to meet to make sure that the water  
2 coming off of this or liquids coming off of this  
3 would go into the lined areas. Other landfills  
4 have done that in other areas.

5 JACKIE CAMPBELL: Any other questions on  
6 the project?

7 UNIDENTIFIED SPEAKER: I have a quick  
8 question. I'm sorry. I'm not that well  
9 backgrounded on this matter. But at what time are  
10 we proposed with the current landfill to run out of  
11 capacity without expansion?

12 IMELDA CRAGIN: Our estimate is in 2005.  
13 And depending on how recycling goes also, if  
14 recycling continues to be good, that -- you know,  
15 this is based on the fill rate that we have now,  
16 waste coming in. If recycling improves, it could  
17 be extended a little bit longer.

18 JACKIE CAMPBELL: Any other questions on  
19 the project? Again, staff will be available after  
20 the meeting to look at the graphs and aerial  
21 photographs to answer any other questions that you  
22 might have.

23 Okay. With that, we'll move into the  
24 public-comment portion of the meeting. And I have  
25 two speaker slips, the first of which is from

25

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1 identifies that the report, the whole report, be  
2 modified to note that there is a significant piece  
3 of zoned residential land immediately down gradient  
4 from that landfill which represents 60 subdivisions  
5 in the county records.

6 Second, I'd, kind of, like to request a --  
7 is there a comment or no?

8 JACKIE CAMPBELL: He was asking me  
9 where --

10 STEVE JOHNSON: Yeah? I can help you with  
11 where it is. Just go to the slip-out thing.  
12 You'll see it all there. They got the maps.

13 The second thing was I, kind of, wanted --  
14 if you look at the monitoring wells and the  
15 location of wells that are in the -- in the -- in  
16 the appendix for the water quality -- so people  
17 check the wells at the Arroyo Quemada community and  
18 your own monitoring wells and one well that is in  
19 Arroyo Hondo, which is -- the Hondo, which is the  
20 old, I think, stagecoach place or something like  
21 that. But there are no wells that are essentially  
22 immediately down gradient from the property, and so  
23 I'm requesting that -- that a -- one of the  
24 mitigations be so that we can carefully monitor the  
25 water, that a monitoring well be placed on our

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1 property in order to monitor the impact to the  
2 water and to the flow of water. There's  
3 essentially a one-mile gap in the current  
4 monitoring possibilities.

5 Third, it's not 100 percent clear in  
6 the -- in the storm flow of water as to where that  
7 goes, as best I can tell, based on what I read in  
8 the study. So I'd like specific identification of  
9 what happens to storm flow. It apparently does  
10 overflow at times. It does get passed to the  
11 highway, who passes it to the railroad, who passes  
12 it to -- in an attempt over our land, which they  
13 have the rights to do, but those culverts that  
14 carry those are in total disrepair and have been  
15 for decades. So I'd, kind of, like specific  
16 identification of any storm flow that escapes the  
17 catch basins or anything of that nature and where  
18 that goes so that we can help identify that.

19 You know, I mean, the sense here with  
20 respect to comment is it's really, to the best of  
21 my knowledge, not -- there's no permission from me  
22 certainly to pass water for anything other than the  
23 railroad across the land to the ocean. So I'd,  
24 kind of, like that question addressed as to the  
25 legal rights that the Public Works has with respect

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1 overflow water and sedimentation is dured.  
2 Sixth, the groundwater which is south of  
3 the Tajiguas fill certainly in the Arroyo Quemada  
4 community, that groundwater has recently been  
5 identified as having a certain bacteria -- and I'm  
6 not sure of the name of the bacteria. Jackie might  
7 remember. I don't know the name -- but the county  
8 public records do identify that bacteria. None of  
9 the bacteria issues are identified in the EIR. The  
10 bacteria is identified, and there are certain  
11 studies underway at the County with respect to the  
12 bacteria. And one of the possible considerations  
13 is that the bacteria has resulted from the  
14 significant population of seagulls that are in the  
15 community as a direct result because -- they don't  
16 say this, but the seagull population is increased  
17 significantly by the landfill. So to the extent  
18 the landfill has created the seagull population,  
19 that is impacting the water quality as well as -- I  
20 know people would really like to say that -- that  
21 it is not impacting otherwise the ground fill  
22 water.

23 It's a little hard to imagine that however  
24 many tonnes of unlined canyon can't impact the  
25 groundwater immediately down gradient for that.

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1 to passing water across that.

2 Fifth, there is a little bit of a question  
3 with respect to -- and perhaps it's assumptions  
4 that are made or not made with respect to the  
5 impact of the water and the leakage, either  
6 groundwater or overflow water into Pils Creek, with  
7 respect to what deletions, either in that water or  
8 caused by the landfill itself, may impact -- impact  
9 the ocean.

10 I think everybody can see, just to point  
11 that out -- and to the best of my knowledge,  
12 there's no specific indication, but these dark  
13 areas here, all of these dark areas, are kelp beds  
14 in the ocean. Those kelp beds are -- provide the  
15 resources, I guess, the ocean life, including sea  
16 otter. So any impact with respect to the kelp beds  
17 and the -- and the ocean life that is there  
18 including the sea otters -- I know they're there  
19 because I saw them yesterday out there playing.

20 But my understanding is that the kelp beds  
21 are under severe attack environmentally throughout  
22 the entire Santa Barbara coastline, and any  
23 protection that can be afforded those should be  
24 done. So this kelp bed is clearly in the outflow  
25 of Pils Creek, which is where the landfill's

30

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1 And I would like to specifically request that the  
2 EIR consider as a mitigation the provisioning of  
3 trucked-in water to all households, both now or in  
4 the future, that are within the water-table flows  
5 of the Tajiguas Landfill project. That certainly  
6 includes the Arroyo Quemada community as well as  
7 the property which I have described in this  
8 testimony or in this comment period.

9 It should also include as a mitigation an  
10 approval by the Board of Supervisors that a  
11 specific waiver on any well requirements for  
12 on-property water, since it would be nonsensical to  
13 build those, if trucked-in water were permitted as  
14 a mitigation.

15 Seventh, I'd like to identify any impact  
16 on the flow of groundwater. As best I can tell in  
17 the study, the groundwater flow is a managed flow,  
18 that the Tajiguas project itself goes down 40 feet  
19 into the water tables and levels and manages the  
20 flow of that water to some extent. I don't fully  
21 understand that, but I would like to understand the  
22 impact of that management of the flow with respect  
23 to all down-gradient water tables.

24 Eighth, I'm quite concerned with respect  
25 to the fire hazard that is here. Almost any

32

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33-10  
 1 development of any size would require gravel roads,  
 2 no more than 18-degree slope, 8 inches of gravel,  
 3 12 feet wide, 18-foot by 56-foot turnaround  
 4 slip-outs every 500 feet. This particular project  
 5 has none of those.  
 6 The mitigation, I suspect, would be that,  
 7 well, nobody lives on the property. But given the  
 8 close communities that are nearby, I'd like the EIR  
 9 to consider that the -- all roads be paved  
 10 sufficient -- or gravelled sufficient to enable the  
 11 passage-of a 25-ton fire truck for that.

33-11  
 12 Like to also address that -- there's an  
 13 interesting process here where no permits are  
 14 required by this particular project and in lieu of  
 15 that, no permits from the Planning Commission, if  
 16 I'm correct here; that's what I've been told. And  
 17 that, of course, would not be permitted for  
 18 anything other than a public agency.

19 And in lieu of the permit process, I would  
 20 like that the EIR identify all Planning Commission  
 21 or Coastal Commission policies that would be  
 22 violated by this landfill in any fashion whatsoever  
 23 and that those be specifically identified in a  
 24 matrix format that can be easily presented to the  
 25 Board so that they have a complete understanding

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33-15  
 1 statements that were documented. I'd like to  
 2 really get a collection of all of the documents  
 3 since 1967 so that we can view what statements, if  
 4 any, were made with respect to the shutting down of  
 5 the property of the -- of the Tajiguas fill. Like  
 6 to get all public written records and documents  
 7 associated with that in a place so that the public  
 8 can view previous commitments with respect to the  
 9 shutting down of the Tajiguas fill on that.

33-16  
 10 The last thing is that the report clearly  
 11 identifies sound alternatives to the expansion. It  
 12 clearly states that the -- that there is an  
 13 out-of-county landfill that would meet the  
 14 requirements for 200 years, I believe is the  
 15 statement in there. It is rejected because of the  
 16 offsetting pollution that is created by the trucks  
 17 going back and forth. I don't know that the air  
 18 pollution -- there's no study on that. There's  
 19 just a statement to that effect.

20 But I would specifically like to request  
 21 that if trucks using alternative fuels, such as  
 22 natural gas, were used in that particular  
 23 alternative consideration, since there would be no  
 24 air-pollution impact as a result of the natural-gas  
 25 or alternative-fuel use, that would clearly become

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33-19  
 1 recognize the fact that there may only be a need  
 2 for a ten-year expansion on top of the already  
 3 granted five-year expansion, both of which will be  
 4 subsequent to the Board's decision to create a new  
 5 or finding a new landfill site within a 15-year  
 6 window. I don't find that in the document.

33-19  
 7 I also note that on page 124, that the EIR  
 8 states that the landfill is currently in compliance  
 9 with all its existing permits. It's my  
 10 understanding that it's still under a corrective  
 11 action order from the Regional Water Board for the  
 12 existence of VOCs in the downstream well. Monitor  
 13 Well No. 4. As far as I understand, that hasn't  
 14 changed. At least I'm not seeing any letter from  
 15 the Regional Board that says that the corrective  
 16 action program has ceased. So that seems an  
 17 inconsistency.

33-19  
 18 Also, there's some discussion about a  
 19 front-canyon sedimentation basin, but it's vague  
 20 and hard to understand exactly whether that's part  
 21 of the project or not part of the project. And  
 22 it's my understanding, again, that the Regional  
 23 Water Board has placed a mandate on the County to  
 24 find a way to put a sedimentation basin in below  
 25 the landfill.

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1 believe. We questioned that, and we referred to  
 2 the 1988 EIR that allowed for the first expansion  
 3 of this landfill, and the consultants that prepared  
 4 that EIR had used a much higher number. I believe  
 5 it was .38 gravities. And subsequent to that  
 6 discussion and letters sent, Geologic Associates on  
 7 November 12 of 1993 sent a letter to the County  
 8 basically upping their number for site acceleration  
 9 from .21 to .354.

10 And I notice that the same consultant now  
 11 in this EIR is back to .21 ground acceleration, and  
 12 I really don't understand why this number keeps  
 13 flipping around. It'd be nice to have some  
 14 clarification because site stability, slope  
 15 stability is a key issue here, especially given the  
 16 fact that the landfill, which I'll address later,  
 17 is saturated with water.

18 Page 3.4 talks about the red-legged frog  
 19 management plan. As most people know, the  
 20 red-legged frog is an endangered species, highly  
 21 protected both at the statewide and national  
 22 level. Been found in the creek behind the landfill  
 23 in what's called the back canyon, and yet the  
 24 back-canyon expansion is proposed to be built  
 25 essentially about 50 or so feet away from the ponds

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33-12  
 1 that this project, if it was not a public project,  
 2 would have very little opportunity for success.

33-13  
 3 Tenth, I'd like to recognize that at the  
 4 end of the Arroyo Hondo -- and while the study  
 5 claims that there is no impact whatsoever on the  
 6 Arroyo Hondo, it's not within the watershed -- we  
 7 should all recognize that the steelhead salmon are  
 8 in the Arroyo Hondo and are in the pool which is  
 9 where the ocean and Arroyo Hondo meet. So given  
 10 the impact of the steelhead there, I know that  
 11 there are claims that there's no impact, but it's a  
 12 little hard to imagine given the proximity.

33-14  
 13 We did ask that there be clarification of  
 14 the -- what is lined or tiled, and I have that  
 15 clarification. So I appreciate that with respect  
 16 to it.

17 It does not consider, as I pointed out,  
 18 the proximity of the public scenic view, which is  
 19 the scenic view that embodies the old state  
 20 highway. It's identified by a sign as you at least  
 21 head west to south. So I'd like that to be  
 22 considered. Clearly a 200-foot, 1,000-foot-wide  
 23 block of solid waste will be visible from that  
 24 scenic view.

25 Thirteenth, I'd like to identify all

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1 a superior environmental alternative, as it would  
 2 have no impacts and no mitigation required, as it  
 3 would be on an existing landfill that has 200 years  
 4 left of capacity.

5 That's all my comments.  
 6 JACKIE CAMPBELL: Thank you.  
 7 STEVE JOHNSON: Thank you.  
 8 JACKIE CAMPBELL: Next speaker slip is  
 9 from Bob Hazzard.

10 BOB HAZZARD: If the record could show  
 11 that I'm here for the Gaviota Coast Conservancy. I  
 12 just have some brief comments. I'll be submitting  
 13 written comments in much greater detail.

33-17  
 14 I'm just going to, kind of, work from the  
 15 beginning of the document to the end. Start off by  
 16 commenting that it's my understanding that the  
 17 Board, in the approval of the 15-year expansion as  
 18 opposed to the original 25-year expansion, was  
 19 premising that decision on the notion that it would  
 20 take at a maximum 15 years to acquire a new  
 21 landfill site and develop it. That was my  
 22 understanding of the Board.

23 Given that this landfill has gotten  
 24 already a five-year expansion through bench  
 25 filling, I'm wondering why the document doesn't

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33-20  
 1 Page 253, there's mention of the landfill  
 2 being closed during high-wind situation where trash  
 3 can't be contained and blows around and off site  
 4 and that transfer stations would be used to move  
 5 the trash to other locations. I don't really  
 6 understand how that can happen. There's no  
 7 description of what transfer stations. Later in  
 8 the document they talked about the fact that there  
 9 aren't enough transfer stations to move the bulk of  
 10 trash out of the south coast area to other  
 11 landfills presently.

33-21  
 12 I want to jump into Section 3 and talk  
 13 about the seismic implications and requirements.  
 14 It's a little technical, but basically the slopes'  
 15 ability analyses that were done as part of the  
 16 technical document talk about a maximum  
 17 ground-shaking event related to the acceleration of  
 18 the landfill horizontally as given by a gravity  
 19 number, in other words, one gravity or less. It's  
 20 a pretty substantial number. All the calculations  
 21 pretty much depend on it.

22 We went through this in the bench-fill  
 23 project, and Geologic Associates, the consultant  
 24 for the County, had used a number in that analysis  
 25 several years ago of an acceleration of .21, I

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1 that the red-legged frogs are using as a habitat.  
 2 The mitigation is called out to be a  
 3 management plan, as yet to be (INVALID) or  
 4 offered, and I don't see how that can possibly be.  
 5 That's like saying the mitigation for any impact is  
 6 to do a study, and that's what the EIR is supposed  
 7 to be. It's not supposed to refer to a future  
 8 study.

9 I notice that the ARCO (INVALID) has the  
 10 same problem. They did, in fact, have to do a  
 11 (INVALID) management plan, but that was because  
 12 they didn't discover the red-legged frogs while  
 13 they were in the process of doing their original  
 14 EIR. It was only subsequent to the issuance of  
 15 permits and the certification of the EIR that they  
 16 found the frogs, and now they're doing a separate  
 17 plan. In this case we know about the red-legged  
 18 frogs going in. Seems to me the plan should be  
 19 part of the EIR, not a subsequent document.

20 Page 3.613 talked about the seagulls and  
 21 the birds and how they may, in fact, carry viral  
 22 and bacterial contamination that could, in fact, be  
 23 detrimental to humans and other animals. That goes  
 24 along with things that people have been saying,  
 25 that we've been saying for a long time, that

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1 regardless of how the bacteria gets to the ocean,  
2 which is public land, it has potential to affect  
3 human beings and other animals. And if the  
4 seagulls there are ingesting pollution from the  
5 landfill and carrying it down to the beach and  
6 dropping it off, that's just as bad as if it's  
7 going through the groundwater or being blown  
8 through the air. It's an impact of the landfill.  
9 And there's some talk of mitigations in terms of  
10 trying to minimize the seagull population there,  
11 even to the degree of killings them. But I know  
12 personally the landfill's been, you know, carrying  
13 on a concerted effort for years now to try to get  
14 the seagulls to stay away or go away, and it just  
15 simply hasn't worked. So I don't know how the EIR  
16 can talk about, you know, better ways to do it. I  
17 think the County's tried every way that's possible  
18 to do it.

19 Traffic. The EIR talks about traffic in  
20 and out of the canyon from Highway 101. It doesn't  
21 address the potential for truck -- a runaway truck  
22 coming down off of a 700-foot elevation, very steep  
23 road to roughly 100 feet above sea level, 600-foot  
24 drop, a very short span of road. And what would  
25 happen if the truck were to run away? Brakes

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1 thing gets excavated. It won't be a 20-year day or  
2 15-year daily operation process; there'll be some  
3 kind of peaking there that should be discussed.  
4 And finish up. A lot of us have known for  
5 a long time that there's water under the landfill.  
6 There's a trench in front of the landfill that  
7 collects somewhere between 5- and 15,000 gallons a  
8 day of water that would otherwise migrate off  
9 site.

10 The question's been asked over and over by  
11 groups like ours and by the Regional Water Quality  
12 Board as to where that water comes from. The  
13 County's done studies, they've drilled holes in the  
14 back part of the landfill to see if it's migrating  
15 through the old creek bottom, which apparently only  
16 a teeny portion of that water is migrating through  
17 the old creek bottom.

18 And there's also been uncharacteristic  
19 green spots on the face of the landfill over the  
20 years, vegetation that's unusually lush, obviously  
21 coming from some kind of moisture. And then there  
22 was the declaration of Robert Cadu, who managed the  
23 landfill up until a few years ago from the day of  
24 its inception. And he discussed how, in digging  
25 back into the walls of the canyon to create the

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1 into the landfill from the different benches as go  
2 up the side of the landfill have also indicated  
3 high pressure, high temperature, and moisture, lots  
4 of moisture.

5 And so I don't think you have to be a  
6 rocket scientist to put together from these  
7 indications that, most likely, the barns that were  
8 designed to hold back the trash as the landfill  
9 went up the canyon are now, in fact, earth and sand  
10 holding back water mixed with trash. And when you  
11 drill a hole in trash and it fills up with water,  
12 that just means, essentially, that your trash is an  
13 aquifer. It's no different than drilling a hole in  
14 sand or gravel and having the hole fill up with  
15 water and you found an aquifer.

16 So all this leads me to say two things  
17 about the landfill. I'm kind of wondering why  
18 we're even here because it seems to me, until this  
19 problem is going to be resolved and the landfill  
20 drained, it can't be expanded, at least not the  
21 present footprint of the landfill.

22 And, secondly, we know that there's no  
23 exception to the 5-foot separation between trash  
24 and groundwater. And here we have a landfill that  
25 not -- does not meet the 5-foot separation, but, in

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1 stable? And that question is not even referred to  
2 in the EIR. There's some language to the effect  
3 that further studies should look at the potential  
4 for saturation and what that might mean to  
5 stability. And it's like the red-legged frog.  
6 Well, you know, got a problem, but we'll study it  
7 to death later on.

8 Anyway, that's the end of my comments.  
9 JACKIE CAMPBELL: Thank you very much.  
10 I have no other speaker slips. So with  
11 that, I will close the public hearing for this  
12 evening and thank you all for coming. And, please,  
13 if you have any questions or would like to take a  
14 look at the graphs or aerial photographs, please do  
15 so. Thank you.

(Proceedings concluded at 7:45 p.m.)

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1 failed, whatever? I know this has happened down in  
2 Tolan and there was fatalities involved because of  
3 it.

4 Talk about air impacts. And there's  
5 discussion of alternative scenarios whereby the  
6 trash would be hauled to a more distant landfill,  
7 and that's discarded because of the impacts of the  
8 extended hauling. And yet there's nothing that  
9 discusses the air impacts from basically the  
10 complete removal of a hill, which is really what  
11 the back-canyon expansion will take the place of.  
12 For the people who can't -- it's really hard to  
13 tell from your aerial picture, but basically that  
14 portion that's called the back canyon is really a  
15 hill. It's, in fact, a rock hill. And it has to  
16 be completely excavated, brought out, and sat on  
17 top of the existing landfill, and then used as  
18 cover as the back canyon gets filled. At least  
19 that's my understanding of the process. And so the  
20 impacts of moving that whole hill prior to the  
21 lining and operation for fill in the back canyon  
22 will have to be done in a matter of a few years.

23 So it seems to me that there should be  
24 some calling out of what the air impacts are going  
25 to be during that window of time when the whole

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1 space for the landfill in the early days, they came  
2 across numerous springs. They had tractors stuck,  
3 trucks stuck in the mud and bush from it. They had  
4 to dig channels and fill it up with rubble to  
5 create French drains to get it out of the way so  
6 that they could pile trash on top of it.

7 So the question's been asked over and  
8 over: Where's this water coming from, and how much  
9 water is there?

10 Now, in the technical analysis it becomes  
11 apparent that the whole under portion of landfill,  
12 which sits at around 150 feet above sea level, is  
13 full of water. Wells drilled into it, both for  
14 monitoring and later for extracting some of that  
15 water to see how much there was and what it was  
16 like, have all filled up to somewhere between 50  
17 and 100 feet, at a minimum, above the bottom of the  
18 landfill. Trenches dug along the west side of the  
19 landfill at about 100 to 150 feet above the bottom  
20 of the landfill got filled up with water almost to  
21 the ground surface. We now find out that  
22 gas-extraction wells that were drilled around the  
23 perimeter of the landfill, the slopes of the  
24 landfill, to extract methane and burn it have also  
25 filled up with water. And probes that were poked

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1 fact, it's 100 feet into the water table, at least  
2 according to the indications.

3 So I -- you know, I find it alarming that  
4 those facts and that discussion does not occur in  
5 the main body of the EIR. There might be a  
6 paragraph in reference to it. And there's still  
7 constant language popping up in the EIR to the  
8 effect that this is perched water or water that  
9 sits in one little spot high up on the landfill  
10 that maybe on a real rainy day got captured by the  
11 earth sides of that particular area and is  
12 encapsulated in the body of the landfill and not to  
13 worry about it. It would seem more likely that if  
14 there's anything perched in the landfill, it might  
15 be a cell or two of dry trash. But the vast  
16 majority of the south end of the landfill appears  
17 to be completely saturated 100 percent. And that  
18 has the effect both on a potential on groundwater,  
19 and it has a potential on ground shaping.

20 One has to wonder how this landfill would  
21 fare in an earthquake-shaking event, whether it  
22 be .21 gravity's acceleration of the landfill  
23 or .39. If it's full of water and the earth and  
24 dikes that hold it back are essentially saturated,  
25 at least to some degree, how can this possibly be

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## REPORTER'S CERTIFICATE

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KELLY TAYLOR, RPR, CSR 10088

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**Document 33**  
**Public Meeting**  
**Goleta Valley Community Center**  
**November 19, 2001**  
**Response to Comments**

Response 33-1

Draft EIR Figure 3.7-1 has been revised to include the property referenced in the comment (see Final EIR Revised Figure 3.7-1 in Final EIR Section 4.4). Impacts of the proposed project are evaluated in Draft EIR Sections 3.1 through 3.12. The evaluations encompass potential impacts on nearby properties, including lands south of the landfill and south of Highway 101. Although the analyses focus on developed properties, the coastal area referenced in the comment is within the area evaluated in the impact analyses provided in Draft EIR Chapter 3.0.

It is acknowledged that there may be privately owned property within the coastal area south of the Landfill that is identified as rural residential on Revised Figure 3.7-1 (see Final EIR Section 4.4).

It also is noted that, under the Santa Barbara County Coastal Plan, adequate services must be available to serve a proposed development. Specifically, Coastal Policy 2-6 states the following:

*Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant that adequate public or private services and resources (i.e., potable water, sewer, roads, etc.) are available to serve the proposed development . . .*

Response 33-2

See Responses 1-9, 1-10, 2-5, 2-6 and 2-7.

Response 33-3

Stormwater from the Tajiguas Landfill is passed through sedimentation basins to remove sediment and is sampled regulator to monitor water quality. Excess stormwater from Cañada de la Pila is carried by Pila Creek to U.S. Highway 101, where water flows through Caltrans culverts under the highway to the Union Pacific Railroad, is diverted east and then to the south, where it flows under the railroad and discharges to the Pacific Ocean. This flow to the ocean occurs near the Jensen residence; it does not appear to flow across the property referred to in the comment.

Response 33-4

Pila Creek and every creek along the south coast flows at some point over private property before discharging to the Pacific Ocean. A legal right for a creek to flow to the ocean is not required.

As owner and operator of the Tajiguas Landfill, the County must accept runoff from upstream properties according to drainage law. Caltrans also has the duty to accept runoff from the upstream watershed that includes the Landfill. The railroad has the duty to accept runoff from

the highway and the upstream watershed that includes the Landfill. Downstream property owners, must similarly accept upstream watershed runoff that includes the railroad, highway, landfill and forest properties. This duty does not preclude developing a person's private property; it just means that the development design needs to accommodate the upstream runoff. The proposed project will not result in an increase in downstream flows.

Response 33-5

See Draft EIR Section 3.3.2.2.4 for a description and summary of monitoring data for surface water and groundwater quality testing for existing conditions at the Tajiguas Landfill.

Response 33-6

See Response 24-1.

The Draft EIR and supporting technical studies found impacts to water quality to be less than significant. The County is unaware of any data or studies indicating that the kelp is being adversely affected by the Landfill is unfounded.

The extent of the total kelp canopy is dynamic from year to year, and is dependent on many different environmental factors and interactions. Annual fluctuations in canopy species composition are thought to be the result of a complex combination of physical, chemical and biological factors. Water motion, water temperature/nutrients, light intensity, available habitat, and exposure all have been associated with kelp canopy health and development. In addition, warm water temperature anomalies, especially those associated with the "El Niño Southern Oscillation" (ENSO), have been known to dramatically reduce the abundance, diversity and stability of the near-shore kelp forest community (Monterey Bay National Marine Sanctuary, 2000).

In the latter months of 1997 and in early 1998, the west coast of North America was again influenced by a significant ENSO countercurrent. It lasted several months and raised surface sea temperatures by as much as eight degrees Fahrenheit in Southern California and 5 degrees off the Washington coast. Aerial imagery obtained in the summer of 1998 revealed that the substantial Southern California near-shore giant kelp canopy resource had been largely reduced, presumably by these elevated temperatures or by resultant invertebrate (i.e., sea urchins) overgrazing (Monterey Bay National Marine Sanctuary, 2000).

Also, the effects of a resident sea otter population on the central California kelp resource, and a better understanding of the role of the otter in structuring near-shore ecology, are the subject of ongoing research interest. Sea otter predation on invertebrate kelp grazers, mainly sea urchins, has been shown to dramatically reduce the density of these species, and to increase the extent of kelp canopy in areas of significant otter abundance (Monterey Bay National Marine Sanctuary, 2000).

The relationships of these individual physical factors, and identification of those that may be "limiting" at any one time, have yet to be fully understood and continue to be the subject of numerous ongoing research investigations. In addition, adjacent kelp forests that appear to be

exposed to similar physical factors may frequently produce vastly different canopy species compositions, further revealing the complexity of this dynamic habitat (Monterey Bay National Marine Sanctuary, 2000).

Surface water quality of water discharged downstream of the landfill is addressed in Draft EIR Section 3.3.2.2.4 and Response 33-5. As indicated by the sampling data collected over the years, water quality from Cañada de la Pila is expected to have little effect on the offshore kelp beds and other marine life.

Response 33-7

See Responses 1-9, 1-10 and 1-11 and Responses 3-40, 3-41 and 3-42.

Response 33-8

Subsurface water from Cañada de la Pila is collected at the Landfill in the groundwater leachate collection and recovery trench as explained in Responses 2-3, 2-4 and 2-5.

The County is unaware of any data indicating that the Landfill is adversely affecting groundwater downstream of the facility. As a result, mitigation is not required.

Response 33-9

For a full explanation of the environmental controls for subsurface water at the Tajiguas Landfill, please see Draft EIR Section 3.3.2.2.4 - Groundwater.

Response 33-10

There is little structural development on the Landfill. The fire safety requirements cited by the commenter are for structural and/or residential developments in the County. Fuel breaks are maintained around the perimeter of the Landfill to prevent wildfire from entering the Landfill from off-site ignition sources and to prevent any potential fires originating from the Landfill to move into off-site areas. Please see Draft EIR Section 3.12.3.2.1 for a discussion of potential surface fire impacts.

Response 33-11

See Response 3-5 for the permitting history of the Landfill. Draft EIR Section 3.7 discusses County policies that are applicable to the Landfill. See Responses 3-65 through 3-74.

Response 33-12

See Responses 4-1 and 4-3.

Response 33-13

The areas of the Landfill expansion that would accept new waste (i.e., areas north of the existing Landfill footprint) would be lined. See Draft EIR Figures 2-2 and 2-5.

Response 33-14

The Draft EIR evaluates potential visual impacts of the proposed project. Viewpoints were chosen based on locations that were known to be sensitive and/or from where the proposed project could be seen by the general public.

In response to this comment, two photographs are provided from the referenced coastal scenic viewpoint, located as shown on Revised Figure 3.8-1 (see Final EIR Section 4.4). The view from the viewpoint is shown on new Figures 3.8-15 through 3.8-18 (see Final EIR Section 4.4). As evident from new Figures 3.8-15 through 3.8-18, the land rises sharply from the ocean, and intervening topography blocks any view of either the existing Landfill or the proposed Landfill expansion.

Response 33-15

The commenter is invited to make a formal request to the County of Santa Barbara, Public Works Department, Solid Waste and Utilities Division, 109 East Victoria Street, Santa Barbara, CA 93101, to review correspondence that is available.

Response 33-16

The commenter is incorrect in stating that the Draft EIR mentions ". . . an out-of-county landfill that would meet the requirements for 200 years . . ." The first paragraph of Draft EIR Section 4.3.3 describes mega-landfills that are anticipated to be operational for upward of 100 years and describes the Mesquite Regional Landfill in Imperial County and the Eagle Mountain Landfill in Riverside County. The paragraph concludes with the statement that, "*Both of these facilities are permitted, but not yet operational.*" It is not feasible to attempt to send municipal solid waste to a landfill that is not in operation.

The associated air emissions that are addressed as being approximately 14 times those associated with the proposed project would occur as a result of rail transport to the Mesquite Regional Landfill and/or the Eagle Mountain Landfill, not truck transport as asserted in the comment.

Response 33-17

See Response 3-2.

Response 33-18

See Response 1-6.

Response 33-19

See Response 5-4.

Response 33-20

Transfer stations typically have space for waste storage for 24 to 48 hours in order to provide opportunities for staging of waste shipments in the event of delays or problems at receiving landfill facilities. Waste loads coming from the Santa Barbara Transfer Station are allowed to be held at the transfer station for 48 hours if the loads would leave the facility late in the day and not arrive at the landfill in time to unload or if the receiving facility is closed. This provision is part of the facility permit for the Santa Barbara Transfer Station.

Response 33-21

See Response 2-18.

Response 33-22

See Responses 3-51, 3-61 and 5-10.

Response 33-23

Bacteria are ubiquitous in the environment, and birds are a potential source. Bacteria is used as an indicator that disease-causing organisms may be present. Surface water quality sampling is done for total coliform, fecal coliform and enterococcus.

Total coliform contains coliforms of all types. Total coliform originates from many sources, such as soil, plants, animals and humans. Fecal coliform and enterococcus are found in the fecal matter of mammals (i.e., warm-blooded animals, including humans) and birds. Fecal coliform is included in the count for total coliform, while enterococcus is not.

Disease from birds is most often spread via the air, rather than through aquatic media. People cannot catch most avian diseases, and human interaction with most bird species is minimal, thus drastically reducing any health threat from most birds.

Testing for viruses and other disease-causing organisms does not occur, because the tests are both costly and cumbersome. Instead, testing for bacteria that indicate the presence of sewage is done. These so-called indicator bacteria are naturally found in human intestines, but also in other warm-blooded mammals and birds, meaning that their presence does not always mean human waste is present.

At times, those bacteria cannot be detected even when the water is contaminated, because bacteria die off quickly due to salinity levels and low water temperatures. It is impossible to know whether the indicator bacteria come from human or animal waste in the absence of a DNA Study.

See Responses 3-40 , 3-41 and 3-42.

Response 33-24

See Responses 3-81 and 6-2.

Response 33-25

The emissions and ground-level concentrations of criteria and noncriteria air pollutants listed in tables in Draft EIR Section 3.11 describe the peak-day air quality impacts of operating equipment that will be used to construct the landfill, including the excavation of the "hill." Excavation would be phased so that the "hill" would be removed over a period of at least 10 years.

Response 33-26

See Responses 2-9, 2-10 and 2-13a.

Response 33-27

See Response 1-6.

Response 33-28

Information regarding water levels in the Landfill is included in ARCADIS, Geraghty & Miller (2001a, 2001b) included as a Technical Reports to the Draft EIR and summarized in Draft EIR Section 3.3.

See Response 1-6.

1 SANTA BARBARA COUNTY  
2 PUBLIC WORKS DEPARTMENT/SOLID WASTE DIVISION  
3  
4 TAJIGUAS LANDFILL EXPANSION PROJECT EIR  
5 PUBLIC HEARING ON THE DRAFT EIR

## REPORTER'S TRANSCRIPT OF PROCEEDINGS

12 Wednesday, November 29, 2001  
13 Lompoc City Hall  
14 City Council Chambers  
15 100 Civic Center Plaza  
16 Lompoc, California  
17 6:45 p.m.

25 Reported by: KELLY TAYLOR, RFR, CSR 18808

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1 Lompoc, California  
2 November 29, 2001  
3 --0000--

5 BRIAN BACA: Okay, everybody. I think  
6 we're going to get started. If you could take a  
7 seat. Otherwise, I'll have everybody look at you  
8 and point at you.

9 My name is Brian Baca. I work for the  
10 County of Santa Barbara, the Planning and  
11 Development Department. I'm the environmental  
12 hearing officer for tonight. This meeting is an  
13 environmental hearing to receive public comment on  
14 the environmental impact report prepared for the  
15 proposed Tajiguas Landfill expansion. The EIR  
16 number is 01-EIR-5.

17 CEQA requires that environmental documents  
18 prepared for a proposed project be published and  
19 circulated for public review and comment prior --  
20 for a mandated minimum period of time prior to  
21 being delivered and presented to the decision  
22 makers for their consideration.

23 In this case a 45-day mandatory  
24 public-review period is required. I understand the  
25 review period has been extended to approximately

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## TAJIGUAS LANDFILL EXPANSION PROJECT EIR

## APPEARANCES

4 BRIAN BACA, HEARING OFFICER  
5 County of Santa Barbara  
6 Planning and Development Department  
7 123 East Annapolis Street  
8 Santa Barbara, California 93101-2658  
9 (805) 568-2084

8 IMELDA CRAGIN, PROJECT MANAGER  
9 County of Santa Barbara  
10 Public Works Department  
11 Solid Waste and Utilities Division  
12 185 East Victoria Street  
13 Santa Barbara, California 93101  
14 (805) 568-3008

13 ROBERT C. NASH, EIR PROJECT DIRECTOR  
14 INC. ENVIRONMENTAL CONSULTING FIRM  
15 61 Technology Drive  
16 Irvine, California 92618  
17 (949) 721-5338

## PUBLIC SPEAKERS

17 Claude Lee  
18 Justin Ridge  
19 Dick DeVees  
20 LeRoy Scotler  
21 Richard Pate

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1 60 days for this particular document. This is the  
2 fourth of a series of four public hearings held at  
3 various locations around the county to accept  
4 comment on this environmental impact report.

5 With us tonight are various members of  
6 county staff. I'd like to just point out, up here  
7 is Imelda Cragin to my far right. She's the  
8 permitting and engineering manager for the Solid  
9 Waste and Utilities Division of the County. The  
10 EIR project manager from IRC Corporation, Bob  
11 Mason, is immediately to my right. Kathy Kefauver,  
12 a senior environmental planner, also with the Solid  
13 Waste and Utilities Division, is here. Mike  
14 Schnaelling, from the local enforcement agency,  
15 which in this case is the Environmental Health  
16 Services Division of the County, is in the  
17 audience, as well as Engineer Chris Wilson, who is  
18 a senior engineer with the department.

19 With that, I'm going to turn it over to  
20 Imelda Cragin to give a presentation regarding the  
21 project description and the alternatives that were  
22 analyzed in the EIR.

23 And with that, Imelda.

24 IMELDA CRAGIN: Okay. Thank you, Brian.

25 What I'd like to do is give you just a

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1 general introduction. This is a very important  
2 project for the residents and businesses of our  
3 county because it provides continued safe and  
4 reliable solid-waste disposal services,  
5 particularly in the areas of the south county of  
6 Santa Barbara, the Santa Ynez Valley, the Cuyana  
7 Valley. And the Public Works Department really  
8 appreciates your interest. I know it's a cold  
9 night to come out, and we welcome your  
10 participation in this EIR process for this  
11 expansion project.

12 What I'd like to go over is the project  
13 objectives. Why are we doing a 15-year  
14 landfill-expansion project? On August 3rd, 1939,  
15 the Board of Supervisors gave us a policy directive  
16 to provide adequate disposal capacity at the  
17 Tajiguas Landfill to allow for the siting and the  
18 development of a new in-county regional landfill  
19 for the future. That meant that Tajiguas would be  
20 an interim step into looking at a larger disposal  
21 capacity for siting possibly a new landfill on a  
22 regional basis.

23 The second objective was to meet a minimum  
24 of 15 years' county disposal requirements as  
25 required by the California Integrated Waste

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1 with.

2 The third objective is to provide  
3 solid-waste disposal services for the residents of  
4 southern Santa Barbara County, cities of Goleta,  
5 Santa Barbara, Buellton, and Solvang and also,  
6 actually, the Santa Ynez -- the Cuyana Valleys and,  
7 again, continue to provide a well-managed municipal  
8 solid-waste disposal facility to assure safe  
9 solid-waste disposal.

10 So what I want to do next is talk about  
11 the background a little bit for those who are not  
12 familiar with the Tajiguas Landfill. It's been in  
13 operation since 1967 for disposal of municipal  
14 solid waste in Santa Barbara County. Solid waste  
15 that has been delivered to Tajiguas Landfill is  
16 generated, like I said, by the city of  
17 Santa Barbara, the city of Goleta, the  
18 unincorporated areas of the southern Santa Barbara  
19 County, Santa Ynez and the Cuyana Valley.

20 And since 1967, the landfill site's  
21 undergone various regulatory-approved changes as to  
22 the shape and the size of the landfill. So it has  
23 changed in shape and size but always per regulatory  
24 requirements.

25 What I want to do next is talk about the

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1 Management Act, often called AB-939 when it was  
2 still going through the legislature. And AB-939  
3 also was the driver or -- this Integrated Waste  
4 Management Act was also the driver for doing our  
5 recycling programs.

6 Santa Barbara County was required by 1999  
7 to recycle 25 percent of the disposal that was  
8 going to our landfills. And our diversion rate  
9 actually turned out to be 38 percent. So we've  
10 done a good job in trying to -- trying to divert  
11 waste from the landfills. And then the act also  
12 said, by the year 2000, we needed to recycle  
13 50 percent of what was allocated or what was  
14 disposed of starting at a baseline year of 1990.  
15 That's when they started the program.

16 So in '95 we did 38 percent diversion,  
17 beating the 25 percent recycle rate. And then in  
18 the year 2000 we were supposed to recycle  
19 50 percent, and we've submitted to our Waste  
20 Board -- Integrated Waste Management Board a  
21 diversion rate of 55 percent. So we beat the  
22 regulatory requirements and are still doing a good  
23 job in trying to do even more recycling. But there  
24 is still residual waste because, even if you do  
25 55 percent, you still have 45 percent to deal

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1 proposed project. There are two expansion  
2 configurations: We call them the front canyon and  
3 back canyon. And both designs or both  
4 configurations have been analyzed at what we call  
5 the project level in this draft EIR document.  
6 Project level means that we analyzed all of the  
7 elements of these designs for a number of  
8 environmental areas, such as, like, geology,  
9 biology, cultural resources, air quality. And  
10 they've gone through a rigorous evaluation of, you  
11 know, what impacts could occur based on the  
12 California Environmental Quality Act requirements.

13 And this is an air photo of the Tajiguas  
14 Landfill and the canyon that it's in. It's Canada  
15 De La Pila. The yellow boundaries here are  
16 county-owned parcel boundaries. The existing  
17 landfill site -- is bounded here with its waste  
18 footprint; that is where waste has been placed to  
19 date with this red boundary here. We have, like I  
20 said, a front-canyon and back-canyon configuration.  
21 two different designs, that utilizes an -- for the  
22 expansion that goes back into what we call this  
23 back-canyon area.

24 Here is the existing landfill here. This  
25 orange -- can people see this? This orange

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TAJIGUAS LANDFILL EXPANSION-LDMFC

TAJIGUAS LANDFILL EXPANSION-LDMFC

1 boundary here is the waste footprint boundary of  
 2 the front-canyon expansion. So it doesn't really  
 3 extend all the way back into this part of the back  
 4 canyon. And there is overlap over the existing  
 5 landfill.

6 The back-canyon design is a little bit  
 7 thinner but extends further back, and it's actually  
 8 a little bit -- the shape is actually lower -- when  
 9 I say "lower," it's more spread out and utilizes  
 10 more of the back-canyon area. And it does have the  
 11 same overlap over the existing landfill, but it  
 12 actually is more spread out; therefore, it's a  
 13 little bit flatter in height down in this area and  
 14 does extend further back, whereas this front-canyon  
 15 design is more, like, a higher waste fill but  
 16 doesn't -- but waste would stop here and not go all  
 17 the way back in here.

18 With the two designs, there would be a  
 19 liner underneath anything that was outside of this  
 20 red line. But anyway that was new, on new native  
 21 ground, would have a regulatory-approved liner  
 22 system.

23 If you want to come up afterwards to look  
 24 at these more closely, here is an example of what  
 25 the front-canyon fill would look like. There are

8

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1 waste being placed on new ground. Drainage systems  
 2 would be extended. Landfill-gas systems would be  
 3 extended out to the expanded areas. We'd continue  
 4 the surface and groundwater monitoring, and  
 5 continue it meaning we'd continue it on the  
 6 existing landfill and also with the expansion.  
 7 Continue nuisance monitoring and controls, like  
 8 litter and dust and odors.

9 We also have a project that's called the  
 10 southeast corner modification where waste would be  
 11 removed in this area that is above 400 feet and  
 12 could be -- would be the opt -- the Board of  
 13 Supervisors would have an option to put it in this  
 14 expanded area of either front- or back-canyon  
 15 design. We have a green waste pad that's located  
 16 back in this corner of the landfill -- or not the  
 17 landfill but in the back canyon, and that may be  
 18 relocated, but it has been analyzed in this  
 19 document. We also analyzed for the scale and our  
 20 scale house to be relocated, as well as our  
 21 maintenance shop. And we also -- the document also  
 22 looked at what -- landfill closure of both the  
 23 existing landfill and the expansion.

24 The Board of Supervisors has to make a  
 25 decision. They can choose either the front-canyon

11

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1 kind of large. The EIR is about --  
 2 Maybe you could hold that up for me.  
 3 Brenda.

4 That's the draft EIR. But we do have  
 5 executive summaries in the -- on the table. If  
 6 you'd like to take that, and then try to look at  
 7 what sections you're interested in.

8 And then there's also a corresponding  
 9 technical studies document, and that actually has  
 10 more of the more specifics. So those are the  
 11 documents that we'd like you to, if you're  
 12 interested in getting -- learning more about the  
 13 project, that's what you should be commenting on  
 14 tonight.

15 I'm going to turn it over to Bob now, and  
 16 he will talk about the environmental impacts and  
 17 the analysis.

18 BOB MASON: Thank you, Inelda.

19 Good evening. My name is Bob Mason. I'm  
 20 with TRC. We're an environmental consulting firm  
 21 out of Irvine. We prepared the environmental  
 22 impact report for the County under contract.

23 In terms of the analysis that we completed  
 24 in accordance with the California Environmental  
 25 Quality Act, we took a look at a full range of

13

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1 summary. There's more information about the  
 2 project specifically in the project description.  
 3 And then we encourage you to, you know, read the  
 4 entire document, if that is your interest. Or if  
 5 you were specifically interested in a couple of key  
 6 areas, perhaps you had a concern over air quality  
 7 or water resources, take a look at those sections.  
 8 And you may find that that leads you into other  
 9 places that you're also wanting to take a look at  
 10 and review. But we do encourage you to do the type  
 11 of review so you get information about the project,  
 12 so you learn about its consequences. And that way  
 13 you're going to be in the best position to provide  
 14 comments that we will then take and develop into  
 15 the final environmental impact report. And that  
 16 information, then, would go to the county  
 17 decision-making body, the Board of Supervisors, for  
 18 their deliberation.

19 As I mentioned, one of the things that's  
 20 important in the environmental-impact process is to  
 21 identify feasible mitigation measures. And those  
 22 are included in the draft. And you can comment on  
 23 those and indicate whether or not you think there  
 24 may be additional mitigations that may be  
 25 applicable or that there may be mitigations you

15

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1 benches above -- the maximum height here would be  
 2 608 feet for the front-canyon design. And it would  
 3 be somewhere in this area here. And then -- and  
 4 the difference would be -- well, let me back up.

5 The back-canyon design goes further back.  
 6 It also has the same kind of benches designed over  
 7 the overlap. But there is a sedimentation basin  
 8 that will be placed here so it's narrower and,  
 9 therefore, more spread out, whereas this is wider  
 10 in here. And the sedimentation basin that we have  
 11 existing on our landfill would remain or be  
 12 enlarged in this area.

13 So existing on-site environmental control  
 14 features will still continue on the existing  
 15 landfill and be extended out into either one of the  
 16 two expansion configurations, whichever gets picked  
 17 by the Board of Supervisors. And those include,  
 18 like, gas-collection systems, our  
 19 groundwater-monitoring systems, surface-drainage  
 20 systems; all of those things would continue -- and  
 21 the liner system, they'd all be continued into  
 22 these new areas.

23 Other project elements are -- as I, kind  
 24 of, mentioned already, the composite-liner system  
 25 would be constructed anywhere where there's new

18

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1 or the back-canyon configuration but not both.  
 2 Each are two separate projects, but like I said,  
 3 they've been analyzed for all of the different  
 4 environmental issues.

5 The Board of Supervisors also needs to  
 6 make a decision whether they should certify this  
 7 EIR as adequate and complete. Did it meet all the  
 8 regulatory requirements per the California  
 9 Environmental Quality Act?

10 They also have to make a decision whether  
 11 they should adopt a statement of overriding  
 12 considerations for significant and unavoidable  
 13 impacts. There are four impact areas that both the  
 14 front canyon and back canyon -- even if you do the  
 15 projects, the impacts cannot be mitigated. So  
 16 they -- the Board of Supervisors will need to make  
 17 a decision on whether the project still warrants  
 18 going forward even -- and have to make an  
 19 overriding consideration statement on -- or make  
 20 that finding.

21 But at this time what I'm going to do is  
 22 turn it over to our project -- the project manager  
 23 from the TRC. They are the consulting firm that  
 24 prepared the EIR for us. Copies of the EIR, so  
 25 that you can, kind of, get a feel for it, they're

12

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1 topical areas, all the way from geology to health  
 2 and safety. Those are all documented within the  
 3 draft environmental impact report. Included in  
 4 that analysis is a discussion of the existing  
 5 conditions at the site. There is the analysis of  
 6 the potential impacts and identification of  
 7 impacts. Identification of the significance of  
 8 those impacts, and then also the inclusion of  
 9 mitigation measures that are intended to reduce the  
 10 impact to the lowest possible point.

11 Now, in accordance with the California  
 12 Environmental Quality Act, the EIR is not a  
 13 decision-making document. It doesn't recommend.  
 14 It's a disclosure document. Its intent is to  
 15 ensure that you, as the public agencies, and the  
 16 ultimate decision makers, the Board of Supervisors,  
 17 have a full understanding of the potential  
 18 consequences of the project. Again, it doesn't  
 19 recommend. It just provides the information. And  
 20 that information is important for you to consider  
 21 to let your comments be known, your feelings be  
 22 known.

23 Again, as Inelda indicated, the document  
 24 is very lengthy. It covers a lot of topics. We do  
 25 encourage you to take a look at the executive

14

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1 don't think (INAUDIBLE) -- those are all valid  
 2 comments.

3 In this case, through the analysis, we  
 4 determined that even with the implementation of  
 5 feasible mitigation measures, that there are four  
 6 areas where there are significant, unavoidable  
 7 adverse impacts. So even with the implementation  
 8 of the mitigation measures, the impacts are still  
 9 significant. Those are within the areas of  
 10 biological resources, cultural resources, visual  
 11 resources, and air quality. And the EIR documents  
 12 explains why those impacts are unavoidable and to  
 13 the extent that they can be mitigated, but they  
 14 still have that unavoidable significant impact and  
 15 consideration.

16 And that is one of the items that the  
 17 Board of Supervisors will have to consider if they  
 18 choose to go forward with the project is they will  
 19 have to make what is called, as Inelda mentioned  
 20 earlier, a statement of overriding considerations.  
 21 They would have to explain in writing and have  
 22 rationale and findings about why they may go ahead  
 23 and decide to go forward with the project even  
 24 though these impacts are significant and  
 25 unavoidable.

16

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1 Another important part of the  
 2 environmental impact analysis process in the  
 3 environmental impact report is the evaluation of  
 4 alternatives to the proposed project. In this case  
 5 we evaluated a full range of alternatives, we took  
 6 a look at in-county waste disposals, other  
 7 landfills within the county, both existing and  
 8 possible new locations; we took a look at the  
 9 alternative of transporting waste from  
 10 Santa Barbara County to existing out-of-county  
 11 landfills; we took a look at alternative disposal  
 12 technology and waste technologies, whether that be  
 13 waste energy, increased recycling, composting; we  
 14 also took a look at a larger project, what would be  
 15 the impacts if this landfill would be expanded for  
 16 a 25-year capacity; and we took a look at a reduced  
 17 project, what would be the impacts associated with  
 18 a 10-year project rather than a 15-year project.  
 19 And, then, in accordance with the California  
 20 Environmental Quality Act, we also took a look at  
 21 the "no project" alternative, what happens if this  
 22 project is not approved.  
 23 All of those alternatives were then  
 24 compared to the proposed project in terms of  
 25 relative impacts. Based upon that analysis, it was

17

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1 public-comment period has been extended and will  
 2 end on December 14th at 5:00 o'clock p.m. So we  
 3 really encourage you to get your written or faxed  
 4 comments in to us by that time.  
 5 The final EIR preparation, as Bob said,  
 6 that document will include responses to all public  
 7 comments received during this public-comment  
 8 period. And then the final EIR is expected to be  
 9 released in the spring of 2002. And the Board of  
 10 Supervisors will do their final EIR certification  
 11 hearing and project decision also in the spring of  
 12 2002.  
 13 Your public comments are really valuable.  
 14 It's important to review the EIR and comment on  
 15 information contained in the document. Verbal  
 16 comments will be accepted at these public-comment  
 17 meetings. This is our fifth and last  
 18 public-comment meeting. We're glad to be able to  
 19 come to Lompoc to do this. And please direct the  
 20 written comments to our Santa Barbara County Public  
 21 Works Department/Solid Waste and Utilities  
 22 Division.  
 23 And the person that you can send the  
 24 written comments to is Kathy Kefauver. She's our  
 25 senior planner that's collecting everyone's

19

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1 As has been said many times, this is an  
 2 environmental hearing involving a draft  
 3 environmental impact report that is being  
 4 circulated for public comment. You read -- the  
 5 comments we are here to receive are those on  
 6 environmental issues associated with the expansion  
 7 of the landfill. And I repeat that sentence there,  
 8 "environmental issues associated with the  
 9 expansion of the landfill," not issues associated  
 10 with the existing landfill, which is not the  
 11 subject of the proposed expansion action and not  
 12 the subject of the environmental impact report.  
 13 We have a court reporter here, Kelly, who  
 14 is taking down all the comments to this hearing.  
 15 And so I would encourage you to speak clearly and  
 16 try to avoid things like "uh-huh" and "un," and  
 17 "uuhhh" because those are very difficult for her  
 18 to translate. And since I did all three of them,  
 19 she's going to have a hard time putting them on the  
 20 record right now.  
 21 So there's a comment form that we'd like  
 22 you to fill out if you want to make some comments  
 23 tonight. And we would call everybody up one by  
 24 one. You can ask any questions of the county staff  
 25 that's here in terms of the project description.

21

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1 say, for 40 or 50 years? Will that be a totally  
 2 new effort?  
 3 BRIAN BACA: Well, that's actually not an  
 4 environmental issue, but I'll go ahead and answer  
 5 it.  
 6 The decision to look for a 15-year project  
 7 for now was made by the Board of Supervisors. And,  
 8 of course, there was considerable debate as to  
 9 whether it should be either closed or expanded for  
 10 100 years. And the Board of Supervisors took a lot  
 11 of comment and made a decision that it would be  
 12 15 years. I think Ms. Cragin already stated that  
 13 the 15-year period corresponds with a mandate and  
 14 estate law. So I believe that's a minimum that was  
 15 selected by the Board of Supervisors for an  
 16 expansion project at Tajiguas.  
 17 UNIDENTIFIED SPEAKER: Basically, what my  
 18 question -- I understand that. But could this  
 19 study later on be rolled over, the information from  
 20 it, to a proposed project, shall we say; make it  
 21 more difficult for a longer project?  
 22 BRIAN BACA: I don't think that this  
 23 project physically would preclude a longer project  
 24 and a greater fill. And certainly all the  
 25 information that's been generated on this project

23

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1 determined that none of the alternatives were  
 2 environmentally superior to the proposed project,  
 3 and that also included the "no project" was not  
 4 environmentally superior.  
 5 With that, I'll turn it back over to  
 6 Inelda for some wrap-up.  
 7 IMELDA CRAGIN: Okay. How can you  
 8 participate in this EIR process? The draft EIR and  
 9 the technical studies are available for review at  
 10 all city and county libraries, also at the County  
 11 Planning and Development Department, both in  
 12 Santa Barbara and Santa Maria, and also at the  
 13 Public Works Department/Solid Waste and Utilities  
 14 Division at our offices at 109 East Victoria Street  
 15 in Santa Barbara. Also, you can purchase an EIR or  
 16 purchase sections of the EIR, if you'd like to do  
 17 that, at Kinko's in Santa Barbara at the Hope  
 18 Avenue location or also in Santa Maria and also at  
 19 the Alternative Copy Shop in Santa Barbara.  
 20 There is a blue handout that has all of  
 21 the local addresses and locations of the libraries  
 22 and also where you can purchase the sections or the  
 23 whole EIR, if you'd like to have a copy, and how  
 24 you can get to be able to review the documents.  
 25 In regards to the whole EIR process, our

18

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1 comments. So you can call or even fax comments to  
 2 her. And our phone number and fax number you can  
 3 pick up is on some of the paperwork in the back  
 4 here. Brenda or Chris can get you the right  
 5 information. Okay?  
 6 All right. And the last thing is, you  
 7 know, to learn more about our expansion, we  
 8 encourage you to come out and see Tajiguas. Come  
 9 out and sign up for a landfill tour. If you call  
 10 our main number, we'd like to have you come out and  
 11 see what an operating landfill for Santa Barbara  
 12 County is like. And also you can visit our Website  
 13 at [www.publicworks.sb.org](http://www.publicworks.sb.org). There's information on  
 14 the Website that you can learn about Tajiguas and,  
 15 not only that, our recycling programs and how you  
 16 can get involved in those, and some of the  
 17 activities that may be happening up in the north  
 18 county that involve solid-waste diversion.  
 19 And with that, I'm going to turn it back  
 20 over to Brian.  
 21 BRIAN BACA: Thank you, Inelda.  
 22 Well, I'm encouraged to hear that there  
 23 are landfill tours going on, but I would advise  
 24 everyone to dress casually when you go to the  
 25 landfill.

20

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1 If there's something unclear about what exactly is  
 2 being proposed and the differences between the  
 3 various alternatives, certainly ask questions on  
 4 that.  
 5 As far as environmental issues go, we're  
 6 not here to answer them or respond to them tonight,  
 7 although we may be able to. We're here to mainly  
 8 gather the comments and make sure that those are  
 9 addressed in the final environmental impact  
 10 report.  
 11 With that, we're going to take about a  
 12 three-minute break. And then if anyone has any  
 13 comment forms, they can bring them up, and we'll  
 14 start taking comments in just a few minutes.  
 15 (Short break.)  
 16 BRIAN BACA: Okay. We're going to  
 17 reconvene. And it's time to take public comment on  
 18 the project and answer any questions you may have  
 19 about it. Does anyone wish to ask any questions or  
 20 make any comments?  
 21 Come on up.  
 22 UNIDENTIFIED SPEAKER: How does this  
 23 period tie into -- you're doing it only for  
 24 15 years. What is the process and what is the  
 25 relationship of this document to a study, shall we

22

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1 is not going to be thrown away after the project is  
 2 completed. So there's a lot of information that  
 3 will be used in the future. But whether there will  
 4 ever be a approval is anyone's  
 5 guess and, sort of, off the point for tonight.  
 6 IMELDA CRAGIN: Can I make one statement  
 7 though?  
 8 BRIAN BACA: Go ahead.  
 9 IMELDA CRAGIN: I know -- well, one of the  
 10 things is -- this board cannot preclude other  
 11 boards in the future from making different  
 12 decisions. So because our board that's sitting now  
 13 that would make this decision chooses to do a  
 14 15-year project, a different complement or board  
 15 down the road could change that and either make it  
 16 smaller or keep going. But I think mainly, yes,  
 17 there is potential to go larger if that is what the  
 18 board desires.  
 19 BRIAN BACA: This project's a little bit  
 20 different than your average development project in  
 21 that it is a public agency, that is, the County  
 22 itself, that is proposing the project. And so the  
 23 County gets to choose the project description, like  
 24 most other applicants, and then subsequently in  
 25 many ways has to rule on it itself. So it's in

24

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1 unusual process. But the scope of the project and  
 2 the limits have already been decided by the Board  
 3 of Supervisors.  
 4 UNIDENTIFIED SPEAKER: I'm a novice at  
 5 this. I'm still learning about the project.  
 6 Can you explain what the impact on Lonpoc  
 7 would be versus now and after this is adopted?  
 8 BRIAN BACA: Well, I'm wondering if we're  
 9 getting everyone's names here.  
 10 UNIDENTIFIED SPEAKER: I just asked a  
 11 question. I'm sorry.  
 12 BRIAN BACA: Okay.  
 13 UNIDENTIFIED SPEAKER: Not a comment, just  
 14 asking a question.  
 15 BRIAN BACA: Okay. Well, how does this  
 16 affect the Lonpoc Valley? Well, that's an  
 17 interesting question since you have your own  
 18 waste-disposal facility for the city of Lonpoc.  
 19 I'm not sure I know the answer to that.  
 20 How does it affect the Lonpoc Valley? It  
 21 certainly would affect the county as a whole if  
 22 some other project, you know, one of the -- there  
 23 is an effect on the county as a whole depending on  
 24 which of the alternatives are selected, including  
 25 the "no project" alternative. That would have a

1 IVELDA CRAGIN: Yeah, let me make a little  
 2 bit of the clarification.  
 3 The Tajiguas Landfill Expansion Project  
 4 does have an Alternatives section where it does  
 5 look at alternative sites to this particular  
 6 front-canyon or back-canyon project, but those are  
 7 for a 15-year project because our project that the  
 8 board told us to expand the landfill for is only  
 9 for a 15-year period. So Bob's company, you know,  
 10 did an alternative looking for other alternative  
 11 new landfill sites that could be compared to the  
 12 Tajiguas expansion.  
 13 CLAUDE LEE: Is that in one of these books  
 14 over here?  
 15 IVELDA CRAGIN: Yes, it's in the  
 16 Alternatives section of Chapter 4.  
 17 BOB MASON: Chapter 4.  
 18 IVELDA CRAGIN: Chapter 4. And there's  
 19 this whole section on alternative sites to Tajiguas  
 20 Landfill, new sites.  
 21 But let me make one other maybe  
 22 clarification. You probably all know that we have  
 23 also been working on a regional in-county landfill  
 24 study. That is a separate study. It's for a  
 25 50-year site, looking down the road for, you know,

1 large effect on the county. And being part of the  
 2 county and the county taxpayers, there's an  
 3 indirect effect. I'm not sure what it would be.  
 4 And, really, we can't answer it tonight.  
 5 CLAUDE LEE: Can I follow up on her  
 6 question?  
 7 Not that long ago, it was --  
 8 BRIAN BACA: What's your name, sir?  
 9 CLAUDE LEE: Claude Lee. I'm a resident  
 10 here in Lonpoc.  
 11 On page 18 here, it says, "Under existing  
 12 permit, it is anticipated that it will be" --  
 13 "operate until 2005 or 2006." Then it drops down  
 14 and says "approximately 15 years to 2020."  
 15 Now, not that long ago you were talking  
 16 about alternative sites for this landfill, Tajiguas  
 17 Landfill. Is that study still going?  
 18 BRIAN BACA: Well, I will refer to Ivelda  
 19 Cragin on where we are on that. But, you know, the  
 20 focus of tonight is not the various studies that  
 21 have been done about alternative sites in the north  
 22 county area or south county area. It's really  
 23 trying to focus on taking comment on the Tajiguas  
 24 Landfill Project. Perhaps Ivelda has a brief  
 25 comment on that particular subject.

1 a 50-year landfill to take care of all of the  
 2 county waste, and not to confuse the new sites --  
 3 and that was a new siting study that, I think,  
 4 people are interested in, but that is a different  
 5 project. And the way it ties into this Tajiguas  
 6 Expansion Project is this was the second phase of a  
 7 three-phased plan that the Board of Supervisors is  
 8 trying to work towards where, if Tajiguas got  
 9 expanded for 15 years, meeting the mandates and all  
 10 of these objectives, it also gives, technically, a  
 11 time frame of 15 years to look for possibly a new  
 12 in-county regional landfill and get one  
 13 established. And then at that point, that siting  
 14 study that people have been involved with, that's  
 15 for the future disposal site after, you know -- if  
 16 this project should go through as a 15-year site.  
 17 BRIAN BACA: And to point out the  
 18 difference here or the disconnect is that CEQA,  
 19 that is, the California Environmental Quality Act,  
 20 under which the EIR is prepared, requires an  
 21 analysis of alternative sites. And the alternative  
 22 sites are to be comparable to the project that's  
 23 being proposed. So that's why there's this  
 24 difference between the two. And, also, the more  
 25 regional project involves the analysis of many more

1 sites than is required under the Environmental  
 2 Quality Act. So I'm not sure how many alternative  
 3 sites, eight or nine --  
 4 BOB MASON: Yeah, we have nine alternative  
 5 sites within the county.  
 6 BRIAN BACA: -- within the county that are  
 7 looked at in this document. And I think there's  
 8 approximately eight times that many in the regional  
 9 siting study that's going on. So the alternatives  
 10 here was for purposes of having an adequate CEQA  
 11 document.  
 12 UNIDENTIFIED SPEAKER: Just as a  
 13 clarification, as I recall, in the EIR it mentions  
 14 something that if the "no project" alternative  
 15 happens, i.e., neither A nor B is selected, then  
 16 the waste currently -- you may want to go into what  
 17 Foxen Canyon's status is, what would happen to the  
 18 waste, where it would go from the Santa Maria  
 19 unincorporated area and the Santa Ynez area and how  
 20 that would impact Lonpoc. I think that's what  
 21 they're looking for an answer to.  
 22 IVELDA CRAGIN: Well, just to clarify  
 23 that, the "no project" alternative basically says  
 24 that you would not do either of the two proposed  
 25 projects, front canyon or back canyon. But the

1 could occur under the "no project" alternative.  
 2 It's important for this group tonight to  
 3 understand the EIR process and the way it's put  
 4 together. Our alternative -- evaluation of  
 5 alternatives, again, was to compare the proposed  
 6 project against the range of alternatives that  
 7 would give information to you and to the Board of  
 8 Supervisors so there could be some comparison.  
 9 If the Board were to choose not to go  
 10 forward with the expansion of Tajiguas, the "no  
 11 project" alternative, they would then be in a  
 12 position -- and this is why they're paid the big  
 13 bucks -- they would then have to decide where the  
 14 waste is going to go. They would contemplate  
 15 that. This environmental impact report would not  
 16 be sufficient for them to pick another  
 17 alternative. It would actually have to be some  
 18 decisions made by them, directions to county staff,  
 19 about where they might want the land -- the waste  
 20 that is currently going to Tajiguas, what would  
 21 their choice for its long-term management. Is it  
 22 to go out of county? Does it go to an existing  
 23 in-county landfill? Is it a combination of  
 24 things? At that point they would provide direction  
 25 to county staff to start a new environmental impact

1 waste still comes, you know, from those areas that  
 2 Tajiguas serves. So there would have to -- you  
 3 have to pick something else in the Alternatives  
 4 section to take the waste to or to have it either  
 5 go to an existing site, go off -- out of county,  
 6 maybe, you know, even have to build something in  
 7 six years, which is very -- almost impossible to  
 8 do, so -- but those things have been analyzed as  
 9 part of the "no project" alternative.  
 10 BRIAN BACA: The alternative of no waste  
 11 being generated appears infeasible and so --  
 12 IVELDA CRAGIN: Does that make -- did I  
 13 answer your question?  
 14 MIKE SCHWAEGLING: The one thing that I  
 15 saw --  
 16 BRIAN BACA: By the way, that's Mike --  
 17 MIKE SCHWAEGLING: Mike Schwaebling,  
 18 S-c-h-w-a-e-l-i-n-g.  
 19 -- Is that Foxen Canyon's (INDAUDIBLE)  
 20 would end up going to the Lonpoc Landfill: is that  
 21 correct?  
 22 IVELDA CRAGIN: Was that analyzed, Bob?  
 23 BOB MASON: It's one --  
 24 IVELDA CRAGIN: It's one of the --  
 25 BOB MASON: -- one of the potentials that

1 process to evaluate that because that would still  
 2 be a decision that they would have to make, that  
 3 they would have to do that under the California  
 4 Environmental Quality Act. And this EIR does not  
 5 evaluate -- it is not required to evaluate  
 6 alternatives at a sufficient level in order for the  
 7 Board of Supervisors to be actually able to make a  
 8 decision and go forward immediately with one of  
 9 those alternatives.  
 10 DICK DEVEES: Speaker slip --  
 11 BRIAN BACA: Okay. Well, are you Justin?  
 12 DICK DEVEES: I'm Dick.  
 13 BRIAN BACA: All right. Well, Mr. Runge  
 14 is first.  
 15 JUSTIN RUNGE: I'm Justin Runge,  
 16 R-u-n-g-e.  
 17 Did we intentionally leave out this  
 18 alternative site here, which is the biggest site in  
 19 the south county?  
 20 IVELDA CRAGIN: The Baron Ranch was bought  
 21 by the County as a buffer, and it was not intended  
 22 for a landfill. That's part of -- I think in the  
 23 actual deed itself. So it was not considered  
 24 because of that deed restriction.  
 25 BRIAN BACA: Part of the process of buying

1 that land involved various findings made by the  
2 Board of Supervisors. And they made a finding at  
3 the time of purchase that it would not be used for  
4 landfills. And so, I mean, that board didn't  
5 constrain the current board, but the current board,  
6 in their decision on the project description, did  
7 not include the possibility of revisiting the Baron  
8 Ranch decision.

9 JUSTIN RUNGE: It's obviously right next  
10 door, and it's much larger than this site, and it  
11 certainly could be used as the most efficient,  
12 obvious site to use. Instead of shipping everything  
13 out of the county, which is one of the alternatives  
14 you have in your list. And, you know, your  
15 alternatives get more and more ridiculous as you  
16 look at them when you got this one right next door,  
17 and you didn't include that one.

18 BRIAN BACA: Well, the requirement to look  
19 at alternatives doesn't specify which alternatives  
20 you must look at. You need to look at a reasonable  
21 range of alternatives. The Baron Ranch property is  
22 not without its constraints, and even though it is  
23 immediately adjacent, it is quite different in its  
24 character and hydrology from Canada De La Pila. So  
25 there are constraints on Baron Ranch that are in

1 Impact report, there is a Water Resources section  
2 that goes through a full analysis of existing  
3 operations as a baseline and the future going  
4 forward. And it evaluates groundwater resources,  
5 surface-water resources, and runoff from Pila Creek  
6 into the ocean. And as documented in the  
7 environmental impact report, the groundwater is  
8 contained; there are extensive monitoring that's  
9 done at the site. We don't show that there is  
10 down-gradient pollution from the landfill, either  
11 in terms of groundwater or surface water, and those  
12 findings are documented within the environmental  
13 impact report. And we realize that there is -- are  
14 those people who believe that the pollution is  
15 occurring, and we are encouraging them to provide  
16 us information that would support their position.  
17 DICK DEVEES: Thank you.  
18 BRIAN BACA: Do we have anyone else?  
19 Don't go back there and hide behind that  
20 guy. Just come on forward. I know who you are.  
21 INELDA CRAGIN: You can sit. You don't  
22 have to stand.  
23 LEROY SCOLARI: I'm Leroy Scolari and a  
24 resident of Lompoc. I'm here to support the  
25 Tajiguas Landfill Expansion. I believe -- and I

34-7

1 I have handled very well here in Lompoc at the  
2 landfill. Other landfill operations have come to  
3 Lompoc to view our landfill and follow what Lompoc  
4 has done here. And Santa Barbara always seems to  
5 have a lot of environmentalists down there that  
6 want to promote recycling and whatnot, but I think  
7 Santa Barbara -- City of Santa Barbara ought to  
8 take a few notes from Lompoc and follow what we  
9 do. And south county always seems to want to dump  
10 on north county. We were getting sewage sludge up  
11 here from south county, and now we're supposed to  
12 accept south county's garbage. I think communities  
13 ought to keep what they produce right there in  
14 their own community and not dump it somewhere else.  
15 BRIAN BACA: Thank you.  
16 JUSTIN RUNGE: Yes. I spent some time  
17 reading some big books over here, and we're  
18 citizens of the city and community and --  
19 BRIAN BACA: Excuse me. Could you state  
20 your name for the --  
21 JUSTIN RUNGE: Justin Runge.  
22 -- and not experts on EIRs and how EIRs  
23 should be done. And I've always been curious in  
24 attending these meetings, which I've done over the  
25 years, to find a way to respond to an EIR, which is

1 EIRs and how you can make effective comments.  
2 There are two types of comments that we  
3 can receive on an environmental document. One type  
4 of comment, which is pretty simple, is that we just  
5 plain missed an issue and didn't think about a  
6 potential environmental issue and it wasn't  
7 analyzed in the EIR. And that doesn't take a  
8 technical expertise in order to make a comment like  
9 that, that we've just missed some and it's not  
10 analyzed. And so that's the simplest form of  
11 comment on an EIR, that it's inadequate because an  
12 issue was just missed.  
13 Now, in terms of technical issues, such as  
14 the issue of water quality or an issue of geology,  
15 the California Environmental Quality Act requires  
16 that the information in an EIR, in certain  
17 specialty areas such as geology and engineering, be  
18 derived from licensed geologists and licensed  
19 engineers. And the Board of Supervisors or the  
20 decision makers, whether they be the Planning  
21 Commission or the Board of Supervisors, they need  
22 to rely on that expert type of information in order  
23 to make their decision. And so in order for  
24 effective comment on a technical issue in which a  
25 licensed professional has made a call, you need to

1 many ways significant or more significant than some  
2 of the alternatives that have been proposed, so --  
3 or been analyzed.

4 Anyway, Mr. DeVeas.

5 DICK DEVEES: I guess, first, a comment  
6 and then a question. In regards to this  
7 gentleman's question about having to accept waste  
8 from Foxen Canyon Landfill, I can almost guarantee  
9 that the city council will not allow -- Lompoc  
10 would not accept solid waste from any other agency  
11 in the area, so -- and we cannot be dictated to by  
12 the Board of Supervisors in that regard.

13 The question I have is -- environmental  
14 question is the existing landfill and the possible  
15 expansion of the landfill. Some of the concerns of  
16 the people on the coast is -- and other places,  
17 central coast, I should say, is that it is  
18 affecting groundwater basin and contributing to the  
19 pollution of the seashore itself.

20 My question is, is there any credible  
21 evidence at all to indicate that either of -- is  
22 that -- is that the case? Credible evidence, or is  
23 it just speculation?

24 BRIAN BACA: Thank you.

25 BOB NASON: Within the environmental

1 haven't had a chance to go through the documents,  
2 but I fully believe what the situation is there in  
3 regards to the hydrology and the lack of pollution  
4 of the water, as is sometimes claimed. But taking  
5 the other alternative, I feel that in the event,  
6 which is always a possibility, there should be a  
7 leak of pollution that would eventually go to the  
8 ocean, it would affect a whole lot less population  
9 base than in the event of any site that would  
10 contribute to a sweet-water basin, whether it be  
11 the Santa Ynez Valley, Lompoc Valley, Cuyana  
12 Valley, which is interior. And for that reason  
13 alone, I think that makes Tajiguas an  
14 environmentally superior site than any other site  
15 that can be found in the county.

16 I think you would find that there would be  
17 extreme opposition to any alternative that would  
18 occur in the Lompoc or Santa Ynez Valleys or their  
19 tributary valleys. Thank you.

20 BRIAN BACA: Thank you.

21 Richard Pata.

22 RICHARD PATA: I'm Richard Pata. I reside  
23 at (INAUDIBLE), Lompoc.

24 Lompoc's landfill is noted probably  
25 statewide for their recycling efforts which they

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34-6

1 BRIAN BACA: That's Mike Schnaeling again.  
 2 MIKE SCHNAELING: As a local enforcement  
 3 agency, we sit on the opposite side of the table as  
 4 Public Works does. If you've got concerns and you  
 5 need help, please feel free to call me -- I'd be  
 6 happy to give you my business card -- or Lisa  
 7 Sloan, who regulates the particular site, and we'll  
 8 be happy to go through the document with you and  
 9 answer any questions, help you out any way that we  
 10 can. Because we want to be sure that that document  
 11 is correct because we are going to be using that to  
 12 issue then a permit. So it's really important for  
 13 us to work with you, the citizens, to be sure that  
 14 they do their job right.  
 15 BRIAN BACA: I think it's important that  
 16 Mr. Schnaeling is bringing up; the point is the  
 17 regulatory framework in the State of California.  
 18 The California Integrated Waste Management Board is  
 19 the entity that issues permits for landfills and  
 20 regulates the operation of landfills. The local  
 21 enforcement agency in this case can be delegated  
 22 the authority to do that in various local  
 23 jurisdictions. In this case the local enforcement  
 24 agency is the Environmental Health Services  
 25 Division of the County Health Department. And so

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1 county. So that's why we really encourage you, if  
 2 you have strong feelings about the projects, one of  
 3 the alternatives, any of the alternatives, anything  
 4 about the project itself, that you do contact us,  
 5 put it in writing or even send letters to the Board  
 6 of Supervisors directly and talk to your  
 7 representatives to let them know your strong  
 8 feelings about one -- or anything about the  
 9 project.  
 10 UNIDENTIFIED SPEAKER: So say that we  
 11 support the project, that we find it's a very  
 12 valuable way to proceed for the next 15 or 20 years  
 13 and we really think their best approach is to take  
 14 the back-canyon approach, that's a valid comment to  
 15 make in regard to this EIR?  
 16 IMELDA CRAGIN: Yes, you can do that.  
 17 BRIAN BACA: Sure.  
 18 IMELDA CRAGIN: Yes, very much so. And I  
 19 would even -- you know, for anybody -- somebody  
 20 that's supporting the project or opposing the  
 21 project should also send letters to your decision  
 22 makers, your Board of Supervisors, you know, your  
 23 actual supervisor or even all of them. Just so that  
 24 they know the feelings of the community.  
 25 BRIAN BACA: You know, there are physical

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1 tell us to move that waste in that southeast  
 2 corner, that both designs accommodate that. That's  
 3 why you wouldn't pick both. You would pick one or  
 4 the other.  
 5 And one of the reasons why there are two  
 6 designs is we did get comments during the scoping  
 7 process; we did get strong comments of people  
 8 saying don't use the entire back canyon and put  
 9 waste in the whole back canyon. See what you can  
 10 do to design as much of it over the landfill and  
 11 you know, not use as much of the back-canyon area  
 12 as new waste, for new waste. Other groups have  
 13 said, no, we don't want it so high. We'd like to  
 14 see it more spread out and lower.  
 15 So that's where the back-canyon design  
 16 came through.  
 17 UNIDENTIFIED SPEAKER: With the designs  
 18 you're proposing, would the front-canyon or  
 19 back-canyon design preclude any further projects in  
 20 that area, for instance, in 40 years? I'm  
 21 referring to the fact that the past two grand  
 22 juries stated that this area should be good for the  
 23 next 65 years. And so the project you're proposing  
 24 today, will that preclude an additional project for  
 25 another 15 years?

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1 to look at the maps or the photographs and talk to  
 2 us privately. That's it.  
 3 IMELDA CRAGIN: Thank you very much for  
 4 coming.  
 5 (Proceedings concluded at 7:50 p.m.)  
 6 --00800--

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1 they actually are the regulators regulating the  
 2 operation of a landfill.  
 3 The second question I'll leave to Imelda,  
 4 and we'll see if she remembers it.  
 5 IMELDA CRAGIN: You asked -- let me make  
 6 sure I can rephrase or get the question correct.  
 7 You said, How would the Board -- what is the  
 8 motivating guidelines that the Board of Supervisors  
 9 would use in choosing whether the front or the back  
 10 canyon or any decision?  
 11 Well, the thing is, the environmental  
 12 document is one of the tools that the Board of  
 13 Supervisors can use in making their decision on  
 14 which project to go forward with. They take other  
 15 information; they take public comment; they  
 16 could -- at either hearing or at their offices;  
 17 they also take into consideration other documents  
 18 that are supplied by either the county staff or  
 19 other experts. There'll probably be at least one  
 20 hearing, but more than likely, we're expecting  
 21 possibly two; you know, one with a continued  
 22 hearing because this is pretty -- a big project,  
 23 and I'm sure they'll want to hear comments from  
 24 more -- both north and south county because the  
 25 Board is -- you know, takes -- represents the whole

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1 differences between the two projects. One is of a  
 2 higher elevation than the other and, hence, would  
 3 be more visible from a few short viewing areas  
 4 along the highway. So there are some differences  
 5 there, and it's helpful, if you're going to support  
 6 one or the other, to have some reasons why because  
 7 that would aid the Board in making their decision.  
 8 Mr. Scolari.  
 9 LEROY SCOLARI: One further question. I'm  
 10 looking at page 114 and 115. But you made mention  
 11 that the Board could either select the front or the  
 12 back but not both. Is this because of the  
 13 parameters that the Board has set?  
 14 IMELDA CRAGIN: Well --  
 15 BRIAN BACA: They're physically  
 16 overlapping each other, so -- you really couldn't  
 17 do both because the way that -- you're grading in  
 18 the same physical volume. So it's either one or  
 19 the other. Just physically.  
 20 IMELDA CRAGIN: Both designs, front-canyon  
 21 or back-canyon design, actually are both for  
 22 15 years. And they hold -- the design capacity is  
 23 for the 8.2 million cubic yards to take the  
 24 15 years, plus that southeast corner modification  
 25 area, in case the Board decides to go forward and

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1 IMELDA CRAGIN: No.  
 2 BRIAN BACA: And the decision that's made  
 3 will not preclude future decision makers of future  
 4 boards from making a decision to alter the landfill  
 5 even as -- you know, before even the 15-year waste  
 6 prism is filled, to alter that to some other  
 7 design. So this is the decision that's -- in terms  
 8 of project description, that has been put before  
 9 county staff to take forward. And this current  
 10 board or a future board can change it.  
 11 Is there anyone else who would like to  
 12 speak?  
 13 Well, before I close the meeting, we're  
 14 all going to hang around here for a little while  
 15 longer if you want to talk to us individually about  
 16 anything going on with the county process or the  
 17 landfill.  
 18 I would like to point out that government  
 19 long ago gave up simple speech in simple terms like  
 20 "garbage"; it's municipal solid waste. And it's  
 21 not a dump; it's a sanitary landfill. So just  
 22 wanted to clarify that.  
 23 With that, this hearing is now closed.  
 24 County staff will hang around for another half-hour  
 25 or so if you have any individual questions and want

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1 REPORTER'S CERTIFICATE  
 2  
 3 STATE OF CALIFORNIA  
 4 COUNTY OF SANTA BARBARA | ss.  
 5  
 6 I, KELLY TAYLOR, RPR, CSR 18086, Certified  
 7 Shorthand Reporter of the State of California, for  
 8 the County of Santa Barbara, do hereby certify that  
 9 the foregoing pages are a true and correct  
 10 transcript of the proceedings held on November 28,  
 11 2001, in the above-entitled matter.  
 12 Dated at Santa Barbara, California, this  
 13 14th day of December, 2001.

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**Document 34**  
**Public Hearing Comments**  
**Lompoc City Council Chambers**  
**November 28, 2001**  
**Response to Comments**

Response 34-1

As discussed by Brian Baca and Imelda Cragin, representing the County of Santa Barbara at the Public Scoping Meeting in the City of Lompoc on November 28, 2001, the 15-year Tajiguas Landfill expansion project corresponds to a policy directive by the County Board of Supervisors on August 3, 1999, to allow for the siting and development of a new in-County landfill for the future.

Response 34-2

As discussed by Brian Baca and Imelda Cragin, representing the County of Santa Barbara at the Public Scoping Meeting in the City of Lompoc on November 28, 2001, the Baron Ranch was acquired by the County as a buffer area and is not intended for a landfill. The requirement to look at different alternatives does not specify which alternatives to consider. There are significant constraints to the Baron Ranch, even though it is adjacent to the project site.

Response 34-3

Comment noted. The City of Lompoc is not willing to accept solid waste from any other agency in the area (see Draft EIR Section 4.2.1.2).

Response 34-4

See Responses 1-3, 1-6, 2-5 and 2-6.

Response 34-5

Comment noted. See Responses 1-3, 1-6, 2-5 and 2-6 for information on water and monitoring programs.

Response 34-6

Comment noted.

Response 34-7

Comment noted.



County of Santa Barbara Public Works Department  
**PUBLIC COMMENT FORM**

**TAJIGUAS LANDFILL EXPANSION PROJECT  
DRAFT ENVIRONMENTAL IMPACT REPORT  
PUBLIC COMMENT MEETINGS 6:30 p.m.**

Check One:

- November 7, 2001  
Santa Barbara Public Library  
Central Branch/Faulkner Gallery  
40 East Anapamu St., Santa Barbara
- November 8, 2001  
County Government Center  
511 East Lakeside Dr., Santa Maria
- November 13, 2001  
Andersen's Pea Soup Restaurant  
Ballroom  
376 Avenue of the Flags  
Buellton, CA
- November 19, 2001  
Goleta Community Center  
5679 Hollister Avenue  
Goleta, CA
- November 28, 2001  
Lompoc City Hall  
City Council Chambers  
100 Civic Center Plaza  
Lompoc, CA

PLEASE PRINT:

Name: Steven L. Johnson  
 Address: 5702 Ridgely Rd.  
 City: Bethesda Md. ZIP: 20814

- How did you hear about this meeting?  Newspaper  Radio  TV Commercial  
 <www.publicworkssb.org>  TV (Government Access Channel)  Notice of Availability  Other

Comments:  
Significant Comments See Written  
and Formak Requests to Be Submitted  
to Mark Schleich by Nov. 26<sup>th</sup>.

35-1

Signature: Steven L. Johnson



**Document 35**  
**Public Comment Form Responses**  
**Steven C. Johnson**  
**November 19, 2001**  
**Response to Comments**

Response 35-1  
Comment noted.

See Responses 33-1 through 33-28.



County of Santa Barbara Public Works Department  
**PUBLIC COMMENT FORM**

**TAJIGUAS LANDFILL EXPANSION PROJECT  
DRAFT ENVIRONMENTAL IMPACT REPORT  
PUBLIC COMMENT MEETINGS 6:30 p.m.**

Check One:

- November 7, 2001  
 Santa Barbara Public Library  
 Central Branch/Faulkner Gallery  
 40 East Anapamu St., Santa Barbara
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 County Government Center  
 511 East Lakeside Dr., Santa Maria
- November 13, 2001  
 Andersen's Pea Soup Restaurant  
 Ballroom  
 376 Avenue of the Flags  
 Buellton, CA
- November 19, 2001  
 Goleta Community Center  
 5679 Hollister Avenue  
 Goleta, CA
- November 28, 2001  
 Lompoc City Hall  
 City Council Chambers  
 100 Civic Center Plaza  
 Lompoc, CA

PLEASE PRINT:

Name: Bob Hazard

Address: 2099 Refugio Rd

City: Goleta ZIP: Ca.

- How did you hear about this meeting?  Newspaper  Radio  TV Commercial
- <www.publicworkssb.org>  TV (Government Access Channel)  Notice of Availability  Other

36  
1

Comments: Representing Maricopa Coast Conservancy

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Signature: \_\_\_\_\_



**Document 36  
Public Comment Form  
Bob Hazard  
November 19, 2001  
Response to Comments**

Response 36-1

See Responses 5-1 through 5-17.



County of Santa Barbara Public Works Department  
**PUBLIC COMMENT FORM**

**TAJIGUAS LANDFILL EXPANSION PROJECT  
DRAFT ENVIRONMENTAL IMPACT REPORT  
PUBLIC COMMENT MEETINGS 6:30 p.m.**

Check One:

November 7, 2001  
Santa Barbara Public Library  
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November 8, 2001  
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November 13, 2001  
Andersen's Pea Soup Restaurant  
Ballroom  
376 Avenue of the Flags  
Buellton, CA

November 19, 2001  
Goleta Community Center  
5679 Hollister Avenue  
Goleta, CA

November 28, 2001  
Lompoc City Hall  
City Council Chambers  
100 Civic Center Plaza  
Lompoc, CA

PLEASE PRINT:

Name: MARK KAPPINEN

Address: 315 1/2 S. "E" ST.

City LOMPOC, CA. ZIP 93436

How did you hear about this meeting?  Newspaper  Radio  TV Commercial

<www.publicworkssb.org>  TV (Government Access Channel)  Notice of Availability  Other

37-1

Comments: Concerned about festive needs  
after 15 yrs. Incinerator or other alternatives.

Signature: M. Kappinen



**Document 37**  
**Public Comment Form Responses**  
**Mark Kauppinen**  
**November 8, 2001**  
**Response to Comments**

Response 37-1  
Comment noted.

No specific response to this comment is required. See Response 34-1 and Final EIR Chapter 3.0 for a discussion of waste processing technologies.







**Document 38  
Public Comment Form  
Joan Leon  
November 8, 2001  
Response to Comments**

Response 38-1

See Responses 29-1 through 29-14.



39

1

County of Santa Barbara Public Works Department  
**PUBLIC COMMENT FORM**

**TAJIGUAS LANDFILL EXPANSION PROJECT  
DRAFT ENVIRONMENTAL IMPACT REPORT  
PUBLIC COMMENT MEETINGS 6:30 p.m.**

Check One:

November 7, 2001  
Santa Barbara Public Library  
Central Branch/Faulkner Gallery  
40 East Anapamu St., Santa Barbara

November 8, 2001  
County Government Center  
511 East Lakeside Dr., Santa Maria

November 13, 2001  
Andersen's Pea Soup Restaurant  
Ballroom  
376 Avenue of the Flags  
Buellton, CA

November 19, 2001  
Goleta Community Center  
5679 Hollister Avenue  
Goleta, CA

PLEASE PRINT:

Name: Brian Trautwein, EDC representing Surfrider Fnd.

Address: 906 Garden St.

SB

93101

City

ZIP

How did you hear about this meeting?  Newspaper  Radio  TV Commercial

<www.publicworkssb.org>  TV (Government Access Channel)  Notice of Availability  Other

39-1 Comments: Re adequacy of draft EIR.

Signature: \_\_\_\_\_



**Document 39  
Public Comment Form  
Brian Trautwein, EDC  
November 7, 2001  
Response to Comments**

Response 39-1

See Responses 3-1 through 3-124.



40

2

County of Santa Barbara Public Works Department  
**PUBLIC COMMENT FORM**

**TAJIGUAS LANDFILL EXPANSION PROJECT  
DRAFT ENVIRONMENTAL IMPACT REPORT  
PUBLIC COMMENT MEETINGS 6:30 p.m.**

Check One:

November 7, 2001  
Santa Barbara Public Library  
Central Branch/Faulkner Gallery  
40 East Anapamu St., Santa Barbara

November 8, 2001  
County Government Center  
511 East Lakeside Dr., Santa Maria

November 13, 2001  
Andersen's Pea Soup Restaurant  
Ballroom  
376 Avenue of the Flags  
Buellton, CA

November 19, 2001  
Goleta Community Center  
5679 Hollister Avenue  
Goleta, CA

PLEASE PRINT:

Name: James Smallwood

Address: 1319 Santa St

City: SB ZIP: 93601

How did you hear about this meeting?  Newspaper  Radio  TV Commercial  
 <www.publicworkssb.org>  TV (Government Access Channel)  Notice of Availability  Other

40-1 Comments: Comment about on-site composting  
\* will provide copy of the  
\* letter re: Sonoma Compost Co.

Signature: \_\_\_\_\_



**Document 40  
Public Comment Form  
James Smallwood  
November 7, 2001  
Response to Comments**

Response 40-1  
Comment noted.

See Final EIR Chapter 3.0 for a discussion of waste processing technologies.



41

3

County of Santa Barbara Public Works Department  
**PUBLIC COMMENT FORM**

**TAJIGUAS LANDFILL EXPANSION PROJECT  
DRAFT ENVIRONMENTAL IMPACT REPORT  
PUBLIC COMMENT MEETINGS 6:30 p.m.**

Check One:

November 7, 2001  
Santa Barbara Public Library  
Central Branch/Faulkner Gallery  
40 East Anapamu St., Santa Barbara

November 8, 2001  
County Government Center  
511 East Lakeside Dr., Santa Maria

November 13, 2001  
Andersen's Pea Soup Restaurant  
Ballroom  
376 Avenue of the Flags  
Buellton, CA

November 19, 2001  
Goleta Community Center  
5679 Hollister Avenue  
Goleta, CA

PLEASE PRINT:

Name: Hillary Hauser

Address: Near the Ocean

City \_\_\_\_\_ ZIP \_\_\_\_\_

How did you hear about this meeting?  Newspaper  Radio  TV Commercial  
 <www.publicworkssb.org>  TV (Government Access Channel)  Notice of Availability  Other

Comments:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Acoustic Report  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature: \_\_\_\_\_

414



**Document 41  
Public Comment Form  
Hillary Hauser  
November 7, 2001  
Response to Comments**

Response 41-1

See Responses 1-1 through 1-15 and 2-1 through 2-26.



42

4

County of Santa Barbara Public Works Department  
**PUBLIC COMMENT FORM**

**TAJIGUAS LANDFILL EXPANSION PROJECT  
DRAFT ENVIRONMENTAL IMPACT REPORT  
PUBLIC COMMENT MEETINGS 6:30 p.m.**

Check One:

November 7, 2001  
Santa Barbara Public Library  
Central Branch/Faulkner Gallery  
40 East Anapamu St., Santa Barbara

November 8, 2001  
County Government Center  
511 East Lakeside Dr., Santa Maria

November 13, 2001  
Andersen's Pea Soup Restaurant  
Ballroom  
376 Avenue of the Flags  
Buellton, CA

November 19, 2001  
Goleta Community Center  
5679 Hollister Avenue  
Goleta, CA

PLEASE PRINT:

Name: KEITH ZANDONA SB Surfrider Chapter Chair

Address: Box 60021

City SANTA BARBARA ZIP 93160

How did you hear about this meeting?  Newspaper  Radio  TV Commercial

<www.publicworkssb.org>  TV (Government Access Channel)  Notice of Availability  Other

42-1

Comments: [Signature]  
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\_\_\_\_\_  
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\_\_\_\_\_

Signature: \_\_\_\_\_



**Document 42  
Public Comment Form  
Keith Zandona  
November 7, 2001  
Response to Comments**

Response 42-1  
See Responses 6-1 through 6-5.



43

Please forward  
to Liguas  
Project if necessary.  
Thanks.

Kathleen  
Brown  
569-0020

Santa Barbara Public Works Department  
**C COMMENT FORM**

LANDFILL EXPANSION PROJECT  
VIRONMENTAL IMPACT REPORT  
COMMENT MEETINGS 6:30 p.m.

2001  
Public Library  
Faulkner Gallery  
Maru St., Santa Barbara

November 8, 2001  
County Government Center  
511 East Lakeside Dr., Santa Maria

2001  
Sea Soup Restaurant

November 19, 2001  
Goleta Community Center  
5679 Hollister Avenue  
Goleta, CA

of the Flags  
Buellton, CA

PLEASE PRINT:

Name: KATHLEEN BROWN  
Address: 145 Vista de la Umbra  
Santa Barbara CA 93105  
City: \_\_\_\_\_ ZIP: \_\_\_\_\_

How did you hear about this meeting?  Newspaper  Radio  TV Commercial  
 <www.publicworks.org>  TV (Government Access Channel)  Notice of Availability  Other

Comments: Thanks so much for the informative city. My  
only comment is that I think it is extremely important to  
reduce the amt. of waste we create. I suggest that commercial  
bdgs and apartments be required to recycle, rather than  
recycling being on a voluntary basis.

I would also like to see the city forbid the use  
of plastic "carry sacks" at grocery stores and the use  
of any styrofoam containers and plastic ware at  
schools and restaurants. "Carry sacks," though recyclable,  
often are used instead to line garbage cans, or pick up  
dog dirt (poop) and are thrown away.  
Thank you.

Signature: Kathleen Brown

43-1  
43-2



**Document 43  
Public Comment Form  
Kathiann Brown  
November 7, 2001  
Response to Comments**

Response 43-1

Comment noted. Suggestions regarding the requirement for buildings and apartments to recycle are beyond the scope of this EIR. It is suggested that the City of Santa Barbara and the County of Santa Barbara be consulted about this issue. See the discussion of waste processing technologies in Final EIR Chapter 3.0.

Response 43-2

Comment noted. Suggestions regarding the requirement for stores, schools and restaurants to recycle are beyond the scope of this EIR. It is suggested that the City of Santa Barbara and the County of Santa Barbara be consulted about this issue.



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County of Santa Barbara Public Works Department  
**PUBLIC COMMENT FORM**

**TAJIGUAS LANDFILL EXPANSION PROJECT  
DRAFT ENVIRONMENTAL IMPACT REPORT  
PUBLIC COMMENT MEETINGS 6:30 p.m.**

Check One:

November 7, 2001  
Santa Barbara Public Library  
Central Branch/Faulkner Gallery  
40 East Anapamu St., Santa Barbara

November 8, 2001  
County Government Center  
511 East Lakeside Dr., Santa Maria

November 13, 2001  
Andersen's Pea Soup Restaurant  
Ballroom  
376 Avenue of the Flags  
Buellton, CA

November 19, 2001  
Goleta Community Center  
5679 Hollister Avenue  
Goleta, CA

PLEASE PRINT:

Name: J. Wesley Brown

Address: 145 VISTA De La Cumbre

City: Santa Barbara, CA ZIP: 93105

How did you hear about this meeting?  Newspaper  Radio  TV Commercial  
 <www.publicworkssb.org>  TV (Government Access Channel)  Notice of Availability  Other

Comments:

The County needs to legislate more  
conservation ~~laws~~ laws. Too much recyclable  
material is still being dumped in the  
landfill rather than recycled/reused. Other  
counties have better records than we do in  
this area. Research to find best practices in  
use and work to match or exceed those  
practices -

Signature:





**Document 44  
Public Comment Form  
J. Wesley Brown  
November 7, 2001  
Response to Comments**

Response 44-1  
Comment noted.



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County of Santa Barbara Public Works Department  
**PUBLIC COMMENT FORM**

**TAJIGUAS LANDFILL EXPANSION PROJECT  
DRAFT ENVIRONMENTAL IMPACT REPORT  
PUBLIC COMMENT MEETINGS 6:30 p.m.**

Check One:

November 7, 2001  
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40 East Anapamu St., Santa Barbara

November 8, 2001  
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Ballroom  
376 Avenue of the Flags  
Buellton, CA

November 19, 2001  
Goleta Community Center  
5679 Hollister Avenue  
Goleta, CA

November 28, 2001  
Lompoc City Hall  
City Council Chambers  
100 Civic Center Plaza  
Lompoc, CA

PLEASE PRINT:

Name: Richard Pata

Address: 3500 Salama Rd.

City Lompoc ZIP 93436

How did you hear about this meeting?  Newspaper  Radio  TV Commercial

<www.publicworkssb.org>  TV (Government Access Channel)  Notice of Availability  Other

*meetings in Buellton*

Comments:  
\_\_\_\_\_  
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\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature: \_\_\_\_\_

45-1



**Document 45  
Public Comment Form  
Richard Pata  
November 28, 2001  
Response to Comments**

Response 45-1  
See Response 34-7.



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County of Santa Barbara Public Works Department  
**PUBLIC COMMENT FORM**

**TAJIGUAS LANDFILL EXPANSION PROJECT  
DRAFT ENVIRONMENTAL IMPACT REPORT  
PUBLIC COMMENT MEETINGS 6:30 p.m.**

- Check One:
- November 7, 2001  
Santa Barbara Public Library  
Central Branch/Faulkner Gallery  
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  - November 8, 2001  
County Government Center  
511 East Lakeside Dr., Santa Maria
  - November 13, 2001  
Andersen's Pea Soup Restaurant  
Ballroom  
376 Avenue of the Flags  
Buellton, CA
  - November 19, 2001  
Goleta Community Center  
5679 Hollister Avenue  
Goleta, CA
  - November 28, 2001  
Lompoc City Hall  
City Council Chambers  
100 Civic Center Plaza  
Lompoc, CA

PLEASE PRINT:

Name: LeRoy Saolani  
 Address: 423 No. "B" St  
 City: Lompoc, Calif ZIP: 93436

- How did you hear about this meeting?
- Newspaper
  - Radio
  - TV Commercial
  - <www.publicworkssb.org>
  - TV (Government Access Channel)
  - Notice of Availability
  - Other

46-1

Comments: Friend Called at 5:30 PM This date  
where was Advertising?

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Signature: \_\_\_\_\_



**Document 46  
Public Comment Form  
LeRoy Scolari  
November 28, 2001  
Response to Comments**

Response 46-1

The Lompoc Public Meeting on the Draft EIR was added following requests from concerned citizens. Advertisements were run in the Lompoc and Santa Ynez Valley newspapers (see Final EIR Appendix B).



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County of Santa Barbara Public Works Department  
**PUBLIC COMMENT FORM**

**TAJIGUAS LANDFILL EXPANSION PROJECT**  
**DRAFT ENVIRONMENTAL IMPACT REPORT**  
**PUBLIC COMMENT MEETINGS 6:30 p.m.**

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- November 13, 2001  
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376 Avenue of the Flags  
Buellton, CA
- November 19, 2001  
Goleta Community Center  
5679 Hollister Avenue  
Goleta, CA
- November 28, 2001  
Lompoc City Hall  
City Council Chambers  
100 Civic Center Plaza  
Lompoc, CA

PLEASE PRINT:

Name: DICK DEWEEES

Address: CITY HALL

---

City: LOMPOC ZIP: \_\_\_\_\_

47-1

- How did you hear about this meeting?
- Newspaper
  - Radio
  - TV Commercial
  - <www.publicworkssb.org>
  - TV (Government Access Channel)
  - Notice of Availability
  - Other

Comments: \_\_\_\_\_

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\_\_\_\_\_

Signature: \_\_\_\_\_



**Document 47  
Public Comment Form  
Dick DeWees  
November 28, 2001  
Response to Comments**

Response 47-1  
Comment noted.



48

County of Santa Barbara Public Works Department  
**PUBLIC COMMENT FORM**

**TAJIGUAS LANDFILL EXPANSION PROJECT  
DRAFT ENVIRONMENTAL IMPACT REPORT  
PUBLIC COMMENT MEETINGS 6:30 p.m.**

- Check One:
- November 7, 2001  
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376 Avenue of the Flags  
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Goleta Community Center  
5679 Hollister Avenue  
Goleta, CA
  - November 28, 2001  
Lompoc City Hall  
City Council Chambers  
100 Civic Center Plaza  
Lompoc, CA

PLEASE PRINT:

Name: J Rube 7379536

Address: \_\_\_\_\_

\_\_\_\_\_

City \_\_\_\_\_ ZIP \_\_\_\_\_

- How did you hear about this meeting?
- Newspaper
  - Radio
  - TV Commercial
  - <www.publicworkssb.org>
  - TV (Government Access Channel)
  - Notice of Availability
  - Other

48-1 Comments: ultimate choices do not include  
the Barron Ranch

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\_\_\_\_\_

Signature: \_\_\_\_\_



**Document 48**  
**Public Comment Form**  
**J. Ruhge**  
**November 28, 2001**  
**Response to Comments**

Response 48-1

The County of Santa Barbara acquired the Baron Ranch in 1991 as “. . . an open space buffer to prevent urbanization in the vicinity of the Landfill and to prevent parcelization of the property into homesites. . .” (Board of Supervisors of the County of Santa Barbara, State of California, Minute Order, November 27, 1990).

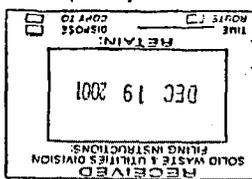
The Board of Supervisors gave direction to evaluate expanding the landfill at the Tajiguas Landfill site, but did not direct the SWUD to consider the Baron Ranch. Since the purpose for which the Baron Ranch was purchased and direction of the Board of Supervisors on the use of the property have not changed, the alternatives discussions in Draft EIR Chapter 4.0 did not consider the Baron Ranch as a feasible alternative.

In addition to the policy implications, the Baron Ranch is a viable agricultural operation. Loss of this agricultural land would be considered a potentially significant impact and would have greater impacts to agriculture than the proposed expansion at the Tajiguas site. No agricultural impacts would occur by expanding the Tajiguas site, since no agricultural land use is located on the property.

See Response 34-2.



(49)



County of Santa Barbara Public Works Department

# PUBLIC COMMENT FORM

TAJIGUAS LANDFILL EXPANSION PROJECT  
DRAFT ENVIRONMENTAL IMPACT REPORT  
PUBLIC COMMENT MEETINGS 6:30 p.m.

Check One:

- November 7, 2001  
Santa Barbara Public Library  
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- November 13, 2001  
Andersen's Pea Soup Restaurant  
Ballroom  
376 Avenue of the Flags  
Buellton, CA
- November 19, 2001  
Goleta Community Center  
5679 Hollister Avenue  
Goleta, CA

PLEASE PRINT:

Name: JOSHUA DAVID SMITH  
 Address: 200 WEST MASON ST  
APT. # 7  
 City SANTA BARBARA CA ZIP 93101

- How did you hear about this meeting?  Newspaper  Radio  TV Commercial  
 <www.publicworks.sb.org>  TV (Government Access Channel)  Notice of Availability  Other

Comments: THE TAJIGUAS LANDFILL EXPANSION PROJECT  
SEEMS TO BE AN ATTEMPT TO BUY TIME BY EXPANDING  
THE PRESENT LANDFILL BECAUSE A ~~BETTER~~ BETTER SITE  
FOR A NEW LANDFILL HAS NOT YET BEEN CHOSEN.  
I HAVE BEEN TO THE LANDFILL AND SEEN THE DESIGN PERSONNEL  
THOUGH THE NEW ADDITIONS TO THE LANDFILL ARE UP TO THE  
CURRENT SAFETY STANDARDS, THE BASE AND CONTACT POINT  
OF THE LANDFILL IS SIMPLY WASTE PILED UPON "RINCON"  
CLAY. THE EXTENT TO WHICH LEACHATES ARE TRULY  
~~AND~~ CONTAINED BY THIS CLAY IS NOT FULLY UNDERSTOOD.  
THEREFORE I BELIEVE IT IS FOOLISH TO EXTEND THE PERMIT OF  
THE TAJIGUAS LANDFILL WITHOUT MORE EXTENSIVE STUDY'S. (ESPECIALLY  
SIMPLY BECAUSE OF BEING Signature: [Signature]  
PRESSURED BY TIME.)

AT



**Document 49  
Public Comment Form  
Joshua David Smith  
November 7, 2001  
Response to Comments**

Response 49-1  
See Responses 2-3 and 2-4.



P-2  
50



**SANTA YNEZ BAND  
OF MISSION INDIANS  
Tribal Elder's Council**

P.O. Box 365  
Santa Ynez, Ca 93460  
(805)888-8446 FAX (805)693-1768  
elders@sythc.com



Council Members

Art Lopez, Chairman  
Adelina Alva-Padilla, Vice Chairman  
Alfred Romano, Council Member  
Julio Carrillo, Jr., Council Member

March 6, 2002

Kathy Kefauver  
Project Planner  
Solid Waste and Utilities Division  
109 East Victoria Street  
Santa Barbara, CA 93101

Dear Kathy:

It was a pleasure to meet with you and those associated with the proposed expansion of the Tejiguas Landfill on February 28, 2002.

We were all impressed with the conditions at the landfill and with the care being taken to see that the interests of the Chumash are considered.

Based on our observations we have no unfavorable comments to make at this time, and only ask that if any ground disturbance is to take place, that a Native American Monitor be present to assure if any artifacts are uncovered, they can be identified in a timely fashion.

Thank you for remembering that at one time our ancestors walked and lived in all areas of the Santa Barbara and Gaviota Coast.

Sincerely,

Art Lopez, Chairman  
Tribal Elder's Council

AL:sh

50-1

RECEIVED  
SOLID WASTE & UTILITIES DIVISION  
FILING INSTRUCTIONS:  
MAR 12 2002  
RETAIN:  
TIME ROUTE  DISPOSE COPY TO



**Document 50**  
**Santa Ynez Band of Mission Indians**  
**Tribal Elder's Council**  
**December 10, 2001**  
**Response to Comments**

Response 50-1  
Comments noted.



## 3.0 RESPONSE TO COMMENTS ON DRAFT EIR REGARDING WASTE PROCESSING TECHNOLOGIES

### 3.1 INTRODUCTION

This chapter provides the response to comments on the Draft EIR regarding waste processing technologies and a discussion of their feasibility, either separately or in combination, as an option to solid waste disposal in Santa Barbara County.

Several of the Draft EIR comment letters have stated that the County should pursue one or a combination of waste processing technologies in lieu of expanding the Tajiguas Landfill. In these letters, commenters have proposed a range of potential waste processing technologies. (Table 3-1 provides a listing of the type of waste processing technologies mentioned in the various comments.) According to the commenters, if the County pursues a combination of some or all of these waste processing technologies, the County may be able to significantly reduce or eliminate its need for additional landfill capacity.

As stated in Draft EIR Section 1.5.2, the County is subject to the 50 percent diversion requirement established by Assembly Bill (AB) 939. The proposed Tajiguas expansion assumes the County will comply with the AB 939 diversion requirement. In fact, the unincorporated County's current diversion rate reached 57 percent in 2000 (Solid Waste and Utilities Division, 2002). The purpose of the expansion project is to provide 15 years of capacity for that portion of the waste stream that is not diverted from landfilling (Draft EIR Section 1.4).

A recommendation to rely on other waste processing technologies is, in effect, a recommendation to achieve a diversion rate in excess of the 57 percent the County currently diverts. From a practical perspective, if the County achieves a greater diversion rate, and does not exceed the projected growth rate, then the undiverted residual solid waste disposed of at Tajiguas or at another landfill would be proportionately reduced. This could result in the need for less landfill capacity than with the proposed project, while still providing 15 years of disposal capacity as required by AB 939 and the project objectives.

The proposed project focuses on providing adequate disposal capacity at Tajiguas, in light of current and projected disposal rates in the County. The proposed project does not revise the whole of the County's solid waste management system. Such reconsideration is beyond the scope of both the proposed Tajiguas Landfill expansion project and this EIR. The County Board of Supervisors could, at its discretion, revise the project objectives to consider the whole of the County's solid waste management system, including diversion rates and other waste processing technologies. However, in August 1999, the Board of Supervisors directed County staff to analyze the impacts of expanding Tajiguas to provide 15 years of additional disposal capacity; the EIR focuses on a project that is consistent with this direction. If the Board of Supervisors directs County staff to expand its analysis to embrace the whole of the solid waste management system, then further consideration of waste processing technologies and higher diversion rates may be appropriate. Absent such direction, the current scope of the EIR is appropriate.

The Court of Appeals' decision in *National Parks and Conservation Association v. County of Riverside* (1996) 42 Cal.App.4th 1505 (*National Parks*) indicates that Santa Barbara County

need not expand its analysis to consider other aspects of the solid waste system, above and beyond landfilling. In *National Parks*, the EIR analyzed a proposed, new waste-by-rail landfill located in eastern Riverside County (Eagle Mountain Landfill). The proposed landfill would be authorized to receive waste only after the waste was processed at a materials recovery facility (MRF). The petitioners argued that Riverside County should have expanded the EIR to analyze the impacts of siting, constructing and operating the MRFs that would process the waste. The Court disagreed. According to the Court, the EIR did not need to analyze the impacts of the MRFs because: the County did not know where these MRFs would be located, the County did not know how these MRFs would be operated and, further, environmental review of the MRFs would be performed by the agencies where the facilities would be located rather than by the County. Therefore, the Court concluded that Riverside County could treat the MRFs as separate projects outside the scope of the EIR.

In another case (*Christward Ministry v. County of San Diego* [1993]), 13 Cal.App.4th 31, the Court determined that the County of San Diego did not need to revise an EIR for a landfill expansion project to consider other aspects of the County's solid waste management system.

For purposes of analyzing the impacts of the Tajiguas expansion project, the EIR assumes that jurisdictions within the landfill service area (County of Santa Barbara and cities of Santa Barbara, Goleta, Solvang and Buellton) will, at a minimum, maintain the 50 percent diversion rate established by AB 939. The County concludes that adherence to the 50 percent diversion rate is a reasonable assumption for purposes of calculating the residual solid waste stream that will have to be disposed of, either at Tajiguas or at another landfill. The County already has assumed implementation of methods necessary to achieve this diversion rate. The EIR is framed accordingly. The court decisions cited above indicate that this approach is appropriate.

Although a discussion of optional waste processing technologies is not required, in light of comments on the Draft EIR that propose one or more waste processing technologies other than landfill disposal, the County provides the following information regarding these technologies and their potential to divert solid waste from landfilling.

### **3.2 WASTE DIVERSION IN SANTA BARBARA COUNTY**

The proposed Tajiguas expansion is just one aspect of the County's comprehensive integrated waste management program. The programs for jurisdictions in the Tajiguas watershed (unincorporated southern Santa Barbara County, Santa Ynez and Cuyama valleys, and the cities of Santa Barbara, Goleta, Solvang and Buellton) consists of the following:

- Collection of municipal solid waste, commingled recyclables and green waste from residences and businesses.
- Processing of green waste.
- Separation of construction and demolition waste for recycling.
- Sorting and consolidation of waste and recyclables at the Santa Barbara Transfer Station and Foxen Canyon Landfill.

- Collection of household and small quantity business-generated hazardous waste.
- Public education regarding recycling and beneficial reuse of municipal solid waste.
- Disposal of residual waste at Tajiguas Landfill.
- Disposal of residual waste at Foxen Canyon Landfill (scheduled for closure in 2004).

These programs have resulted in an overall diversion rate for the unincorporated Santa Barbara County watershed that has increased from 30 percent in 1995 to 57 percent in 2000 (most recent data available) (see Table 3-2). The County anticipates ongoing improvements in waste diversion, although the rate of increase is expected to slow as the “easy” elements of diversion already are occurring. Additional programs are being considered for development and implementation to further improve the diversion of municipal solid waste and decrease the portion of the waste stream that is “residual” and requires disposal at a landfill.

Existing programs within the Tajiguas watershed consist of a variable can rate system, whereby waste collection rates vary according to the amount of trash disposed. With this system, customers pay more for disposing of more trash, thereby encouraging waste reduction by each household and/or business. Consistent with this program, the County and cities provide curbside collection of residential and commercial commingled recyclables. Green waste also is collected separately from residences and businesses. Construction and demolition (C&D) waste (concrete, lumber, rebar) is separated for recycling at the Santa Barbara Transfer Station. In addition, several private haulers contract directly with remodeling and construction sites for collection and recycling of construction waste, collecting and recycling more than 60,000 tons per year. Seasonal waste diversion programs include collection of phone books and Christmas trees. The County program also has an extensive educational component. The County conducts a multi-media recycling education program, with information provided via radio, television, newspaper and brochures. The County contracts with a non-profit organization for children to visit a facility, where they learn about recycling and make objects from waste materials as art projects. Additionally, the County contracts with a waste processor to organize trips for school children to visit a North County MRF.

Within the past year, as part of its hazardous waste collection program, the County has begun collecting cathode ray tubes and small electronics such as coffee makers and hair dryers, and also removes these items from the waste stream at the Santa Barbara Transfer Station. The County also conducts electronic collection events at three different sites each year. In May 2002, the County received the California EPA award for having the best household hazardous waste program in the state.

For the future, the County is working to increase its collection of commercial recyclables in the near-term. For the long term, the County is working with a regional multi-jurisdictional task force to investigate other potential diversion activities and develop waste processing technologies that will further enhance waste reduction and diversion.

### 3.3 EVALUATION OF WASTE PROCESSING TECHNOLOGIES

#### 3.3.1 EXPANSION OF EXISTING WASTE REDUCTION/RECYCLING

##### 3.3.1.1 Enhanced Recycling

The County Solid Waste and Utilities Division has an active and proactive program for implementing various waste reduction and recycling programs to divert waste from the Tajiguas Landfill watershed. In addition, the City of Santa Barbara and other cities within the Tajiguas watershed are proactive in developing and implementing recycling and waste reduction programs. The waste diversion rate in the unincorporated Santa Barbara County watershed increased from 30 percent in 1995 to 57 percent in 2000 (see Table 3-2). These rates are anticipated to continue to increase, although the most easily obtained waste already is diverted from the waste stream. Additional information on the County Department of Public Works recycling programs is provided in Final EIR Section 3.2.

##### 3.3.1.2 Waste Reduction

Waste reduction involves diverting discarded materials out of the waste stream, thereby reducing the volume of waste that is disposed of at landfills. Measures to accomplish this include recycling of usable manufactured materials, recycling of usable C&D waste, diverting green waste for mulching, composting and other uses, and converting waste materials to other products, such as building materials, ethanol, and gas.

For the unincorporated Santa Barbara County watershed, the waste stream currently was reduced by 57 percent in 2000 (the most recent data available). This reduction was accomplished through curbside recycling of metal, glass, plastic, paper, cardboard and other substances, and diversion of green waste and C&D waste. Based on current and planned programs, the County continues to expand its existing waste reduction activities and adopt additional ones as they become feasible. Current measures being investigated include, for the near term, an increase in commercial recycling and, for the long term, consideration of potential waste processing technologies by the multi-jurisdictional task force. These measures involve policy decisions to be made by the County Board of Supervisors and cities in the Tajiguas watershed, implementation by waste haulers, and acceptance by the public.

##### 3.3.1.3 Source Reduction

Source reduction involves reuse of products so they stay in circulation or are used a number of times before they are recycled or disposed as waste. Essentially, this is recycling prior to discarding the material, rather than recycling after the material is discarded. Examples include reuse of grocery and other shopping bags, minimization of disposable product packaging and reuse of beverage containers. One way this is encouraged in the Tajiguas watershed is through the existing variable can rate system for waste disposal, which encourages source reduction. Residents and businesses in the Tajiguas watershed are charged for waste pick-up service based on the number of cans of waste that are collected for disposal.

One study of variable rate systems found that, of the communities sampled, those with variable rates had average waste generation rates 16 percent lower than those in non-variable rate

communities, based on a combination of recycling, green waste diversion and source reduction (Skumatz, 2000).

In the Tajiguas watershed, existing recycling, source reduction, and green waste and C&D diversion programs accomplish an overall diversion rate of 57 percent. As a result, while the County continues to evaluate measures to increase the diversion rate, as the more easily diverted materials are already removed from the waste stream, waste reduction will continue to improve, but is expected to improve at a slower rate. Source reduction may be a primary mechanism for additional waste reduction.

#### 3.3.1.4 Materials Recovery Facility

A materials recovery facility (MRF) is a facility where waste is received and usable recyclable materials are sorted and packaged for transport to other facilities where they are again made into usable products. There are two basic types of MRFs: "dirty" MRFs and "clean" MRFs.

A "dirty" MRF is a facility that receives a stream of raw solid waste and sorts and processes recyclables directly from the waste stream. A "dirty" MRF typically is used in communities that have no curbside recycling programs. The sorting systems can be fully or partly automated or entirely a manual sorting system. A properly designed system can process and recover between 5 and 45 percent of incoming material as recyclables, depending on the content of the waste stream (U.S. Department of the Navy, no date).

A "clean" MRF is a facility that receives recyclable materials that already have been separated from the waste stream. Examples include metal cans, glass, plastic, computer paper, cardboard boxes and newsprint.

Operation of a MRF involves contracts with recyclers that purchase and transport the bundled separated materials for re-manufacture and reuse. The market price for recyclables is volatile and, since there are no long-term markets for recyclables, operators of MRFs must research markets frequently. The volatility of the market place requires MRF operators to avoid long-term contracts to stay on top of changing commodity prices and not get locked into a contract that ultimately will not be profitable. The County continues to evaluate the Tajiguas waste stream to implement programs to divert additional recyclables. This includes evaluation of a program to separate out commercial loads that contain a high content of dry cardboard and paper suitable for recycling.

The curbside recycling program in the Tajiguas watershed currently diverts approximately 8 percent of the overall solid waste streams (an additional 49 percent of the waste streams is diverted through the ongoing green waste and construction and demolition debris programs) (Santa Barbara County, 2002). Curbside recyclables from the Tajiguas watershed are currently routed to the Del Norte Regional Recycling and Transfer Station in Oxnard, California, Gold Coast Recycling in Ventura, California, and the North County MRF in Santa Maria. Currently the curbside commingled recyclables collected in the southern unincorporated County and the cities of Santa Barbara and Goleta are routed through the Santa Barbara Transfer Station, from where they are transported to the Del Norte and Gold Coast facilities in County-owned transfer

trucks. The curbside commingled recyclables collected in the unincorporated Santa Ynez Valley and the cities of Solvang and Buellton are routed through the North County MRF.

A decision to site a new clean MRF in the Tajiguas watershed would not necessarily result in an increase in the diversion rate. However, a new "dirty" MRF could facilitate an increase in the diversion rate. Implementation of a "clean" or "dirty" MRF involves a site of several acres in an area of appropriate land use. Issues of public perception and acceptability include noise, traffic, dust and odor. MRFs frequently generate significant opposition from residents and businesses located nearby. Such a facility would require CEQA documentation and evidence of compliance with both state and local environmental regulations. Siting, permitting and construction of such a facility could take several years.

#### 3.3.1.5 Combined Transfer Station/MRF

Typically, a combined transfer station/MRF (TS/MRF) is a facility that receives waste materials that are delivered in haul vehicles, as well as source-separated recyclables, such as from curbside recycling programs. The TS/MRF receives the waste materials from the haul vehicles (usually about 8-ton capacity) and loads this waste into larger (usually about 20-ton capacity) "transfer" vehicles that transport the waste to a landfill for disposal. The MRF receives the recyclable materials for sorting and packaging for shipment. A "dirty" MRF also could function as a combined TS/MRF.

As with a MRF, implementation of a transfer station involves a site of several acres in an area of appropriate land use. In addition to issues of noise, traffic, dust and odor are issues of litter and vectors. These issues may be perceived as being greater than with a clean MRF, as a transfer station processes either an entire waste stream or a waste stream from which recyclables have already been removed. Such a facility requires CEQA documentation and evidence of compliance with both state and local environmental regulations. Siting, permitting and construction could take several years.

#### 3.3.1.6 Expanded Reuse and Recycling

The County continues to explore additional programs to increase the amount of diversion within the Tajiguas watershed, including expanded reuse and recycling of municipal solid waste materials. As discussed above, the current overall diversion rate in the unincorporated Santa Barbara County watershed is 57 percent, which is greater than the statewide goal of 50 percent required by AB 939. As additional programs are evaluated, they are referred to the Board of Supervisors and to the cities within the Tajiguas watershed for policy decisions regarding their potential implementation.

### 3.3.2 COMPOSTING

Composting is a feasible technology that involves the processing of wood/yard waste (green waste) and also may include other organics, such as food waste and other organic components of the solid waste stream. The product from composting can be used as soil amendment for a

variety of agricultural purposes. However, long-term end-users and/or end-markets for the compost must be identified and the specific product component needs to be established.

Composting of the green waste collected in the Tajiguas wasteshed is technically feasible; however, since the green waste is already diverted from the Tajiguas waste stream and is ground/chipped into mulch, composting of green waste would not result in diversion of additional waste from Tajiguas. As stated in Draft EIR Section 1.5.3, the County currently diverts approximately 140 tons per day of green waste from the Tajiguas waste stream. The green waste is ground either at Tajiguas or at the South Coast Transfer Station for a variety of end uses. The ground green waste is sold or is distributed to Caltrans, the public, nonprofit or other government agencies, agricultural ranches and/or is used out-of-County as fuel for biomass conversion. Some of the ground green waste is utilized at Tajiguas for erosion control or alternative daily cover on rainy days. Green waste from the cities of Solvang and Buellton and the unincorporated Santa Ynez Valley is ground at the North County MRF in Santa Maria; a portion of it is composted at a facility in Santa Maria.

#### 3.3.2.1 Development and Implementation Considerations

To establish a composting facility for the green waste and/or organics from the waste stream would involve specific facility siting and design considerations. These include sufficient size to accommodate facility design, a convenient location to minimize haul distances, adequate buffer between the facility and nearby land uses, and suitable site topography and soil characteristics. Other considerations include existing infrastructure (utilities, storage space, paved access roads), zoning, site ownership and nearby land uses (EPA, 1994).

To implement a green waste/food waste composting program and facility in the Tajiguas wasteshed would require multi-jurisdictional commitments to guarantee feedstock and provide the necessary long-term contracts to assure a steady wastestream to the composting facility. Such a combined composting facility would eliminate the current green waste mulching program in the Tajiguas wasteshed that has been operating successfully for a number of years.

#### 3.3.2.2 Environmental Considerations

Environmental considerations include, but are not limited to, air emissions, odors, water pollution, noise, vectors, fire and litter. Concerns regarding air emissions are related primarily to vehicle traffic and dust. Odor is a major related concern, as feedstock can contain odorous compounds. Odors can be produced during collection, transport and storage of feedstock or discards, or as a result of improper composting procedures (EPA, 1994). Concerns about odors often force composting facilities (especially municipal solid waste composting facilities) to be sited away from ideal collection and distribution locations. Noise is related to transport trucks entering and leaving the facility. Composting equipment, especially hammermills and other shredding/grinding machines, can measure approximately 90 dB at the source (EPA, 1994).

Proximity to certain water sources, such as floodplains, wetlands, surface waters, groundwater also is a consideration, as these need to be protected from facility runoff or leachate. Further, the

facility needs to be protected from run-on, which could interfere with processing of the compost material.

Other environmental considerations include vectors, which are small animals or insects that carry disease (mice, rats, flies, mosquitoes) and are attracted to the decaying organic materials. Fire also is a concern, as spontaneous combustion is possible if compost material becomes too dry.

Litter also is a concern. Litter can occur from yard trimmings and municipal solid waste delivered to the compost facility in open loads. Plastic and paper can blow away from windrows, and reject materials can blow away during preliminary screening procedures. Litter can be controlled by operational procedures, such as requiring incoming materials to be delivered in closed trucks, use of litter fences, regular litter collection, and enclosed areas for some procedures.

Because green waste from the Tajiguas washed is already diverted and ground/chipped for mulch, composting of green waste alone would not further reduce waste disposal at Tajiguas. Although the technology exists to compost a combination of green waste and other organics (e.g., food waste), the food waste component of the Tajiguas waste stream is only 10 percent. Because less than one-half of this could be feasibly and economically diverted from the waste stream, limited additional diversion opportunity is available (Santa Barbara County, 2002). Based on the combination of development, implementation and environmental considerations, it is speculative as to whether a green waste/food waste composting facility could be in place and operating within the time frame of the Tajiguas expansion project.

### 3.3.3 CONVERSION TECHNOLOGIES

In addition, "Conversion" or "transformation" technologies may be defined as technologies that change one material or product to another – such as rice and straw to ethanol. As defined by the CIWMB, "conversion" means the processing, through non-combustion thermal means, chemical means, or biological means, other than composting, of residual solid waste from which recyclable materials have been substantially diverted and/or removed to produce electricity, alternative fuels, chemicals or other products that meet quality standards for use in the marketplace, with a minimum amount of residuals remaining after processing (CIWMB, 2002a).

Some leading conversion technologies are hydrolysis, high solids anaerobic digestion, gasification and landfill gas recovery. These technologies compete with materials used by conventional composting and recycling systems, such as organic waste and paper. When demand is high, certain technologies might compete for higher value source-separated materials. It is expected that these conversion technologies will be commercialized only incrementally over the next decade (2000-2010), a period when continued growth and improvement in composting, recycling and source reduction is expected (Wright and Meyer, 1999).

Issues regarding feedstock (i.e., waste stream) and flow control (i.e., reliability of the waste stream), permitting and public perception are common to the various conversion technologies. Access to feedstock is important, as most conversion technologies are capital-intensive and, therefore, require long-term contracts to guarantee feedstock. Further, there is competition for this feedstock, between landfill, recycling and conversion destinations. Because of this

competition for feedstock, some may perceive conversion technologies as weakening the recycling industry; others may see new technologies as the basis to resolve many environmental issues. As a result, it may take considerable time to build public support for conversion technologies (Wright and Meyer, 1999).

Permitting a facility to utilize conversion technology may take considerable time. To reduce the current rigors of permitting for a conversion facility, it will take time to alter the regulations and permitting requirements and to reduce the time required. In addition, depending on the amount of waste a facility converts, it may be classified either as a processing plant or a solid waste facility (Wright and Meyer, 1999), which will determine the lead permitting agencies and the specific regulatory requirements.

#### 3.3.3.1 Development Considerations

There are various considerations regarding development and implementation of conversion technologies. Development issues include siting and financing issues. Conversion technologies may be able to use only certain types of feedstocks, and operating efficiencies may depend on the type of feedstock converted. The type of technology and the feedstock utilized may result in varying emissions and varying residuals from production.

Conversion technologies raise a number of siting and permitting issues, including whether or not facilities should be sited near feedstock supplies, such as at a MRF. In addition, such facilities raise questions as to which agencies have permitting jurisdiction over, for example, a conversion facility co-located at a MRF. Existing regulations do not address whether permit requirements must be modified for such a facility or whether existing regulations are applicable. Related effluent/emissions/materials management issues may impact other required permits, such as air permits or waste discharge permits (CIWMB, 2001).

In addition, financing and commercialization issues are involved. There need to be technologies that can utilize municipal residuals as feedstock that are ready for commercialization. Once commercialization is determined, there need to be methods to secure public and/or private funding for construction and operation, or it may be necessary to determine how a "first" conversion project can be funded (CIWMB, 2001). Due to high capital costs, 20-year contracts are normally required to commit the waste stream to the facility, to allow the capital cost of the facility to be amortized over that period of time. Currently, many waste-collection contracts are 7 to 10 years in duration (Wright and Meyer, 1999), which could result in the need to amortize the capital cost over this shorter time period. The potential related effect would be an increase in the per-ton cost for processing waste through the facility, thereby making the facility less economic.

Ultimately, the long-term end use must be identified. For example, for a gasification plant, the gas could be used to generate electricity. This means that either the gasification plant needs to be sited adjacent to an existing power plant, or a power plant needs to be built near the gasification plant, or a mechanism must be identified for transporting the gas to the power plant. The end user must be able to use the gas generated on a long-term basis, as the gas cannot be stored. For example, if the gas would fuel a power plant, it would need to be a baseload plant – a plant that

is intended to generate electricity all the time, not a peaker plant that operates only during periods of daily or seasonal high demand.

Economic and market issues are paramount. The long-term viability of a conversion facility is dependent on a number of factors, including access to feedstock (amount and term of contract) and markets for products (CIWMB, 2001). In addition, there are transportation costs of feedstock if the conversion facility is not co-located at a MRF, as well as cost savings if the facility is co-located at a MRF. There are questions regarding the status of markets/end-users for conversion products and about potential benefits. Are the benefits real? Will implementation of conversion technologies result in reduced landfill emissions and leachate, reduced air pollution, reduced transport costs, and in the economic production of fuels and other products (CIWMB, 2001)?

### 3.3.3.2 Environmental Issues

Related to any technology that is perceived as “new,” there are potential public perception issues because the outcome of implementing the technology is not known. These may include concerns over environmental impacts, environmental justice issues, support of a new/unknown technology, cost and the potential to weaken existing recycling programs (CIWMB, 2001).

### 3.3.3.3 Implementation Considerations

There are various implementation considerations related to conversion technologies that need to be addressed in order to establish a viable commercial-scale facility. These considerations include those described above related to development, plus the following, as presented at a CIWMB-sponsored forum – Conversion Technologies for Municipal Residuals, May 3-4, 2001 (CIWMB, 2001):

- Lack of Political Leadership and Support: There is a lack of credible leadership and/or constituency at both the state and local levels that is capable of promoting conversion technologies.
- Statutory Constraints: There is a lack of statutory framework to promote conversion technologies. Further, there are statutory disincentives, and there is no state policy directive.
- Lack of Coordinated and Streamlined Regulatory Framework: There is a lack of streamlining in the regulatory process, and an uncertainty of the regulatory environment. Agencies are fragmented in their definition of and regulatory approach to conversion technologies. Further, the time lag between plan development and when a permit finally is issued is too long, making implementation difficult.
- Lack of Funding: Funding limitations due to absence of proven technology demonstration and use. This leads to an unwillingness to take risks on the part of both the public and private sectors.

Additionally, the Tax Reform Act of 1986 affected the ability of public entities to obtain funding. The Act restricts states and localities in the

amount of revenue bond financing they may undertake for public/private projects. Prior to passage of the Act, many waste processing technologies were financed with public monies and then were owned and operated by private companies.

- Economics and Markets: Under current market conditions, conversion technologies are not perceived as economically competitive. Compared to landfilling, they are expensive. Compared to many alternatives, the capital costs are greater. The conversion technologies are not yet economical in the free market. Further, because of the volatility of energy prices, long-term contracts, which are needed to assure funding, are difficult to get at the needed rates.
- Public Perception and Understanding: Overall, there is a lack of knowledge on the part of the public, as well as public leaders and elected officials regarding the benefits of conversion technologies. There is a related lack of knowledge regarding potential incentives, investors, and other resources contributory to commercial implementation.
- Lack of Data: Because the technology is not widely implemented, there is a lack of reliable data on lifecycle benefits and emissions, technology performance, feedstock availability and vendor availability.
- Feedstock Access: There is competition for feedstock and, in some cases, a lack of access to necessary feedstock. These factors are related to the feedstock delivery infrastructure, changing value of feedstocks, reliability (in terms of quality, quantity, price), competition with other technologies (such as composting) for green waste and food feedstocks, inability of local jurisdictions to commit supply, and the related issue of feedstock flow.
- Diversion Credit: As of April 2002, the CIWMB (in Resolution 2002-177 [Revised]) determined that jurisdictions could obtain a maximum 10 percent diversion credit for the amount of waste utilized in a conversion facility, provided the following conditions were met – (1) the jurisdiction continues to implement the recycling and diversion programs in its source reduction and recycling element or its modified annual report, (2) the facility complements the existing recycling and diversion infrastructure and is converting solid waste that was previously disposed, (3) the facility maintains or enhances environmental benefits and (4) the facility maintains or enhances the economic sustainability of the integrated waste management system (CIWMB, 2002a).

Although these implementation issues can be resolved, it could require considerable time and effort. In Santa Barbara County, there are various jurisdictions involved with waste disposal in the Tajiguas watershed (i.e., the County, and the cities of Santa Barbara, Goleta, Solvang and Buellton.) As a result, it will be necessary to establish multi-jurisdictional commitments to guarantee feedstock and provide the necessary long-term contracts for flow control to allow a

select conversion technology to be implemented. Based on the combination of development and implementation considerations, it is speculative as to whether a conversion technology could be in place and operating within the time frame of the Tajiguas expansion project.

#### 3.3.3.4 Example Conversion Technologies Using Municipal Solid Waste

Biomass consists of organic materials that comprise a portion of the municipal solid waste stream that typically is landfilled. Examples of biomass include yard, tree and brush trimmings (green waste), construction waste such as sawdust and wood debris, agricultural residues such as corn stalks and rice and wheat straw, used vegetable oils and paper. These materials can be used as feedstock for processes to produce secondary products. New conversion technologies such as hydrolysis, gasification and anaerobic digestion have the potential to convert biomass to energy, alternative fuels and other products (CIWMB, 2002). The conversion technologies discussed below have similar environmental issues.

For example, ethanol facilities can be located in urban areas, co-located with MRFs where materials are collected and the existing solid waste transport system can be utilized, although siting is "no easy task" (CIWMB, 2001a). According to the CIWMB, no information is available on actual emissions and environmental performance of such a facility, and CIWMB staff is unaware of any existing commercial hydrolysis plants that use MRF residuals as feedstock (CIWMB, 2001d). Although under development, the long-term environmental impacts would be difficult to analyze accurately.

Green waste already is separated out of the Tajiguas waste stream. As stated in Draft EIR Section 1.5.3, this green waste is sold, or is distributed to Caltrans, the public, nonprofit or other government agencies, agricultural ranches and/or is used out-of-County as fuel for biomass conversion. Some of the material is used for erosion control and alternative daily cover at the Tajiguas Landfill. Utilization of all of this feedstock for biomass-to-energy or other products would eliminate other uses. Other materials would need to be utilized to provide the same benefits as the current uses of green waste.

##### 3.3.3.4.1 Hydrolysis/Ethanol

Hydrolysis is the chemical decomposition of substances using water. Feedstocks typically are plant-based materials that include forest material and sawmill residue, agricultural residue, urban waste and waste paper. With hydrolysis, these materials are broken down into their component sugars, which then can be fermented to produce ethanol. The sugars also can be converted into acids to be used in fuels, herbicides, pesticides and in the food industry (CIWMB, 2001d).

Hydrolysis currently is used in the midwestern U.S. to convert corn residue to ethanol (CIWMB, 2001a). Capital costs for an ethanol facility vary depending on the technology used and the size of the facility. For ethanol facilities co-located at a biomass facility and using urban residuals as feedstock, capital investment could range from \$76 million for a 30-million gallon per year facility to \$176 million for a 50-million gallon per year facility (CIWMB, 2001a).

It is technically feasible to produce ethanol (a gasoline fuel additive) from organic materials (including the organic component of municipal solid waste), or biomass. Conversion technologies for producing ethanol from biomass resources such as forest materials, agricultural residues and urban wastes are under development, but have not been demonstrated commercially (California Energy Commission, 2001). Although ethanol produced from biomass offers potential for meeting California's oxygenated gasoline needs, there are major challenges (California Energy Commission, 1999). First, the cost of producing ethanol is high and requires government price supports to make it a competitive fuel additive. Second, developing a California ethanol industry will require a state government role to overcome economic, technical and institutional barriers. Third, California-produced ethanol will face stiff competition from out-of-state ethanol supplies and in-state petroleum products (California Energy Commission, 1999).

Further, the cost/benefit equation is uncertain. Because the technologies are evolving, they present investors with greater risks than other investments. Production costs are expected to drop in the long term, making biomass-to-ethanol more competitive with ethanol from other sources. The size and duration of the market for ethanol is uncertain, so producers find it difficult to enter into long-term contracts at favorable prices (California Energy Commission, 2001). The ethanol that is produced from biomass must compete with ethanol from the Midwest, and the combination of technology and market risk makes investors reluctant to invest (California Energy Commission, 2001).

Establishing a waste-biomass ethanol industry in California will likely depend on further state government actions aimed at assuring development of feedstock supply, production facility construction and operation, and markets for ethanol and co-products. Biomass (cellulosic) waste-based ethanol production is an unproven technology on a commercial scale. Therefore, conventional ethanol production in California using agricultural commodities and agricultural processing wastes could contribute to the state's ethanol needs sooner than a waste biomass-based ethanol industry.

For an ethanol facility that uses urban waste, feedstock includes waste paper, tree prunings, urban wood waste and yard waste. The majority of these wastes already are being diverted from the Tajiguas waste stream for recycling or green waste mulch. Therefore, use of municipal solid waste from the Tajiguas watershed would require use of materials that currently are being recycled.

#### 3.3.3.4.2 Plasma Arc

This is a technically feasible, non-incineration thermal process that uses extremely high temperatures in an oxygen-starved environment to decompose waste. This decomposition produces a gas that may be used for industrial processes, including generation of electricity and production of methanol and ethanol. Slag is produced by the inorganic material in the feedstock and can be used in the construction industry for road paving. Long-term end users must be provided for both the gas and the slag.

#### 3.3.3.4.3 Anaerobic Digestion

Anaerobic digestion is the breakdown of organic materials in the absence of oxygen. This process produces a gas (biogas) composed primarily of methane (55%-75%) and carbon dioxide. Feedstocks include sewage sludge, livestock manure and wet organic materials (CIWMB, 2001b).

#### 3.3.3.4.4 Gasification

Gasification is the use of heat, pressure and steam to convert feedstock materials (agricultural, forestry, green waste and solid waste residuals) into a carbon monoxide/hydrogen gas. Feedstocks include coal, petroleum-based materials (plastics), and organic materials. Gasification technologies require a separate energy source to generate heat and begin processing. Gasifiers can range in size and require as little as 24 tons of feedstock per day to 1,000 tons of feedstock per day (Wright and Meyer, 1999). The gasification product, a synthetic gas (syngas), can be used as a fuel to generate electricity or steam or as a component for other uses (CIWMB, 2001c). Gasification technology can convert 1,000 tpd of MRF residuals to produce nearly 25 MW of electricity. Gasification is used in Australia to convert sorted municipal solid waste into energy.

The inorganic material in the feedstock is converted to slag, which is inert and has a variety of uses in the construction and building industries. It is necessary to have a ready, long-term end user for both the gas and the slag.

These facilities can be co-located at MRFs to take advantage of solid waste transportation infrastructure. This also ensures that recyclable materials are removed beforehand and only municipal solid waste residuals are sent to a gasifier.

Emissions and byproduct can include mineral matter and particulates in the form of ash, and nitrogenous products such as ammonia and  $\text{NO}_x$ . Volatile organic emissions in the form of tars and oils also may occur. Air emissions of carbon dioxide,  $\text{NO}_x$  and non-methane hydrocarbons, and sulfur oxides occur primarily in feedstock production and from use of the gas by the end-user. Therefore, air emissions occur not only from the gasification process, but also, for example, from the generation of the electricity or steam that is produced by the gas.

For implementation by the County, this technology would require a MRF of sufficient size to provide the necessary feedstock. Other major issues include a long-term end user for the gas, such as an electrical or steam generation facility. This would need to be a baseload generation facility or steam plant; it would need to operate on a routine basis, as the gas cannot be stored. To be most economic, the end user and the gasification plant would need to be co-located.

### 3.3.4 WASTE-TO-ENERGY

The technology for waste-to-energy using municipal waste combustion involves the incineration of waste and use of the heat to generate steam, hot water or electricity – using mass burn, modular or refuse-derived fuel. In the 1980s and early 1990s, mass burn technologies were the most common waste-to-energy technologies utilized in the U.S. This technology processes raw

municipal solid waste “as is,” with little or no sizing, shredding or separation (U.S. Department of Energy, 2002a). Modular facilities use one or more small-scale combustion units to process lesser quantities of waste than mass burn. They usually generate steam that can be sold and/or used to generate electricity. Refuse-derived fuel (RDF) technologies employ a 2-stage incineration system. Wastes are pre-processed to provide a more homogenous fuel. The RDF is sold or is burned in a “dedicated” furnace.

The waste-to-energy industry experienced a dramatic decline in the 1990s, after rapid growth in the 1980s. In 1990, there were more than 50 facilities in California with a generating capacity of nearly 800 megawatts (MW) (average 16 MW each). However, with deregulation of the California electricity market, the number of facilities has decreased. Many plants have closed because, prior to deregulation, they operated under contracts that guaranteed higher-than-market prices for their energy. With deregulation, as the contracts expired, approximately one-half of the plants were unable to compete in the open market. In 1999, there were 29 operating biomass-to-energy plants in California. By 2001, that number had decreased to 26, generating a total of approximately 300 MW (CIWMB, 2001).

#### 3.3.4.1 Development Considerations

Environmental regulations and government policies that once encouraged waste combustion into energy changed to emphasize pollution control at waste-to-energy facilities and recycling as the preferred disposal option. Federal tax policy no longer favors investments in capital-intensive waste-to-energy facilities. Energy regulations that once required utilities to buy energy from such facilities at favorable rates are being revamped to promote regional competition and lower energy prices. There are three primary factors involved in this change:

- Tax Reform Act of 1986: This legislation made it more difficult to publicly finance projects that were not controlled entirely by a public entity. Previously, many waste-to-energy projects (and other waste processing technologies) were financed with public monies and then owned and operated by private companies. Under this legislation, this type of public/private sector arrangement no longer qualifies as “public purpose.” States and localities are restricted in the amount of revenue bond financing for public/private sector joint financing they can undertake, and solid waste projects must compete with other infrastructure projects for financing. It is no longer easy to secure low-cost public financing for a privately owned and operated project, and tax law changes have eliminated some of the advantages of private ownership (U.S. Department of Energy, 2002b).
- 1994 Supreme Court Decision (*C & A Carbone, Inc. v. Town of Clarkstown*): This decision struck down local flow control ordinances that required waste to be delivered to municipal waste combustion facilities rather than to landfills that may have had lower tipping fees (U.S. Department of Energy, 2002b). This was important because waste-to-energy projects must secure a waste flow – through interlocal agreements, contracts and other arrangements. Previous to the *Carbone* decision, “put-or-pay” contracts were signed. These obligated

municipalities to provide a certain amount of waste to a facility and pay a per-ton fee, even if the projected amount was not forthcoming. Many facilities also relied on flow control legislation to ensure that the waste would be delivered.

- Prior to the *Carbone* decision, industry developments upset the flow control situation. First, the projected amount of waste did not materialize, so revenue targets were not met. Factors that led to this were increased recycling, a recession in the early 1990s and the availability of cheaper landfill space. Therefore, localities challenged the “put-or-pay” contracts or waited until they ended and did not renew them. As a result, the waste-to-energy facilities raised their tipping fees to provide increased revenues, effectively driving away customers.
- Increasingly Stringent Environmental Regulations: As a result of increasingly stringent environmental regulations, there has been an increase in the capital cost to construct and maintain municipal waste combustion facilities. At the same time, waste streams have continued to drop as a result of national environmental policy. With implementation of AB 939 and state-mandated waste diversion rates in California, waste reduction, reuse and recycling are being promoted – rather than incineration.
- Mega-Landfills: The emergence of large, privately-owned megafills with low tipping fees has made it problematic for more expensive waste-to-energy plants to compete without guaranteed put-or-pay contracts or a locked-in supply of MSW (Hickman and Eldredge, 2002).

Costs also are an issue. On average, the initial capital cost of a waste-to-energy facility, indexed to 1999 dollars, is \$77 million. Additional capital investment per plant is \$22 million in 1999 dollars (U.S. Department of Energy, 2002a).

#### 3.3.4.2 Environmental Issues

For a variety of reasons, siting a waste-to-energy facility is a difficult task. Many residents and citizen groups oppose the construction of any waste-to-energy plant in their area. Concerns include air pollution and related health effects, as well as truck noise, traffic and odor. The primary environmental hazard with respect to the ash residue is fly ash, as heavy metals and organic compounds tend to be concentrated in the fly ash as a product of combustion (U.S. Department of Energy, 2002a).

Emissions and byproduct can include mineral matter and particulates in the form of ash, and nitrogenous products such as ammonia and NO<sub>x</sub>. Volatile organic emissions in the form of tars and oils also may occur. Air emissions of carbon dioxide, NO<sub>x</sub> and non-methane hydrocarbons, and sulfur oxides occur primarily in feedstock production and power plant operations.

There also are potential environmental justice issues – restrictions on siting “high-impact environmental projects” in low-income areas with high percentage of minority residents. There

are zoning and CEQA issues that require analysis, and both provide multiple opportunities for public review and comment. As a result, procedures make permitting a facility a long and arduous process that can take 5 to 7 years – or more (U.S. Department of Energy, 2002b).

### 3.3.5 OTHER

#### 3.3.5.1 Bio-Solids Composting

The Tajiguas Landfill does not accept sludge (i.e., bio-solids) from wastewater treatment plants. Therefore, although bio-solids can be managed through composting (often in conjunction with green waste composting), bio-solids composting does not represent an alternative to the disposal of municipal solid waste at Tajiguas. Implementation of a bio-solids composting program would not increase the diversion of municipal solid waste in the Tajiguas watershed.

#### 3.3.5.2 Rail Transport of Waste

The transport of waste by rail could be a potential future alternative to the disposal of waste at Tajiguas, based on the existence of a landfill that is open to receive such waste and on appropriate rail infrastructure for waste generated in the Tajiguas watershed. It is not an alternative waste technology, however. The potential for rail transport of waste generated in the Tajiguas watershed is addressed in Draft EIR Section 4.3.3.

#### 3.3.5.3 Fuel Cells

A fuel cell is an electrochemical energy conversion device that converts hydrogen and oxygen into electricity and heat. It is similar to a battery that can be recharged while power is being withdrawn from it (Fuel Cells 2000, 2002a). A fuel cell consists of two electrodes sandwiched around an electrolyte. Oxygen passes over one electrode and hydrogen over the other, generating electricity, water and heat (Fuel Cells 2000, 2002a). Applications for fuel cells include primary or back-up power, power for vehicles, power for personal electronics and landfill/wastewater treatment, for generating power from methane gas (Fuel Cells 2000, 2002b).

There are many types of fuel cells, with different uses. These include:

Proton exchange membrane. Most promising. Will be used to power motor vehicles.

Alkaline fuel cell. Very expensive. Unlikely to be commercialized. Used in the space program since the 1960s.

Phosphoric-acid fuel cell. Potential for use in small stationary power-generation systems.

Solid oxide fuel cell. Best suited for large-scale stationary power generators

Molten carbonate fuel cell. Best suited for large stationary power generators (Nice, 2002).

Some of the more promising fuels for use in fuel cells are natural gas, propane and methanol. Methanol is a liquid fuel that has similar properties to gasoline and may be a likely candidate to power fuel-cell cars (Nice, 2002).

One technical issue with fuel cells is that the hydrogen used to produce electricity has some limitations that make it impractical for use in most applications, as it is difficult to store and distribute (Nice, 2002). Various technical and engineering challenges remain, and fuel cells are still too expensive to produce and sell for widespread use. At the present time, not enough are being made to allow economies of scale (Fuel Cells 2000, 2002b). Even so, it is estimated that, by 2004, there will be a \$2.4 billion market for fuel cells in electric power generation, motor vehicles, portable electronic equipment, military /aerospace, and other uses (Fuel Cells 2000, 2002c).

Although fuel cells offer promise for convenient sources of power in the future, they do not currently provide an alternative to landfill disposal of municipal solid waste. As indicated, the fuel cells may be able to use methanol (which may be produced from municipal solid waste) as a fuel, and methane gas may be used with fuel cells to generate power. Landfill gas can be used for fuel cells if the gas is of appropriate quality. However, the composition of gases in a landfill varies, depending on the make-up of the decomposing material. As a result, landfill gas is unreliable as a source of energy for fuel cells (O'Brien, 2002). Currently, the approximately 3 MW of power generated at Tajiguas from the recovery of landfill gas (which contains methane) is being used to generate electricity and is being fed into the Southern California Edison electrical transmission grid.

### 3.3.6 SUMMARY OF EVALUATION

As discussed above, there are numerous issues that must be addressed in the process of developing and implementing waste processing technologies. These issues include, but are not limited to siting, permitting, identification of end users, economics, financing, market acceptability, political leadership and support, statutory constraints, regulatory framework, public perception and understanding, available data, feedstock reliability and flow control. These issues must be resolved either individually or jointly by the various jurisdictions within the Tajiguas watershed in order for one or a combination of the technologies to be developed. To agree upon a specific strategy regarding waste processing technologies and to implement such a strategy, decisions and agreements would be required among the various jurisdictions within the Tajiguas watershed. Although such actions have occurred previously (current franchise agreements are evidence of such cooperation), the actions require sufficient lead time to be implemented. Therefore, it is speculative as to whether these complex actions that involve multiple jurisdictions may occur within the time frame of the proposed project.

As discussed in Draft EIR Section 4.4.4 – Other Developmental Technologies, the current developing waste processing technologies hold promise for the future. Many of the obstacles to developing and marketing these technologies will likely be overcome in the future, enabling them to be considered as part of long-term planning to meet the waste disposal needs of Santa Barbara County. Virtually all of the processes addressed are technically viable, and many are being implemented in other countries or locations within the United States; however, based on the development and implementation considerations discussed in this chapter, these technologies also require sufficient lead time to be implemented. Therefore, it is speculative to assume one or more of these processes could be implemented within the Tajiguas Landfill watershed within the time frame of the proposed project.

### 3.4 CEQA REQUIREMENT FOR ALTERNATIVES ANALYSIS

Within the context of this EIR, it is necessary to consider the requirements of the California Environmental Quality Act (CEQA) in considering whether one or more of the waste processing technologies represent a potential alternative to the proposed project. It then is necessary to assess whether one or more of the potential waste processing technologies would meet the requirements of CEQA as a true alternative to the proposed project.

The Guidelines for Implementation of CEQA (CEQA Guidelines) provide the framework for analyzing alternatives to a proposed project as part of an EIR in Section 15126.6 – Consideration and Discussion of Alternatives to the Proposed Project. The following parts of this Section 15126.6 are of interest as they pertain to consideration of waste processing technologies as alternative(s) to the proposed Tajiguas expansion project:

*“(a) Alternatives to the Proposed Project. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible.”*

*“(c) Selection of a range of reasonable alternatives. The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. . . Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.”*

*“(f) Rule of reason. The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project.”*

*“(1) Feasibility. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site . . .”*

#### 3.4.1 FRAMEWORK FOR EVALUATING POTENTIAL ALTERNATIVES UNDER CEQA

As stated above, per CEQA Guidelines (§15126.6), for an alternative to be considered feasible, it must “. . . attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project . . . The discussion of alternatives shall focus

on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.”

As addressed and evaluated in the Draft EIR, the proposed Tajiguas expansion project would result in significant unavoidable adverse impacts (Class I, per Santa Barbara County Planning Department guidelines) in four resource areas: Air Quality, Biological Resources, Cultural Resources and Visual Resources. In accordance with the CEQA Guidelines, for an alternative to be considered feasible, it would need to avoid or substantially lessen one or more of the identified significant impacts for the project, while meeting the project objective of 15 years of disposal capacity for residual solid waste in the area served by the Tajiguas Landfill. Based on the analysis provided in the Draft EIR, the rock shelter would have to be avoided to eliminate the impact to Cultural Resources; the expansion area would have to be decreased to reduce impacts to Biological Resources (impacts to biological resources can be reduced but not avoided); the portion of the landfill expansion that is visible over the permitted landfill would have to be decreased to reduce the impacts to Visual Resources, and onsite activities would have to be reduced to result in decreased impacts to Air Quality (impacts to air quality can be reduced but not avoided).

As described in the CEQA Guidelines, the two primary issues in considering potential alternatives are feasibility and the ability of an alternative to avoid or substantially lessen significant impacts. For the proposed project, a feasible alternative is one that generally meets the same time frame as the proposed expansion, i.e., 15 years, beginning when the currently permitted landfill reaches capacity. To avoid or substantially lessen significant impacts in this case, the alternative must decrease the amount of residual waste that is landfilled and/or reduce the space necessary for disposal of the residual waste. There must be enough reduction to significantly reduce the daily volume of waste delivered to the landfill in order to result in a smaller landfill footprint. At the same time, however, the alternative must provide for 15 years of disposal capacity for residual solid waste generated by southern Santa Barbara County, the Santa Ynez and Cuyama Valleys, and the cities of Santa Barbara, Goleta, Solvang and Buellton.

Based on the combination of the CEQA Guidelines direction for alternatives and the four Class I impacts that result from the proposed Tajiguas expansion project, one or a combination of feasible waste processing technologies must result in sufficient additional diversion from the waste stream within the time frame of the proposed project to allow for a landfill configuration that would:

- Avoid entirely the Cultural Resources impact by reducing the size of the expansion (i.e., modifying the landfill footprint) to avoid the rock shelter altogether.
- Reduce by 50 percent the visibility of the landfill from Viewpoint 5.
- Reduce impacts to Biological Resources by reducing the size of the expansion (in essence this would be achieved by modifying the landfill footprint to avoid the rock shelter).
- Reduce daily onsite activities to the extent that onsite air emissions would be reduced. In essence, this occurs with the reduced daily volume

and a smaller landfill footprint (achieved by modifying the landfill footprint and landfill height to avoid the rock shelter and reducing the height to reduce the visibility of the landfill) and meeting the basic overall objective of the project, which is to provide for 15 years of disposal capacity.

The above measures would avoid or substantially lessen the four significant impacts of the project. Implementation of these measures would result in a landfill that is approximately 32 percent smaller than the proposed expansion and has a corresponding 32 percent reduction in daily and total disposal capacity, as follows:

- Decrease in expansion footprint by 24.5 acres (from 71 acres of new disturbance shown in the Draft EIR to 46.5 acres of new disturbance).
- Decrease in height of the landfill by 60 feet in the area where the landfill is visible from Viewpoint 5 (from 620 feet in elevation shown in the Draft EIR to 560 feet in elevation).
- As a result of the decrease in the area of the landfill footprint and the decrease in the height of the landfill, there would be a 2.6 million cubic yard decrease in the total capacity (air space) of the landfill (from 8.2 million cubic yards shown in the Draft EIR to 5.6 million cubic yards).
- Decrease in landfill capacity (air space) by 720,000 cubic yards to account for material to be relocated from the southeast corner of the landfill (from 5.6 million cubic yards shown in the Draft EIR to 4.9 million cubic yards).
- Total new capacity = 4.9 million cubic yards available for new municipal solid waste disposal. This would be 15 years of capacity after an overall 32 percent reduction in the daily disposal rate, as shown in Table 3-3.

The above measures, which result in a reduced volume of air space (cubic yards) for the landfill expansion, also reduce the total number of tons of municipal solid waste that can be placed in the landfill.

Table 3.11-9 of the Draft EIR estimates the average tons per day of municipal solid waste that will be placed in the landfill during the 15-year life of the proposed expansion. The values in Table 3.11-9 reflect the base year (1998-1999) average daily tonnage of municipal solid waste brought to Tajiguas for disposal. These values then were projected to the year 2020 in

Table 3.11-9, with increases based on estimates of population growth. These estimates, and the reduction in average tons per day with a 32 percent smaller landfill, are shown in Table 3-3.

**TABLE 3-3  
REDUCTION IN WASTE DISPOSAL RATES**

Year of Operation	Estimated MSW (TPD)	Percent Reduction	Required Reduction in MSW (TPD)	Overall Decrease in MSW (TPD)	Revised MSW (TPD)
2005	= 847	X 0.32	= 271	847 - 271	= 576 tpd
2010	= 874	X 0.32	= 280	874 - 280	= 594 tpd
2015	= 901	X 0.32	= 288	901 - 288	= 613 tpd
2020	= 929	X 0.32	= 297	929 - 297	= 632 tpd

Note: The above numbers are projected rates of disposal from Draft EIR Table 3.11-9.

With a landfill that is sized to avoid or substantially lessen significant impacts of the proposed project and maintain 15 years of disposal capacity, it will be necessary to increase the diversion rate by an average of 32 percent (over and above the 57 percent diversion rate already achieved) over the 15-year life of the expansion project to reduce the daily tonnage of municipal solid waste disposed of at the reduced-capacity landfill. The increase in waste diversion can occur only if one or a combination of waste processing technologies is increased and jointly implemented by the County of Santa Barbara and cities of Santa Barbara, Goleta, Buellton and Solvang. The potential for this to occur depends on a variety of factors that include, but are not limited to:

- Environmental considerations/permitting
- Siting issues
  - Land use
  - Community attitudes
  - Accessibility
  - Proximity to other compatible/incompatible uses
- Implementability
  - Regulatory constraints (state, county, city)
  - Time requirements
  - Public acceptance
  - Cost
- Policy decisions
  - County of Santa Barbara
  - City of Santa Barbara
  - City of Goleta
  - City of Buellton
  - City of Solvang
  - Waste flow control
  - Economics

### 3.4.2 POTENTIAL TO MEET CEQA REQUIREMENTS

As shown above, there are numerous issues associated with development and implementation of waste processing technologies. To provide a feasible alternative to the proposed project, these and other issues must be resolved either individually or jointly by the various jurisdictions within the Tajiguas watershed and within the 15 years of the proposed landfill expansion.

The County controls 24.5 percent (approximately 190 tpd) of waste disposed at the Tajiguas Landfill (based on the most recently available data). The remainder is controlled by the cities of Santa Barbara, Goleta, Solvang and Buellton. To provide sufficient feedstock for a feasible alternative to the proposed Tajiguas expansion, the amount of feedstock would need to be sufficient on both a short-term (daily) and long-term (annual) basis. Therefore, for the County to provide the appropriate quantity of feedstock over a sufficient period of time, it would need to gain control of the municipal solid waste generated within the cities of Santa Barbara, Goleta, Solvang and Buellton. This would require multi-jurisdictional agreements and, potentially, control of solid waste and green waste that currently is being diverted for recycling purposes.

The Tajiguas Landfill expansion is proposed to provide 15 years of disposal capacity for jurisdictions within the Tajiguas watershed. To be a feasible alternative to the proposed project, that alternative would have to avoid or substantially lessen the significant impacts of the proposed project. As described above, to meet these requirements would require a landfill that is 32 percent smaller than the proposed project. A reduction of less than 32 percent would have little effect in reducing significant impacts, due to engineering requirements that would be implemented. Existing regulations require standards for slope stability and other elements of construction that would otherwise require the disturbance footprint to be similar to the proposed project. As noted on Table 3-3, it would be necessary to divert nearly 300 tpd from Tajiguas in order to achieve the necessary additional diversion of 32 percent (over and above the 57 percent diversion that already is achieved). Even if it were possible for the County to divert all of the 190 tpd under its control, this would not be sufficient to accomplish the 32 percent decrease in waste disposed at Tajiguas to accomplish the goals of an alternative to the proposed project, as defined under CEQA. Further, due to the extent and complexity of developing and implementing an alternative and the lead time associated with its development, to accomplish a 32 percent reduction in the amount of waste disposed at Tajiguas, it is speculative to assume this reduction could be achieved within the 15-year time frame of the proposed expansion project.

### 3.4.3 DIVERSION OF WASTE TO EXISTING IN-COUNTY LANDFILLS

In addition to the various comments regarding other waste processing technologies, several comments suggested that, in combination with implementation of other waste processing technologies, waste be diverted from Tajiguas to other existing in-County landfills (i.e., Foxen Canyon, Lompoc, Santa Maria and USAF Vandenberg Landfills). As discussed in Responses 3-100, 3-101, 3-102, 3-103, 3-104, 3-107 and 3-108 and below, there are various reasons why an alternative that involves implementation of other waste processing technologies, in combination with diversion of waste from Tajiguas, is not feasible.

Under existing policies of the Santa Barbara County Board of Supervisors, the City of Santa Maria, the City of Lompoc, and the United States Air Force, it is not feasible to dispose of waste

from the Tajiguas Landfill in the Foxen Canyon Landfill, the Santa Maria Landfill, the Lompoc Landfill or the Vandenberg Air Force Base Landfill. See Draft EIR Sections 4.2.1.1 - Foxen Canyon Landfill, 4.2.1.2 - Lompoc Landfill, 4.2.1.3 - Santa Maria Landfill and 4.2.1.4 - Vandenberg Air Force Base Landfill.

For the purpose of this EIR, an alternative is considered infeasible if it would involve a change in policy of a governing agency. It is speculative to assume that the County Board of Supervisors will change policy to re-open the Foxen Canyon Landfill. It is speculative to assume that the City of Lompoc and City of Santa Maria would change their policies and begin accepting waste that currently is disposed at the Foxen Canyon Landfill or to accept waste disposed at the Tajiguas Landfill. It also is speculative to assume that the United States Air Force will change its policy and accept waste from the Foxen Canyon and/or Tajiguas landfills. Moreover, the CEQA Guidelines (§15144) state that, in preparing an EIR, while foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can. This section of CEQZ limits the requirement for forecasting to that which could be reasonably expected under the circumstances and is part of the effort to provide a general "rule of reason" for EIR contents. In regard to forecasting, the *Laurel Heights* Court commented that an agency is required to forecast only to the extent that an activity could be reasonably expected under the circumstances. An agency cannot be expected to predict the future course of governmental regulation or exactly what information scientific advances may ultimately reveal (see *Laurel Heights Improvement Association v. Regents of the University of California* [1988] 47 Cal. 3d 376). In accordance with the CEQA Guidelines (§15126.6[f][3]), "An EIR need not consider an alternative whose . . . implementation is remote and speculative."

In addition to the policies of the cities of Lompoc and Santa Maria regarding not accepting waste disposed at the Foxen Canyon and/or Tajiguas landfills, the County of Santa Barbara's 1997 Countywide Integrated Waste Management Plan (CIWMP) plans for regional solid waste management. The CIWMP assumes the current wastesheds. In accordance with state regulations, the CIWMP was approved/adopted by the County, the cities within the County and the California Integrated Waste Management Board (CIWMB). The wastesheds identified in the CIWMP for the Lompoc and Santa Maria landfills do not include the Santa Ynez Valley (serviced by Foxen Canyon) or southern Santa Barbara County (serviced by Tajiguas). Therefore, not only would the policies of the cities of Lompoc and Santa Maria need to be changed to accept waste currently disposed at Foxen Canyon and/or Tajiguas, but the CIWMP would need to be revised to reflect changes in the wastesheds for the in-County landfills. The CIWMP revision would need to be approved/adopted by the County, the cities in the County, and the CIWMB.

In addition to the wastesheds defined in the County's CIWMP, for southern Santa Barbara County (including the cities of Santa Barbara and Goleta) and the Santa Ynez Valley (including the cities of Solvang and Buellton), there are existing franchise agreements for solid waste services, specifying that waste for disposal shall be routed to Tajiguas. The existing franchise agreements have varying expiration dates over the next 10 to 15 years. Therefore, in addition to the need to change the policies of the cities of Lompoc and Santa Maria, and the need to redefine the wastesheds and reapprove/adopt the CIWMP, the existing franchise agreements would require re-negotiation in order for waste currently disposed at Foxen Canyon and/or Tajiguas to

be redirected to another in-County landfill (i.e., Lompoc and/or Santa Maria) or to an out-of-County landfill. It is speculative as to whether this combination of factors might be changed and approved and is beyond the sole jurisdiction of the County Board of Supervisors. Therefore, the alternative of re-directing waste that currently is disposed at Foxen Canyon and/or Tajiguas to the Lompoc and/or Santa Maria landfills is not a feasible alternative to the proposed Tajiguas expansion project.

The specific issues associated with the diversion of waste to the four existing in-County landfills (i.e., Foxen Canyon, Lompoc, Santa Maria, and Vandenberg Air Force Base) are as follows:

- Foxen Canyon Landfill: As discussed in Draft EIR Section 4.2.1.1, the Santa Barbara County Board of Supervisors has made the decision to not expand, but rather to close, the Foxen Canyon Landfill and build a transfer station at the site of the closed landfill. Currently, the Foxen Canyon Landfill is scheduled to close in 2004.

County staff's Board Letter, dated June 24, 1997, for subsequent action on July 7, 1997, stated that the Foxen Canyon Landfill would be closed (Santa Barbara County, 1997). In addition, the Board Letter stated the Foxen Canyon Landfill expansion previously proposed and analyzed in 90-EIR-14 would not be implemented. The Board of Supervisors adopted the staff recommendations in the Board Letter.

The decision was based on a determination by the Board of Supervisors that, due to changes in landfill design regulations (Subtitle D of the federal Resource Conservation and Recovery Act and California Code of Regulations [CCR] Title 23 - now part of CCR Title 27), expansion of the Foxen Canyon Landfill would be so expensive as to be economically infeasible. In 1995, County staff estimated that, to meet the new Subtitle D requirements, a composite liner system would need to be installed as part of the expansion of the Foxen Canyon Landfill at a cost of approximately \$250,000 per acre. A subsequent analysis determined it would be more economic to close the Foxen Canyon Landfill and convert it to a transfer station than to expand it. In addition, this action enabled the County to avoid an adverse impact to sensitive biological resources (i.e., loss of 46 mature oak trees) that would have occurred if the Foxen Canyon Landfill had been expanded.

Economic factors in addition to the cost of the liner system for expansion of the Foxen Canyon Landfill involve the County's lease agreement with the owner of the landfill property and make the expansion uneconomic. Under the current lease agreement, the County tipping fee at the Foxen Canyon landfill can be increased by only 50 cents per year for self-haul, which is not sufficient to defray the cost of the liner system that would be required for the expansion. In addition, under the current lease agreement, should the County decide to dispose of waste from outside the Santa Ynez Valley School District at the Foxen Canyon Landfill, the property owner would receive the entirety of the tipping fee for each ton of waste that originated outside this area.

These two lease issues make it uneconomic to expand the Foxen Canyon Landfill and/or to divert waste from Tajiguas to Foxen Canyon.

Based on the above, it is speculative whether the County Board of Supervisors would change its decision regarding closure of the Foxen Canyon Landfill. Therefore, the alternative of keeping Foxen Canyon open to continue to accept waste from the Santa Ynez Valley (i.e., diverting it from Tajiguas as part of the proposed project) is not a feasible alternative.

In addition, to keep the approximately 100 tpd of Foxen Canyon waste at the Foxen Canyon Landfill for disposal rather than transporting it to Tajiguas for disposal would not result in a sufficient reduction in the daily/annual tonnage of solid waste disposed of at Tajiguas to allow a reduction in the size of the proposed expansion.

Due to the topography of Cañada de la Pila and the engineering requirements of the Tajiguas Landfill expansion project, the expanded Landfill footprint would not be smaller, even if the approximately 30,000 tons per year (460,000 tons over the 15-year life of the expansion project) of waste currently disposed at the Foxen Canyon Landfill were not disposed at Tajiguas. Therefore, not only is the expansion of Foxen Canyon Landfill speculative and not a feasible alternative, it would not significantly affect the size of the proposed Tajiguas expansion, and it therefore would not lessen the impacts to biological, cultural or visual resources associated with the proposed expansion of Tajiguas.

- Lompoc Landfill: The City of Lompoc would have to decide whether it is willing to accept waste that now goes to the Foxen Canyon Landfill. As stated in Draft EIR Section 4.2.1.2 (page 4-10), the City of Lompoc's policy is to protect the value of the Lompoc Landfill air space for the City of Lompoc and its watershed and not to accept waste from outside the Lompoc watershed. Further, the City of Lompoc has previously made it known that it would not accept waste from the Tajiguas watershed. The cities of Buellton and Solvang and other areas of the Santa Ynez Valley that utilize the Foxen Canyon Landfill do not fall within the Lompoc watershed (King, 2002). Therefore, based on the current policy of the City of Lompoc, when the Foxen Canyon Landfill closes in 2004, that waste cannot be disposed at the Lompoc Landfill.

As the County of Santa Barbara has no jurisdiction over the City of Lompoc decision to not accept waste that now goes to the Foxen Canyon Landfill, it is speculative to assume that that City of Lompoc would change its policy and choose to receive that waste. In accordance with the CEQA Guidelines (§15126.6[f][3]), "An EIR need not consider an alternative whose ... implementation is remote and speculative."

To divert the approximately 100 tpd of solid waste currently being disposed of at the Foxen Canyon Landfill to the Lompoc Landfill rather than transporting it to Tajiguas for disposal would not result in a

sufficient reduction in the daily/annual tonnage of solid waste disposed of at Tajiguas to allow a reduction in the size of the proposed expansion. As discussed above, such a diversion is not feasible under the current policy of the City of Lompoc, the existing County CIWMP, or the existing waste services franchise agreements.

Due to the topography of Cañada de la Pila and the engineering requirements of the Tajiguas Landfill expansion project, the expanded Landfill footprint would not be smaller, even if the approximately 30,000 tons per year (460,000 tons over the 15-year life of the expansion project) of waste currently disposed at the Foxen Canyon landfill were not disposed at Tajiguas. Therefore, not only is a diversion of Foxen Canyon waste to the Lompoc Landfill speculative and not a feasible alternative, the size of the expanded Tajiguas Landfill would remain the same. Therefore, the diversion would not lessen the impacts to biological, cultural or visual resources associated with the proposed expansion of Tajiguas.

- Santa Maria Landfill: As stated in Draft EIR Section 4.2.1.3 (page 4-11), the Santa Maria Landfill has a permitted daily capacity of 740 tpd and a current waste disposal rate of 375 tpd. A permit to expand the Santa Maria Landfill within the existing landfill property was issued by CIWMB on September 28, 2001. At the current average disposal rate of 375 tpd, the expansion provides capacity to 2017 (Schmaeling, 2001). The addition of waste from the Santa Ynez Valley (57 tpd) and the Foxen Canyon Transfer Station (52 tpd) would increase the waste disposal rate at the Santa Maria Landfill to approximately 484 tpd, thereby decreasing the life of the landfill by approximately 20 percent. The primary impact of diverting Santa Ynez Valley and Cuyama Valley waste to the Santa Maria Landfill would be an increase in the daily waste tonnage at this landfill and the resulting reduction of the projected life of the Santa Maria Landfill. As a result, the City of Santa Maria Landfill would not be able to provide 15 years of capacity to its waste disposal service area or 15 years of disposal capacity for the Tajiguas waste from the Santa Ynez and Cuyama Valleys. This would be inconsistent with the purpose of the proposed Tajiguas expansion project, which is to provide 15 years of additional reliable and cost-effective municipal solid waste disposal services for the residents of southern Santa Barbara County, and the Santa Ynez and Cuyama Valleys.

The City of Santa Maria's objective for the 15-year expansion of the Santa Maria Landfill is to provide sufficient time for that city to identify and select a new landfill site. The City of Santa Maria has stated it will not accept waste from outside the Santa Maria Landfill watershed (i.e., northern Santa Barbara County), as it does not want to jeopardize the 15-year life of the recent expansion. Specifically, the City of Santa Maria has indicated it will not accept waste from the Santa Ynez Valley

or from southern Santa Barbara County. It is speculative to assume the City of Santa Maria might change its policy regarding receipt of waste from outside the watershed of the Santa Maria Landfill. Therefore, the suggested alternative of diverting waste that is currently disposed at Foxen Canyon to the Santa Maria Landfill rather than to Tajiguas as part of the expansion project is not a feasible alternative. Similarly, diverting waste from southern Santa Barbara County to the Santa Maria Landfill also is not a feasible alternative.

In addition, as discussed in Draft EIR Section 4.2.1.3, the Santa Maria Landfill is approximately 34 miles from the designated waste generation area of the Santa Ynez Valley and approximately 30 miles from the Foxen Canyon Transfer Station. This compares to the Tajiguas Landfill, which is approximately 23 miles from the designated waste generation area of the Santa Ynez Valley and approximately 27 miles from the Foxen Canyon Transfer Station. Therefore, an increase in vehicle miles traveled would be required to dispose of waste generated in the Santa Ynez Valley at the Santa Maria Landfill rather than at the Tajiguas Landfill. This increase in vehicle miles would have the potential to result in increased waste disposal costs, vehicular emissions and other transportation-related impacts.

- USAF Vandenberg Landfill: As discussed in Draft EIR Section 4.2.1.4, based on personal communication with personnel at Vandenberg AFB, the Vandenberg Landfill is limited to use by the USAF, and does not accept waste from other jurisdictions. Any decision for the County or other entity to use the Vandenberg Landfill would not be made at the base level; it would be made at the Air Force level, in Washington, D.C. As a result, disposal of waste from the Santa Ynez Valley to the Vandenberg AFB Landfill (via the transfer station at the Foxen Canyon Landfill) is not a feasible alternative.

To divert the approximately 100 tpd of solid waste currently being disposed of at the Foxen Canyon Landfill to the Vandenberg Landfill rather than transporting it to Tajiguas for disposal would not result in a sufficient reduction in the daily/annual tonnage of solid waste disposed of at Tajiguas to allow a reduction in the size of the proposed expansion. As discussed above, such a diversion is not feasible under the current policy of the USAF.

Due to the topography of Cañada de la Pila and the engineering requirements of the Tajiguas Landfill expansion project, the expanded Landfill footprint would not be smaller, even if the approximately 30,000 tons per year (460,000 tons over the 15-year life of the expansion project) of waste currently disposed at the Foxen Canyon Landfill were not disposed at Tajiguas. Therefore, not only is diversion of Foxen Canyon waste to the Vandenberg Landfill speculative and not a feasible alternative, the size of the expanded Tajiguas Landfill would remain the same. Therefore, the diversion would not lessen the impacts to

biological, cultural or visual resources associated with the proposed expansion of Tajiguas.

As discussed in Draft EIR Section 4.4.4 and in Section 3.3.6 of this Chapter 3.0 of the Final EIR, virtually all of the waste processing technologies noted by the comments are technically viable. It is speculative as to whether one or a combination of such technologies could be implemented during the time frame of the proposed Landfill expansion due to development considerations (e.g., siting, environmental, regulatory, financial) and implementation considerations (e.g., multi-jurisdictional policy and contract issues). Therefore, not only is the diversion of waste from the Foxen Canyon Landfill to either the Lompoc, Santa Maria or Vandenberg AFB Landfills speculative and not feasible based on the current policies of those jurisdictions, the existing County CIWMP, or the existing waste services agreements, but the increased diversion of waste from the Tajiguas Landfill through implementation of other waste processing technologies also is speculative during the time frame of the expansion project and, therefore, does not represent a feasible alternative to the proposed project.

Based on the above, the diversion of the Santa Ynez Valley waste from the Tajiguas Landfill to an expanded Foxen Canyon, Lompoc, Santa Maria or Vandenberg Landfill is not a feasible alternative to the proposed expansion project. In addition, the diversion of Santa Ynez Valley waste from the Tajiguas expansion to one of these existing in-County landfills in combination with implementation of other waste processing technologies also is not a feasible alternative.

### **3.5 TAJIGUAS LANDFILL WASTE STREAM**

Waste that reaches Tajiguas for disposal is generated in the unincorporated portions of southern Santa Barbara County, the cities of Santa Barbara, Goleta, Buellton and Solvang, and in the unincorporated portions of the Santa Ynez Valley and the Cuyama Valley. At the present time, a relatively small amount of waste (approximately 100 tons per day [tpd]) that is generated in the Santa Ynez Valley goes to the Foxen Canyon Landfill for disposal. The Foxen Canyon Landfill is anticipated to reach capacity and close as of 2004. At that time, waste that had been transported to Foxen Canyon for disposal will, instead, go to Tajiguas.

As shown in Draft EIR Table 1-1, for purposes of the EIR, the baseline is an average daily disposal rate of 738 tpd and a peak day disposal rate of 1,161 tpd. Of this waste, approximately 48 percent is from the City of Santa Barbara, 22.5 percent is from the City of Goleta, 3 percent is from the City of Solvang, 2 percent is from the City of Buellton, and 24.5 percent is from the unincorporated portions of southern Santa Barbara County, and the Santa Ynez Valley and the Cuyama Valley.

Other waste generated in the County is in the wastesheds of Santa Maria and the Santa Maria Landfill, Lompoc and the Lompoc Landfill, and Vandenberg Air Force Base (VAFB) and the VAFB Landfill.

The County Public Works Department, Solid Waste and Utilities Division (SWUD), is responsible for the Tajiguas Landfill and disposal of residual waste within the wasteshed for the Landfill. As noted above, the Landfill receives waste from the cities of Santa Barbara, Goleta,

Solvang and Buellton and the unincorporated portions of southern Santa Barbara County, the Santa Ynez Valley and the Cuyama Valley. However, the cities of Santa Barbara, Goleta, Solvang and Buellton are not necessarily required to send their waste to Tajiguas. As discussed above in Final EIR Section 3.4.3, the cities have franchise agreements with waste haulers whereby they haul their waste to Tajiguas, but the agreements could be changed, whereby the haulers could transport the waste to other locations for processing or disposal. As a result, although the County provides a disposal site for waste from these areas, the County has long-term flow control (control of waste) only from the unincorporated portions of southern Santa Barbara County, the Santa Ynez Valley and the Cuyama Valley. Therefore, in considering the total waste stream of the Tajiguas watershed, as described above, the County has long-term control over 24.5 percent of the total waste stream (Solid Waste and Utilities Division, 2002), or approximately 190 tpd of waste that was disposed of at Tajiguas, based on landfill data for 2000. The remainder of the Tajiguas watershed waste stream is controlled by the cities of Santa Barbara, Goleta, Solvang and Buellton.

To provide sufficient feedstock for one or a combination of waste processing technologies that may be feasible as an alternative to the proposed Tajiguas expansion, the amount of feedstock would need to be sufficient on both a short-term (daily) and long-term (annual) basis. Therefore, for the County to provide the appropriate quantity of feedstock over a sufficient period of time, it would need to gain control of the municipal solid waste generated within the cities of Santa Barbara, Goleta, Solvang and Buellton. Due to the structure of existing franchise agreements, this goal could not be accomplished until the terms of the agreements expire or are renegotiated. Also, for the County to gain control of sufficient feedstock, it would need to implement multi-jurisdictional agreements and, potentially, obtain control of solid waste and green waste that currently is being diverted for recycling purposes.

As discussed above, the Tajiguas Landfill expansion is proposed to provide 15 years of disposal capacity for jurisdictions within the Tajiguas watershed. To be a feasible alternative to the proposed project, that alternative would have to avoid or substantially lessen the significant impacts of the proposed project. As discussed above, to meet these requirements would require a landfill that is 32 percent smaller than the proposed project. Due to the extent and complexity of developing and implementing such an alternative waste technology to accomplish a 32 percent reduction in the amount of waste disposed at Tajiguas, it is speculative to assume this reduction could be achieved within the 15-year time frame of the proposed expansion project.

### 3.6 CONCLUSIONS

As discussed above, alternatives to ongoing recycling and disposal programs for the Tajiguas watershed involve a host of issues to be resolved. These include, but are not limited to:

- Development and implementation considerations: As discussed above, there are numerous issues to be considered in the process of developing and implementing waste processing technologies. These include, but are not limited to siting, permitting, identification of end users, financing, economics, market acceptability, political leadership and support, statutory constraints, regulatory framework, public perception and understanding, available data, feedstock access and flow control. To

provide a feasible alternative to the proposed project, these issues must be resolved either individually or jointly by the various jurisdictions within the Tajiguas watershed and within the 15 years of the proposed landfill expansion.

- Multi-jurisdictions: To agree upon a specific strategy regarding waste processing technologies and to implement such a strategy, decisions and agreements would be required among the various jurisdictions within the Tajiguas watershed. Although such actions have occurred previously (current franchise agreements are evidence of such cooperation), it is unknown and speculative as to whether these complex actions that involve multiple jurisdictions are feasible within the time frame of the proposed project.
- Flow control: The County controls 24.5 percent (approximately 190 tpd) of the waste disposed at Tajiguas, based on landfill data for 2000. The remainder of the Tajiguas watershed waste stream is controlled by the cities of Santa Barbara, Goleta, Solvang and Buellton. Therefore, the County has long-term control over approximately 190 tpd of waste without affecting ongoing recycling and diversion programs. To provide sufficient feedstock for a feasible waste processing technology, the amount of feedstock would need to be sufficient on both a short-term (daily) and long-term (annual) basis. Therefore, for the County to provide the appropriate quantity of feedstock over a sufficient period of time, it would need to gain control of the municipal solid waste generated within the cities of Santa Barbara, Goleta, Solvang and Buellton. Due to the structure of existing franchise agreements, this goal could not be accomplished until the terms of the agreements expire or are renegotiated. For the County to gain control of sufficient feedstock, it would need to implement multi-jurisdictional agreements and, potentially, control of solid waste and green waste that currently is being diverted for recycling purposes. This would require multi-jurisdictional agreements and, potentially, control of solid waste and green waste that currently is being diverted for recycling purposes.
- Project Time Frame: The Tajiguas Landfill expansion is proposed to provide 15 years of disposal capacity for jurisdictions within the Tajiguas watershed. To be a feasible alternative to the proposed project, that alternative would have to avoid or substantially lessen the significant impacts of the proposed project. As discussed above, to meet these requirements would require a landfill that is 32 percent smaller than the proposed project. Due to the extent and complexity of developing and implementing one or a combination of waste processing technologies to accomplish a 32 percent reduction in the amount of waste disposed at Tajiguas, it is speculative to assume this reduction could be achieved within the 15-year time frame of the proposed expansion project.

The Draft EIR evaluates alternative disposal technologies in Section 4.4. The Draft EIR considers recycling, composting, waste-to-energy, conversion technologies and other developmental technologies. As discussed in Draft EIR Section 4.4.4 – Other Developmental Technologies, although the current developing waste processing technologies hold promise for the future, the current project objective is to provide waste disposal capacity at the Tajiguas Landfill for 15 years. Many of the obstacles to developing and marketing waste processing technologies will likely be overcome in the future, enabling these technologies to be considered as part of long-term planning to meet the waste disposal needs of Santa Barbara County.

Based on the discussions provided in this response to comments on waste processing technologies, the conclusions remain the same as stated in the Draft EIR Section 4.4.4. Although virtually all of the waste processing technologies addressed are technically viable, and many are being implemented in other countries or other locations within the United States, based on the development and implementation considerations discussed in this chapter, it is speculative to assume one or more of these technologies could be implemented within the Tajiguas Landfill watershed within the time frame of the proposed project. Therefore, in accordance with the CEQA Guidelines (§15126.6), waste processing technologies do not represent a feasible alternative to the proposed Tajiguas expansion project.

### **3.7 REFERENCES AND RESOURCES FOR WASTE PROCESSING TECHNOLOGIES**

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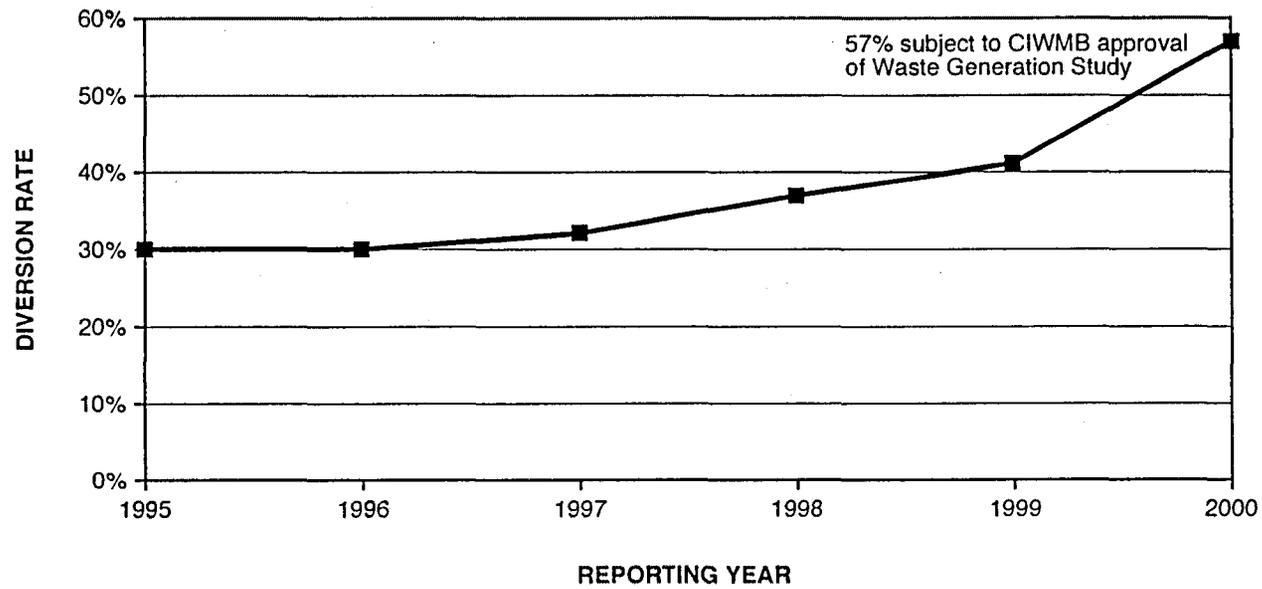
**TABLE 3-1**

**PUBLIC COMMENTS ON WASTE PROCESSING TECHNOLOGIES**

<b>Technology</b>	<b>Comment Number</b>
Expansion of Existing Waste Reduction/ Recycling	
Enhanced Recycling	3-117; 20-1; 21-3; 30-4
Waste Reduction	6-4; 30-13; 43-1
Source Reduction	3-117; 6-4; 18-1
Materials Recovery Facility (MRF)	3-103; 3-118; 3-120; 6-4; 10-3; 9-1; 17-2; 18-1; 20-1; 28-1; 30-4; 30-13
Combined Transfer Station/ MRF	3-118
Expanded Re-Use, Reconditioning, Recycling	4-10; 9-1; 30-4; 44-1
Composting	4-10; 9-1; 17-2; 18-1; 20-1; 21-3; 28-1; 30-4; 40-1
Conversion Technologies	4-10; 9-1; 17-2; 28-1
Anaerobic Digestion	4-10; 9-1
Gasification	4-10; 9-1; 18-1; 28-1
Alternative Energy Production	3-120; 9-1; 21-3
Waste-to-Product	3-120
Ethanol-producing Technologies	4-10; 9-1
Building Materials	3-103; 3-120
Waste-to-Energy	3-103; 3-119
Mass burn	37-1
Other	
Advanced Wastewater Treatment	17-2
Rail Transport of Waste	3-116
Fuel Cells	4-10



**TABLE 3-2**  
**UNINCORPORATED SANTA BARBARA COUNTY**  
**WASTE DIVERSION RATE**



<u>REPORTING YEAR</u>	<u>DIVERSION RATE</u>
1995	30%
1996	30%
1997	32%
1998	37%
1999	41%
2000	57%



## 4.0 REVISED AND ADDITIONAL MATERIALS

This Chapter includes minor revisions to the Draft EIR and additional materials in response to comments. Copies of the comments and the responses to those comments are found in Final EIR Chapter 2.0. The revisions and additional materials in this chapter provide amplification and clarification of prior information. They do not alter the findings or conclusions of the Draft EIR, but have been included in this Final EIR for completeness.

### 4.1 REVISED TEXT

This section provides revisions to the Draft EIR text that have been made as a result of public comments on the document. These changes do not alter the findings or conclusions of the Draft EIR.

Section 1.5.3, Paragraph 2 of the Draft EIR. South Coast recyclables no longer go to the Health Sanitation Services Materials Recovery Facility in Santa Maria. Therefore, the last sentence of the paragraph is revised to read as follows in response to Comment 17-5:

“From the transfer station, waste requiring disposal is transported by transfer trucks to Tajiguas, while recyclables are transported by transfer trucks to the Del Norte Transfer Station in Oxnard and Gold Coast Recycling in Ventura, ~~and the Health Sanitation Services Material Recovery Facility in Santa Maria.~~”

Section 1.7.1, Paragraph 3 of the Draft EIR (page 1-24) has been revised to read as follows in response to Comment 16-7:

“The following permits shall be required:

- Coastal Development Permit.
- On-site Water System Permit.
- On-site Sewage Disposal System Permit.

~~In addition to the above,~~ The County will apply for Coastal Development Permit in accordance with the Santa Barbara County Zoning Ordinance for the elements of the proposed Project within the Coastal Zone. The Coastal Development Permit would be issued to the Solid Waste and Utilities Division (SWUD) by County Planning and Development (P&D). An onsite water system permit and an onsite sewage disposal system permit shall be obtained by Environmental Health Services, under County Ordinance No. 4181 and No. 4356, respectively.”

Section 1.7.2.1, second paragraph of the Draft EIR (page 1-26) has been revised to read as follows in response to Comment 16-1:

“In Santa Barbara County, a CIWMP was submitted to the CIWMB in June of 1998 and was subsequently approved. Under AB 939, the CoSWMPs were replaced with CIWMPs. In October 1990, AB 2296 was approved to resolve the conflicts between AB 949 and the previous CoSWMP requirements. For a new or expanded solid waste facility not included in the most recent CoSWMP, AB 2296 allows for the approval of such facility, provided that 50 percent of the cities in the county (not include 50 percent of the county population), and the county, approve the new or expanded landfill. Expansion of the Tajiguas Landfill was

identified in the Countywide Siting Element issued in March 1998, superceding the requirements of AB 2296 adopted in October 1990. Specific requirements for this approval process are included in California Public Resources Code §50000.”

Section 1.7.2.2, second paragraph of the Draft EIR (page 1-26) has been revised to read as follows in response to Comments 18-1 and 18-2:

“At the local level, the Santa Barbara County Air Pollution Control District (SBCAPCD) has review and permitting authority over air emission sources in the area, with CARB serving as a technical review and advisory agency. CARB provides technical advice to SBCAPCD when necessary and offers guidance when SBCAPCD regulations are not sufficiently detailed to address a specific situation. The SBCAPCD also has permit jurisdiction over the landfill gas collection system associated with operation of the Tajiguas Landfill.”

Section 2.1, paragraph 2 of the Draft EIR. The following sentence has been revised to correct an arithmetic error:

This expansion would increase total disposal capacity from 15.1-million to ~~22.6 million~~ 23.3-million cy (approximately 9.1-million to 13.6 million tons) of waste.

Section 3.3 of the Draft EIR. References to Appendix C in Draft EIR Section 3.3 with respect to surface water should be changed to Santa Barbara County (2000b, 2001a). Draft EIR Appendix C contains data on groundwater, not surface water.

Section 3.11.3.2 (page 3.11-14), first bullet of the Draft EIR. The green waste grinder has been included as an onsite source of daily emissions. The third dash has been revised to read as follows in response to Comment 18-10:

Onsite sources:

- Combustion products from the landfill gas control system.
- Fugitive landfill gas emissions from the surface of the covered waste.
- Exhaust emissions from mobile sources and the green waste grinder.
- Fugitive dust emissions from landfill operations and construction.

Section 3.11.1.2, Paragraph 1 of the Draft EIR. The last sentence of this paragraph is revised to read as follows in response to Comment 18-8:

“Air quality in the SCCAB is significantly affected by transport of air pollutants along the coast from the ~~San Francisco Bay Area~~, South Coast Air Basin, and less so from the San Francisco Bay Area and from the inland San Joaquin Valley (CARB, 2001).”

Section 3.11.3.2.1, Paragraph 1 of the Draft EIR. The third sentence of this paragraph is revised to read as follows in response to Comment 18-10:

“Onsite sources include stationary, mobile and fugitive sources. The stationary source is the landfill gas control system. Mobile sources include both onroad trucks and other vehicles, ~~and nonroad heavy-duty equipment~~ and the green waste grinder. Fugitive sources include dust emitted from roads, waste and dirt hauling

and wind erosion. Uncollected, or fugitive, landfill gas is emitted through the surface of the waste prism.”

The green waste grinder was included as an onsite source of daily emissions.

Section 4.2.1.3, Paragraph 1 of the Draft EIR. The second sentence of this paragraph is revised to read as follows in response to Comment 3-107:

“The City of Santa Maria Landfill is a permitted, active landfill. As shown in Table 4-2, its permitted daily capacity is 740 tpd, and it receives an average 375 tpd. ~~At that rate, the landfill has capacity to 2017. A process to permit an to expansion of the landfill within the existing landfill property was issued by CIWMB on September 28, 2001. is in process. At t~~ The current permitted waste disposal capacity is 740 ~~rate of 375~~ tpd, ~~the expansion which provides capacity only to 2017 (Schmaeling, 2001). To provide additional capacity to 2020, a subsequent expansion would be necessary. There would not be adequate capacity within the existing landfill property to accept Tajiguas waste; and it would be necessary to require purchase of adjacent farmland (Zhao, 2000).”~~

## 4.2 MITIGATION MEASURES

This section includes new Draft EIR mitigation measures, and minor revisions to existing mitigation measures, in response to comments received on the Draft EIR. Copies of the comments, and responses to those comments, are found in Chapter 2.0 of this Final EIR. The complete list of mitigation measures for the proposed project is provided in Chapter 1.0, Table 1-2 of this Final EIR. The new or revised mitigation measures do not alter the findings or conclusions of the Draft EIR.

### 4.2.1 NEW MITIGATION MEASURES

- The following mitigation measure has been added in response to Comment 19-4:

GEO-3. Grading and drainage improvements of natural slopes adjacent to the landfill components shall include construction methods to control shallow landslides. The construction methods shall include limiting the size of exposed cut area, diversion of storm water runoff away from potential landslides, and identification of area for drainage.

#### **Plan Requirements and Timing:**

Prior to issuance of the Solid Waste Facility Permit, the landfill design and supporting documentation shall be submitted to the Regional Water Quality Control Board (RWQCB) and Local Enforcement Agency/California Integrated Waste Management Board (LEA/CIWMB) for

review and approval. The SWUD shall construct the landfill facilities in accordance with the approved grading plans.

**Monitoring:** The SWUD shall monitor construction of the landfill facilities throughout operations.

- The following mitigation measure has been added in response to Comment 3-46:

WR-4. Well No. 3 in the Monterey Formation shall be used if the water level in the Vaqueros water supply well drops regularly from pumping activities.

**Plan Requirements  
and Timing:**

If the water level is found to be regularly dropping due to pumping activity, SWUD shall switch to interim use of Well No. 3.

**Monitoring:** During landfill operations, the water level from wells in use in the Vaqueros Formation shall be monitored by SWUD.

- The following mitigation measure has been added in response to Comment 3-88:

VIS-2. Native sycamore trees from local seed or cutting stock shall be planted in Pila Creek, downstream of the landfill, in sufficient quantity to vegetate the area.

**Plan Requirements  
and Timing:**

SWUD shall plant the trees within the first year of the Project.

**Monitoring:** SWUD shall conduct site inspections and maintain the trees throughout the life of the landfill.

**Monitoring:** The SWUD shall monitor the demolition of this facility and ensure rehabilitation of the site.

- The following mitigation measure has been added in response to Comment 3-93:

N-2. Blasting shall be limited to occur between the hours of 8:00 a.m. and 4:00 p.m., Monday through Friday.

**Plan Requirements  
and Timing:**

SWUD shall include this measure as a component of the Solid Waste Facility Permit that shall be submitted to the Local Enforcement Agency/ California Integrated Waste Management (LEA/CIWMB) for approval.

**Monitoring:**

The LEA shall ensure compliance with this measure.

#### 4.2.2 REVISED MITIGATION MEASURES

- Section 3.2.5, Mitigation Measure GEO-1 of the Draft EIR. The Monitoring is revised to read as follows in response to Comment 16-11:

GEO-1. The landfill design shall include the following:

- a) A detailed slope-stability report shall be prepared by a geologist/soils engineer to determine maximum cut-slopes, based on in-field observations of bedrock conditions. Cut-slopes shall not exceed 2:1 unless the slope-stability report concludes that steeper slopes will be stable. In that case, slopes may exceed 2:1, provided the slopes adhere to the design standards identified in the report.
- b) A detailed geological and/or soils engineering study shall be prepared to determine landfill structural design criteria, as required by CCR Title 27, when the final landfill excavation and fill plans are being developed.

**Plan Requirements  
and Timing:**

Prior to the issuance of the Solid Waste Facility Permit, the landfill design and supporting documents (including stability report) shall be submitted to RWQCB and LEA/CIWMB for review and approval. The Solid Waste and Utilities Division (SWUD) shall construct the landfill in accordance with the grading plan.

**Monitoring:**

The ~~LEA~~ SWUD shall monitor construction of the landfill throughout operations.

- Section 3.3.5, Mitigation Measure WR-1 of the Draft EIR. The Monitoring is revised to read as follows in response to Comment 16-12:

WR-1. Known or suspected perched or stratigraphically isolated groundwater zones shall be further delineated and dewatered prior to landfill construction. Design shall consider the location of these zones, as well as other zones identified during construction.

**Plan Requirements  
and Timing:**

Prior to issuance of the revised Waste Discharge Requirements and Solid Waste Facility Permit, specific drainage measures shall be evaluated and designed for incorporation into the liner design. These designs shall be submitted to the RWQCB

and LEA/CIWMB for review and approval. The SWUD shall construct dewatering and drainage systems prior to liner placement.

**Monitoring:**

The SWUD shall construct the dewatering and drainage systems and the LEA-SWUD and RWOCB shall monitor installation of the systems.

- Section 3.4.5, Mitigation Measure BIO-1 of the Draft EIR has been revised to read as follows in response to Comment 13-2:

BIO-1. A survey shall be conducted to identify sensitive plant species identified in Table 3.4-2 in areas to be cleared of native vegetation. The survey for the Gaviota tarplant (*Hemizonia increscens ssp. villosa*) shall be conducted during the months of May through late summer. In the event sensitive plant species (i.e., Santa Barbara honeysuckle, Gaviota tarplant, etc.) are identified, the following measures shall be implemented:

- Plants shall be salvaged and/or propagules shall be relocated to an appropriate location in the Pila Creek watershed or the Baron Ranch, as identified by the biologist.
- Transplanted or propagated plants shall be maintained for a minimum of 5 years, or until the biologist determines that the plants have been successfully established (plants are vigorous, they flower and produce seed).

**Plan Requirements and Timing:**

Prior to clearing of native vegetation, the area scheduled for clearing shall be surveyed by a County-approved biologist. In the event sensitive species are identified, a revegetation or restoration plan shall be developed that includes site identification for transplant/propagation, outlines transplanting/propagation procedures, and identifies maintenance and monitoring requirements, including contingency measures. Sensitive species shall be relocated prior to vegetation clearing.

**Monitoring:**

The biologist shall maintain, inspect and monitor the revegetation effort throughout the implementation and maintenance periods. SWUD shall ensure compliance with the plan.

- Section 3.4.5, Mitigation Measure BIO-3 of the Draft EIR has been revised to read as follows in response to Comment 29-4:

BIO-3. An oak tree replacement plan shall be prepared to replace oak trees identified for removal. Any oak trees that are removed and/or damaged (more than 25 percent of root zone disturbed) shall be replaced on a 10:1 basis with 1-gallon size saplings grown from locally obtained acorns. Trees shall be planted prior to winter rains, irrigated and maintained until established (5 years). The plantings shall be protected from predation by wild and domestic animals, and from human interference by the use of staked fencing and gopher fencing during the maintenance period. In the event that an oak tree(s) does not survive for 5 years, it shall be replaced.

**Plan Requirements and Timing:**

An oak-planting plan shall be prepared prior to initiation of landfill expansion activities. The plan shall identify a planting area, outline propagation procedures, and identify maintenance and monitoring requirements, including contingency measures.

**Monitoring:**

SWUD shall conduct site inspections throughout all phases of landfill development to ensure compliance with the plan and evaluate all tree protection and replacement measures.

- Section 3.4.5, Mitigation Measure BIO-6 of the Draft EIR has been revised to read as follows in response to Comment 3-58:

BIO-6. Erosion control measures shall continue to be implemented. Erosion control methods could include silt fencing, straw bales, hydroseeding with appropriate native plant species from the project vicinity, or use of sandbags in conjunction with other methods. Hydroseeding, if used, shall be applied prior to the rainy season.

**Plan Requirements and Timing:**

Annually, prior to each rainy season or as required in the Waste Discharge Requirements (WDRs), the SWUD shall prepare a wet weather preparedness plan that shall be submitted to the California Regional Water Quality Control Board (RWQCB). The plan shall identify drainage system maintenance measures to be implemented prior to the rainy season throughout project operations.

**Monitoring:** SWUD shall monitor surface water quality and stormwater runoff control as required in the WDRs.

- Section 3.4.5, Mitigation Measure BIO-8 of the Draft EIR has been revised to read as follows in response to Comment 13-1:

BIO-7. To compensate for native habitats disturbed by the expansion, a County-approved biologist shall prepare and implement a revegetation plan (e.g., a ratio of not less than 1:1 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.

**Plan Requirements and Timing:**

A revegetation or restoration plan for the landfill shall be submitted to and approved by the Local Enforcement Agency (LEA), with concurrence by California Integrated Waste Management Board (CIWMB) and RWQCB as part of the Landfill Closure Plan. The plan shall be implemented ~~as part of phased closure each acre of habitat is removed from the Landfill expansion site.~~ Restoration shall occur in Cañada de la Pila or Arroyo Quemado.

**Monitoring:** SWUD shall ensure compliance with the plan.

BIO-8. To reduce impacts to California red-legged frogs (CRLF) that reside in the in-channel sedimentation basins, ~~the following actions- an extensive CRLF Management Plan shall be implemented and shall include the following:~~

- a) The basin scheduled for maintenance shall be drained between mid-August and late-September. Maintenance activities for either basin shall occur October through November after draining the basin or following a survey by a qualified biologist that confirms tadpoles have left the basin. Should SWUD demonstrate a need to conduct activities outside this period, the activities shall be subject to review and approval by the USFWS.
- b) At least 15 days prior to the onset of draining or maintenance activities, the SWUD shall submit the name(s) and credentials of biologists who conduct activities specified in the following measures to the USFWS. No project activities shall begin until

SWUD receives verbal/written approval from the USFWS that the biologist(s) is qualified to conduct the work.

- c) Before any draining or maintenance activities begin on the sediment basin, a USFWS-approved biologist shall conduct a training session for all landfill personnel involved with these activities. At a minimum, the training shall include a description of the California red-legged frog and its habitat, and the general measures that are being implemented to conserve the California red-legged frog as they relate to the project. Brochures, books, and briefings may be used in the training session, provided that a qualified person is present to answer any questions.
- d) A USFWS-approved biologist shall survey the sediment basin at least 2 weeks before draining the basin. If California red-legged frogs, tadpoles, or eggs are found, the approved biologist shall contact the USFWS to determine the appropriate level of consultation.
- e) To obtain water for dust control (and prior to sediment removal), water shall be pumped on alternate days. Water shall be pumped only from July through November or as directed by a qualified biologist. The intake shall be placed within a floating, screened cage (3 feet by 3 feet by 3 feet) constructed of 0.25-inch mesh wire. To prevent adult frogs from climbing into the cage from below, the upper 12 inches of the cage may be covered with sheet metal flashing that extends above and below the water line and is bent at 90 degrees to form a 6-inch lip around the top of the cage.
- f) Maintenance activities (sediment removal) in the basins shall be conducted when the basins are as dry as possible. A temporary barrier (silt fencing or other appropriate material) shall be placed between the two in-channel sedimentation basins to exclude red-legged frog from the work area. A qualified biologist, approved by USFWS, shall perform a survey of soil cracks immediately prior to initiation of sediment removal. Any California red-legged frogs found should be captured and relocated to the other basin. Each night following sediment removal, the remaining soil cracks shall be searched in preparation for the next day's work. Sediment removal, once initiated, shall proceed as quickly as possible.
- g) A USFWS-approved biologist shall be present prior to and during draining and maintenance until such a time as all removal of California red-legged frogs, instruction of workers, and habitat disturbance has been completed. After this time, the SWUD shall designate a person to monitor onsite compliance with all impact minimization measures. The USFWS-approved

biologist shall ensure that this individual receives training outlined above (in measure c) and is trained in the identification of California red-legged frogs. The monitor and the USFWS-approved biologist shall have the authority to halt any action that might result in impacts that exceed the levels anticipated by the USFWS during review of the proposed action. If work is stopped, the USFWS shall be notified immediately by approved biologist or onsite biological monitor.

- h) All fueling and maintenance of vehicles and other equipment shall occur at least 20 meters from any riparian habitat or water body. SWUD shall ensure that contamination of habitat does not occur during such operations. Prior to the onset of work, the USFWS shall ensure that SWUD has prepared a plan to allow a prompt and effective response to any accidental spills. All workers shall be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.
- i) Native riparian and upland vegetation on the upper banks of the basins shall remain in place to provide cover for red-legged frogs except where the equipment will access the basins during sediment removal activities (e.g., a ratio of not less than 1:1 for each disturbed acre of existing habitat). To the extent feasible, sediment removal shall occur in the bottom of the basins, below the high water mark. A revegetation plan to enhance riparian wetland and upland vegetation in Pila Creek upstream of the sediment basins shall be prepared. A species list and restoration-monitoring plan shall be included with the project proposal for review and approval by the USFWS. Such a plan must include, but not be limited to, location of the restoration, species to be used, restoration techniques, time of year the work will be done, identifiable success criteria for completion, and remedial actions if the success criteria are not achieved.
- j) Stream contours shall be returned to their original condition at landfill closure, unless consultation with the USFWS has determined that it is not beneficial to the species or is not feasible.
- k) Access to the southern sediment basin shall be from the north. The size of staging areas, and the total area of the activity shall be limited to the minimum necessary to achieve the project goal. Routes and boundaries shall be clearly marked. Where impacts occur in these staging areas and access routes, restoration shall occur as identified in measures (i) and (j).
- l) To control erosion during and after project implementation, the applicant shall implement best management practices (BMPs) as identified by the RWQCB.

- m) During pumping of water from the in-channel sediment basins, intakes shall be completely screened with wire mesh ~~not larger than 5 millimeters (mm)~~ size set by the size of the frog larvae to prevent California red-legged frogs from entering the pump system. The screen box on the intake pipe shall be kept clean to maintain low water velocities across all screens. The wetted surface area of the box shall be designed based on pump rates and targeted water velocities across the screens. Upon completion of pumping activities, any barriers to flow shall be removed in a manner that would allow flow to resume with the least disturbance to the substrate.
- n) A USFWS-approved biologist shall permanently remove from within the project area any individuals of exotic species, such as bullfrogs, crayfish, and centrarchid fishes, to the maximum extent possible. SWUD shall have the responsibility to ensure that these activities are in compliance with the California Fish and Game code.

**Plan Requirements  
and Timing:**

Prior to landfill expansion, a California Red-Legged Frog Management Plan that incorporates the above measures shall be developed and submitted for review and approval to CDFG and the U.S. Army Corps of Engineers (ACOE), who will initiate consultation with USFWS.

**Monitoring:**

SWUD shall coordinate with USFWS and ensure compliance with the plan. A qualified biologist shall monitor red-legged frog presence in the sediment basins quarterly (January, April, July and October) for at least 5 years. The results of this monitoring, with an evaluation of the effectiveness of plan requirements, shall be reported annually to the SWUD for submittal to the ACOE, USFWS and CDFG for review and comment.

- Section 3.4.5, Mitigation Measure BIO-9 of the Draft EIR has been revised to read as follows in response to Comment 3-63:

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. ~~Use of artificial lighting during the months of October through March shall be minimized and used on an as-needed basis.~~ Except on an emergency basis, artificial lighting shall not be employed prior to 6:00 a.m. or after 8:00 p.m.

**Plan Requirements and Timing:** SWUD shall include this measure as a component of the Solid Waste Facility Permit that shall be submitted to the RWQCB and Local Enforcement Agency/California Integrated Waste Management Board (LEA/CIWMB) for approval.

**Monitoring:** SWUD shall ensure compliance with this measure.

- Section 3.6.5, Mitigation Measure NUI-2 of the Draft EIR. Part f (12) is revised to read as follows in response to Comment 16-14 and 17-26:

NUI-2. To reduce nuisance birds at the landfill, a Bird Management Plan shall be developed. The plan shall include, but not be limited to, the following measures:

- a) Landfill personnel shall be assigned to bird management from dawn until all refuse has been buried and the landfill closed for the day. Personnel shall be trained in bird identification and behavior.
- b) The working face shall be maintained as small as safely practicable, considering the types and numbers of landfill equipment operating.
- c) The landfill shall be inspected regularly for cracks or fissures which can attract birds. Repairs shall be implemented as necessary.
- d) Extremely odiferous waste shall be buried as soon as possible after unloading.
- e) Application of a minimum 6-inch-thick layer of compacted soil or approved ADC shall be applied during the day and/or at the end of each working day.
- f) The following actions to deter birds at the landfill shall include; but not be limited to one or more of the following:
  - 1) Propane cannons and noisemakers.
  - 2) Distress calls.
  - 3) Gull "decoys" displayed in distressed positions.

- 4) Remote control airplanes.
- 5) Overhead lines or wires.
- 6) Kites.
- 7) Flash tape and streamers.
- 8) Balloons.
- 9) Bird trainers (e.g., *JUMPO*<sup>TM</sup>).
- 10) Raptors.
- 11) Dogs.
- 12) ~~Extermination.~~ Depredation.

g) SWUD shall determine the feasibility of using a large cage or netting as a bird deterrent at the landfill working face.

**Plan Requirements  
and Timing:**

Prior to issuance of the Solid Waste Facility Permit, SWUD shall provide a Bird Management and Monitoring Plan to the LEA. The Bird Management and Monitoring Plan shall identify a hierarchy for use of all elements of the plan. A monthly monitoring report shall be prepared and submitted by SWUD and the LEA to track populations of gulls at the landfill. Use of elements in the plan will be periodically reevaluated as bird populations fluctuate. The Bird Management and Monitoring Plan shall be implemented throughout project operation.

A depredation permit shall be obtained from the USFWS and the California Department of Fish and Game (CDFG) prior to extermination. Use of lethal control shall be a final option, after the operator has demonstrated that other management practices have been ineffective and in consultation with a professional biologist. Emphasis will be placed on nonlethal methods of management. Such actions shall be in consultation with the CDFG, U.S. Department of Agriculture Animal and Plant Health Inspection Service, and USFWS.

**Monitoring:** The LEA shall monitor bird management practices on a quarterly basis.

- Section 3.8.5, Mitigation Measure VIS-1 of the Draft EIR is revised to read as follows in response to Comment 3-89:

VIS-1. At final closure the landfill shall be contoured to be consistent with the surrounding terrain. It shall be vegetated with species that include appropriate local native plant species.

**Plan Requirements  
and Timing:**

A Landfill Closure Plan shall be prepared by SWUD a minimum of 2 years prior to landfill closure. The Landfill Closure Plan shall include an ongoing maintenance and monitoring program to correct settlement, erosion, or drainage-related deficiencies following landfill closure. The plan shall specify final cover system maintenance to prevent ponding (e.g., regrading or filling areas) and shall be submitted to and approved by the Local Enforcement Agency/California Integrated Waste Management Board (LEA/CIWMB) and Regional Water Quality Control Board (RWQCB) prior to landfill closure.

**Monitoring:**

The SWUD shall implement the Landfill Closure Plan and monitor and report to the LEA on a quarterly basis.

- Section 3.10.5, Mitigation Measure TRAF-1 of the Draft EIR. The Monitoring is revised to read as follows in response to Comment 12-11 and 16-16:

TRAF-1. A permanent stop sign and speed dots shall be installed and maintained at the landfill exit to Highway 101. All vehicles exiting the landfill site shall be required to make a complete stop prior to entering the Highway.

**Plan Requirements  
and Timing:**

Solid Waste and Utilities Division (SWUD) shall coordinate with Caltrans to install the stop sign and, with the County of Santa Barbara, Roads Division, to install speed dots. SWUD shall include this measure as a component of the Solid Waste Facility Permit that shall be submitted to the ~~Regional Water Quality Control Board (RWQCB) and~~ Local Enforcement Agency/California Integrated Waste Management Board (LEA/CIWMB) for review and approval. These measures shall be implemented throughout the life of the landfill. County vehicle drivers and commercial truck drivers shall be informed of this requirement upon initial employment and annually thereafter. Members of the public shall be informed of this requirement by scalehouse personnel upon entering the landfill.

**Monitoring:**

The California Highway Patrol and Public Works SWUD shall designate personnel to monitor and implement traffic safety measures. Implementation of this measure shall be reported to the LEA on an annual basis.

- Section 3.10.5, Mitigation Measure TRAF-2 of the Draft EIR. The Monitoring is revised to read as follows in response to Comment 16-16:

TRAF-2. To caution motorists approaching the intersection at Highway 101 and the Tajiguas Landfill entrance road, two signs, one for the northbound lanes and one for the southbound lanes of Highway 101 shall be provided. The signage shall be as follows: *Caution - Trucks Entering the Highway.*

**Plan Requirements  
and Timing:**

SWUD shall contact Caltrans to coordinate placement of the signs in an appropriate location along Highway 101. This measure also shall be a component of the Solid Waste Facility Permit that shall be submitted to the RWQCB and LEA/CIWMB for review and approval and implemented throughout the life of the landfill.

**Monitoring:**

Caltrans ~~SWUD~~ shall designate personnel to maintain the signs. Implementation of this measure shall be reported to the LEA on an annual basis.

- Section 3.11.5, Mitigation Measure AQ-1 of the Draft EIR. The mitigation measure is revised to read as follows based on Comments 18-1, 18-11 and 18-13:

The following mitigation measures are applied to reduce project emissions. ~~to the extent feasible.~~

AQ-1 Mobile source emissions shall be reduced ~~to the extent feasible~~ 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. ~~Heavy-duty diesel-fueled equipment~~ Scrapers and compactors shall be retrofitted with diesel particulate filters (DPFs) ~~where applicable.~~
- e. The maximum number of pieces of heavy-duty diesel-fueled equipment scrapers operating simultaneously shall be ~~minimized~~ limited to four.
- f. ~~Alternative fuels such as methanol shall be investigated, and conversion of waste haul vehicle engines to alternative fuels shall be encouraged during the lifetime of the landfill expansion.~~
- ~~g-f.~~ Transfer trucks shall be used, ~~to the extent feasible,~~ to haul waste from the transfer stations to the Tajiguas Landfill, thereby reducing the number of trips to the landfill.

**Plan Requirements and Timing:**

SWUD shall include these measures as a component of the application for the Solid Waste Facility Permit that shall be submitted to the RWQCB and LEA/CIWMB for approval. New heavy-duty diesel-fueled landfill equipment shall comply with the latest California diesel standards prior to placement of waste into the expansion area. ~~All heavy-duty diesel-fueled equipment~~ Scrapers and compactors shall be retrofitted with DPFs prior to ~~issuance of the Solid Waste Facility Permit for the start of~~ construction of the landfill expansion. Staff shall be trained on maintenance of DPFs, which will be implemented according to manufacturer's recommendations.

**Monitoring:**

SWUD shall implement a maintenance program for all landfill equipment and vehicles. Maintenance of DPFs shall be recorded in equipment maintenance logs. Staff shall be trained in the proper maintenance and operation of all air pollution control equipment to reduce emissions. Training events shall be recorded to assure compliance with these measures.

- Section 3.11.5, Mitigation Measure AQ-3 of the Draft EIR. The mitigation measure is revised to read as follows based on Comments 16-17, 18-1 and 18-13:

- AQ-3 Dust generated by landfill activities shall be ~~kept to a minimum and shall be kept onsite to the extent possible,~~ controlled through implementation of the following dust control measures:
- 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. ~~At a minimum, this would include hourly watering of the active unpaved roads.~~
  - Traffic speed shall be limited to 15 mph on all roads.
  - Soil stockpiled for more than two days shall be covered, moistened, or treated with soil binders to prevent dust generation.
  - In areas not in active use, Exposed soil shall be moistened or shall be revegetated by seeding and watering, or by spreading soil binders shall be applied. ~~in areas not in active use.~~
  - 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.
  - Paved roads shall be vacuum swept ~~twice weekly~~ as needed.
  - Monitoring wind speed.
  - Monitoring PM<sub>10</sub> at the landfill boundary.

**Plan Requirements and Timing:**

SWUD shall include these measures as a component of the Solid Waste Facility Permit application that shall be submitted to the ~~RWQCB and LEA/CIWMB~~ for review and approval.

**Monitoring:**

SWUD shall designate personnel to monitor wind conditions, implement the dust control program, and order increased watering, as necessary, to prevent transport of dust off-site during operating hours of the landfill. Monitoring for PM<sub>10</sub> shall be regulated by the APCD. All other parameters may be overseen by the APCD, in addition to the LEA.

- Section 3.12.5, Mitigation Measure HS-3 of the Draft EIR. The Monitoring is revised to read as follows in response to Comment 16-19:

- HS-3. The operator shall install monitoring systems and monitor LFG. If monitoring indicates that impacts are occurring, appropriate corrective actions shall be implemented. These actions include, but are not limited to, the following:
- The LFG collection system shall be adjusted to increase LFG control.
  - One or more additional LFG collectors shall be installed to increase gas collection.

- c. The operator shall place additional daily, intermediate and final cover to control fugitive gas emissions.

**Plan Requirements and Timing:**

SWUD shall include this measure as a component of the Solid Waste Facility Permit that shall be submitted to the RWQCB and LEA/CIWMB for review and approval.

**Monitoring:**

SWUD shall monitor LFG emissions throughout operations and shall report monitoring results to the LEA on a monthly basis. The LFG collection system will be monitored by the APCD. The LEA shall monitor the onsite structures and the landfill perimeter.

- Section 3.12.5, Mitigation Measure HS-4 of the Draft EIR. The Monitoring is revised to read as follows in response to Comment 16-20:

HS-4. The operator shall routinely inspect landfill cover materials for cracks and/or fissures. Cracks and fissures shall be repaired.

**Plan Requirements and Timing:**

SWUD shall include this measure as a component of the Solid Waste Facility Permit that shall be permitted to the RWQCB and LEA/CIWMB for review and approval. Cracks and fissures shall be repaired in a timely manner, or as directed by the LEA.

**Monitoring:**

SWUD shall inspect the landfill cover throughout operations and shall report monitoring results to the LEA APCD on a quarterly basis. The APCD shall monitor the landfill cap for fissures and cracks. The LEA shall inspect the landfill monthly and shall require SWUD to repair as needed.

- Section 3.12.5, Mitigation Measure HS-5 of the Draft EIR. The Mitigation Measure and Plan Requirements and Timing are revised to read as follows:

HS-5. ~~For the Front Canyon configuration,~~ There shall be one or more onsite personnel to direct vehicles and equipment on the landfill as they travel to and from the working face. SWUD shall develop procedures that include, but are not limited to, issues of timing and right-of-way. These shall be modified as necessary specific to actual conditions and incidents that may occur.

**Plan Requirements  
and Timing:**

~~If the Front Canyon configuration is chosen as the project,~~ SWUD shall include this measure as a component of the Solid Waste Facility Permit that shall be permitted to the RWQCB and LEA/CIWMB for review and approval.

**Monitoring:**

SWUD shall keep records of and report occurrence of incidents that may occur to the LEA on a quarterly basis.

- Section 3.12.5, Mitigation Measure HS-6 of the Draft EIR. The Monitoring is revised to read as follows in response to Comment 16-21:

HS-6. An Excavation Plan shall be prepared for the Southeast Corner Modification to address operations associated with the excavation and removal of in-place waste. It shall include procedures and sequencing to maintain stability of the excavation area. Further, a Health and Safety Plan shall be developed to address the specific worker-associated activities of waste removal and relocation.

**Plan Requirements  
and Timing:**

SWUD shall include these measures as a component of the Solid Waste Facility Permit that shall be submitted to the RWQCB and LEA/CIWMB for review and approval.

**Monitoring:**

SWUD shall keep training records and report occurrence of hazardous materials and hazardous wastes at the landfill to the LEA and Department of Toxic Substances Control and/or the Protection Services Division of the County Fire Department on a quarterly basis.

### 4.3 REVISED TABLES

This section provides revisions to the Draft EIR tables that have been made as a result of public comments on the document. These changes do not alter the findings or conclusions of the Draft EIR.

- Draft EIR Table 2-3 has been revised based on Comment 16-9.  
See Revised Table 2-3 in the Final EIR.
- Draft EIR Table 3.1-3 has been revised based on Comment 16-10.  
See Revised Table 3.1-3 in the Final EIR.
- Draft EIR Table 3.7-1 has been revised to correct an arithmetic error.  
See Revised Table 3.7-1 in the Final EIR.



**REVISED TABLE 2-3**

**HOURS AND DAYS OF OPERATION**

DAY OF WEEK	ACTIVITY			
	Waste Receipt and Disposal Operations <sup>(1)</sup>	Cover, Compaction, Construction, Maintenance	Construction Only <sup>(2)</sup>	Special Occurrences <sup>(3)</sup>
Monday-Tuesday	7:00 a.m. - 5:00 p.m.	6:00 a.m. - 6:00 p.m.	6:00 p.m. - 8:00 p.m.	24 hours
Wednesday-Saturday	7:00 a.m. - 4:00 p.m.	6:00 a.m. - 6:00 p.m.	6:00 p.m. - 8:00 p.m.	24 hours
Sunday <sup>(4)</sup>	-	-	7:00 a.m. - 6:00 p.m.	-

In addition to regular waste operations, the following activities would occur:

- (1) Southeast Corner Modification would occur during these hours.
- (2) Not associated with receiving waste. These hours are necessary for activities beyond normal operations.
- (3) Dust control, litter control and nonroutine maintenance will be implemented on an as-needed basis. Two water trucks would be used as required under extreme wind conditions. Litter control would require personnel only. Portable lighting is provided to personnel responding to special occurrences after dark. No other landfill equipment is required.
- (4) Maximum total of 20 Sundays per year will be permitted.



REVISED TABLE 3.1-3

POTENTIAL CUMULATIVE PROJECTS AND IMPACT SUMMARY

POTENTIAL IMPACTS <sup>(1)</sup>	ENVIRONMENTAL RESOURCE AREA										
	Geology and Soils	Water Resources	Biological Resources	Cultural Resources	Nuisances	Land Use	Visual Resources	Noise	Traffic	Air Quality	Health and Safety
TAJIGUAS LANDFILL EXPANSION	○	○	●	●	○	○	●	○	○	●	○
<b>APPROVED COUNTY PROJECTS</b>											
1. Bacara Resort	○	○	●	●	○	○	●	○	○	●	○
<b>PENDING COUNTY PROJECTS</b>											
2. Level 3 Fiber Optics	○	○	●	●	○	○	●	○	○	●	○
3. Arco Golf Links	○	○	●	●	○	○	●	○	○	●	○
4. Naples (Santa Barbara Ranch)	○	○	●	●	○	○	●	○	○	●	○
5. Gaviota National Seashore	○	○	●	●	○	○	●	○	○	●	○
6. Gaviota Oil and Gas Processing Facility	○	○	●	●	○	○	●	○	○	●	○
7. Rancho Tajiguas Lot Line Adjustment (LLA)	○	○	●	●	○	○	●	○	○	●	○
Future County Projects											
8. Tajiguas Beach (proposed park)	○	○	●	●	○	○	●	○	○	●	○
9. Edwards Ranch (proposed park)	○	○	●	●	○	○	●	○	○	●	○
<b>CALTRANS PROJECTS</b>											
10. Arroyo Quemado Bridge	○	○	●	●	○	○	●	○	○	●	○
11. Gaviota Roadside Rest Area	○	○	●	●	○	○	●	○	○	●	○
12. Ellwood Bridge	○	○	●	●	○	○	●	○	○	●	○
<b>DEPARTMENT OF PUBLIC WORKS PROJECTS</b>											
13. Lower Pila Creek Restoration and Enhancement	○	○	●	○	○	○	●	○	○	●	○
14. Intersection Improvement	○	○	●	●	○	○	●	○	○	●	○

LEGEND: ○ = No potential cumulative impacts when considered with the proposed project.  
 ○ = Less than significant cumulative impact when considered with the proposed project.  
 ● = Potential significant cumulative impacts when considered with the proposed project.

(1) See Figures 3.1-2 and 3.1-3 for locations of projects that correspond to the numbers in this table.



REVISED TABLE 3.7-1

SITE INFORMATION

Comprehensive Plan Designation	Rural area, Agricultural land
Zoning District, Ordinance	Parcel APN 081-150-026: AG-II-100, Article III Comprehensive Plan Parcel APN 081-150-019: Northern portion: AG-II-100, Article III Comprehensive Plan Southern portion: AG-II-320; Article II Local Coastal Plan A Solid Waste Facilities Overlay is on the inland portions of both parcels.  Parcel APN 081-150-021: Northern portion: AG-II-100, Article III Comprehensive Plan Southern portion: AG-II-320; Article II Local Coastal Plan
Site Size	APN 081-150-026: 282 acres APN 081-150-019: 130 acres APN 081-150-021: 85 acres Total: <del>412</del> 497 acres gross and net
Present Use & Development	The project site is currently the site of the operating Tajiguas Landfill.
Surrounding Uses/Zoning	North: Los Padres National Forest South: Highway 101, Transportation Corridor Two privately owned undeveloped parcels APN 081-150-033, -034, AG-II-320 East: Baron Ranch APN 081-150-019 and -020, AG-II-320 (coastal) and AG-II-100 (Inland)- Cultivated agriculture (Orchards: avocados, cherimoya) West: Aera Energy APN 081-150-015, AG-II-320 - (oil and gas) Arroyo Hondo APN 081-150-002, -025, and -028, AG-II-320 (coastal) and AG-II-100 (Inland) - Passive agriculture (citrus orchard and grazing) and open space The community of Arroyo Quemada is located approximately 2000 feet southeast of the landfill and is zoned RR- 40.
Access	Access is taken from Highway 101 to the existing Tajiguas Landfill access road.
Public Services	Water Supply: Onsite wells Sewage: Onsite septic system Fire: Santa Barbara County Fire Other: Electricity (Southern California Edison)
Other Site Information	The Tajiguas Landfill site is bisected by the Coastal Zone Boundary and the Coastal Commission appeals jurisdiction associated with Pila Creek. Highway 101 along the Gaviota Coast is a State Master-Planned Scenic Highway.

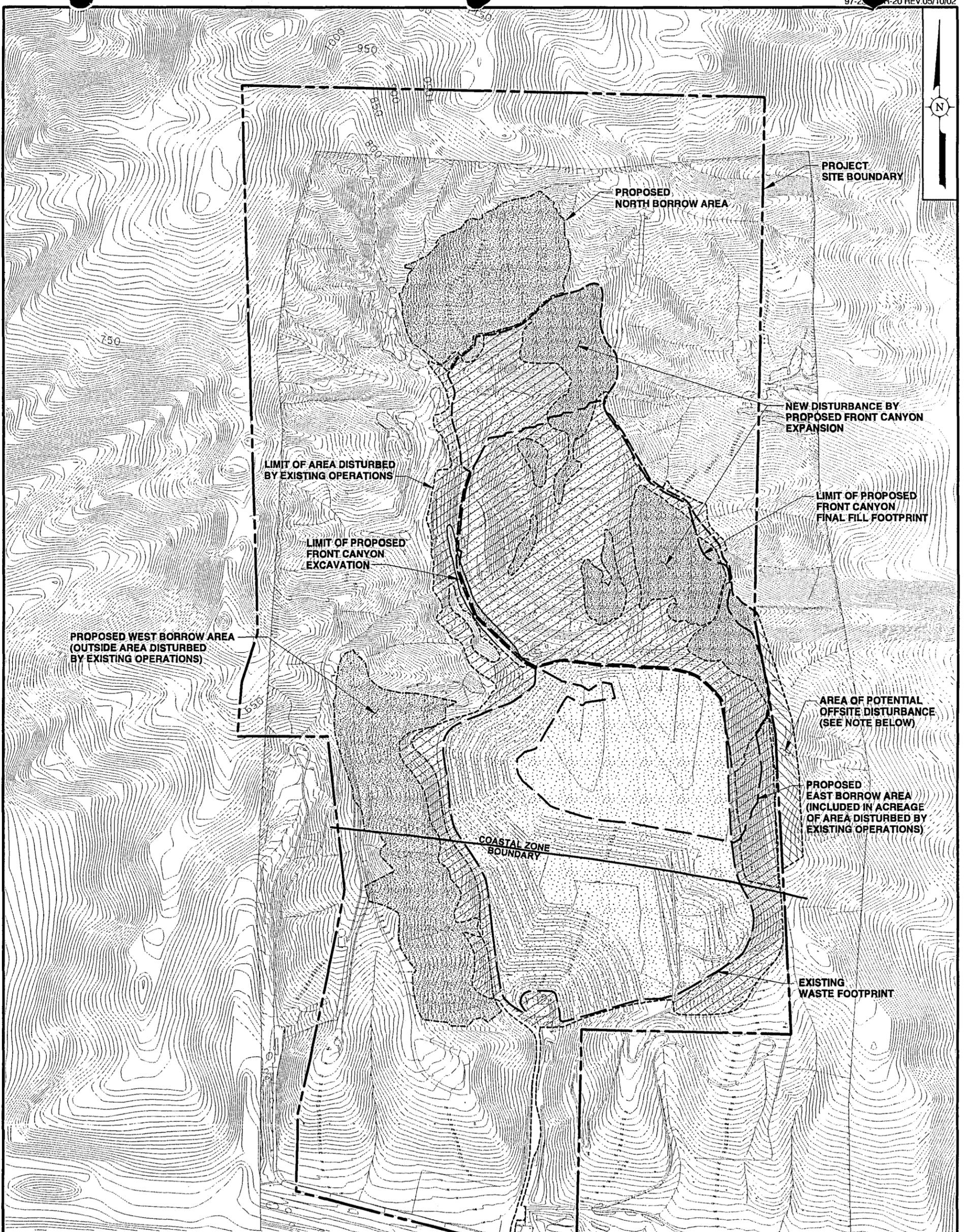


#### 4.4 REVISED AND NEW FIGURES

This section provides revisions to Draft EIR figures and new figures that are provided as a result of public comments on the document. These changes do not alter the findings or conclusions of the Draft EIR.

- Draft EIR Figure 2-4 has been revised based on Comment Numbers 16-3 and 16-4. See Revised Figure 2-4 in the Final EIR.
- Draft EIR Figure 2-7 has been revised based on Comment Numbers 16-5 and 16-6. See Revised Figure 2-7 in the Final EIR.
- Figure 3.3-3A has been added based on Comment Numbers 2-6 and 2-13a. See Figure 3.3-3A in the Final EIR.
- Draft EIR Figure 3.3-5 has been revised based on Comment Number 4-2. See Revised Figure 3.3-5 in the Final EIR.
- Draft EIR Figure 3.7-1 has been revised based on Comment Number 33-1. See Revised Figure 3.7-1 in the Final EIR.
- Draft EIR Figure 3.8-1 has been revised based on Comment Numbers 3-86 and 5-13. See Revised Figure 3.8-1 in the Final EIR.
- Draft EIR Figure 3.8-2 has been revised based on Comment Number 16-15. See Revised Figure 3.8-2 in the Final EIR.
- Draft EIR Figure 3.8-3 has been revised based on Comment Number 16-15. See Revised Figure 3.8-3 in the Final EIR.
- Draft EIR Figure 3.8-4 has been revised based on Comment Number 6-15. See Revised Figure 3.8-4 in the Final EIR.
- Draft EIR Figure 3.8-5 has been revised based on Comment Number 3-84. See Revised Figure 3.8-5 in the Final EIR.
- Draft EIR Figure 3.8-6 has been revised based on Comment Number 3-84. See Revised Figure 3.8-6 in the Final EIR.
- Draft EIR Figure 3.8-7 has been revised based on Comment Number 3-84. See Revised Figure 3.8-7 in the Final EIR.
- Draft EIR Figure 3.8-8 has been revised based on Comment Number 3-84. See Revised Figure 3.8-8 in the Final EIR.
- Draft EIR Figure 3.8-9 has been revised based on Comment Number 3-84. See Revised Figure 3.8-9 in the Final EIR.
- Draft EIR Figure 3.8-10 has been revised based on Comment Number 3-84. See Revised Figure 3.8-10 in the Final EIR.

- Draft EIR Figure 3.8-11 has been revised based on Comment Number 3-84. See Revised Figure 3.8-11 in the Final EIR.
- Draft EIR Figure 3.8-12 has been revised based on Comment Number 3-84. See Revised Figure 3.8-12 in the Final EIR.
- Draft EIR Figure 3.8-13 has been revised based on Comment Number 3-84. See Revised Figure 3.8-13 in the Final EIR.
- Draft EIR Figure 3.8-14 has been revised based on Comment Number 3-84. See Revised Figure 3.8-14 in the Final EIR.
- Figure 3.8-15 has been added based on Comment Numbers 5-13 and 33-14. See Figure 3.8-15 in the Final EIR.
- Figure 3.8-16 has been added based on Comment Numbers 5-13 and 33-14. See Figure 3.8-16 in the Final EIR.
- Figure 3.8-17 has been added based on Comment Numbers 5-13 and 33-14. See Figure 3.8-17 in the Final EIR.
- Figure 3.8-18 has been added based on Comment Numbers 5-13 and 33-14. See Figure 3.8-18 in the Final EIR.
- Figure 3.8-19 has been added based on Comment Number 3-86. See Figure 3.8-21 in the Final EIR.
- Figure 3.8-20 has been added based on Comment Number 3-86. See Figure 3.8-22 in the Final EIR.
- Figure 3.8-21 has been added based on Comment Number 21-9. See Figure 3.8-23 in the Final EIR.
- Figure 3.8-22 has been added based on Comment Number 21-9. See Figure 3.8-24 in the Final EIR.
- Figure 3.8-23 has been added based on Comment Numbers 21-9. See Figure 3.8-25 in the Final EIR.
- Figure 3.8-24 has been added based on Comment Number 21-9. See Figure 3.8-26 in the Final EIR.



PROPOSED WEST BORROW AREA  
(OUTSIDE AREA DISTURBED  
BY EXISTING OPERATIONS)

PROPOSED  
NORTH BORROW AREA

PROJECT  
SITE BOUNDARY

LIMIT OF AREA DISTURBED  
BY EXISTING OPERATIONS

NEW DISTURBANCE BY  
PROPOSED FRONT CANYON  
EXPANSION

LIMIT OF PROPOSED  
FRONT CANYON  
EXCAVATION

LIMIT OF PROPOSED  
FRONT CANYON  
FINAL FILL FOOTPRINT

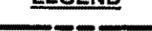
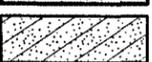
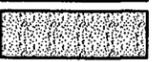
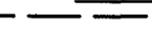
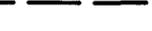
AREA OF POTENTIAL  
OFFSITE DISTURBANCE  
(SEE NOTE BELOW)

PROPOSED  
EAST BORROW AREA  
(INCLUDED IN ACREAGE  
OF AREA DISTURBED BY  
EXISTING OPERATIONS)

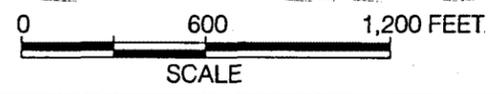
COASTAL ZONE  
BOUNDARY

EXISTING  
WASTE FOOTPRINT

**LEGEND**

-  PROJECT SITE BOUNDARY
-  AREA DISTURBED BY EXISTING OPERATIONS WITHIN EXISTING FOOTPRINT
-  AREA DISTURBED BY EXISTING OPERATIONS OUTSIDE EXISTING FOOTPRINT
-  NEW DISTURBANCE BY PROPOSED OPERATIONS
-  PROPOSED ACCESS ROAD AREA OF 5-ACRE OFFSITE DISTURBANCE
-  EXISTING LANDFILL WASTE FOOTPRINT
-  LIMIT OF FRONT CANYON EXCAVATION
-  LIMIT OF PROPOSED FRONT CANYON FINAL FILL FOOTPRINT
-  LIMIT OF PROPOSED BORROW AREAS

TOTAL DISTURBANCE = 259 ACRES



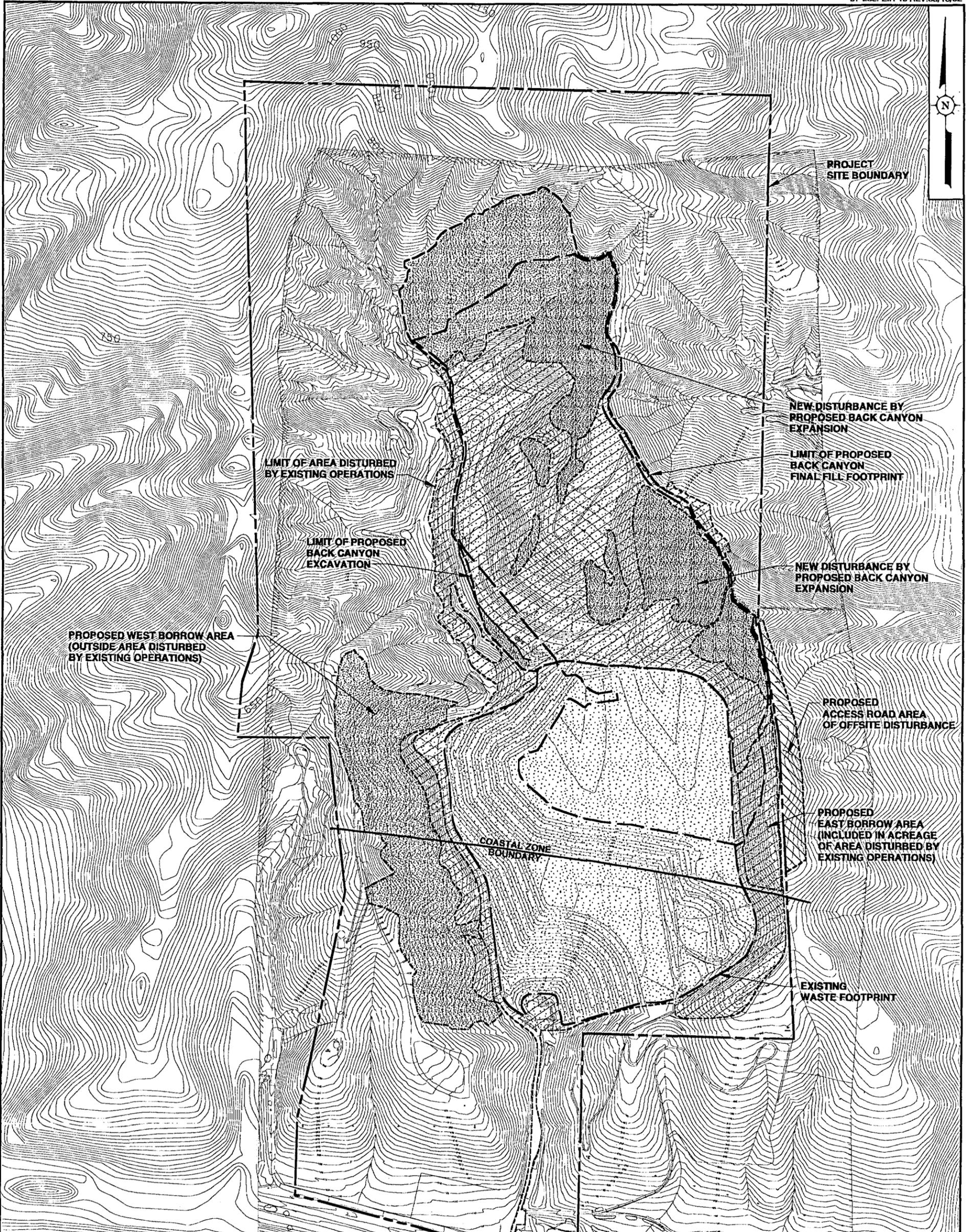
**EXISTING AND PROPOSED  
AREAS OF DISTURBANCE  
FRONT CANYON CONFIGURATION**

TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA

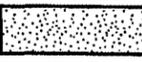
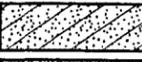
**TRC**

REVISED FIGURE 2-4

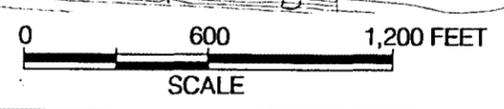
NOTE:  
THIS FIGURE WAS REVISED BASED ON COMMENT  
NUMBERS 16-3 AND 16-4.



**LEGEND**

- PROJECT SITE BOUNDARY
-  AREA DISTURBED BY EXISTING OPERATIONS WITHIN EXISTING FOOTPRINT
-  AREA DISTURBED BY EXISTING OPERATIONS OUTSIDE EXISTING FOOTPRINT
-  NEW DISTURBANCE BY PROPOSED OPERATIONS
-  PROPOSED ACCESS ROAD AREA OF 5-ACRE OFFSITE DISTURBANCE
- EXISTING LANDFILL WASTE FOOTPRINT
- LIMIT OF BACK CANYON EXCAVATION
- LIMIT OF PROPOSED BACK CANYON FINAL FILL FOOTPRINT
- LIMIT OF PROPOSED BORROW AREAS

TOTAL DISTURBANCE = 260 ACRES



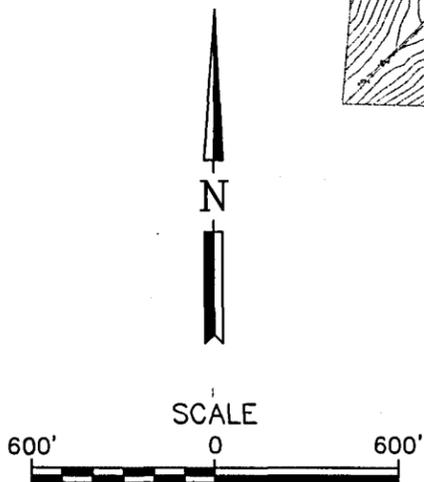
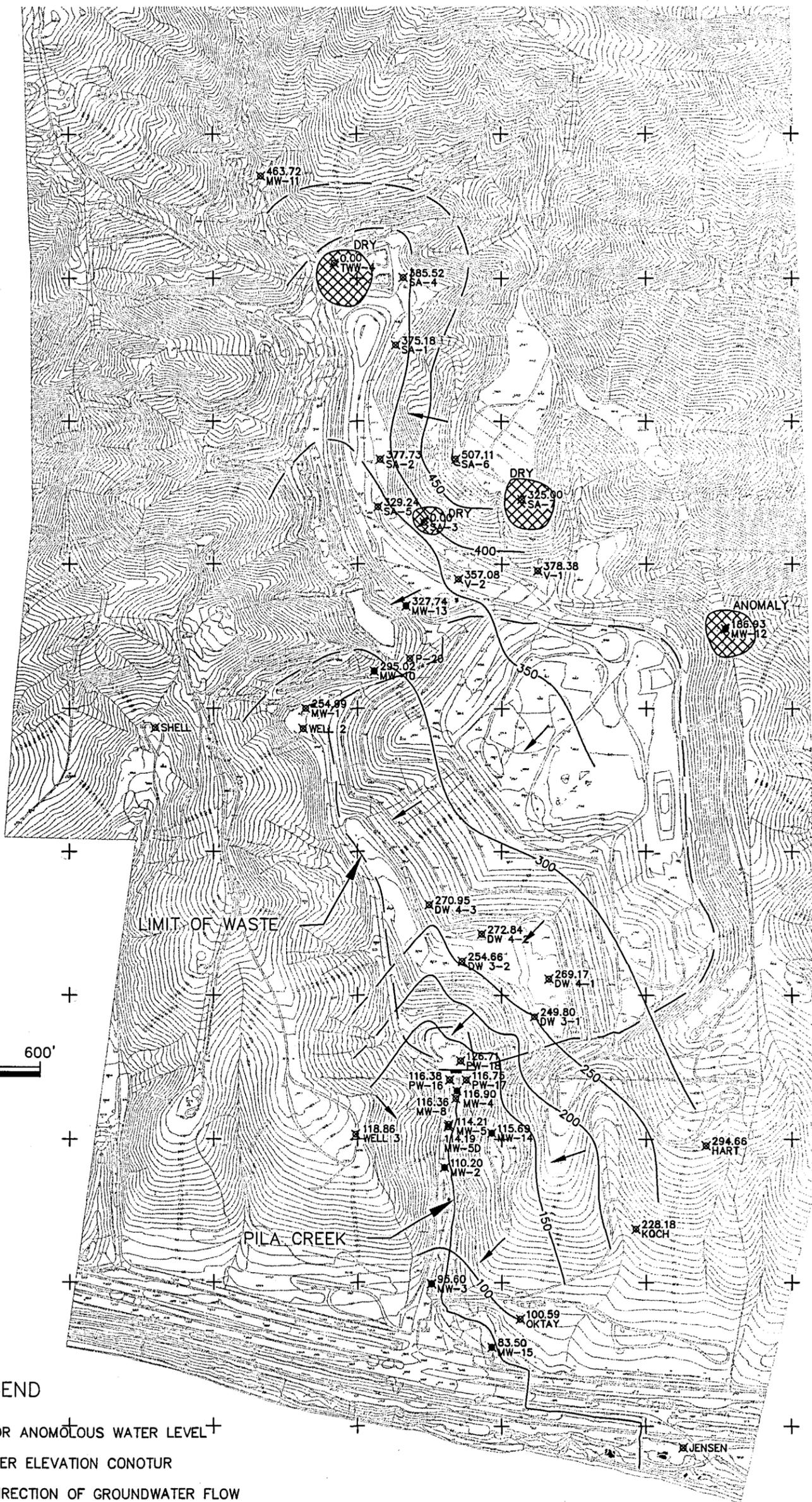
**EXISTING AND PROPOSED AREAS OF DISTURBANCE BACK CANYON CONFIGURATION**

TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA

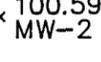


REVISED FIGURE 2-7

NOTE:  
THIS FIGURE REVISED BASED ON COMMENT  
NUMBERS 16-5 AND 16-6.



**LEGEND**

-  DRY WELL OR ANOMALOUS WATER LEVEL
-  100 GROUNDWATER ELEVATION CONOTUR
-  INFERRED DIRECTION OF GROUNDWATER FLOW
-  GROUNDWATER ELEVATION, MEASURED MARCH/APRIL, 2002
-  100.59 MW-2 WELL LOCATION AND NUMBER
-  M&RP MONITORING WELL
-  OTHER WELL

SOURCE: COUNTY OF SANTA BARBARA SOLID WASTE & UTILITIES DIVISION, JUNE 2002.

NOTES: (1) THIS FIGURE ADDED BASED ON COMMENT NO. 2-6 AND 2-13a.

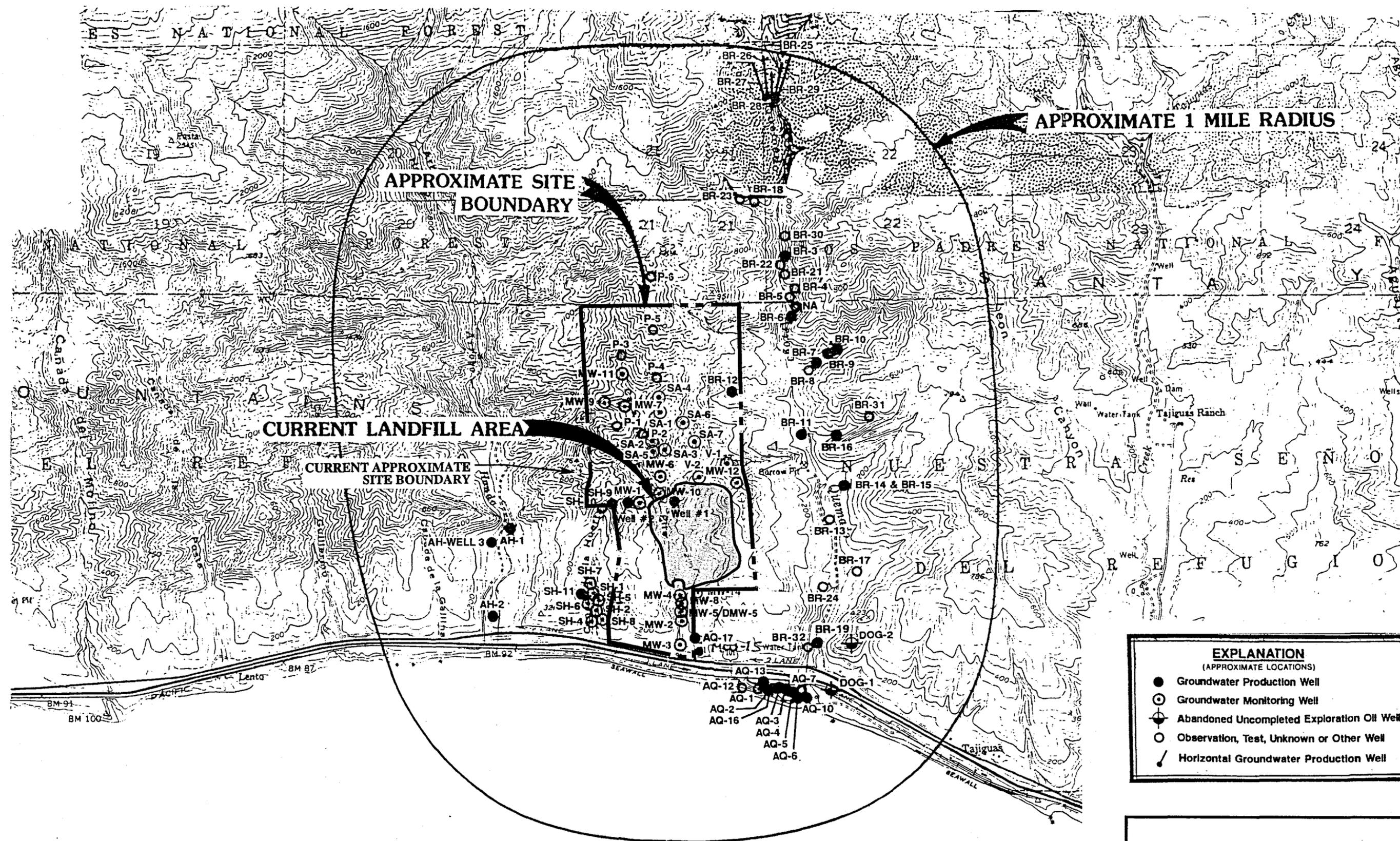
(2) WATER IN THE LANDFILL IS ISOLATED FROM BEDROCK GROUNDWATER. EXTENSION OF CONTOURS THROUGH THE LANDFILL IS QUESTIONABLE.

**TAJIGUAS LANDFILL  
GROUNDWATER ELEVATION MAP**

TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA

**TRC**

**FIGURE 3.3-3A**



APPROXIMATE 1 MILE RADIUS

APPROXIMATE SITE BOUNDARY

CURRENT LANDFILL AREA

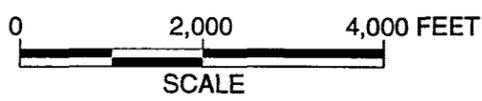
CURRENT APPROXIMATE SITE BOUNDARY

**EXPLANATION**  
(APPROXIMATE LOCATIONS)

- Groundwater Production Well
- Groundwater Monitoring Well
- ⊕ Abandoned Uncompleted Exploration Oil Well
- Observation, Test, Unknown or Other Well
- Horizontal Groundwater Production Well

- REFERENCES:
1. GAVIOTA, SOLVANG AND TAJIGUAS QUADRANGLES (PHOTOREVISED 1982); SANTA YNEZ QUADRANGLE (PHOTOREVISED 1974).
  2. EMCON ASSOCIATES, MAY 1994 LANDFILL EXPANSION SITE CHARACTERIZATION, VOLUME 1.
  3. ARCADIS GERAGHTY & MILLER, INC., JULY 2001 WELLS.
  4. HOOVER & ASSOCIATES, INC., WELL COMPLETION REPORT, 1994.

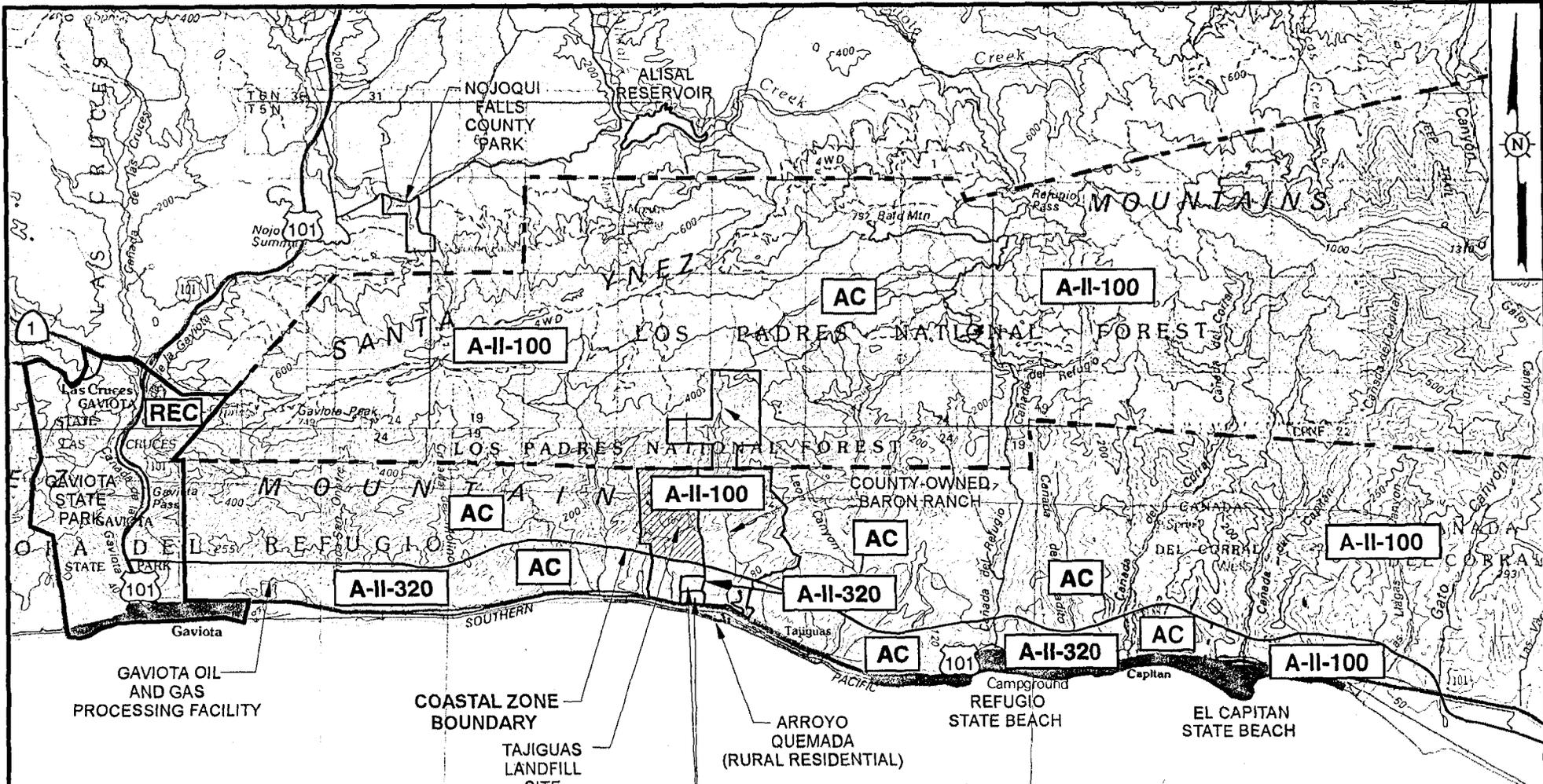
NOTE:  
THIS FIGURE WAS REVISED BASED ON COMMENT No. 4-2.



**WELLS WITHIN 1-MILE RADIUS OF PROJECT SITE**

TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA

**TRC** REVISED FIGURE 3.3-5

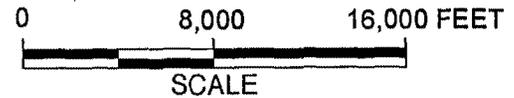


**LEGEND**

- AGRICULTURE II (100 - 320 ACRE MINIMUM PARCEL SIZE)/AGRICULTURE COMMERCIAL
- RURAL RESIDENTIAL (40 - 100 ACRE MINIMUM PARCEL SIZE)
- PUBLIC BEACHES (RECREATION)
- WASTE DISPOSAL FACILITY OVERLAY

NOTES: 1. LAND WITHIN COASTAL ZONE IS INTERMIXED AC AND A-II-320. COASTAL AREA IS PRIMARILY RECREATION.  
 2. THIS FIGURE REVISED BASED ON COMMENT No. 33-1.

REFERENCES: USGS 1:100,000 SCALE MAPS OF POINT CONCEPTION (1981), SANTA BARBARA (1982), CUYAMA (1981) AND SANTA MARIA (1982). GAVIOTA COAST RURAL REGION LAND USE DESIGNATIONS. MAP (NOVEMBER 19, 1998).

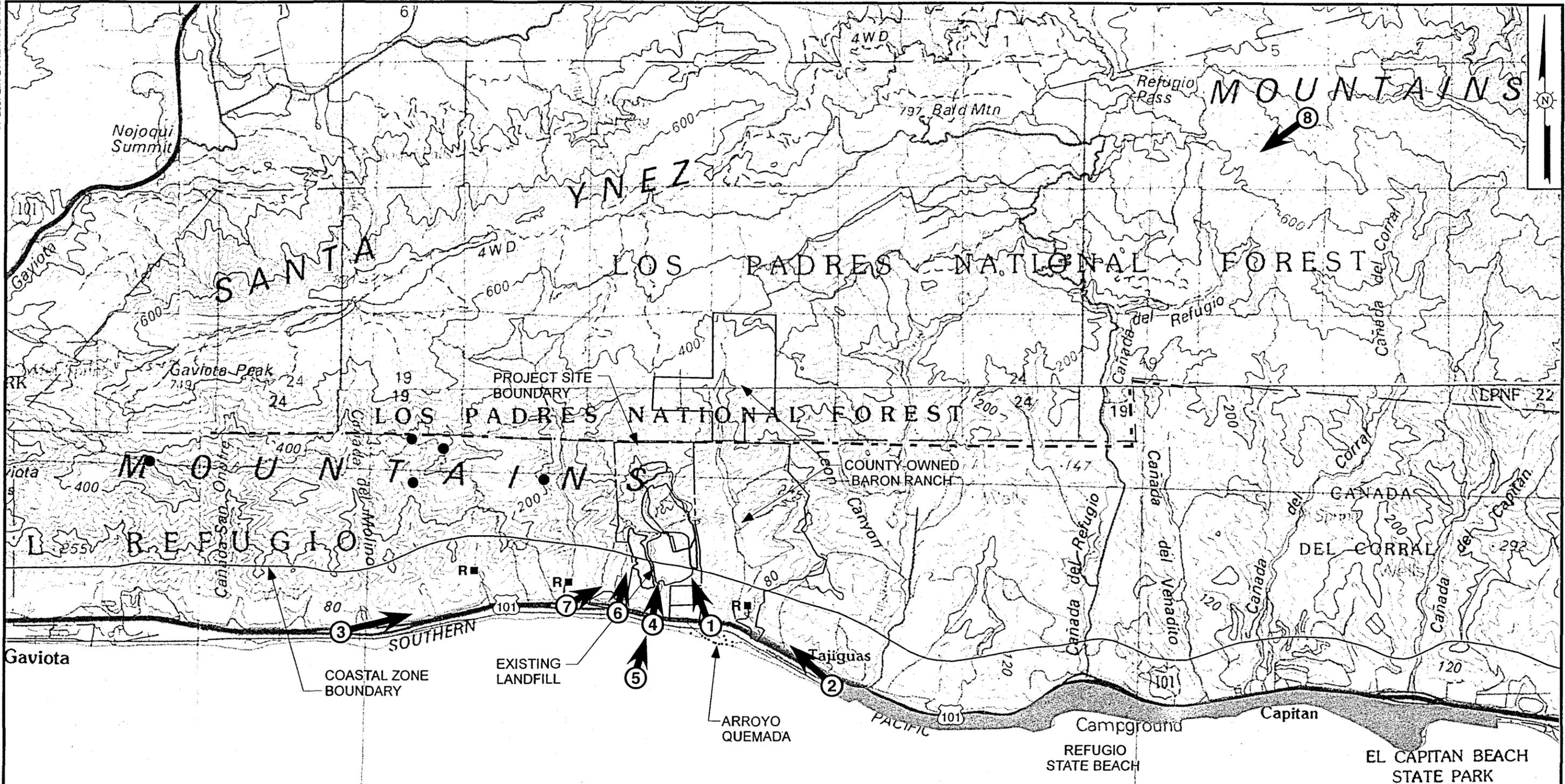


**GENERALIZED  
LAND USE MAP**

TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA

<b>TRC</b>	REVISED FIGURE 3.7-1
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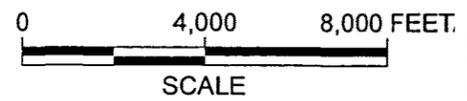




**LEGEND**

- ① VIEWPOINT.
- ← DIRECTION OF VIEW
- R ■ RESIDENCE
- ▨ PUBLIC BEACHES (RECREATION)

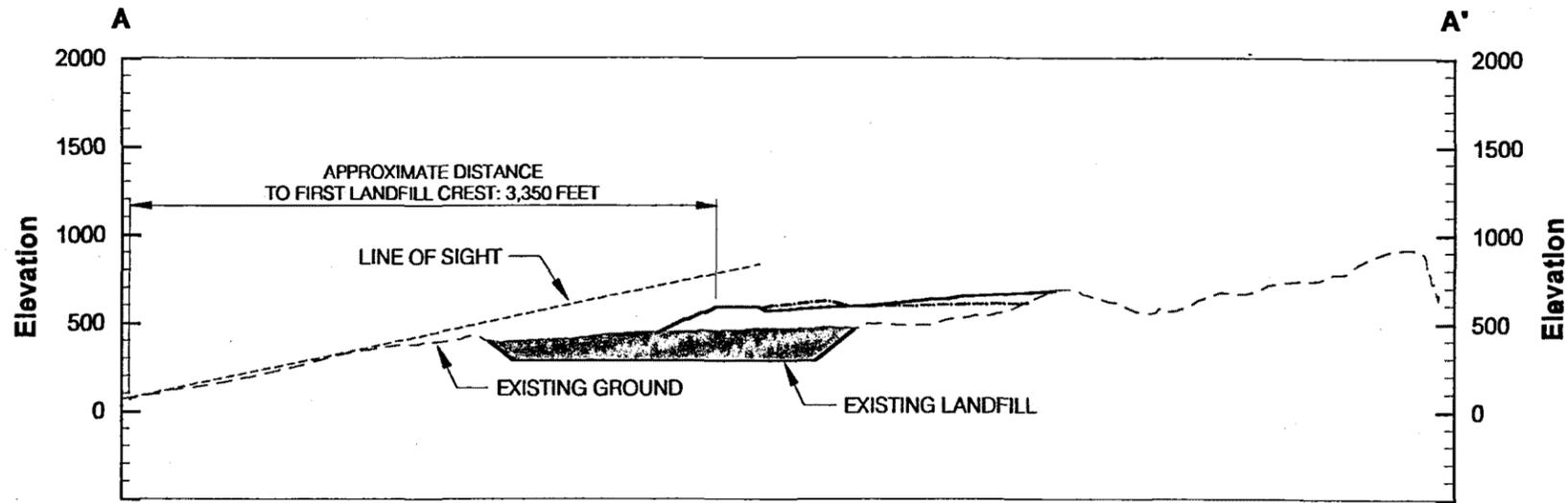
NOTE: THIS FIGURE REVISED BASED ON COMMENT NUMBERS 3-86 AND 5-13.  
 REFERENCE: USGS 1:100,000 SCALE MAPS OF POINT CONCEPTION (1981) AND SANTA MARIA (1982).



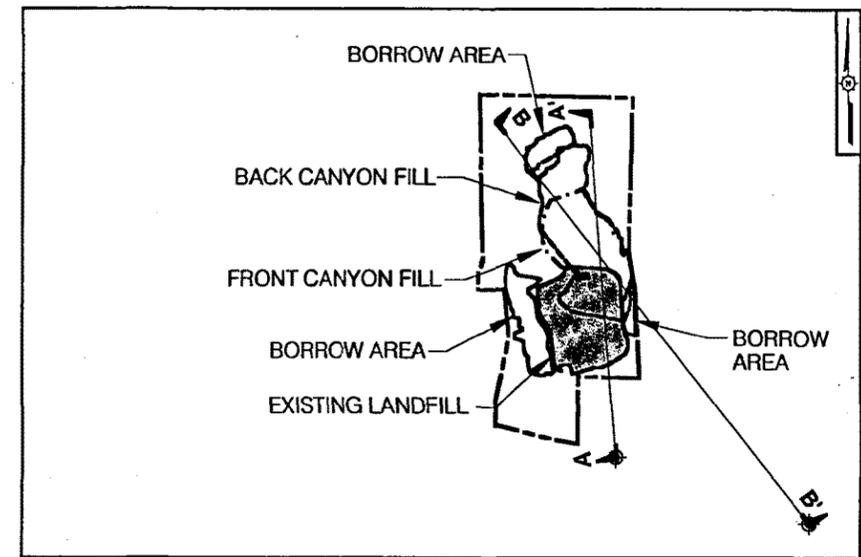
**VISUALLY SENSITIVE LAND USES AND VIEWPOINT LOCATIONS**

TAJIGUAS LANDFILL EXPANSION  
 SANTA BARBARA, CALIFORNIA

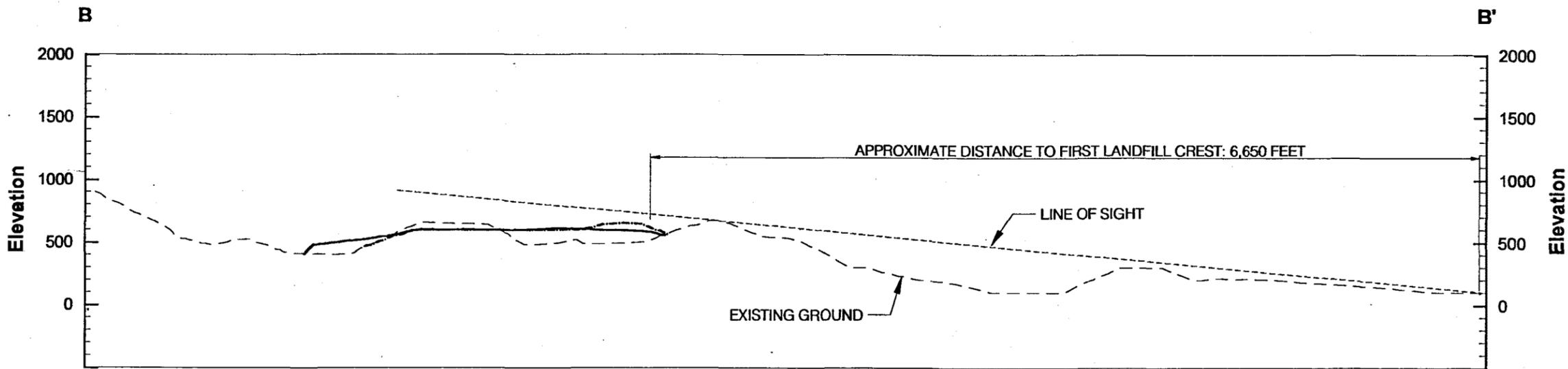
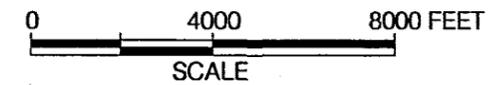
**TRC** REVISED FIGURE 3.8-1



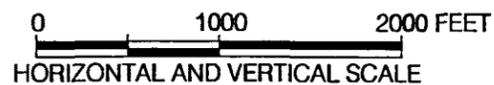
**SECTION A-A'**  
(VIEWPOINT 1)



**KEY MAP**



**SECTION B-B'**  
(VIEWPOINT 2)



**LEGEND**

- BACK CANYON FILL PLAN
- - - - - FRONT CANYON FILL PLAN

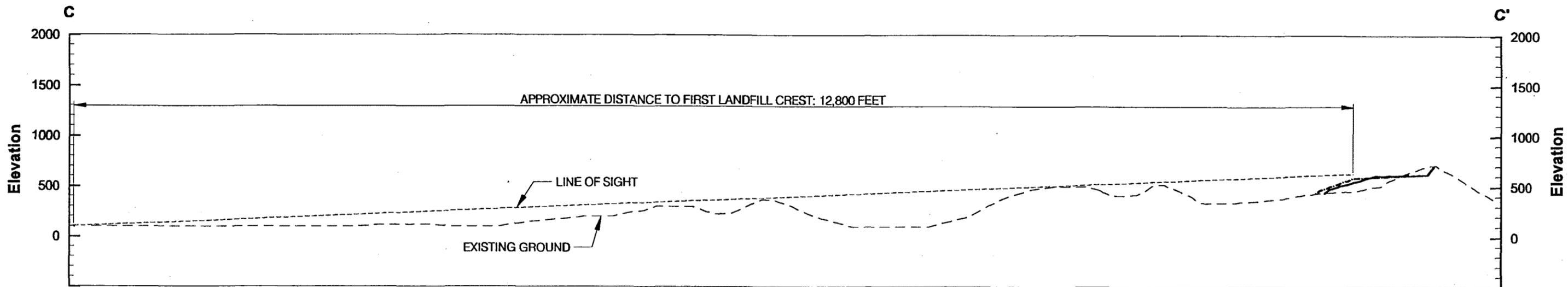
- NOTES:
1. SEE FIGURES 3.8-5 THROUGH 3.8-14 FOR PHOTOGRAPHS FROM EACH VIEWPOINT.
  2. THIS FIGURE REVISED BASED ON COMMENT NO. 16-15.

**LINE-OF-SIGHT SECTIONS  
A-A' AND B-B'  
(VIEWPOINTS 1 AND 2)**

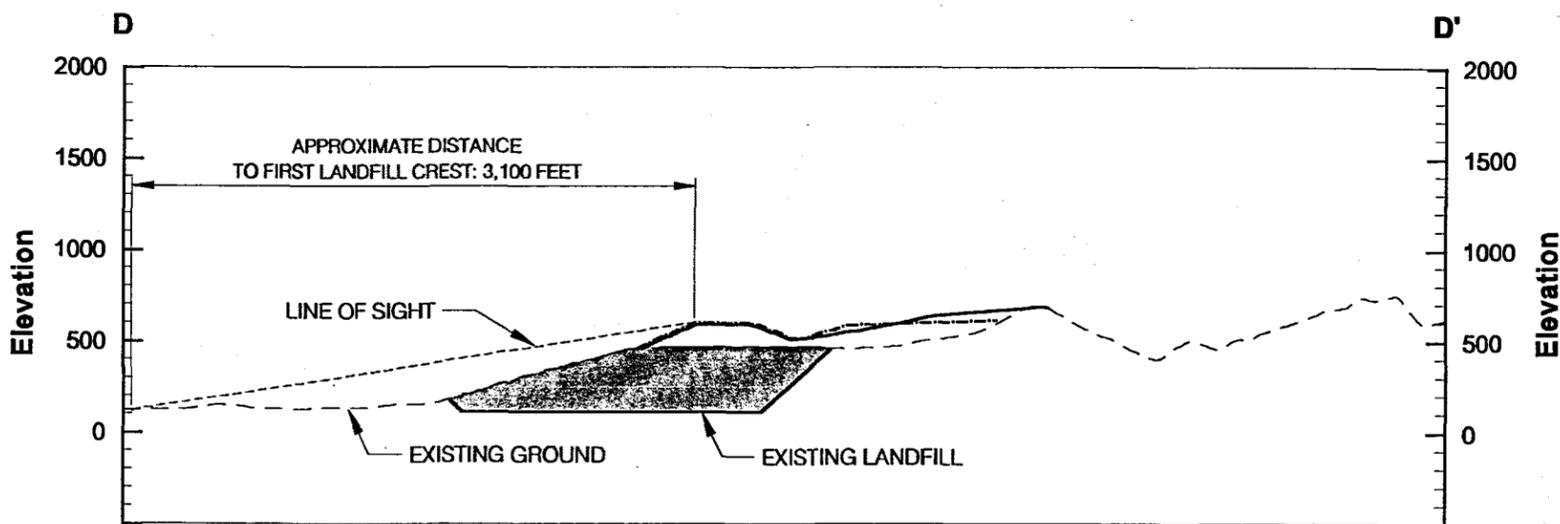
TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA



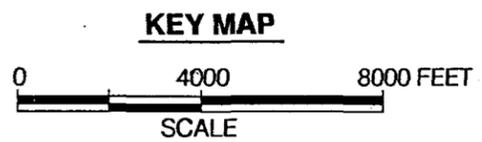
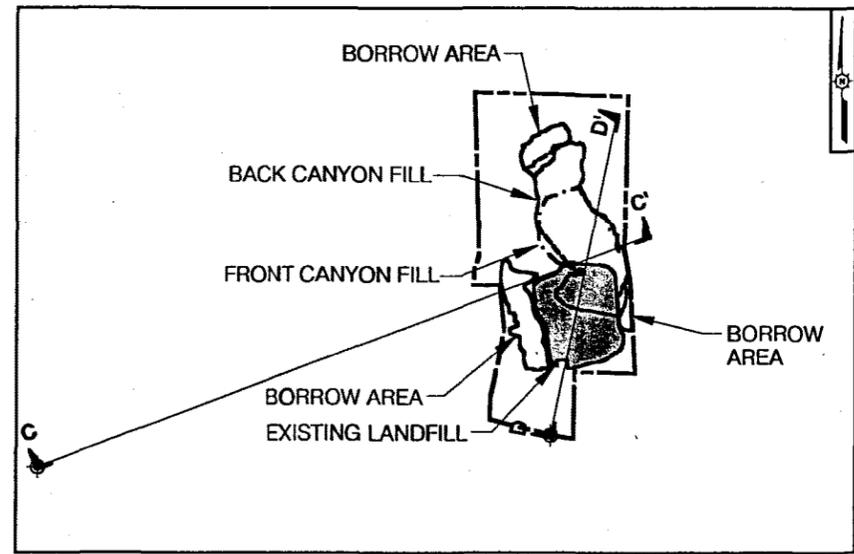
REVISED FIGURE 3.8-2



**SECTION C-C'**  
(VIEWPOINT 3)



**SECTION D-D'**  
(VIEWPOINT 4)



**LEGEND**

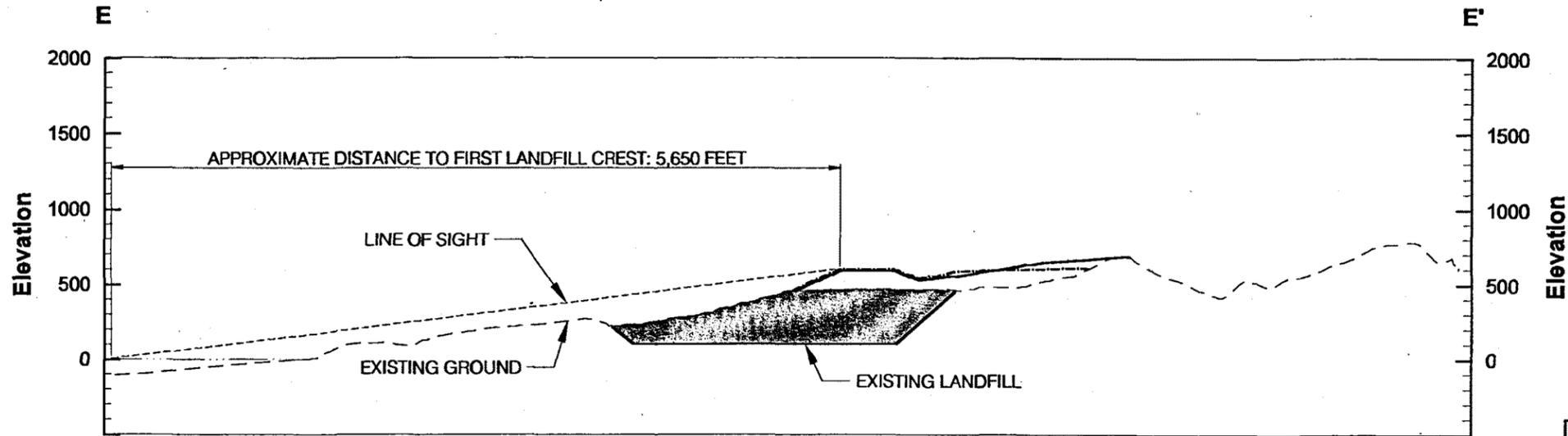
- BACK CANYON FILL PLAN
- - - - - FRONT CANYON FILL PLAN

NOTES:  
 1. SEE FIGURES 3.8-5 THROUGH 3.8-14 FOR PHOTOGRAPHS FROM EACH VIEWPOINT.  
 2. THIS FIGURE REVISED BASED ON COMMENT NO. 16-15.

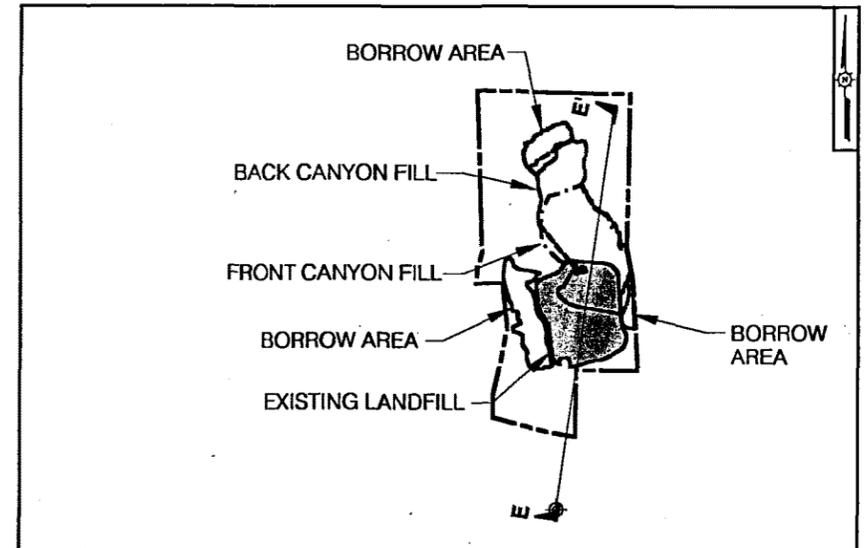
**LINE-OF-SIGHT SECTIONS  
C-C' AND D-D'  
(VIEWPOINTS 3 AND 4)**

TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA

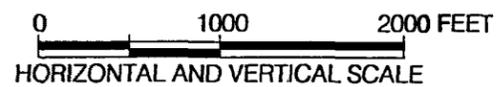
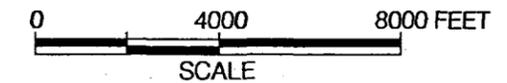
**TRC**      REVISED FIGURE 3.8-3



**SECTION E-E'**  
(VIEWPOINT 5)



**KEY MAP**



**LEGEND**

- BACK CANYON FILL PLAN
- - - - - FRONT CANYON FILL PLAN
- SEA LEVEL

**NOTES:**

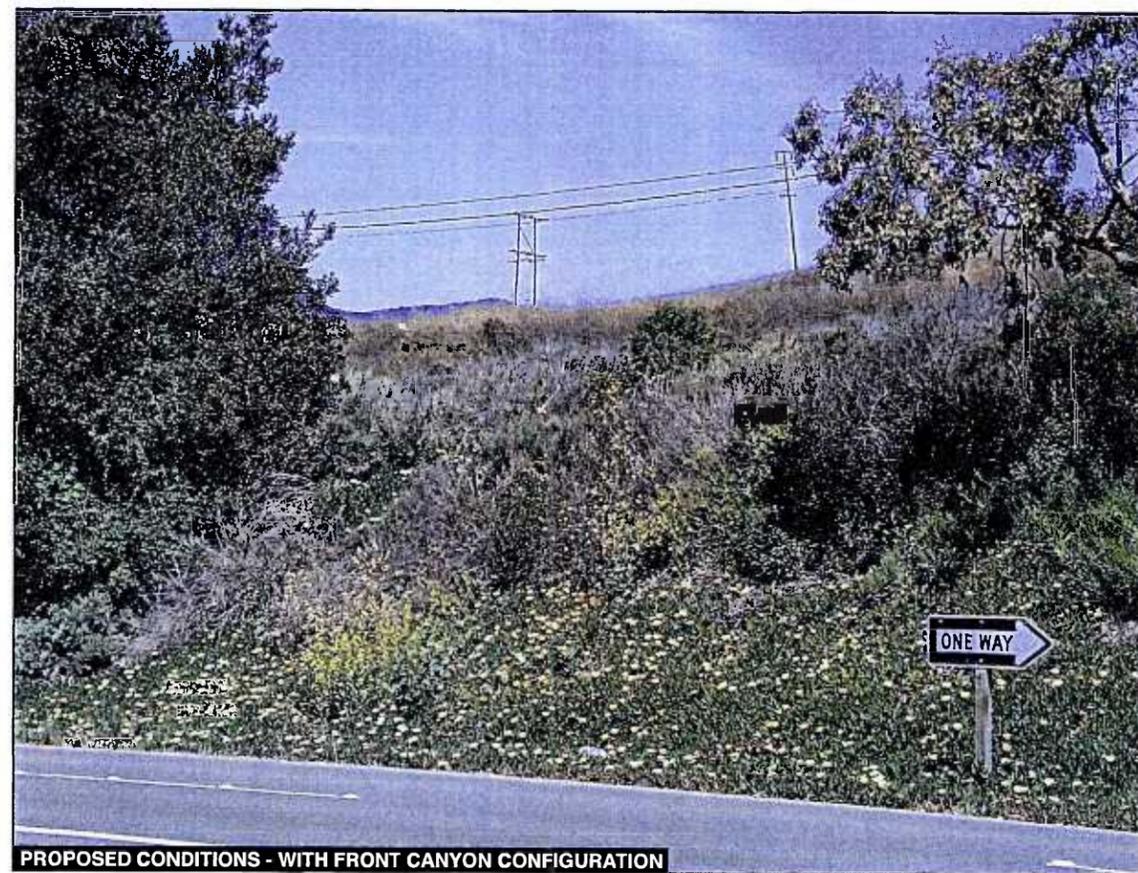
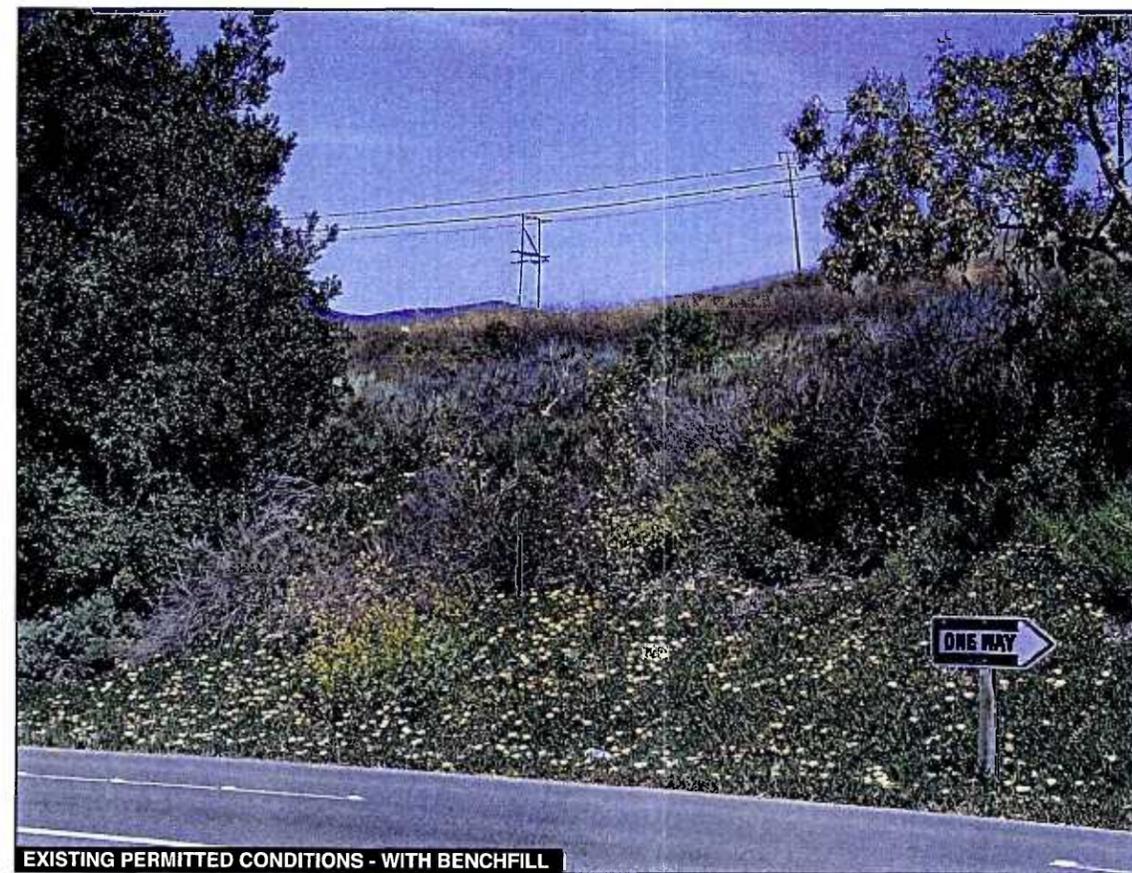
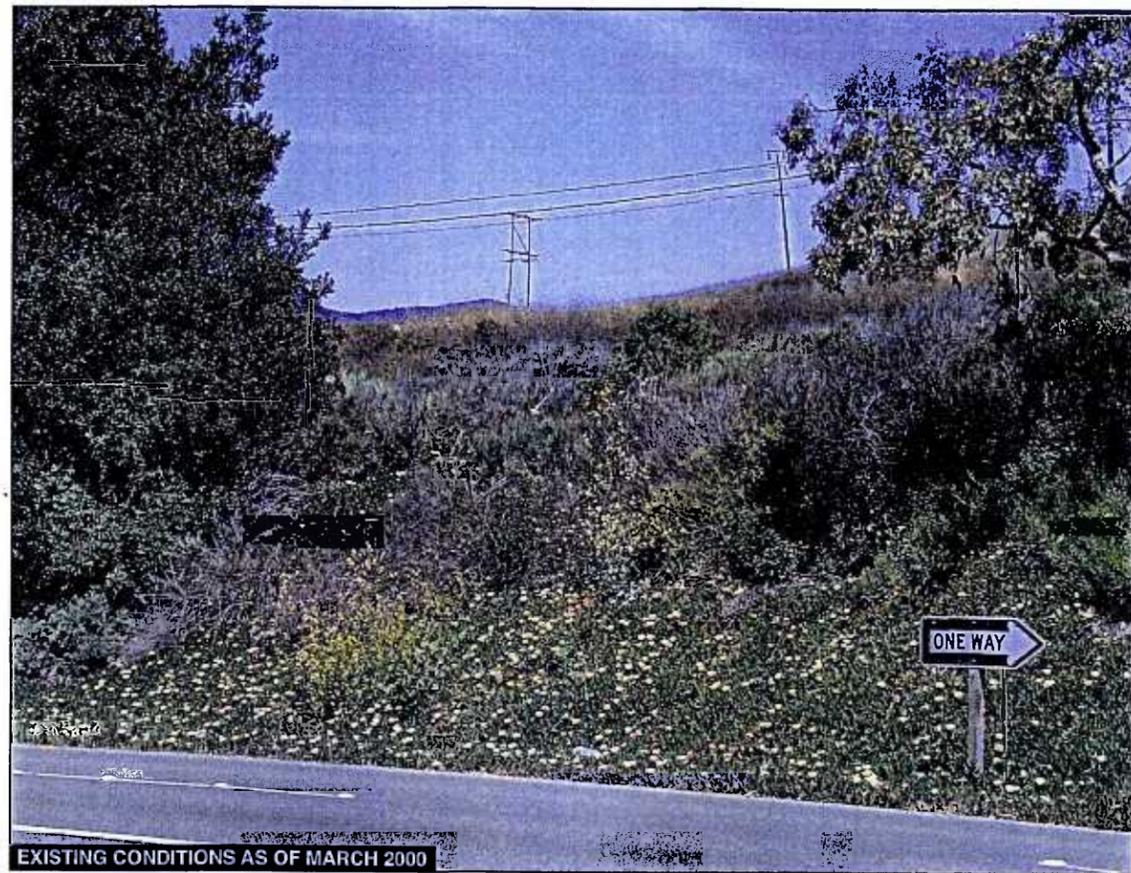
1. SEE FIGURES 3.8-5 THROUGH 3.8-14 FOR PHOTOGRAPHS FROM EACH VIEWPOINT.
2. THIS FIGURE REVISED BASED ON COMMENT NO. 16-15.

**LINE-OF-SIGHT SECTION E-E'**  
(VIEWPOINT 5)

TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA

**TRC**

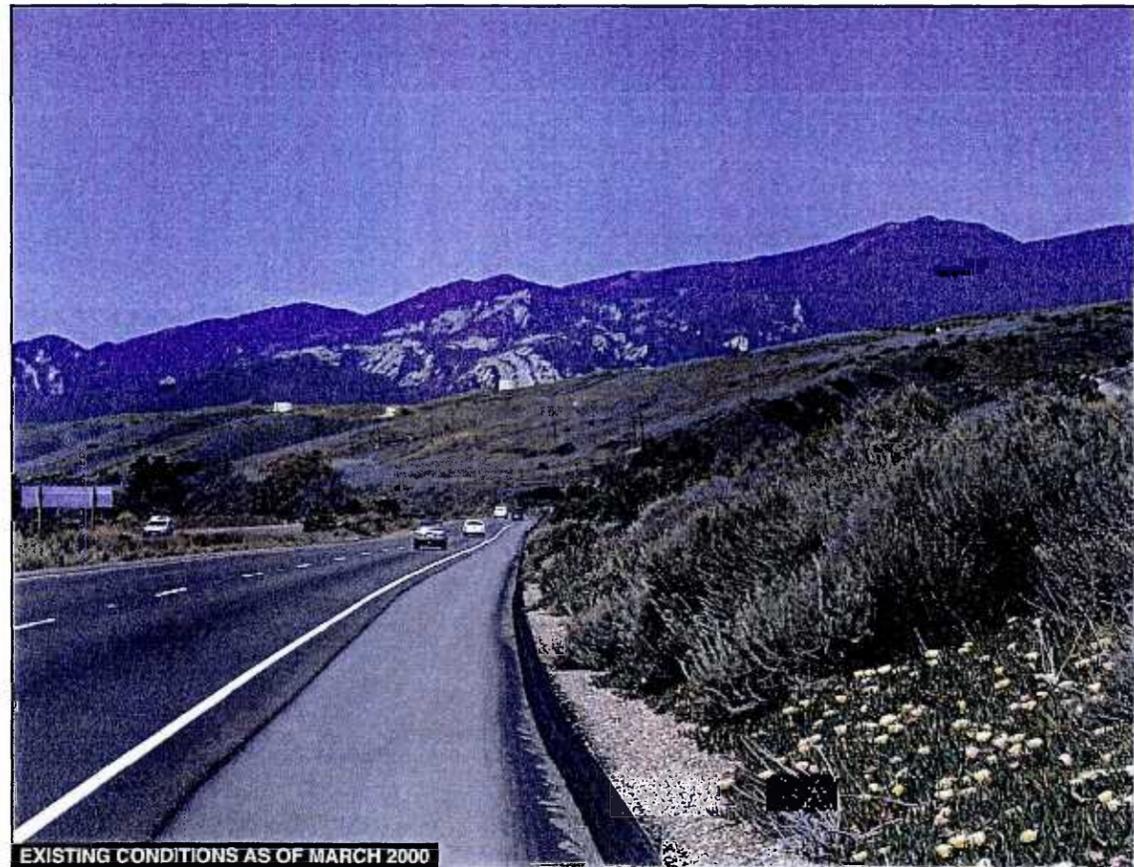
REVISED FIGURE 3.8-4



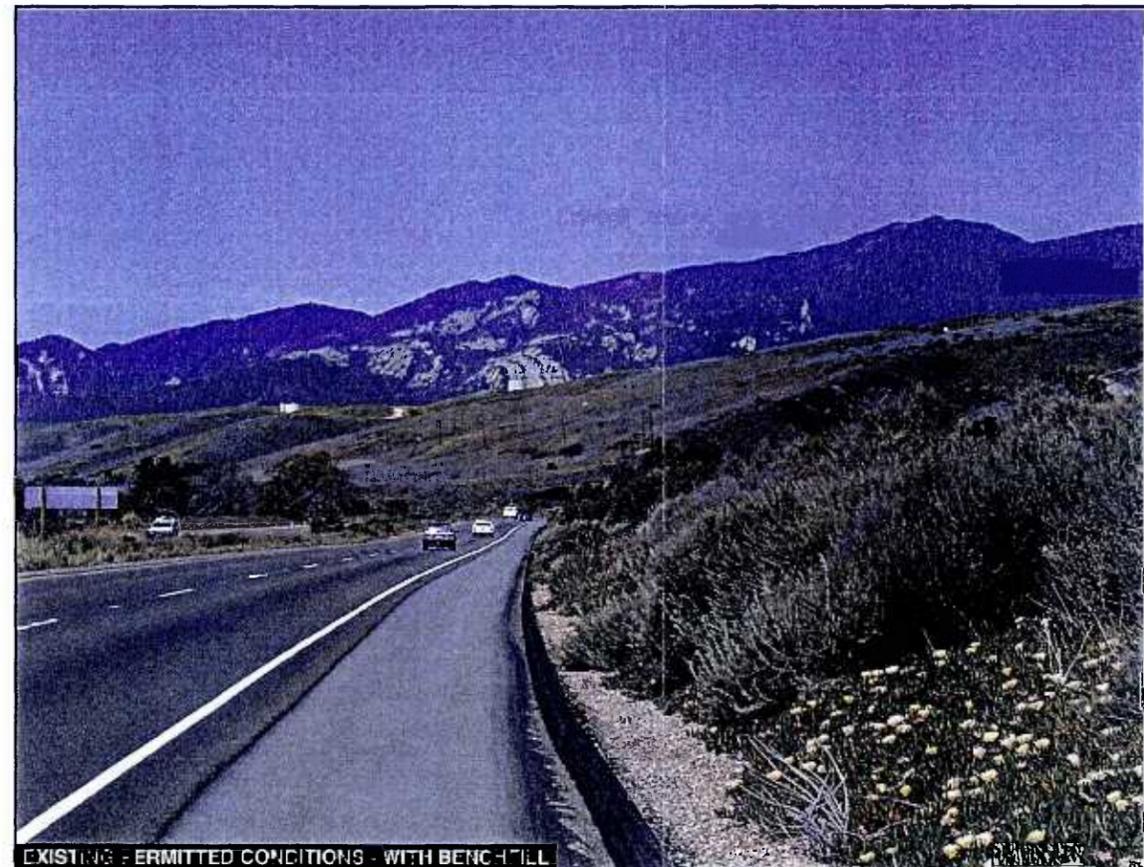
**VIEWPOINT 1  
FRONT CANYON  
EXISTING CONDITIONS,  
EXISTING PERMITTED CONDITIONS  
AND FINAL CONFIGURATION**  
TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA

**TRC** | REVISED FIGURE 3.8-5

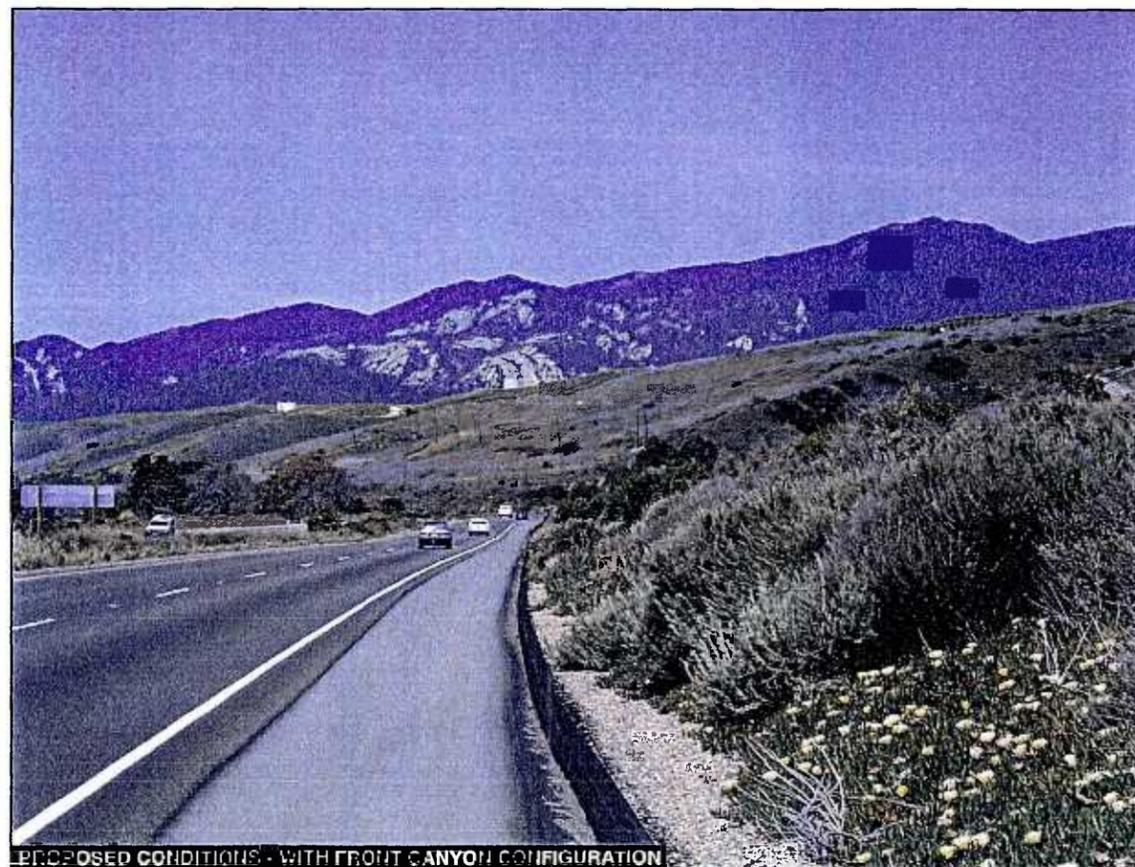
NOTE: THIS FIGURE REVISED BASED ON COMMENT NO. 3-84.



EXISTING CONDITIONS AS OF MARCH 2000



EXISTING PERMITTED CONDITIONS - WITH BENCH HILL



PROPOSED CONDITIONS - WITH FRONT CANYON CONFIGURATION

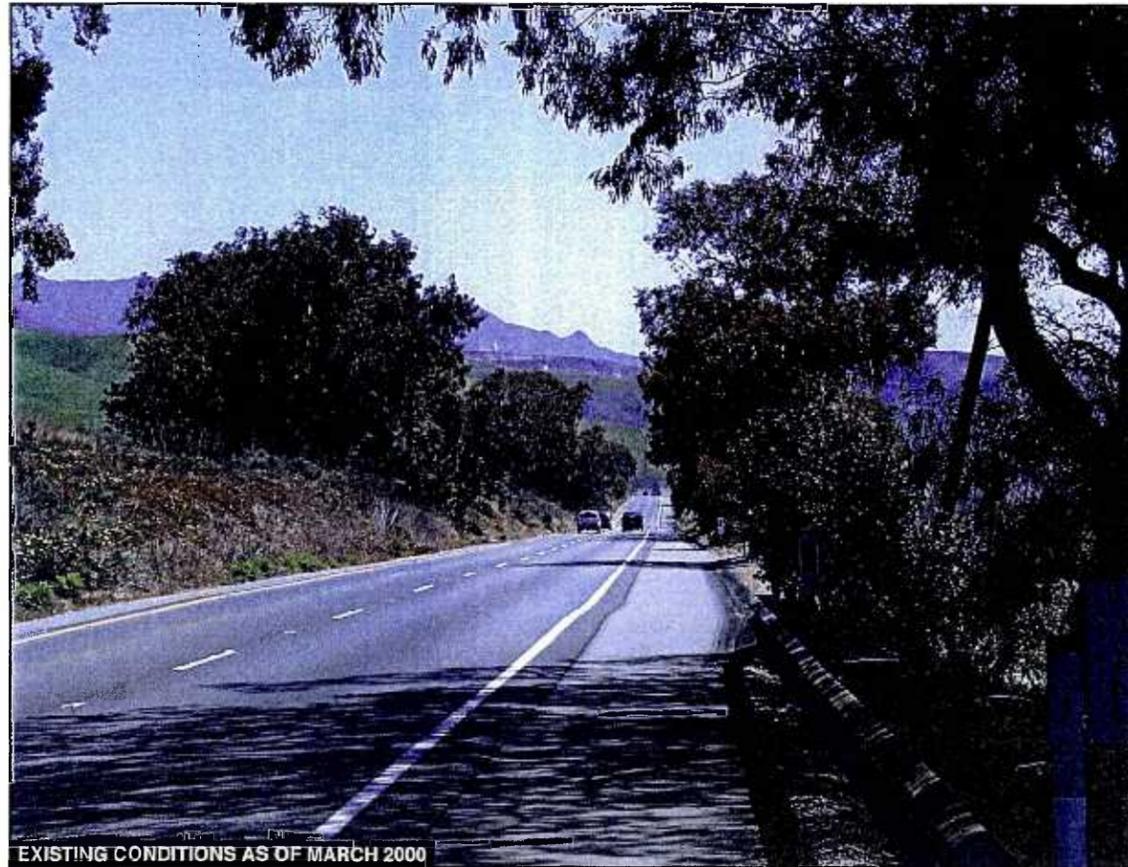
**VIEWPOINT 2  
FRONT CANYON  
EXISTING CONDITIONS,  
EXISTING PERMITTED CONDITIONS  
AND FINAL CONFIGURATION**

TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA

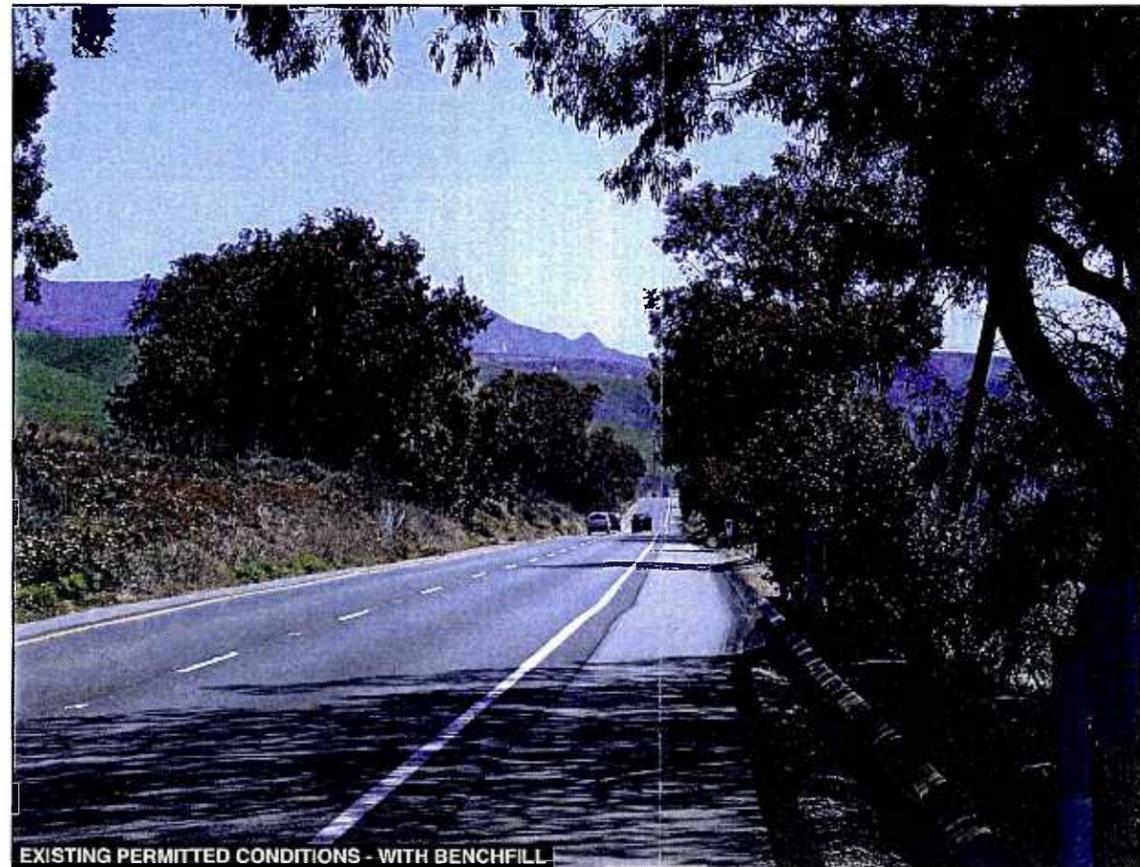


REVISED FIGURE 3.8-6

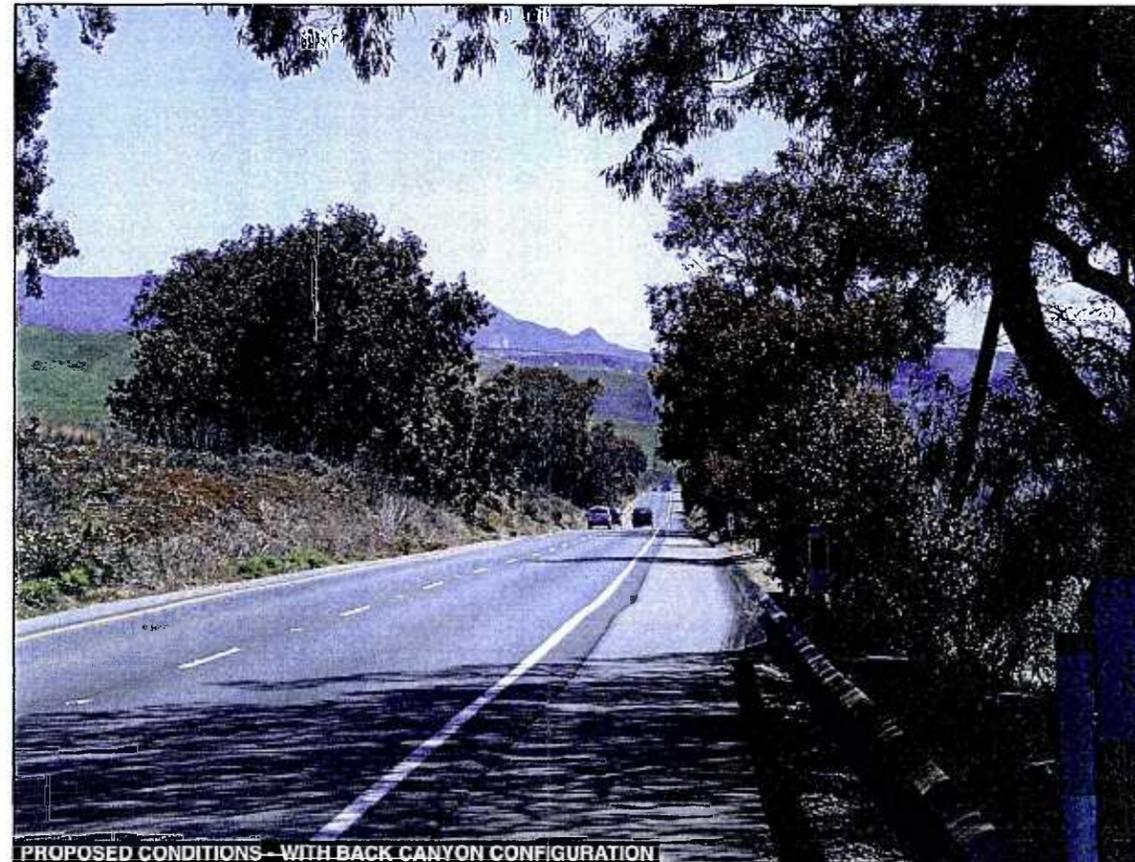
NOTE: THIS FIGURE REVISED BASED ON COMMENT NO. 3-84.



EXISTING CONDITIONS AS OF MARCH 2000



EXISTING PERMITTED CONDITIONS - WITH BENCHFILL



PROPOSED CONDITIONS - WITH BACK CANYON CONFIGURATION

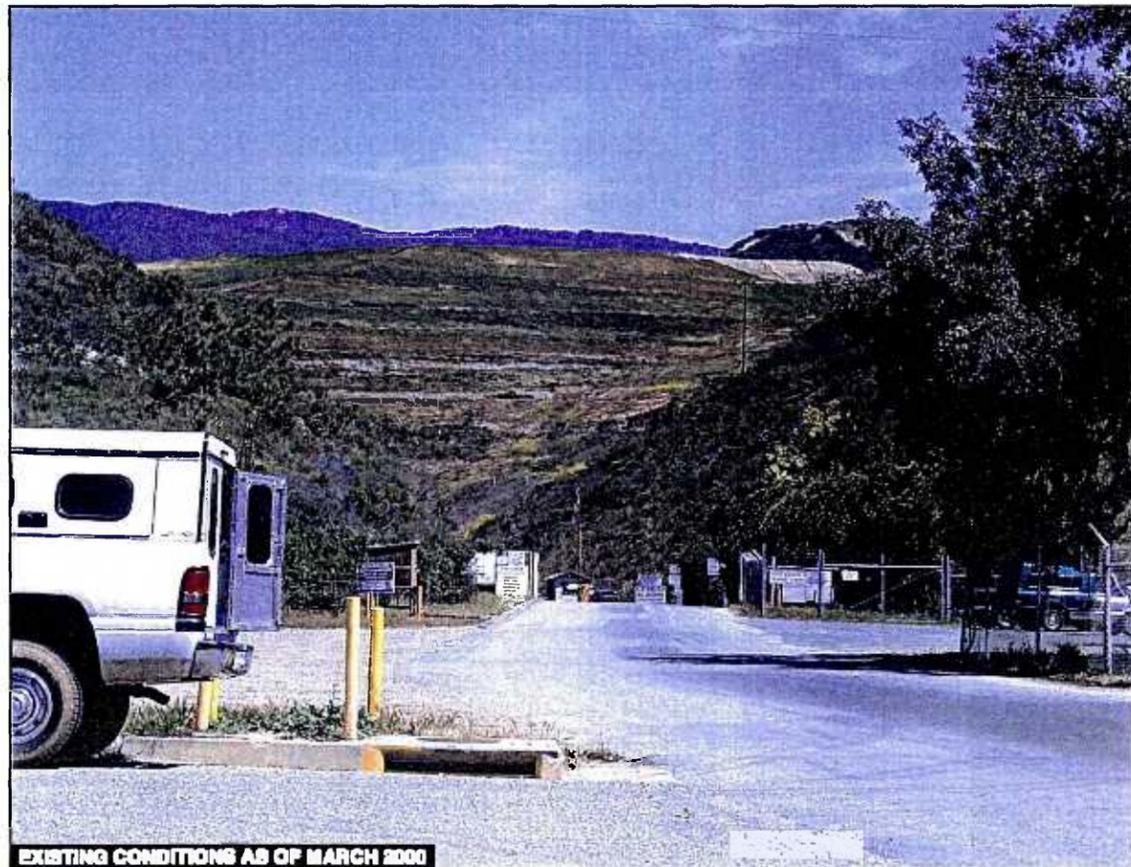
**VIEWPOINT 3  
FRONT CANYON  
EXISTING CONDITIONS,  
EXISTING PERMITTED CONDITIONS  
AND FINAL CONFIGURATION**

TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA

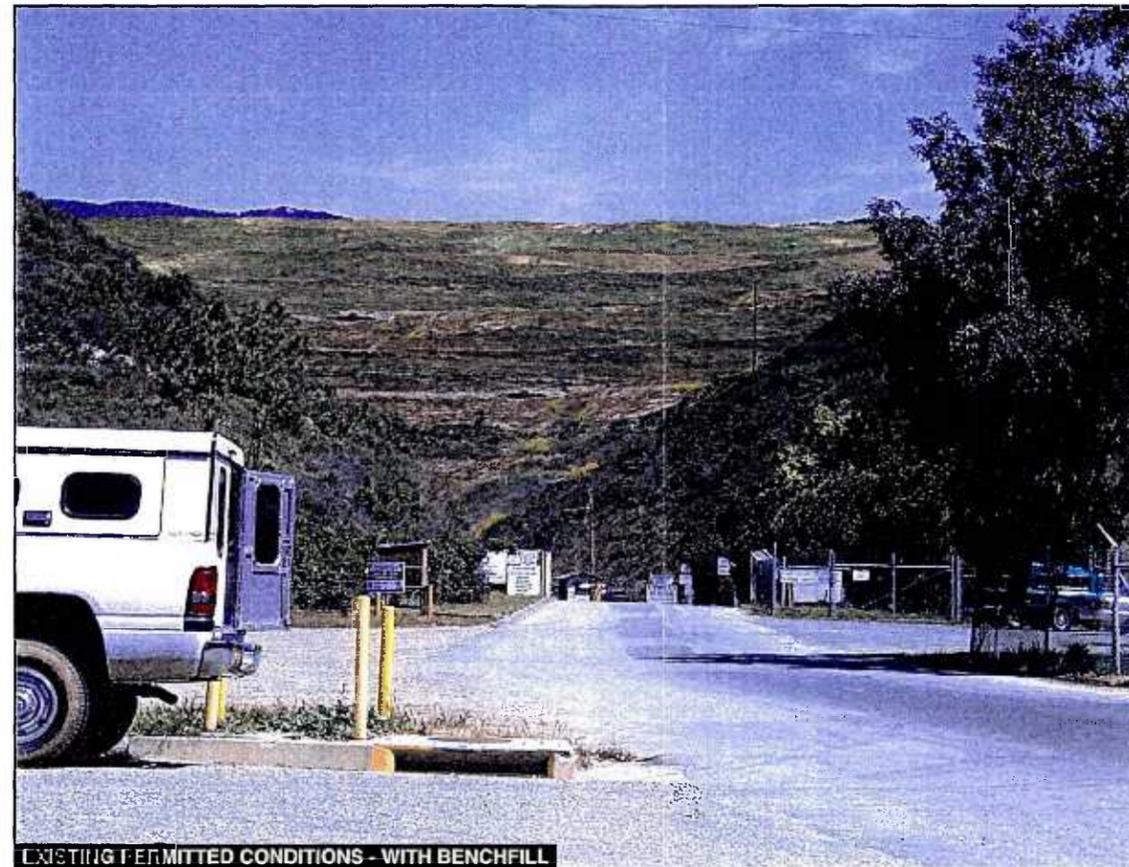


REVISED FIGURE 3.8-7

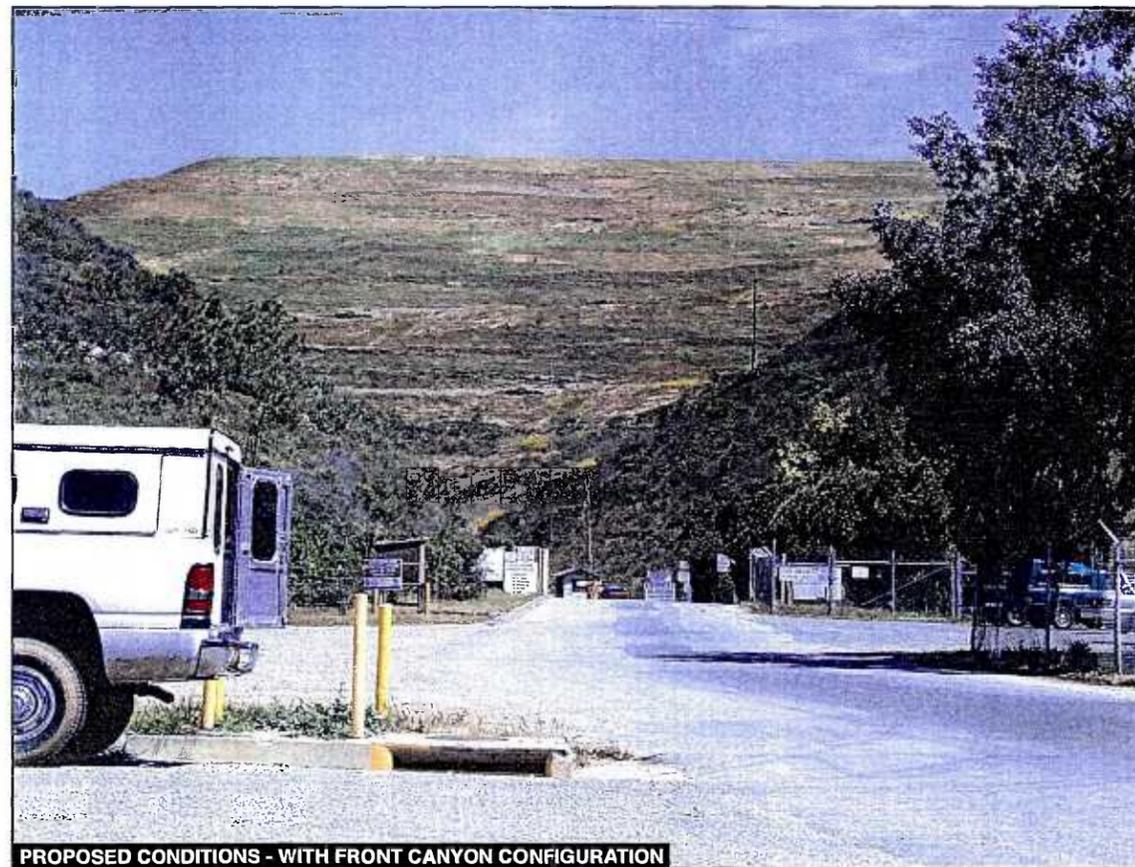
NOTE: THIS FIGURE REVISED BASED ON COMMENT NO. 3-84.



EXISTING CONDITIONS AS OF MARCH 2000



EXISTING PERMITTED CONDITIONS - WITH BENCHFILL



PROPOSED CONDITIONS - WITH FRONT CANYON CONFIGURATION

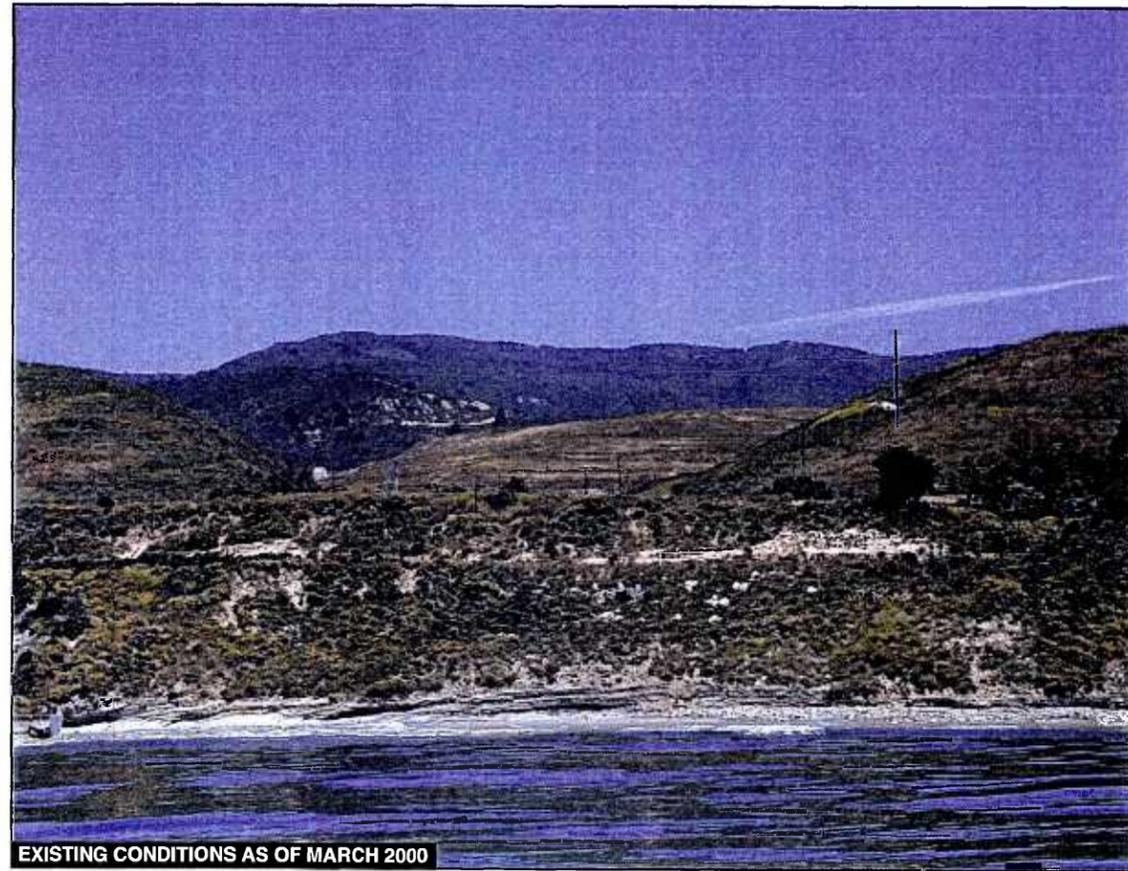
**VIEWPOINT 4  
FRONT CANYON  
EXISTING CONDITIONS,  
EXISTING PERMITTED CONDITIONS  
AND FINAL CONFIGURATION**

TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA

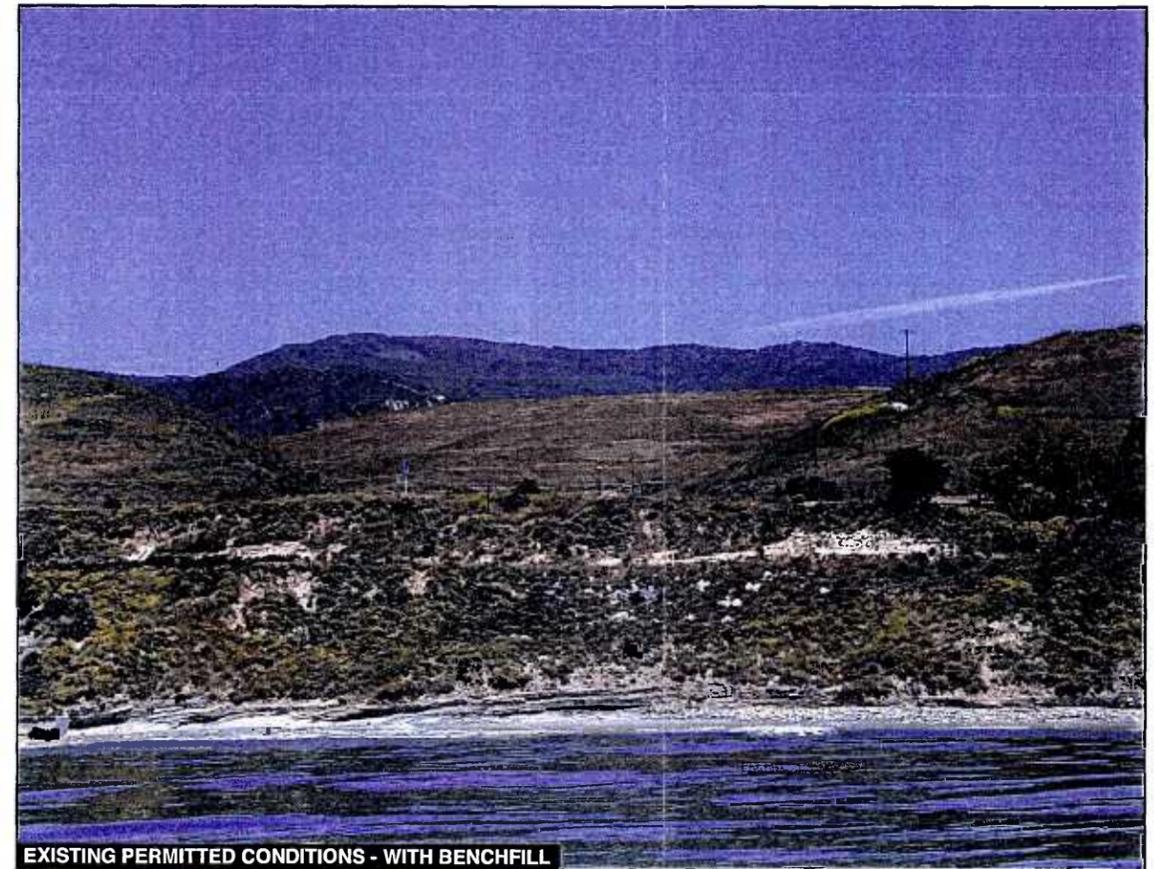


REVISED FIGURE 3.8-8

NOTE: THIS FIGURE REVISED BASED ON COMMENT NO. 3-84.



EXISTING CONDITIONS AS OF MARCH 2000



EXISTING PERMITTED CONDITIONS - WITH BENCHFILL



PROPOSED CONDITIONS - WITH FRONT CANYON CONFIGURATION

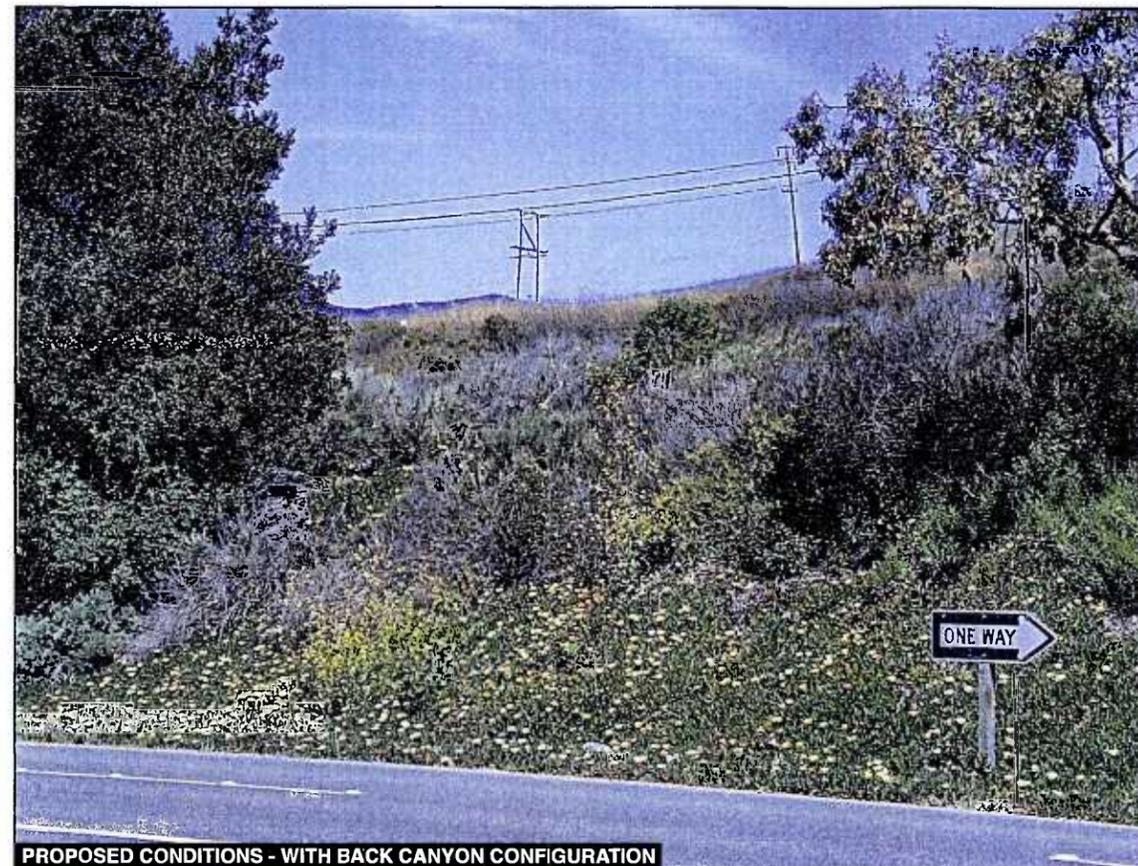
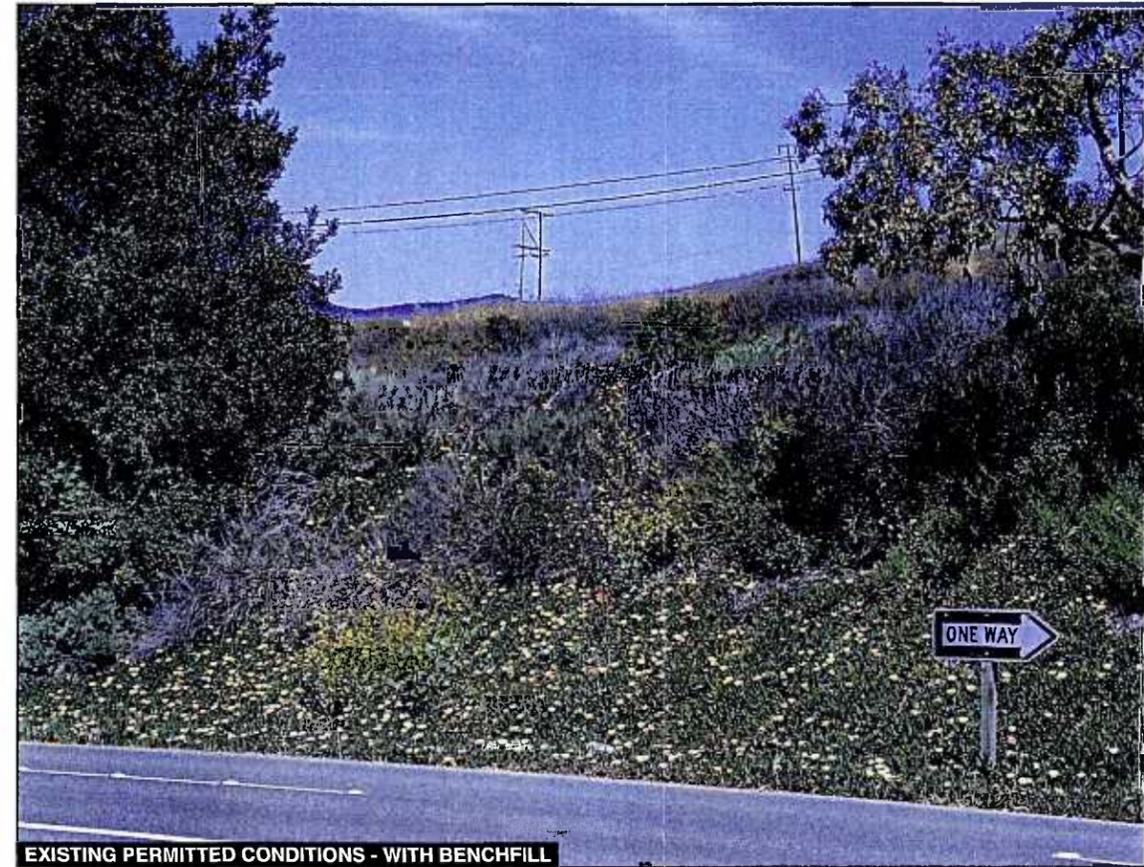
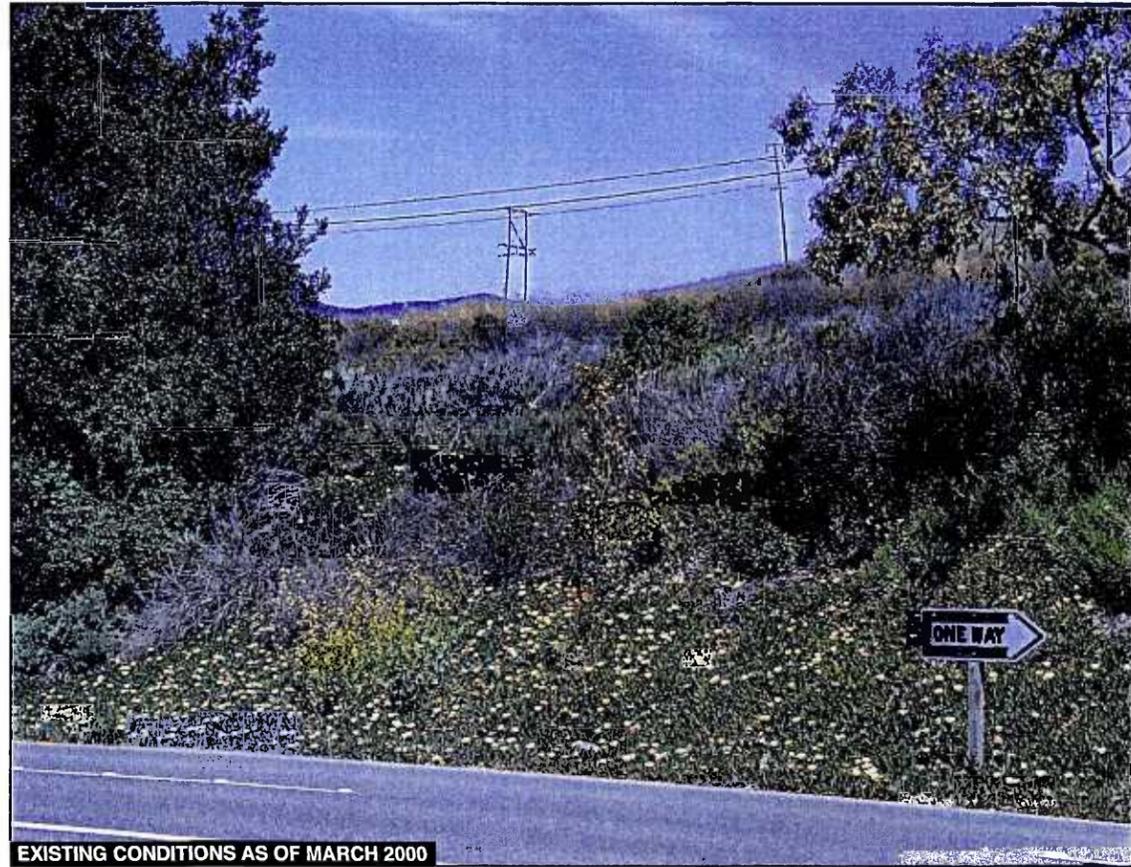
**VIEWPOINT 5  
FRONT CANYON  
EXISTING CONDITIONS,  
EXISTING PERMITTED CONDITIONS  
AND FINAL CONFIGURATION**

TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA



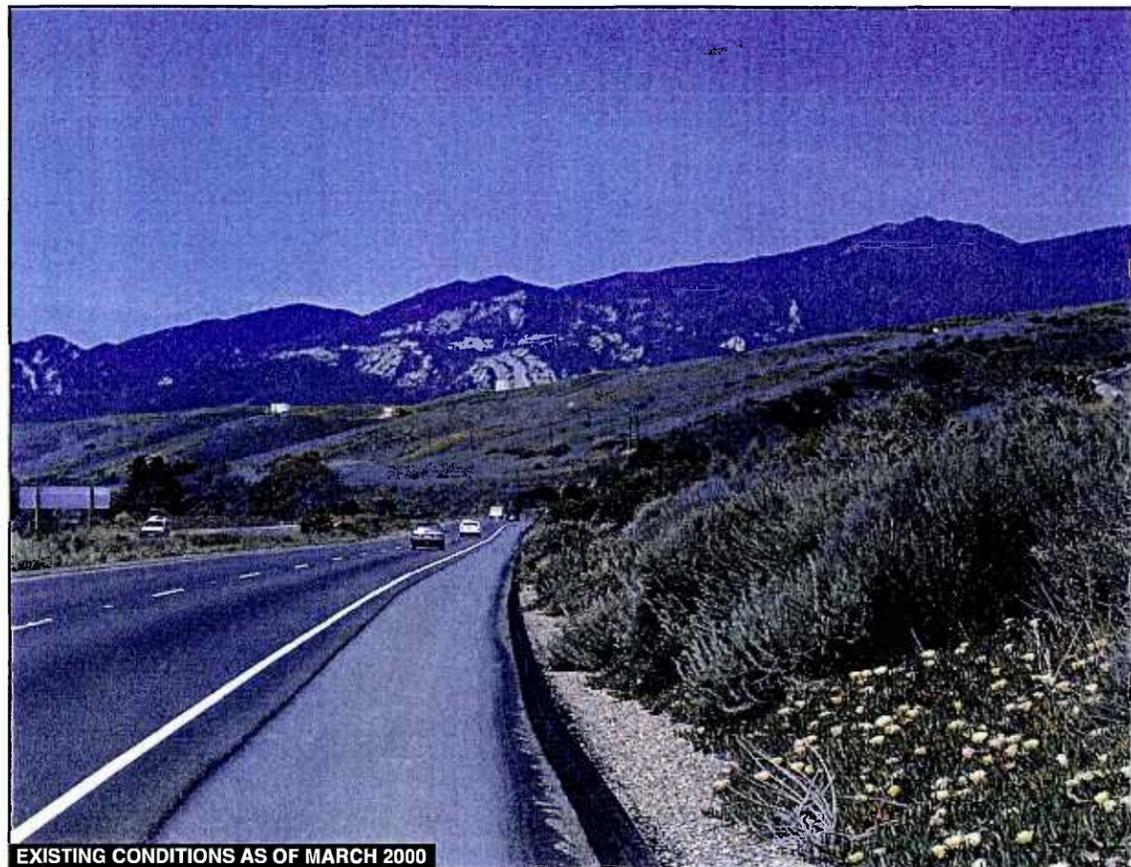
REVISED FIGURE 3.8-9

NOTE: THIS FIGURE REVISED BASED ON COMMENT NO. 3-84.

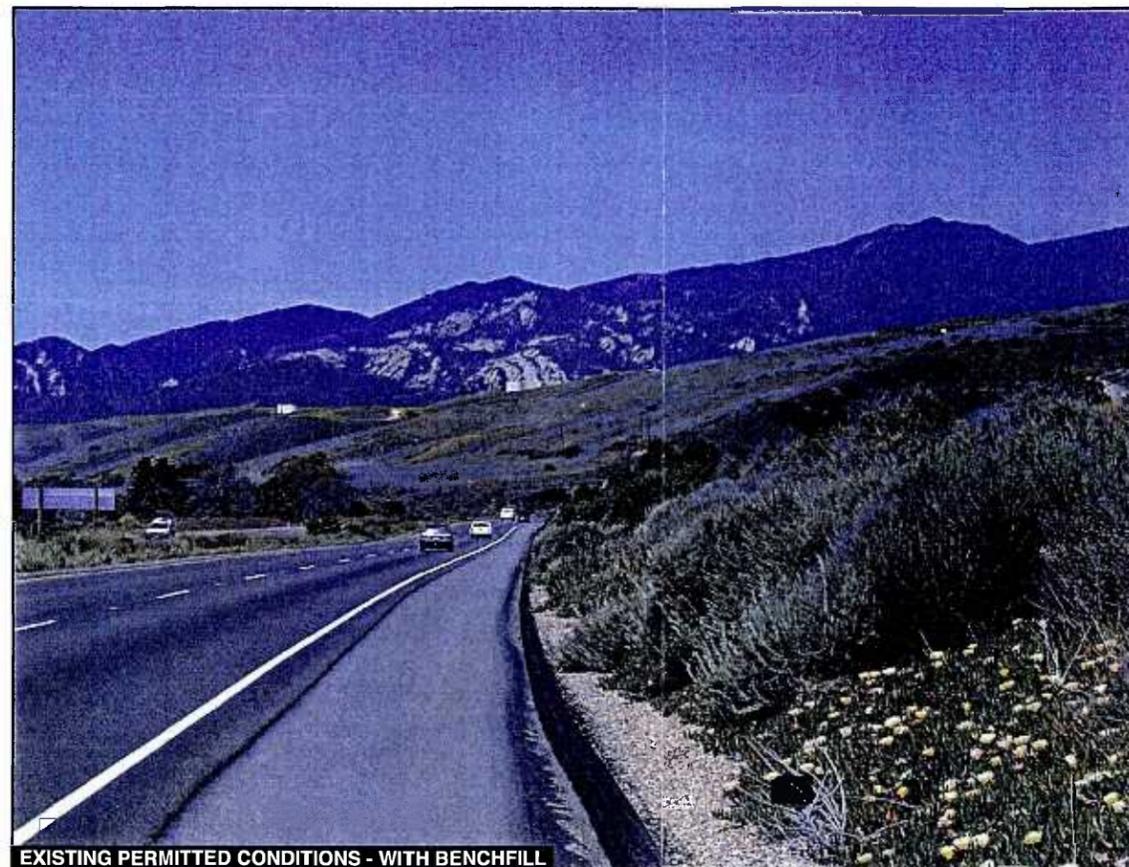


**VIEWPOINT 1  
BACK CANYON  
EXISTING CONDITIONS,  
EXISTING PERMITTED CONDITIONS  
AND FINAL CONFIGURATION**  
TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA  
**TRC** REVISED FIGURE 3.8-10

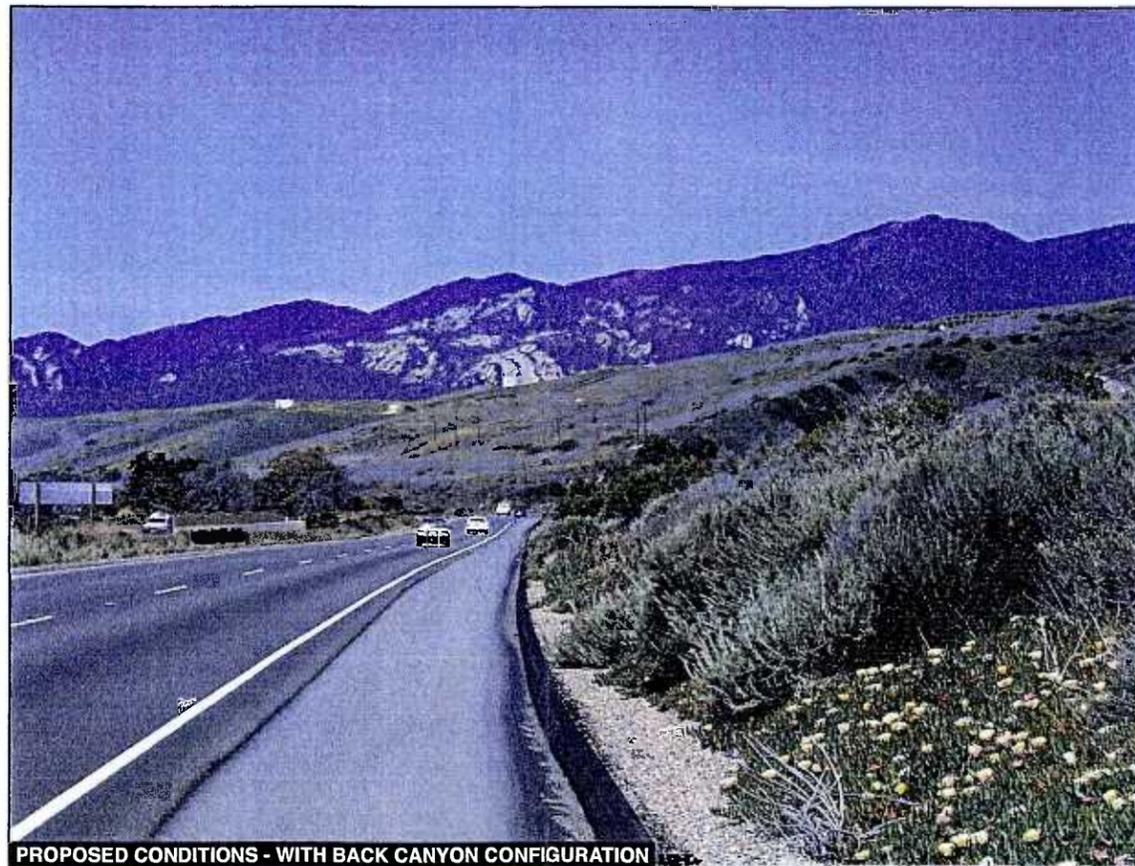
NOTE: THIS FIGURE REVISED BASED ON COMMENT NO. 3-84.



EXISTING CONDITIONS AS OF MARCH 2000



EXISTING PERMITTED CONDITIONS - WITH BENCHFILL



PROPOSED CONDITIONS - WITH BACK CANYON CONFIGURATION

**VIEWPOINT 2  
BACK CANYON  
EXISTING CONDITIONS,  
EXISTING PERMITTED CONDITIONS  
AND FINAL CONFIGURATION**

TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA

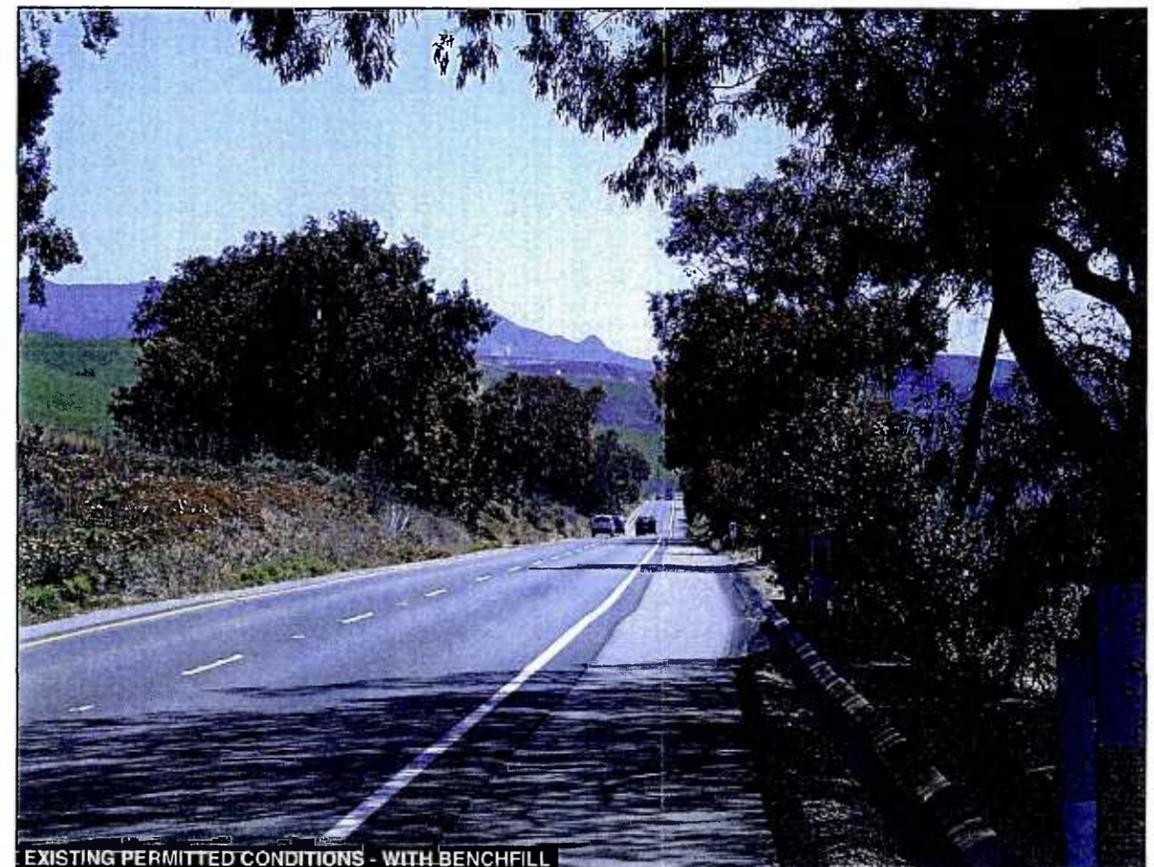


REVISED FIGURE 3.8-11

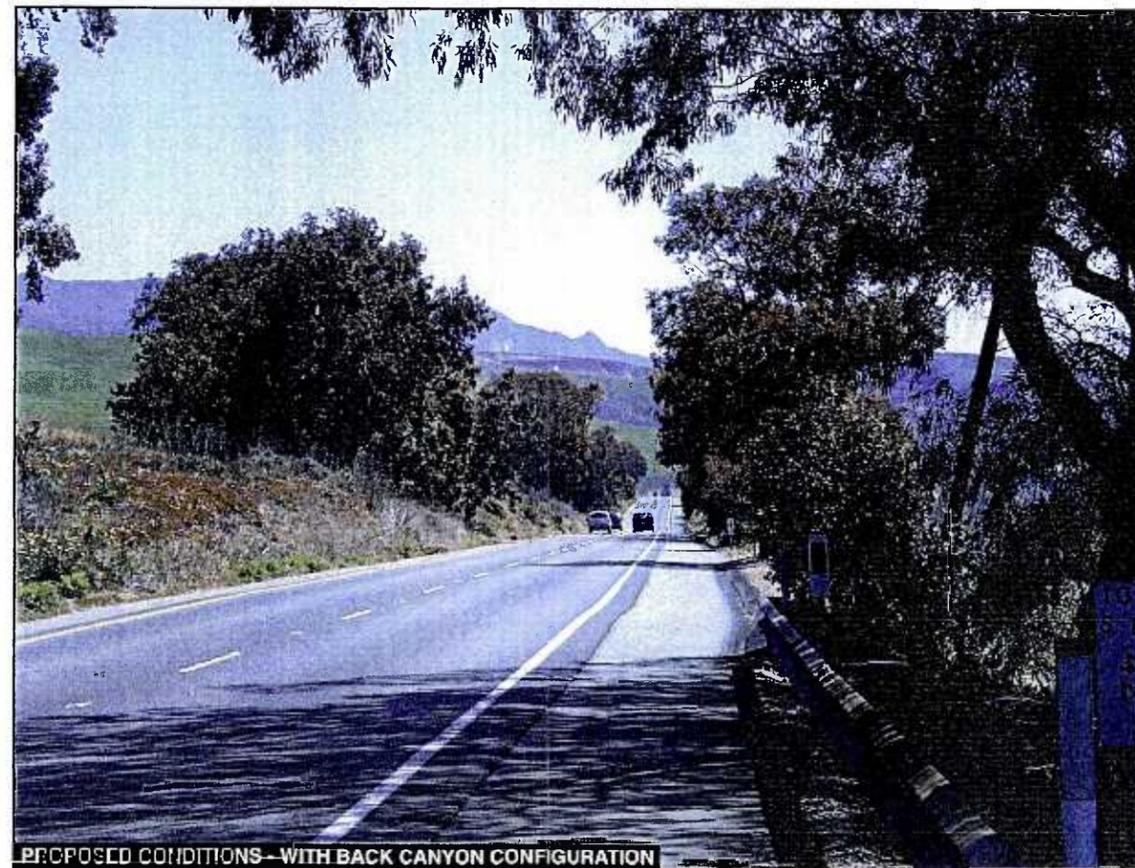
NOTE: THIS FIGURE REVISED BASED ON COMMENT NO. 3-84.



EXISTING CONDITIONS AS OF MARCH 2000



EXISTING PERMITTED CONDITIONS - WITH BENCHFILL



PROPOSED CONDITIONS - WITH BACK CANYON CONFIGURATION

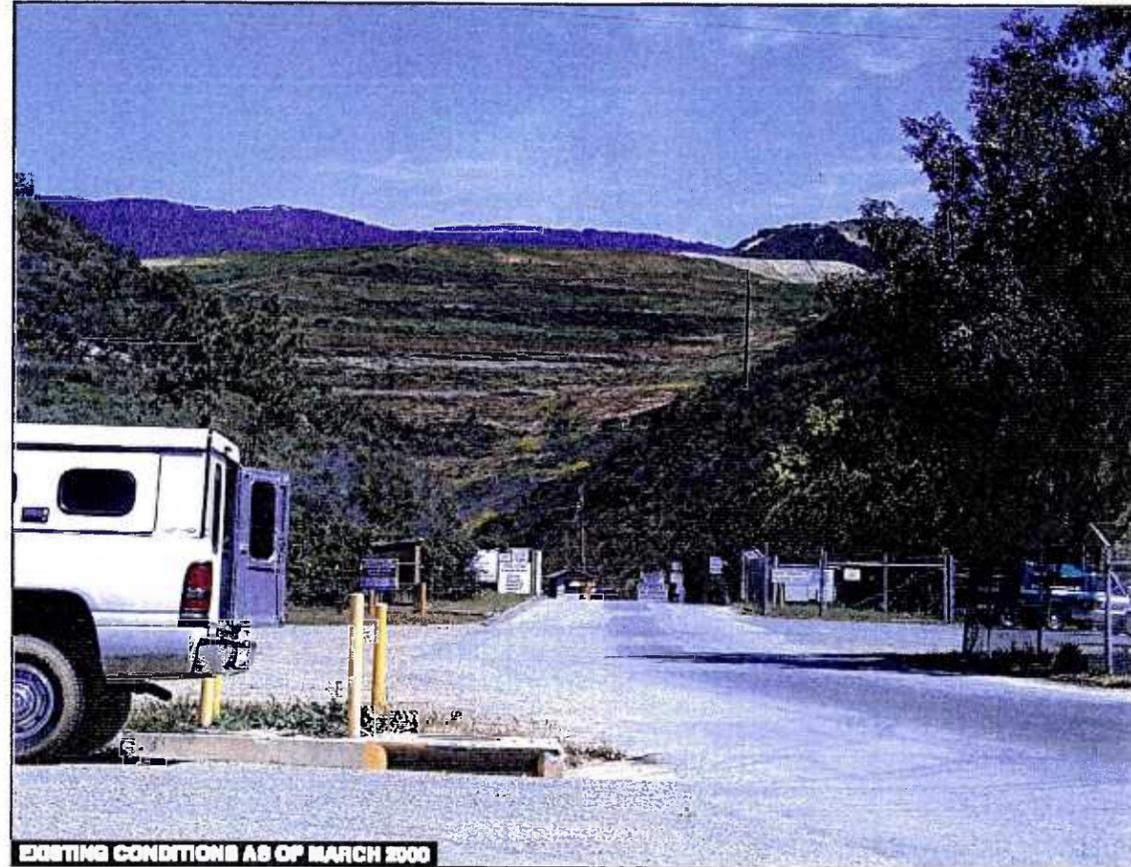
**VIEWPOINT 3  
BACK CANYON  
EXISTING CONDITIONS,  
EXISTING PERMITTED CONDITIONS  
AND FINAL CONFIGURATION**

TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA

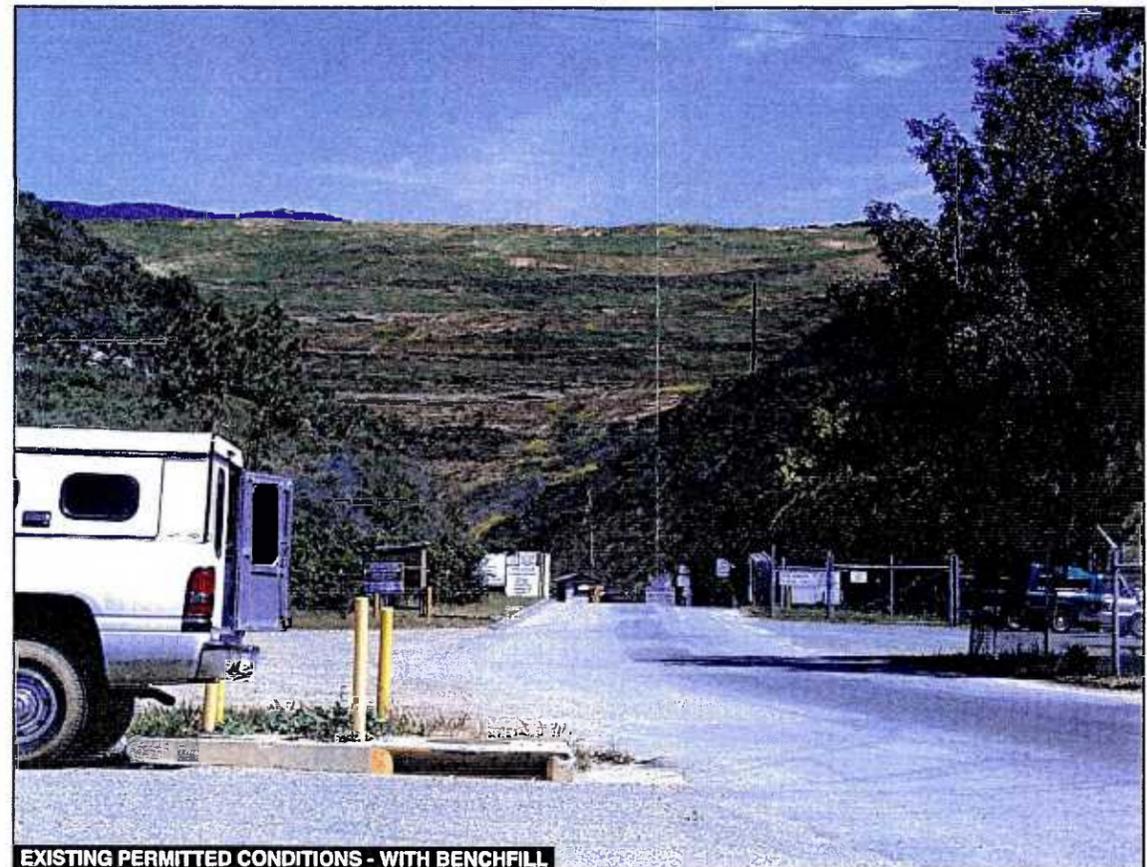


REVISED FIGURE 3.8-12

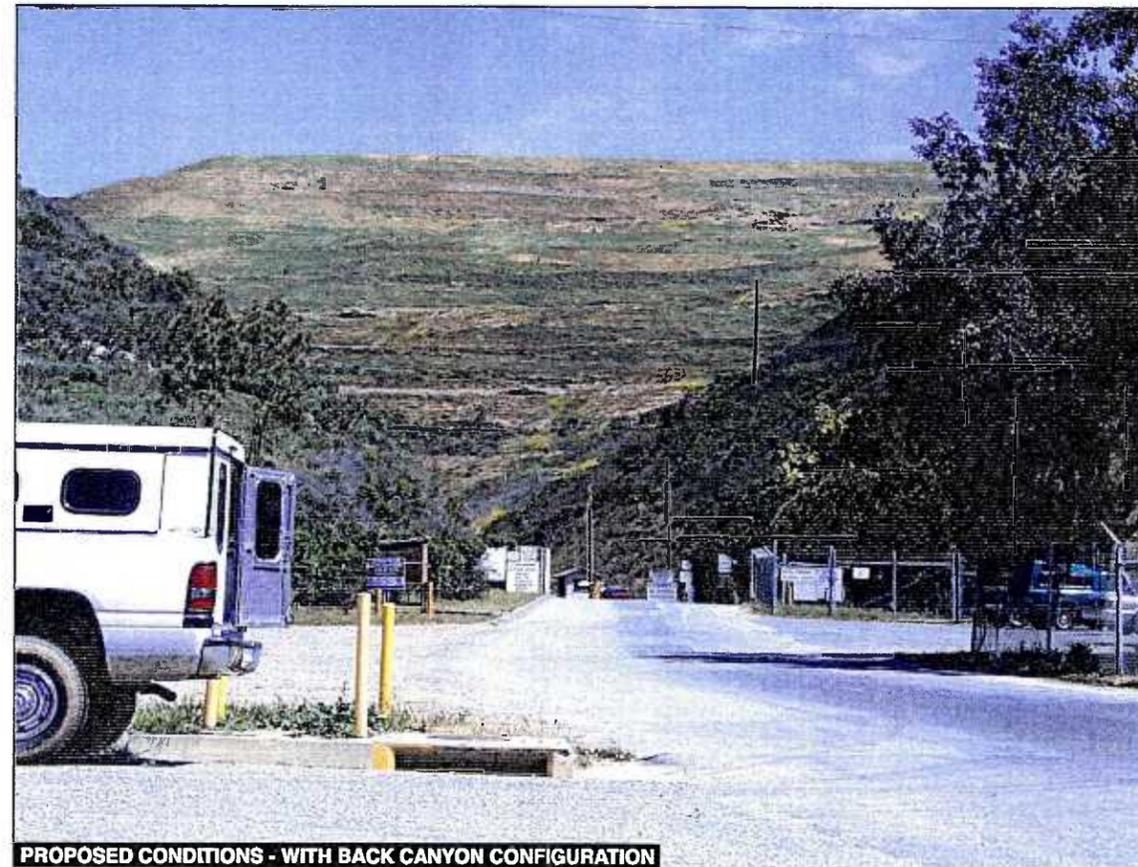
NOTE: THIS FIGURE REVISED BASED ON COMMENT NO. 3-84.



EXISTING CONDITIONS AS OF MARCH 2000



EXISTING PERMITTED CONDITIONS - WITH BENCHFILL



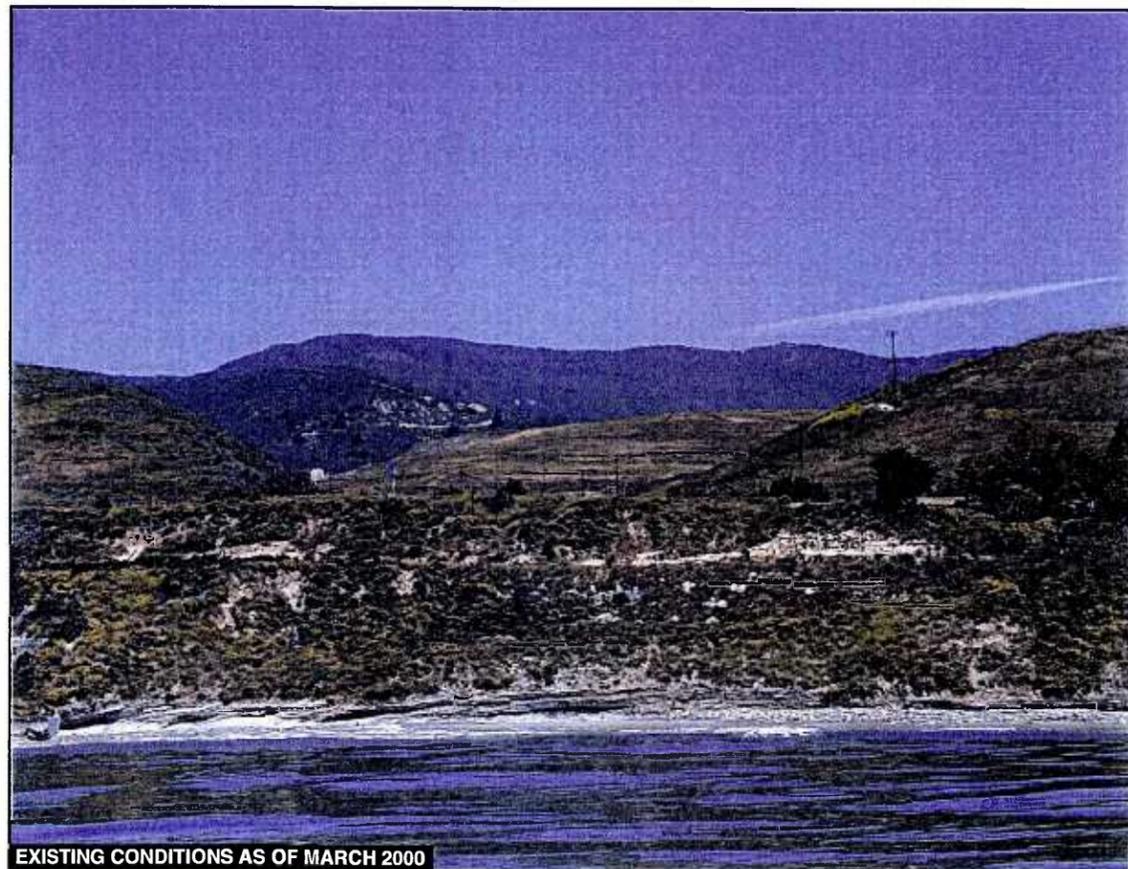
PROPOSED CONDITIONS - WITH BACK CANYON CONFIGURATION

**VIEWPOINT 4  
BACK CANYON  
EXISTING CONDITIONS,  
EXISTING PERMITTED CONDITIONS  
AND FINAL CONFIGURATION**  
TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA

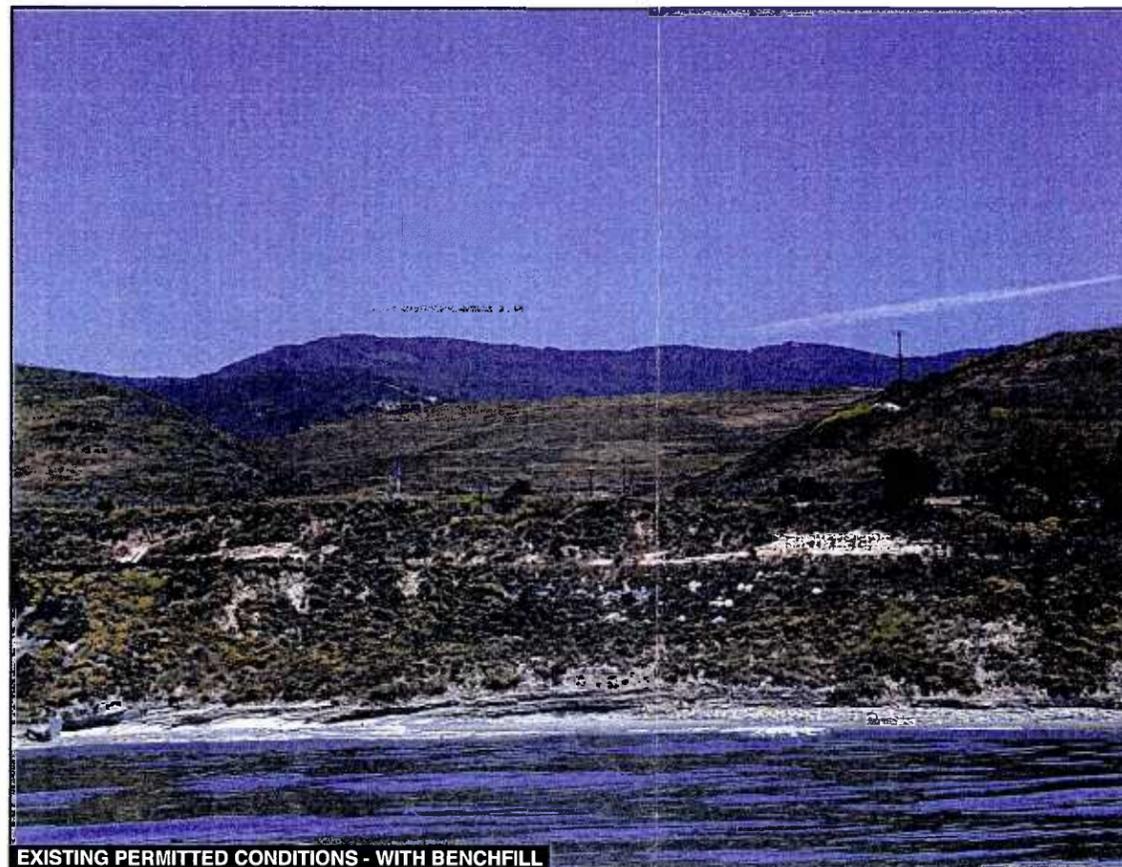


REVISED FIGURE 3.8-13

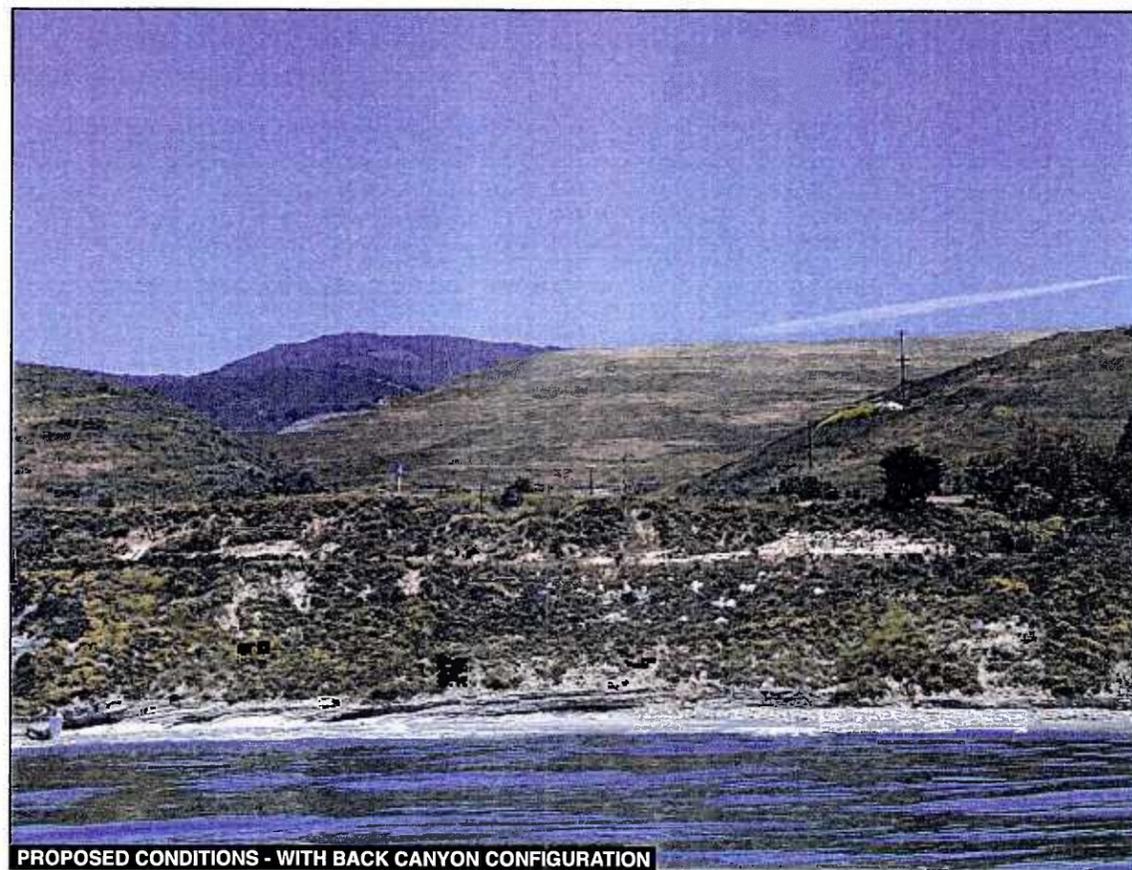
NOTE: THIS FIGURE REVISED BASED ON COMMENT NO. 3-84.



EXISTING CONDITIONS AS OF MARCH 2000



EXISTING PERMITTED CONDITIONS - WITH BENCHFILL



PROPOSED CONDITIONS - WITH BACK CANYON CONFIGURATION

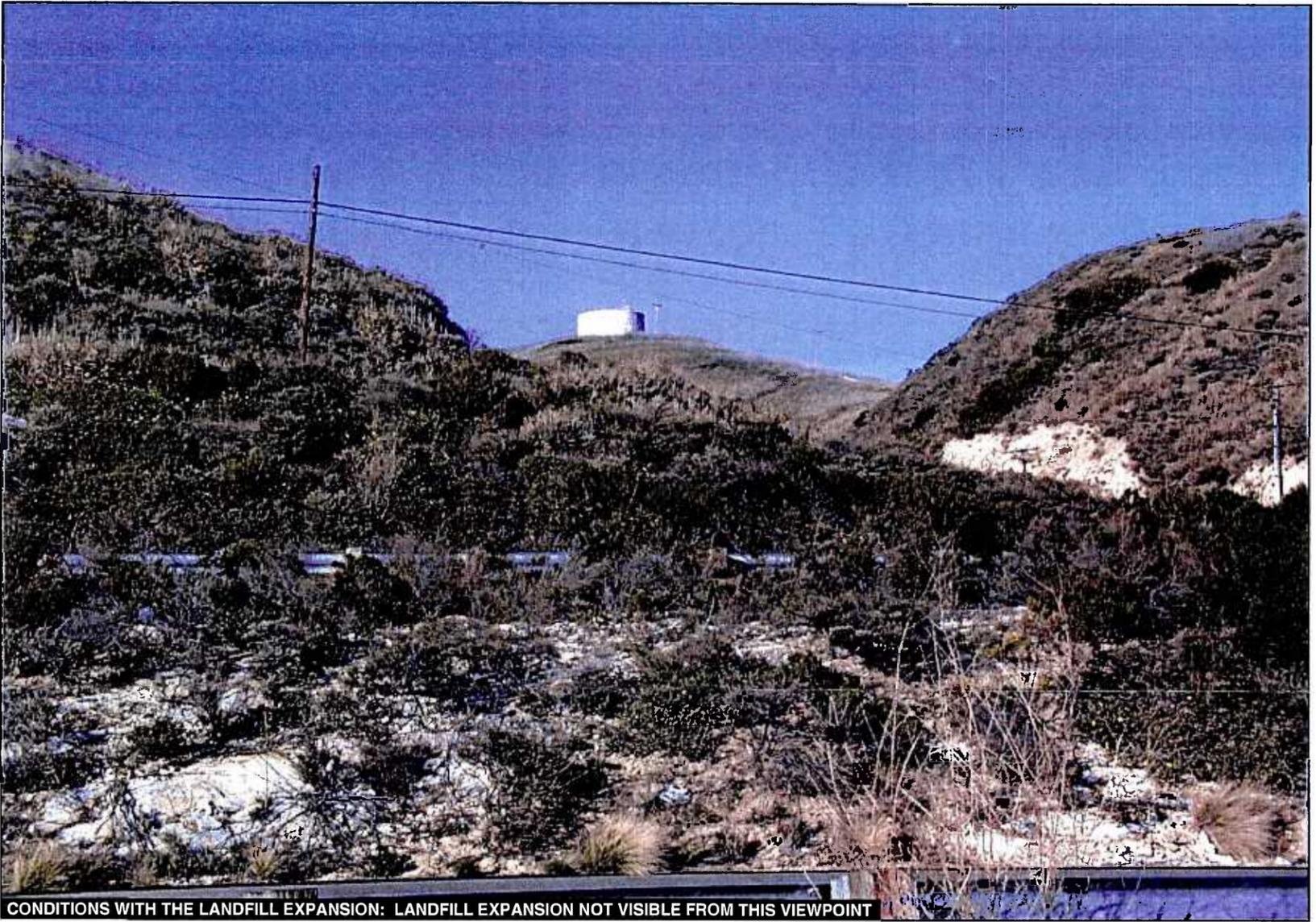
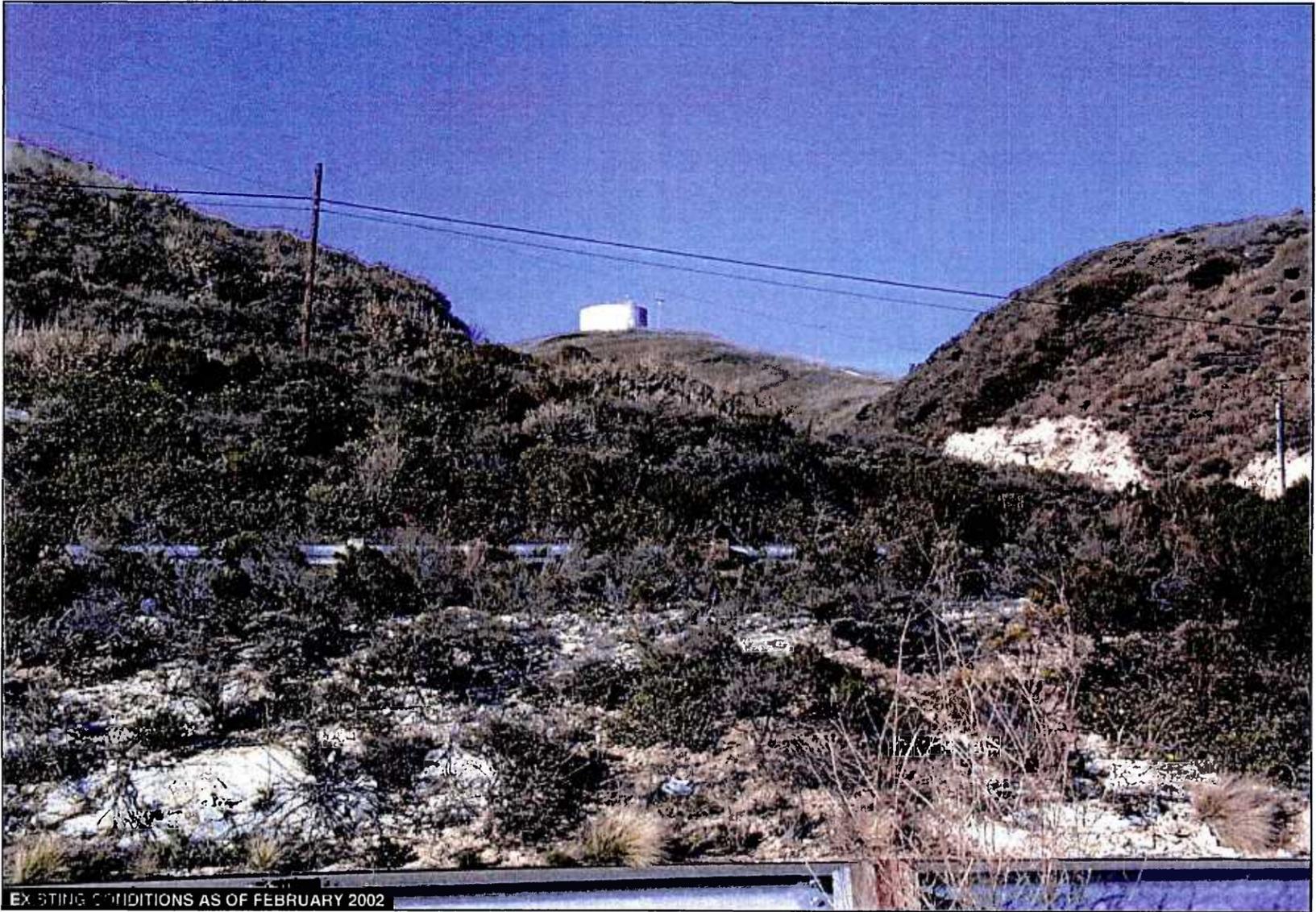
**VIEWPOINT 5  
BACK CANYON  
EXISTING CONDITIONS,  
EXISTING PERMITTED CONDITIONS  
AND FINAL CONFIGURATION**

TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA



REVISED FIGURE 3.8-14

NOTE: THIS FIGURE REVISED BASED ON COMMENT NO. 3-84.



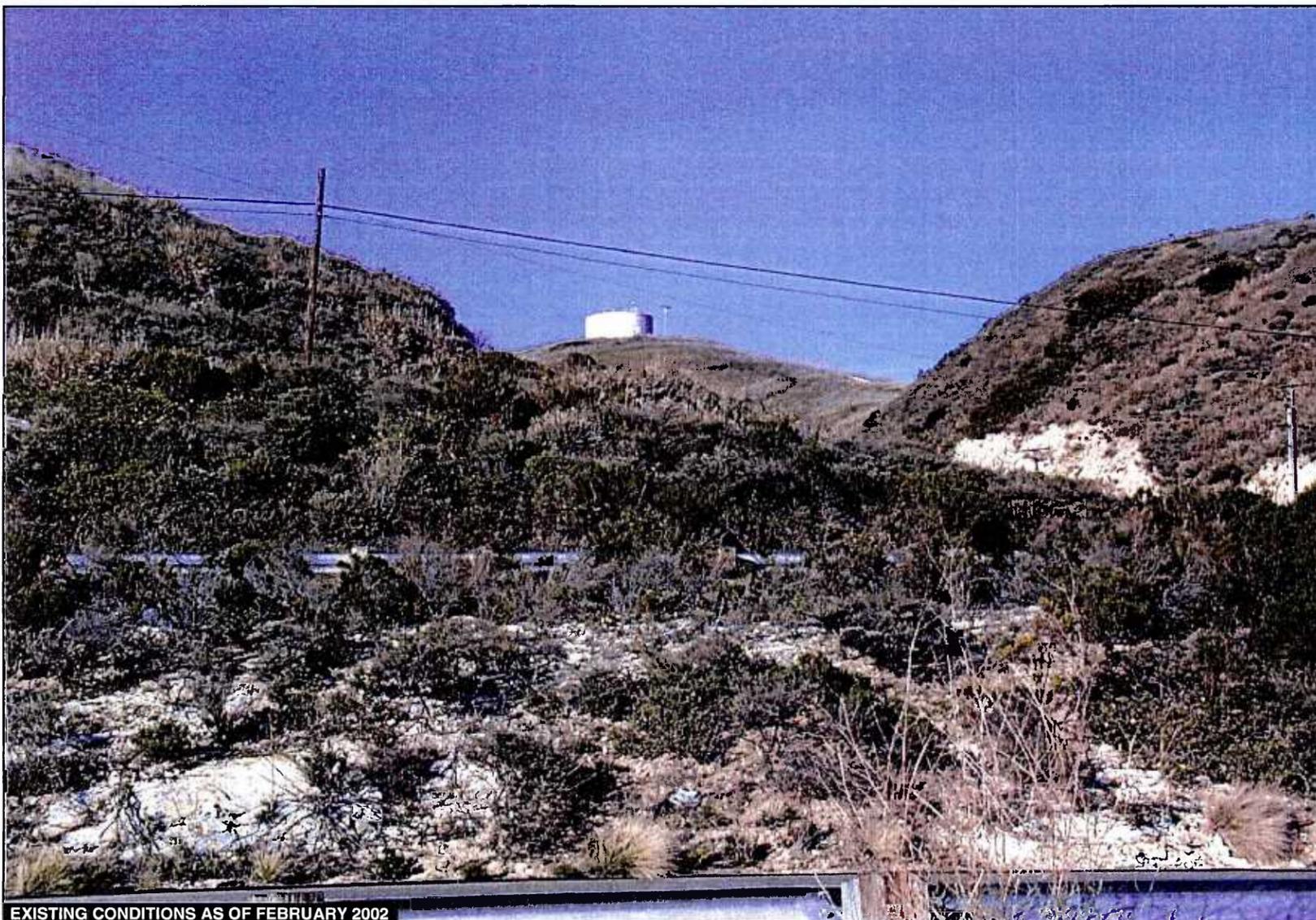
**VIEWPOINT 6  
FRONT CANYON  
EXISTING CONDITIONS  
AND FINAL CONFIGURATION**

TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA

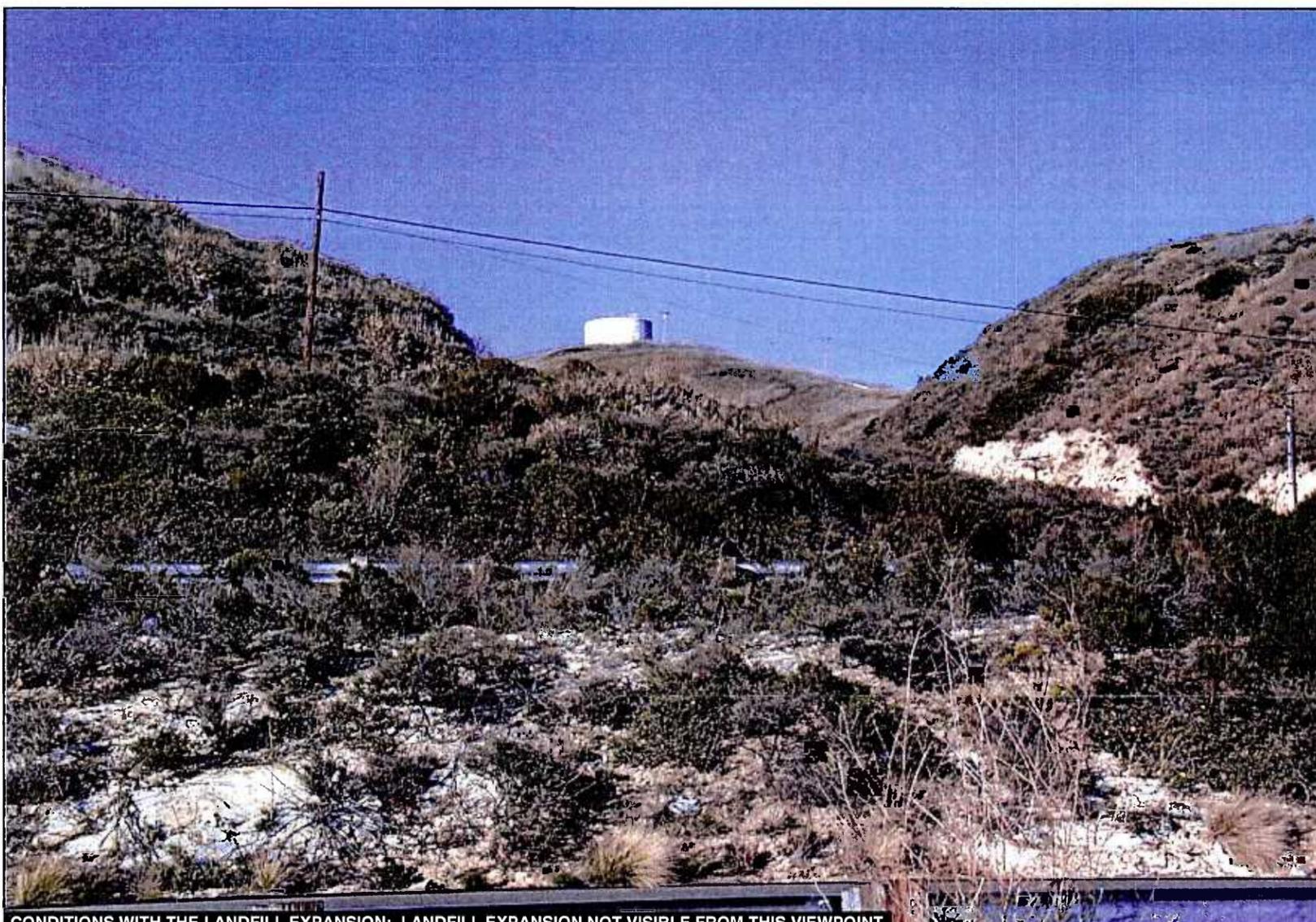


**FIGURE 3.8-15**

NOTE: THIS FIGURE ADDED IN RESPONSE TO COMMENT NOS. 5-13 AND 33-14.



EXISTING CONDITIONS AS OF FEBRUARY 2002

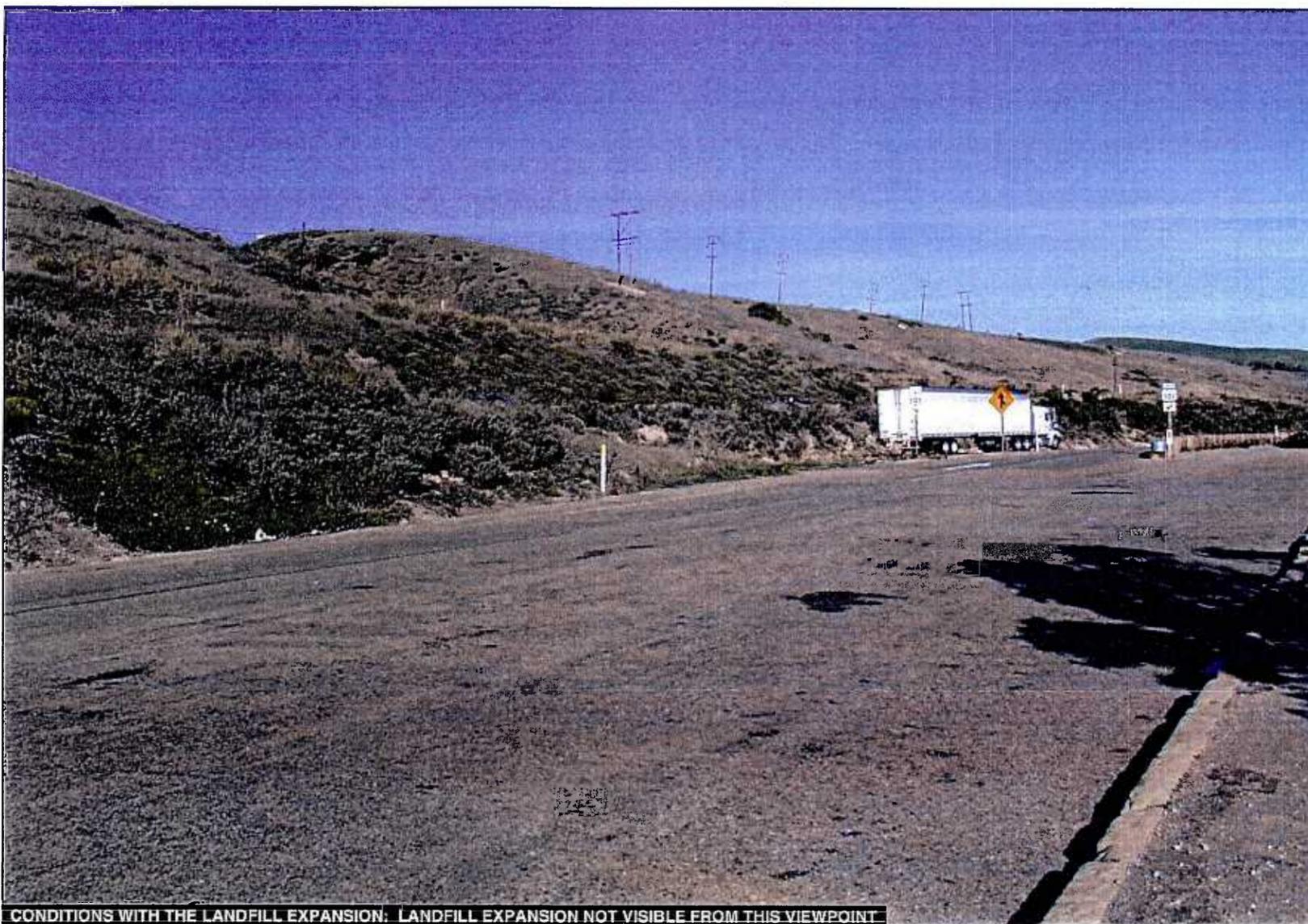
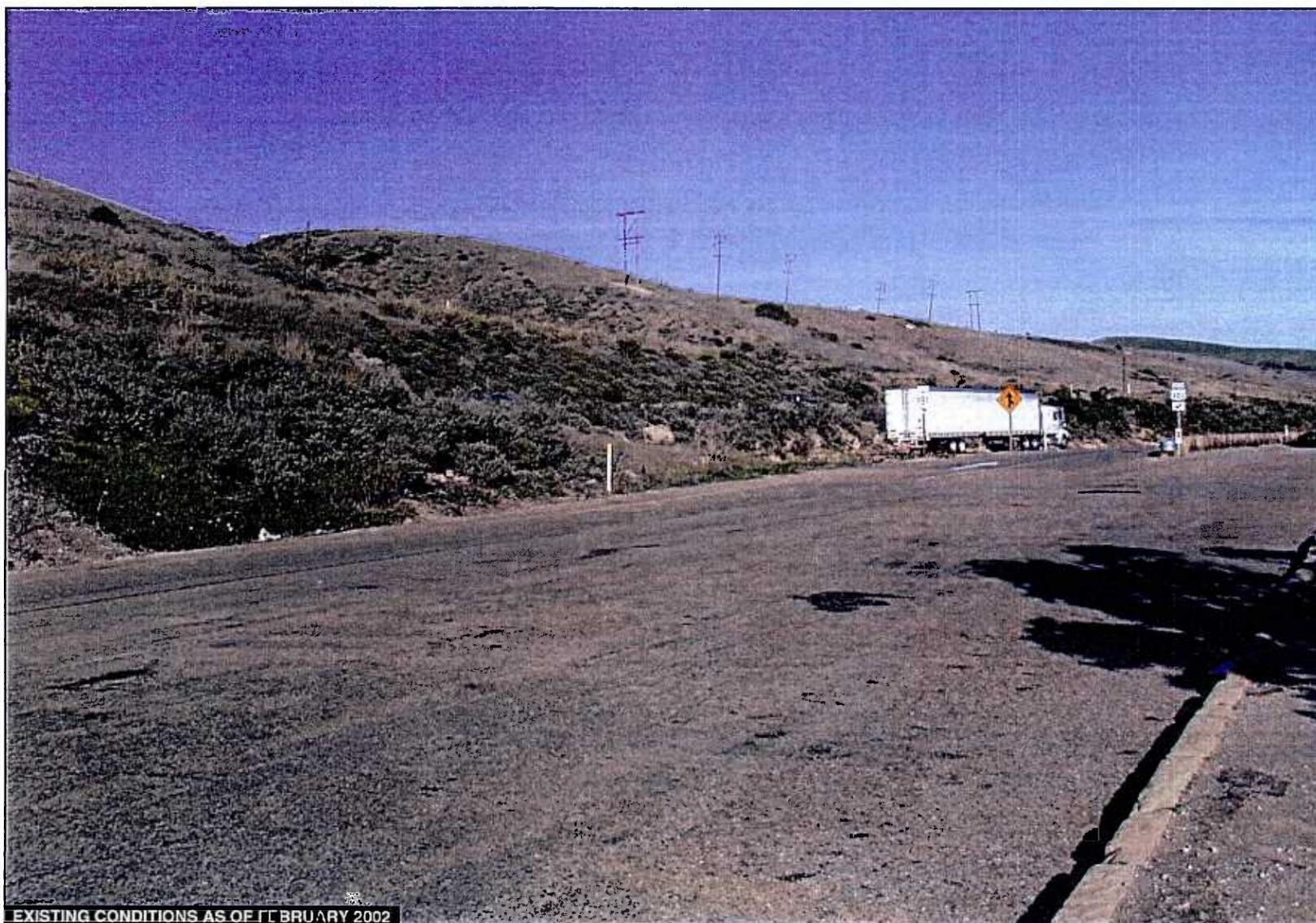


CONDITIONS WITH THE LANDFILL EXPANSION: LANDFILL EXPANSION NOT VISIBLE FROM THIS VIEWPOINT

**VIEWPOINT 6  
BACK CANYON  
EXISTING CONDITIONS  
AND FINAL CONFIGURATION**  
TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA

NOTE: THIS FIGURE ADDED IN RESPONSE TO COMMENT NOS. 5-13 AND 33-14.





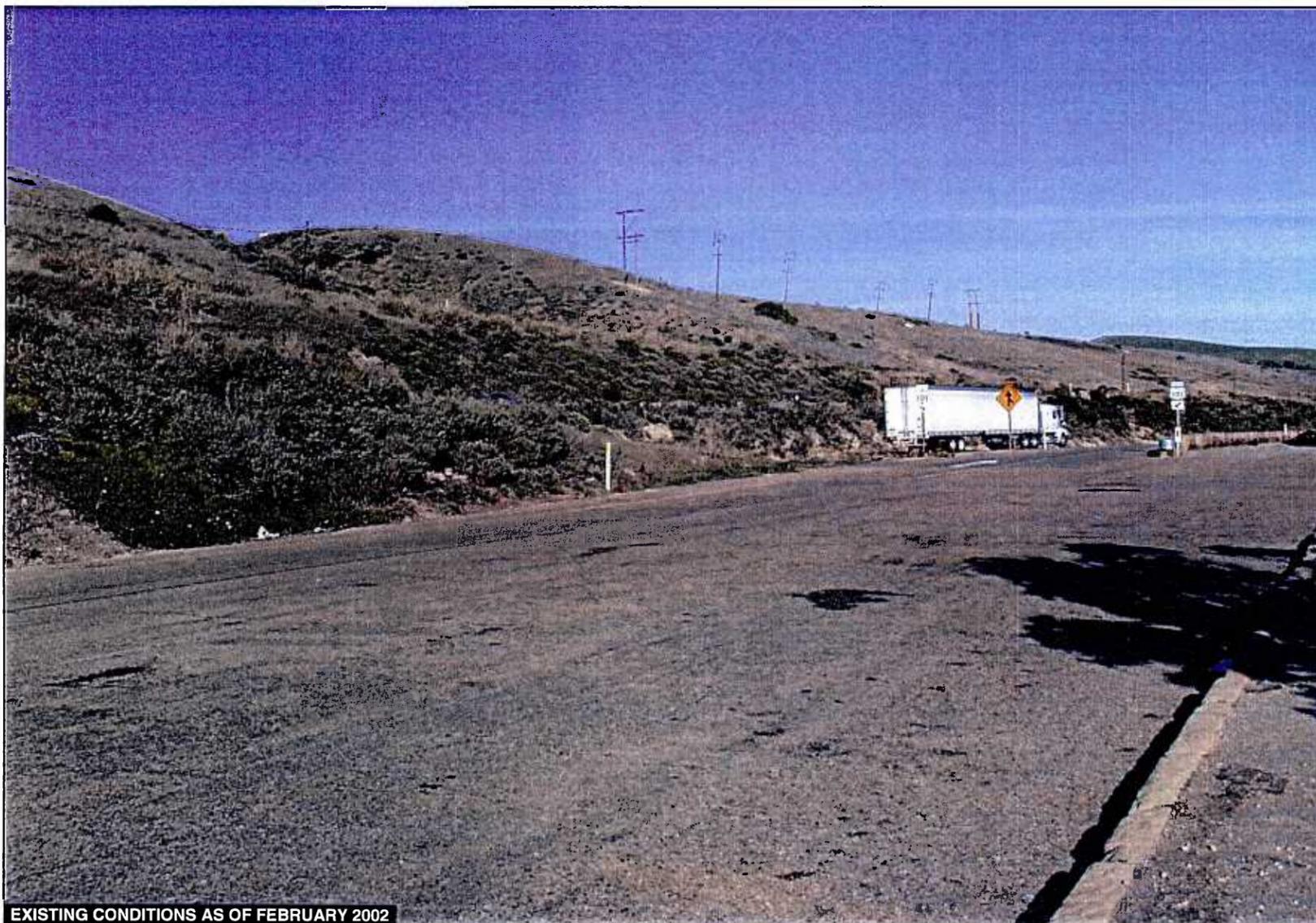
**VIEWPOINT 7  
FRONT CANYON  
EXISTING CONDITIONS  
AND FINAL CONFIGURATION**

TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA

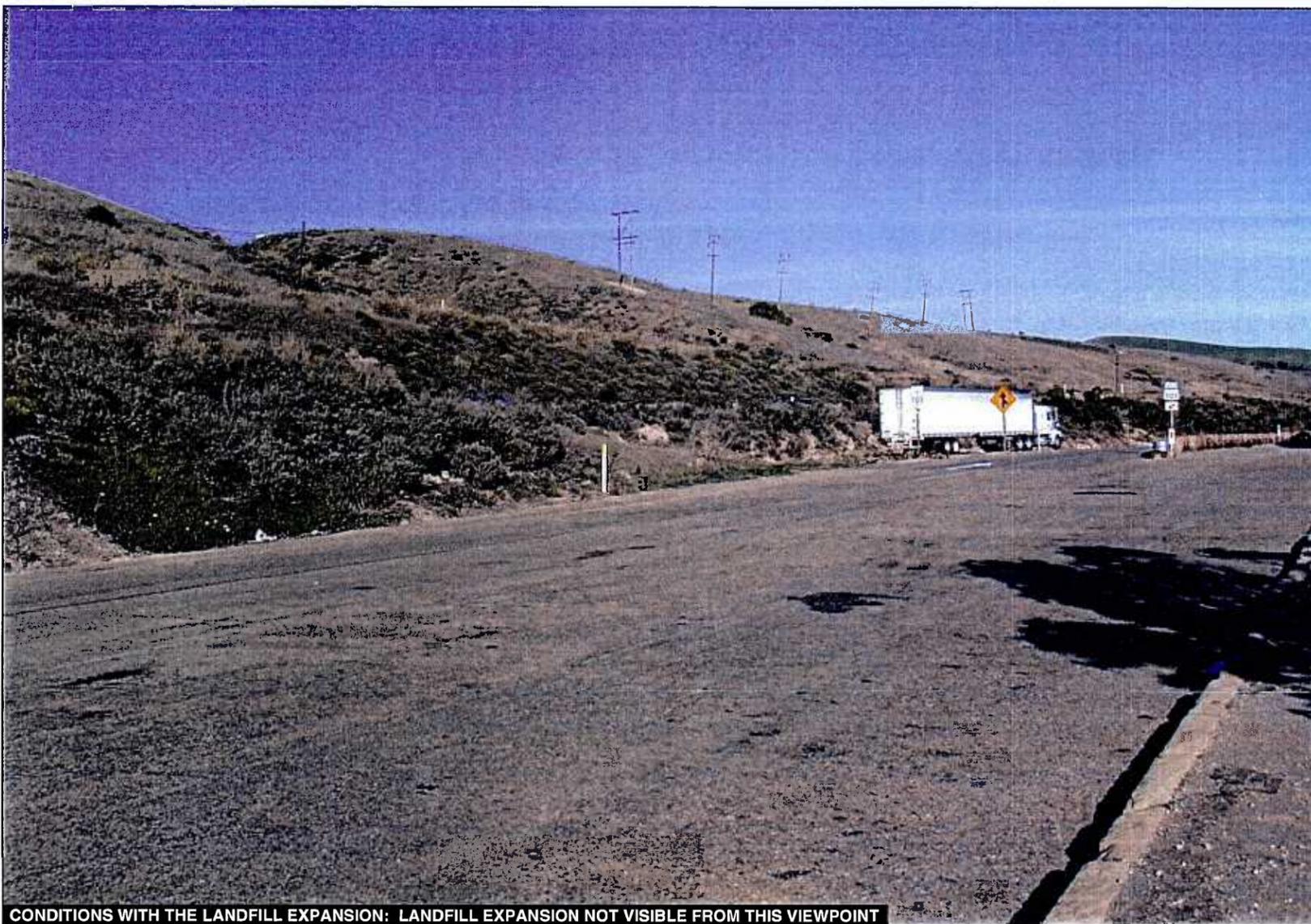
**TRC**

**FIGURE 3.8-17**

NOTE: THIS FIGURE ADDED IN RESPONSE TO COMMENT NOS. 5-13 AND 33-14.



EXISTING CONDITIONS AS OF FEBRUARY 2002



CONDITIONS WITH THE LANDFILL EXPANSION: LANDFILL EXPANSION NOT VISIBLE FROM THIS VIEWPOINT

**VIEWPOINT 7  
BACK CANYON  
EXISTING CONDITIONS  
AND FINAL CONFIGURATION**

TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA

**TRC**

**FIGURE 3.8-18**

NOTE: THIS FIGURE ADDED IN RESPONSE TO COMMENT NOS. 5-13 AND 33-14.



EXISTING CONDITIONS AS OF MAY 2002



PROPOSED CONDITIONS - WITH FRONT CANYON CONFIGURATION

**VIEWPOINT 8  
FRONT CANYON  
EXISTING CONDITIONS  
AND FINAL CONFIGURATION**

TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA



**FIGURE 3.8-19**

NOTE: THIS FIGURE ADDED IN RESPONSE TO COMMENT NO. 3-86.



**VIEWPOINT 8  
BACK CANYON  
EXISTING CONDITIONS  
AND FINAL CONFIGURATION**

TAJIGUAS LANDFILL EXPANSION  
SANTA BARBARA, CALIFORNIA



**FIGURE 3.8-20**

NOTE: THIS FIGURE ADDED IN RESPONSE TO COMMENT NO. 3-86.

## 5.0 PERSONS AND ORGANIZATIONS CONSULTED

The organizations and individuals listed below were involved in the preparation of, or contributed information to, this Final EIR.

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  - Corrine Hindmarsh
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  - Richard L. Pool, P.E.

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## 7.0 LIST OF ABBREVIATIONS

AB	Assembly Bill
ACOE	Army Corp of Engineers
ADC	average daily cover
APCD	Air Pollution Control District
ATE	Associated Transportation Engineers
BMP	Best Management Practice
CAC	Citizens' Advisory Committee
CAPCOA	California Air Pollution Control Officers Association
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
CIWMA	California Integrated Waste Management Act
CIWMB	California Integrated Waste Management Board
CIWMP	County Integrated Waste Management Plan
CoSWMP	County Solid Waste Management Plan
County	Santa Barbara County
CRLF	California red-legged frog
cy	cubic yard
dB	decibel
dBA	A-weighted decibel
DPFs	diesel particulate filters
EC	electrical conductivity
EHS	Environmental Health Services
EIR	Environmental Impact Report
ENSO	El Niño Southern Oscillation
EPA	Environmental Protection Agency
ESHA	Environmentally Sensitive Habitat Area
GCC	Gaviota Coast Conservancy
GLA	GeoLogic Associates
GLCRS	Groundwater Leachate Collection and Recovery System
HDPE	high-density polyethylene
Highway 101	U.S. Highway 101
HWDS	horizontal well drain system
JTD	Joint Technical Document
LCRS	Leachate Collection and Removal System
LEA	Local Enforcement Agency
LFG	landfill gas
LLCRS	liner leachate collection and recovery system
MCL	maximum containment limits
MPN	most probable number
MRF	Material Recovery Facility
MRMP	Mitigation Reporting and Monitoring Program
MRP	Monitoring and Reporting Program

msl	mean sea level
MSW	Municipal Solid Waste
MTBE	methyl tertiary butyl ether
NGWMS	north ground water management system
NO	nitric oxide
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
OEHHA	Office of Environmental Health Hazard Assessment
PCR	California Public Resources Code
P&D	Planning and Development
PM <sub>10</sub>	particulate matter with aerodynamic diameter less than or equal to 10 micrometers
PPT	piezo-penetrometer test
PRC	Public Resources Code
RWQCB	Regional Water Quality Control Board
SCCAB	South Central Coast Air Basin
SWANA	Solid Waste Association Silver Award
SWFP	Solid Waste Facility Permit
SWUD	Solid Waste and Utilities Division
TIC	tentatively identified compounds
tpd	tons per day
TSS	total suspended solids
USFWS	United States Fish and Wildlife Service
VOCs	volatile organic compounds
WDRs	Waste Discharge Requirements

## 8.0 FINAL EIR MAILING LIST

AGENCIES	RECEIVE FINAL EIR	RECEIVE NOTICE OF FINAL EIR
<b>Federal</b>		
U.S. Army Corps of Engineers/Ventura Field Office		X
U.S. Fish & Wildlife Service		X
U.S. Forest Service/Los Padres National Forest		X
Channel Islands National Park		X
Vandenberg AFB		X
U.S. Congressperson Lois Copps		X
U.S. Senator Dianne Feinstein		X
U.S. Senator Barbara Boxer		X
<b>State</b>		
California Coastal Commission/South Central Coastal Zone		X
California Integrated Waste Management Board - Region 3	X	
California Integrated Waste Management Board/Chair	X	
CalTrans - District 5		X
Coastal Conservancy		X
Department of Conservation/Div of Land Res Protection - South Coast		X
Department of Conservation/Div of Recycling		X
Department of Fish and Game/Environmental Services	X	
Department of Parks and Recreation, Channel Coast		X
Fish and Game Commission		X
Governor's Office of Planning and Research - State Clearinghouse	X	
Office of Historic Preservation		X
Public Utilities Commission		X
Regional Water Quality Control Board/Central Coast Region	X	
State Assemblyperson		X
State Division of Oil & Gas		X
State Lands Commission		X
State Senator Jack O'Connell		X
<b>County</b>		
County of Santa Barbara Air Pollution Control District	X	
County of Santa Barbara Board of Supervisors	X	
County of Santa Barbara Fire Dept./Dev. Review Section		X
County of Santa Barbara Planning Commission	X	
County of Santa Barbara Sheriff Department		X
County of Santa Barbara Agricultural Preserve Adv. Commission		X
County of Santa Barbara/County Administrator	X	
County of Santa Barbara/County Council/Director	X	
County of Santa Barbara/County Counsel	X	
County of Santa Barbara/Env. Health-Clean Water		X
County of Santa Barbara/Env. Health-Director		X
County of Santa Barbara/Env. Health-Supervisor.		X
County of Santa Barbara/Env. Health-LEA	X	
County of Santa Barbara/Planning & Development - Energy Division		X
County of Santa Barbara, Health Care Services		X
County of Santa Barbara/Historical Landmarks Division		X
County of Santa Barbara Association of Governments		X
County of Santa Barbara/Park Department		X
County of Santa Barbara/Agriculture Commission		X
County of Santa Barbara/General Services		X
County of Santa Barbara/P W/Dep. Dir. Flood Control		X
County of Santa Barbara/Plng & Dev. - Building & Safety Division		X

AGENCIES	RECEIVE FINAL EIR	RECEIVE NOTICE OF FINAL EIR
County of Santa Barbara/Plng & Dev. Comprehensive Planning		X
County of Santa Barbara/Plng & Dev. Zoning Administrator		X
County of Santa Barbara/Plng & Dev. - Dev. Rev.	X	
County of Santa Barbara/Plng & Dev. Deputy Director		X
County of Santa Barbara/Plng & Dev. - Supervisor		X
County of Santa Barbara/Public Works/Director		X
County of Santa Barbara/Public Works/Department of Roads		X
County of Santa Barbara/Public Works Business Manager		X
County of Santa Barbara/PW County Surveyor		X
County of Santa Barbara/PW Project Clean Water		X
County of Santa Barbara/Transportation Division		X
Kern County Board of Supervisors		X
Kern County/Planning & Development Services		X
Los Angeles County Board of Supervisors		X
Los Angeles County Regional Planning		X
San Luis Obispo County Board of Supervisors		X
San Luis Obispo County Dept. of Planning and Building		X
Ventura County Air Pollution Control District		X
Ventura County Board of Supervisors		X
Ventura County Resource Management		X
Ventura County Solid Waste Management		X
<b>Local</b>		
Agricultural Preserve Advisory Commission		X
Agricultural Commission		X
Association of Governments		X
Association of Governments-Traffic Solutions		X
Cachuma Resource Conservation District		X
Carpinteria Sanitary District		X
City of Buellton/Mayor		X
City of Buellton/Planning Department Director		X
City of Camarillo/Mayor		X
City of Camarillo Planning & Community Development		X
City of Carpinteria/Community Development Director		X
City of Carpinteria/Mayor		X
City of Fillmore/Mayor		X
City of Fillmore Planning		X
City of Golety	X	
City of Guadalupe/Planning Commission		X
City of Lompoc/Mayor	X	
City of Lompoc- Planning Director	X	
City of Moorpark/Mayor		X
City of Moorpark Planning		X
City of Ojai/Mayor		X
City of Ojai Planning		X
City of Oxnard/Mayor		X
City of Oxnard Planning & Building		X
City of Santa Barbara, Community Development Department	X	
City of Santa Barbara/Parks & Recreation		X
City of Santa Barbara/Public Works Department	X	
Santa Barbara City Hall /Council Member		X
Santa Barbara City Hall/De La Guerra Plaza/Mayor		X
City of Santa Paula/Mayor		X
City of Santa Paula Planning		X
City of Simi Valley/Mayor		X

AGENCIES	RECEIVE FINAL EIR	RECEIVE NOTICE OF FINAL EIR
City of Simi Valley Planning		X
City of Solvang/Planning/Community Development Director		X
City of Thousand Oaks/Mayor		X
City of Thousand Oaks Planning		X
City of Ventura/Mayor		X
City of Ventura Planning		X
EL Estero WWTP		X
Embarcadero Municipal Improvement District		X
Goleta Sanitary District		X
Goleta Water District		X
Goleta West Sanitary District		X
City of Santa Maria		X
City of Santa Maria Community Development Department		X
City of San Luis Obispo/Mayor		X
City of San Luis Obispo Community Development Department		X
Health Sanitation SVC		X
Historical Landmarks Committee		X
LAFCO		X
Los Alamos Community Services District		X
San Luis Obispo Dept of Plan & Building/Environment Div		X
Sanitation Agc Mgrs. Assoc./Montecito Sanitary District		X
Santa Ynez Community Services District		X
Surveyor's Office		X
UC Cooperative Extension		X
UCSB Bren School of Environmental Management		X
UCSB Library		X
UCSB Office of Budget and Finance		X
Vista de las Cruces Union School		X
Montecito Sanitary District		X

ORGANIZATIONS AND BUSINESSES	RECEIVE FINAL EIR	RECEIVE NOTICE OF FINAL EIR
Audubon Societv of Santa Barbara		X
Associated Transportation Engineers		X
Beacon		X
BII Enterprise		X
Browning-Ferris Industries		X
Buellton Business Association		X
California Native Plant Society		X
California Preservation Foundation		X
CALPIRG		X
Carpinteria Valley Chamber of Commerce		X
Cattlemen's Association		X
Central Coast Wine Growers		X

ORGANIZATIONS AND BUSINESSES	RECEIVE FINAL EIR	RECEIVE NOTICE OF FINAL EIR
Citizens Planning Association of Santa Barbara County, Inc. Attn: Morgan Slater	X	
Coalition for Safe Neighborhoods		X
COLAB (Coalition of Labor & Agriculture & Business		X
Community Environmental Council, Attn: Laurence L. Laurent	X	
Embarcadero Municipal Improvement District		X
ENTRIX		X
Environmental Defense Center	X	
Gaviota Coast Conservancy	X	
GeoSyntec	X	
Get Oil Out, Inc.		X
Goleta Old Town PAC		X
Goleta Valley Chamber of Commerce/Issues Committee		X
Goleta Valley Vector Control		X
Governor's Office of Planning and Research - State Clearinghouse		X
Hatch and Parent, Attn: Mindy Wolf	X	
Heal the Ocean	X	
Hollister Ranch Owners Association		X
Land Trust for Santa Barbara County	X	
Larry Hunt and Associates		X
League of Women Voters		X
League of Women Voters/Santa Maria Valley		X
Lompoc Valley Chamber of Commerce		X
Los Alamos Coordinating Council		X
Los Olivos Improvement Association		X
Marborg Industries		X
MSW Magazine/Editor		X
Orcutt Area Advisory Group		X
Pacific Waste Management		X
Pacific Gas & Electric Co.		X
Rancho Sueno Improvement Association		X
Remy, Thomas & Moose	X	
Retail Merchants Association Chairman		X
Santa Barbara Chamber of Commerce		X
Santa Barbara County Farm Bureau		
Santa Barbara County Grand Jury	X	
Santa Barbara Association of Realtors		X
Santa Barbara Chamber of Commerce/Executive Director		X
Santa Barbara County Fish and Game Commission		X
Santa Barbara County Trails Council/Exec. Sec.		X
Santa Barbara Natural History Museum		X
Santa Maria Valley Chamber of Commerce		X
Santa Ynez Indian Band of Mission Indians/Tribal Elders Council	X	
Santa Ynez Indian Reservation/Business Council		X
Santa Ynez River Water Conservation District		
Scenic Shoreline Preservation Commission		X
SEIU Local 620/Representative		X
Sierra Club Conservation		X
Solvang Residents Association		X
Southern California Edison		X
Southern California Gas Co		X
Southern Pacific Railroad		X
Surfrider Foundation	X	
Surfrider Foundation National Office		X
The Nature Conservancy		X
Urban Creeks Council		X
URS	X	

INDIVIDUALS	RECEIVE FINAL EIR	RECEIVE NOTICE OF FINAL EIR
Adams, Robert		X
Andrisek, Ed		X
Badel, Julio	X	
Bener, Linda		X
Bernstein, Mitch (scoping?)		X
Blackwill, Donald		X
Blackwill, Jo		X
Brady, Robin		X
Broussard, Todd		X
Brown, JoAnn		X
Brown, J. Westley & Kathiann	X	
Buckley, Jim		X
Cameron, Ronald		X
Campbell, Jan		X
Caponi, Nancy		X
Davis, Christine		X
deMarrais, Gordon		X
Duncan, Roger & Carol		X
Eckberg, Hannah		X
Elbeck, Gail	X	
Ernest, John		X
Friedman, Eric		X
Griffith, David		X
Grivetti, Mark	X	
Hart, Bob & Debbie		X
Hawxhurst, Jack		X
Hazard, Bob		X
Hicks, Mary		X
Hollister, JJ & Barbara		X
Huffman, Matt		X
Jensen, Anne Tichenor		X
Jensen, Bob		X
Jensen, Chickie		X
Jensen, Eric		X
Jensen, Ric & Chickie		X
Jensen, Robert		X
Jones, Brad & Joan		X
Johnson, Steven		X
Kauppinen, Mark	X	
Keller, Dr. Barry	X	
Kelley, Leslie Ann	X	
Kieckhefer, Deirdre		X
Klejeski, Richard		X
Knudsen, Gaylon		X
Knudsen, Connie		X
Krock, Buc		X
Krock, Bill & Peggy		X
Lass, Gary	X	
Lansford, Mike		X
Leon, Joan		X
Lopez, Roberta	X	
Loughran, Kevin		X
Mattoel, Shelly		X
McConner, Caleste		X
McGuire, Ms. Maurie	X	
McLaughlin, Derek		X
Merrill, David, M.D.		X

INDIVIDUALS	RECEIVE FINAL EIR	RECEIVE NOTICE OF FINAL EIR
Merrill, David & Liz		X
Meyer, Fred		X
Meyer, Gary & Gerda		X
Meyer, Jim		X
Mills, Andy		X
Moniot, Louie & Margaret		X
Mooser, Mary		X
Mortensen, Finn		X
Murray, Chris		X
Nelson, Dave & Valerie		X
Newland, Larry		X
Newlin, Larry		X
Nolan, Jean		X
Neustadt, Lander		X
O'Brien, Michael & Virginia		X
Pata, Florence		X
Pata, Richard	X	
Pedersen, Frank & Jean		X
Pedersen, Philip		X
Peters, Marc		X
Petersen, Bill & Myra		X
Philbrick, Ralph		X
Plaister, Deane		X
Podner, Randy		X
Poett, Harold	X	
Rassmusson, Bob & Margaret		X
Reeve, Bill		X
Relis, Paul		X
Rodriguez, Lynn		X
Ruhge, Justin and Ann	X	
Schleich, Otto	X	
Scholle, Cliff		X
Scolari, Gerald		X
Scolari, Leroy	X	
Sehgal, Linda		X
Smallwood, James	X	
Smith, Joshua David	X	
Smith, Dan & Linda	X	
Smith, Dan		X
Smith, Joel		X
Smith Linda		X
Strobach, Fred		X
Strobach, Ruth		X
Taylor, Ken		X
Tichenor, Anne		X
Tichenor, J. Donald & Anne		X
Tichenor, Jay		X
Umenhofer, Tom	X	
Venable, John		X
Wales, Bruce	X	
Walker, Jeanne M.		X
Weakley, C.		X
Zandona, Keith		X

MEDIA	RECEIVE FINAL EIR	RECEIVE NOTICE OF FINAL EIR
Coastal View/Associate Editor		X
County News Service		X
KCOY-TV/News Director		X
KDB/News Director		X
KEYT AM 1250/Senior Reporter		X
KEYT-TV Channel 3/		X
KIST News Dept.		X
KMGQ News Dept.		X
KSMA/Newsroom		X
KSBY-TV		X
KTMS/KSBY/KTYD/PSA Director		X
KUHL/KTME/News Director		X
KXFM/KSTT/KSLY/KQJZ/PSA Director		X
Lompoc Record/Editor		X
Montecito Journal/Publisher		X
Santa Barbara News-Press		X
Santa Barbara News-Press/County Reporter		X
Santa Barbara News-Press/Lompoc Branch		X
Santa Maria Times/County Reporter		X
Santa Ynez Valley News/Editor		X
The Santa Barbara Independent/News Editor		X
Valley Voice/Editor/Publisher		X

30757/Final EIR/Tbls&Figs (6/24/02/jb)



APPENDIX A

NOTICE OF COMPLETION AND STATE CLEARINGHOUSE RESPONSE

COUNTY OF SANTA BARBARA  
PUBLIC WORKS DEPARTMENT

123 East Anapamu Street  
Santa Barbara, California 93101  
805\568-3000 FAX 805\568-3019



PHILLIP M. DEMERY  
Director

October 9, 2001

Office of Planning and Research  
California State Clearinghouse  
ATTN: Scott Morgan  
1400 Tenth Street,  
P.O. Box 3044  
Sacramento, CA 95812-3044

**RE: Notice of Completion and Draft Environmental Impact Report for the  
Tajiguas Landfill Expansion Project- SCH# 98041003**

Dear Mr. Morgan:

Enclosed with this letter are the Notice of Completion and 15 copies of the Notice of Availability and Draft Environmental Impact Report (EIR) for the Tajiguas Landfill Expansion Project.

We request that the State Clearinghouse review begin on October 12, 2001 and end 45-days later on November 26, 2001.

Thank you for your assistance. If you require further information, please contact me at (805) 882-3614.

Sincerely,

Kathy Kefauver  
Senior Engineering Environmental Planner  
Solid Waste and Utilities Division

Attachments: 1 Notice of Completion  
15 Notice of Availability (enclosed in each EIR)  
15 EIR

KSK/ksk

AA/EEO Employer

Thomas D. Fayram, Deputy Director

Scott D. McGolpin, Deputy Director

Mark A. Schleich, Deputy Director

Rochelle Camozzi, Business Manager

Michael B. Emmons, County Surveyor

NOTICE OF COMPLETION

SCH# 98041003

Mail to: State Clearinghouse, 1400 Tenth Street, Sacramento, CA 95814 (916) 445-0613

Project Title: Tajiguas Landfill Expansion Project

Lead Agency: County of Santa Barbara Public Works Dept., Solid Waste and Utilities Division Contact Person: Kathy Kefauver, Project Planner

Street Address: 109 East Victoria Street

Phone: (805) 882-3614

City: Santa Barbara, CA Zip: 93101

County: Santa Barbara

Project Location: County: Santa Barbara City/Nearest Community: Santa Barbara/Goleta

Cross Streets: Highway 101 Total Acres: 497

APN # 081-150-019 and 081-150-026 Section: \_\_\_\_\_ Twp. 5N. Range: 31W. Base: San Bernardino

Within 2 Miles: State Hwy #: Highway 101 Waterways: Arroyo Quemado, Canada de la Pila, Arroyo Hondo

Airports: None Railways: Southern Pacific Railroad Schools: None

DOCUMENT TYPE

- CEQA: NOP Supplement/Subsequent NEPA: NOI Other: Joint Document  
Early Cons EIR (Prior SCH No.) EA Final Document  
Neg Dec Other \_\_\_\_\_ Draft EIS Other  
Draft EIR FONSI

LOCAL ACTION TYPE

- General Plan Update Specific Plan Rezone Annexation  
General Plan Amendment Master Plan Prezone Redevelopment  
General Plan Element Planned Unit Development Use Permit Coastal Permit  
Community Plan Site Plan Land Division Other  
(Subdivision, Parcel Map, Tract Map, etc.)

DEVELOPMENT TYPE

- Residential: Units Acres Water Facilities: Type MGD  
Office: Sq.ft. Acres Employees Transportation: Type  
Commercial: Sq.ft. Acres Employees Mining: Type  
Industrial: Sq.ft. Acres Employees Power: Type Watts  
Educational \_\_\_\_\_ Waste Trtmnt: Type  
Recreational \_\_\_\_\_ Hazardous Wst: Type  
Other: Landfill

PROJECT ISSUES DISCUSSED IN DOCUMENT

- Aesthetic/Visual Flood Plain/Flooding Schools/Universities Water Quality  
Agricultural Land Forest Land Fire Hazard Septic Systems Water Supply/ Groundwater  
Air Quality Geologic/Seismic Sewer Capacity Wetland/Riparian  
Archeological/Historical Minerals Soil Erosion/Compaction/Grading Wildlife  
Coastal Zone Noise Solid Waste Growth Inducing  
Drainage/Absorption Population/Housing Balance Toxic/Hazardous Land use  
Economic/Jobs Public Services/Facilities Traffic/Circulation Cumulative Effects  
Fiscal Recreation/Parks Vegetation Other Nuisance

PRESENT LAND USE/ZONING/GENERAL PLAN USE

Parcel 081-150-026: Present use: Landfill and borrow area; Zoning: AG-II-100; General Plan AG-II  
Parcel 081-150-019: Present Use: Landfill, Zoning: northern portion: AG-II-100; General Plan AG-II  
southern portion: AG-II-320; Local Coastal Plan AG-II

PROJECT DESCRIPTION

The proposed project is to expand the existing Tajiguas Landfill to extend useful life an additional 15 years of additional waste disposal capacity.

**REVIEWING AGENCIES CHECKLIST**

**KEY**

S=Document sent by lead agency

X=Document sent by SCH

√=Suggested distribution

- Resources Agency
- Boating & Waterways
- Coastal Commission
- Coastal Conservancy
- Colorado River Board
- Conservation
- Fish & Game
- Forestry
- Office of Historic Preservation
- Parks & Recreation
- Reclamation
- S.F. Bay Conservation & Development Commission
- Water Resources (DWR)

**Environmental Affairs**

- Air Resources Board
- PCD/AQMD
- California Waste Management Board
- SWRCB: Clean Water Grants
- SWRCB: Delta Unit
- SWRCB: Water Quality
- SWRCB: Water Rights
- Regional WQCB #3

**Business, Transportation & Housing**

- Aeronautics
- California Highway Patrol
- CALTRANS District # 5
- Department of Transportation Planning (headquarters)
- Housing & Community Development
- Food & Agriculture

**Youth & Adult Corrections**

- Corrections

**Independent Commissions & Offices**

- Energy Commission
- Native American Heritage Commission
- Public Utilities Commission
- Santa Monica Mountains Conservancy
- State Lands Commission
- Tahoe Regional Planning Agency

**Health & Welfare**

Health Services \_\_\_\_\_

**State & Consumer Services**

- General Services
- OLA (Schools)

Other

**Public Review Period (to be filled in by lead agency)**

Starting Date October 12, 2001

Ending Date November 26, 2001

Signature *Kathy Kufauer*

Date: 10/12/01

**Lead Agency (Complete if applicable):**

**For SCH Use Only:**

Consulting Firm: TRC

Date Received at SCH

Address: 21 Technology Drive

Date Review Starts

City/State/Zip: Irvine, CA 92618

Date to Agencies

Contact: Bob Mason

Date to SCH

Phone: (949) 727-9336

Clearance Date

Notes:

Applicant: Santa Barbara County Public Works Department, Solid Waste and Utilities Division

Address: 109 East Victoria Street

City/State/Zip: Santa Barbara, CA 93101

Phone: (805) 882-3600

NOC SCH.doc





Gray Davis  
GOVERNOR

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH  
State Clearinghouse



Steven A. Nis  
DIRECTOR

**ACKNOWLEDGEMENT OF RECEIPT**

DATE: November 7, 2001

TO: Kathy Kefauver  
County of Santa Barbara, Public Works Department  
Solid Waste and Utilities Division  
109 East Victoria Street  
Santa Barbara, CA 93101

RE: Tajiguas Landfill Expansion Project  
SCH#: 1998041003

This is to acknowledge that the State Clearinghouse has received your environmental document for state review. The review period assigned by the State Clearinghouse is:

Review Start Date: October 23, 2001  
Review End Date: December 6, 2001

We have distributed your document to the following agencies and departments:

California Coastal Commission  
California Highway Patrol  
Caltrans, District 5  
Department of Conservation  
Department of Fish and Game, Region 5  
Department of Parks and Recreation  
Department of Toxic Substances Control  
Department of Water Resources  
Integrated Waste Management Board  
Native American Heritage Commission  
Regional Water Quality Control Board, Region 3  
Resources Agency  
State Lands Commission  
State Water Resources Control Board, Division of Water Quality

The State Clearinghouse will provide a closing letter with any state agency comments to your attention on the date following the close of the review period.

Thank you for your participation in the State Clearinghouse review process.



APPENDIX B

PUBLIC NOTICES OF AVAILABILITY OF DRAFT EIR  
AND PUBLIC MEETINGS  
AND EXTENSION OF COMMENT PERIOD



October 12, 2001

**NOTICE OF AVAILABILITY OF AND PUBLIC HEARINGS ON THE  
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED  
TAJIGUAS LANDFILL EXPANSION PROJECT  
01-EIR-5**

**PROJECT DESCRIPTION:** The County of Santa Barbara, Public Works Department, Solid Waste and Utilities Division (SWUD) proposes to expand the Tajiguas Landfill to provide 15 years of additional waste disposal capacity.

**PROJECT LOCATION:** The project site is located approximately 26 miles west of the City of Santa Barbara on the Gaviota Coast, commonly known as 14470 Calle Real, APNs 081-150-019, -021 and -026 in the Gaviota area, 3rd Supervisorial District.

**PUBLIC HEARING AND COMMENT:** Santa Barbara County is soliciting comments on the adequacy and completeness of the analysis and proposed mitigation measures described in 01-EIR-5. You may comment by providing testimony at the public hearings at the meetings listed below and/or submitting written or oral comments to the project planner identified below prior to the close of public comment on November 26, 2001 at 5:00 p.m.

**Public Meetings Locations:**

*For solicitation of comments on the adequacy of the Draft Environmental Impact Report (EIR)*

- |   |   |
|---|---|
| • <b>Wednesday, November 7</b><br><b>Santa Barbara</b><br>Santa Barbara Public Library<br>Central Branch<br>Faulkner Gallery<br>40 East Anapamu Street<br>Santa Barbara, CA | • <b>Thursday, November 8</b><br><b>Santa Maria</b><br>County Government Center<br>Board of Supervisors' Hearing Room<br>511 East Lakeside Drive<br>Santa Maria, CA |
| • <b>Tuesday, November 13</b><br><b>Buellton</b><br>Anderson's Pea Soup Restaurant<br>Ballroom<br>376 Avenue of the Flags<br>Buellton, CA                                   | • <b>Monday, November 19</b><br><b>Goleta</b><br>Goleta Community Center<br>5679 Hollister Avenue<br>Goleta, CA   |

All meetings will take place at 6:30 p.m.

**PROJECT DETAILS:** The County of Santa Barbara, Public Works Department, Solid Waste and Utilities Division (SWUD) proposes to expand the Tajiguas Landfill to provide 15 years of additional waste disposal capacity. The Draft EIR analyzes both a Front Canyon and Back Canyon Configuration at project level.

The Tajiguas Landfill is expected to reach its existing capacity in 2005. The proposed expansion of the Tajiguas Landfill is to increase the solid waste disposal capacity to meet the waste disposal needs of southern Santa Barbara County and the Santa Ynez and Cuyama Valleys until 2020.

**ENVIRONMENTAL REVIEW FINDINGS:** SWUD has prepared a Draft Environmental Impact Report (01-EIR-5) pursuant to requirements of the State Guidelines for the Implementation of the California Environmental Quality Act (CEQA) and the County of Santa Barbara Guidelines for the Implementation of CEQA. SWUD has prepared a Draft EIR for the proposed project due to the potential for unavoidable, significant adverse effects to result from project implementation. The Draft EIR prepared for the project identifies and discusses potential impacts; mitigation measures, residual impacts and monitoring requirements for identified subject areas. Significant effects on the environment are anticipated in the following areas: **Biological Resources, Cultural Resources, Visual Resources, and Air Quality.** If the project description changes, a reevaluation will be required to consider the changes. If you challenge this environmental document in court, you may be limited to raising only those issues raised by you or others in written correspondence or in hearings on the proposed project.

**DOCUMENT AVAILABILITY:** If a copy is not attached, the Draft EIR may be obtained and all documents referenced in the Draft EIR may be reviewed at the Santa Barbara Planning & Development offices located at 123 E. Anapamu Street, Santa Barbara **OR** 624 Foster Road, Suite C, Santa Maria and at the Public Works Department, Solid Waste and Utilities Division offices located at 109 E. Victoria Street, Santa Barbara. The Draft documents are also available for review at all County and City libraries and copies are available for purchase at Kinko's Copies located at 23 South Hope Avenue, Santa Barbara, (805) 569-5100 and 2142 South Bradley, Santa Maria (805) 922-6324 and the Alternative Copy Shop, 209 East Anapamu Street, Santa Barbara (805) 963-7731.

**HOW TO COMMENT:** Please provide comments to the project planner, Kathy Kefauver, Solid Waste and Utilities Division at 109 East Victoria Street, Santa Barbara, CA 93101, PHONE # (805) 882-3614, FAX # (805) 882-3601 prior to the close of public comment period on November 26, 2001 at 5:00 p.m. or provide testimony at the public hearings on the dates and times specified above. Please limit comments to environmental issues such as traffic, biology, noise, etc. You will receive notice of the dates of future public hearings before the Board of Supervisors to consider project approval or denial, which is estimated to be in February-March 2002.

In compliance with the Americans with Disabilities Act, if you need special assistance to participate in any of these hearings, please contact Solid Waste and Utilities Division Staff (805) 882-3600. Notification at least 48 hours prior to the hearing will enable SWUD to make reasonable arrangements.

**EXTENSION OF PUBLIC COMMENT PERIOD AND ADDITIONAL PUBLIC HEARING ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED TAJIGUAS LANDFILL EXPANSION PROJECT 01-EIR-5**

**PROJECT DESCRIPTION:** The County of Santa Barbara, Public Works Department, Solid Waste and Utilities Division (SWUD) proposes to expand the Tajiguas Landfill to provide 15 years of additional waste disposal capacity.

**PROJECT LOCATION:** The project site is located approximately 26 miles west of the City of Santa Barbara on the Gaviota Coast, commonly known as 14470 Calle Real, APNs 081-150-019, -021 and -026 in the Gaviota area, 3rd Supervisorial District.

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*For solicitation of comments on the adequacy of the Draft Environmental Impact Report (EIR)*

- **Wednesday, November 7**  
**Santa Barbara**  
Santa Barbara Public Library  
Central Branch  
Faulkner Gallery  
40 East Anapamu Street  
Santa Barbara, CA
- **Thursday, November 8**  
**Santa Maria**  
County Government Center  
Board of Supervisors' Hearing Room  
511 East Lakeside Drive  
Santa Maria, CA
- **Tuesday, November 13**  
**Buellton**  
Anderson's Pea Soup Restaurant  
Ballroom  
376 Avenue of the Flags  
Buellton, CA
- **Monday, November 19**  
**Goleta**  
Goleta Community Center  
5679 Hollister Avenue  
Goleta, CA
- **Wednesday, November 28**  
Lompoc City Hall  
City Council Chambers  
100 Civic Center Plaza  
Lompoc, CA



All meetings will take place at 6:30 p.m.

**PROJECT DETAILS:** The County of Santa Barbara, Public Works Department, Solid Waste and Utilities Division (SWUD) proposes to expand the Tajiguas Landfill to provide 15 years of additional waste disposal capacity. The Draft EIR analyzes both a Front Canyon and Back Canyon Configuration at project level.

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**HOW TO COMMENT:** Please provide written comments to the project planner, Kathy Kefauver, Solid Waste and Utilities Division at 109 East Victoria Street, Santa Barbara, CA 93101, PHONE # (805) 882-3614, FAX # (805) 882-3601 prior to the close of public comment period on December 14, 2001 at 5:00 p.m. or provide testimony at the public hearings on the dates and times specified above. Please limit comments to environmental issues such as traffic, biology, noise, etc. You will receive notice of the dates of future public hearings before the Board of Supervisors to consider project approval or denial, which is estimated to be in spring of 2002.

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October 12, 2001

**NOTICE OF AVAILABILITY OF AND PUBLIC HEARINGS ON THE  
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED  
TAJIGUAS LANDFILL EXPANSION PROJECT  
01-EIR-5**

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**Public Meetings Locations:**

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- **Tuesday, November 13, Buellton, Anderson's Pea Soup Restaurant, Ballroom, 376 Avenue of the Flags, Buellton, CA**
- **Monday, November 19, Goleta, Goleta Community Center, 5679 Hollister Avenue, Goleta, CA.**

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**PROJECT DETAILS:** The County of Santa Barbara, Public Works Department, Solid Waste and Utilities Division (SWUD) proposes to expand the Tajiguas Landfill to provide 15 years of additional waste disposal capacity. The Draft EIR analyzes both a Front Canyon and Back Canyon Configuration at project level. The Tajiguas Landfill is expected to reach its existing capacity in 2005. The proposed expansion of the Tajiguas Landfill is to increase the solid waste disposal capacity to meet the waste disposal needs of southern Santa Barbara County and the Santa Ynez and Cuyama Valleys until 2020.

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**EXTENSION OF PUBLIC COMMENT PERIOD AND  
ADDITIONAL PUBLIC HEARING ON THE  
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7

# Let's Talk Trash.

Let's talk garbage. Let's talk recycling.  
Let's talk Tajiguas Landfill.

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Does it just go "Away"? Where is "Away"? In southern Santa Barbara County, "Away" is the Tajiguas Landfill where a majority of the municipal solid waste goes for disposal.

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## Public Comment Meeting dates and locations:

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<p>Santa Barbara Public Library Faulkner Gallery 40 E. Anapamu Street</p>	<p>County Government Center Board of Supervisors Hearing Room 511 East Lakeside Drive</p>	<p>Pea Soup Andersen's Restaurant 376 Avenue of Flags</p>	<p>Goleta Valley Community Center 5679 Hollister Ave</p>

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## Tajiguas Landfill Expansion Project

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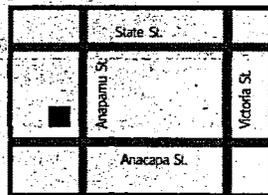
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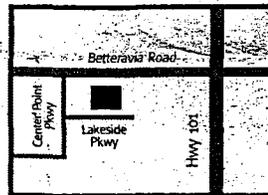
Santa Barbara.



Santa Barbara Public Library  
Faulkner Gallery  
40 E. Anapamu Street

### November 8

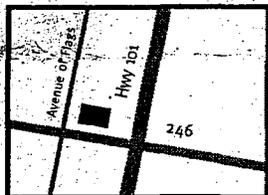
Santa Maria



County Government Center  
Board of Supervisors Hearing Room  
511 East Lakeside Drive

### November 13

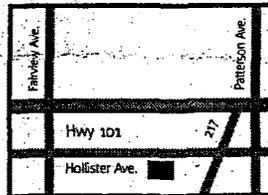
Buellton



Pea Soup Andersen's Restaurant  
376 Avenue of Flags

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Goleta



Goleta Valley Community Center  
5679 Hollister Ave

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## Tajiguas Landfill Expansion Project

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**introduction to yoga**  
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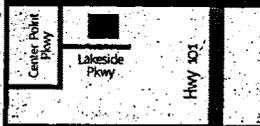
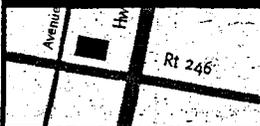
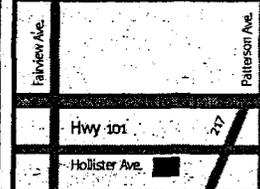
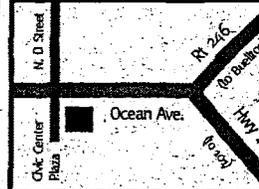
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<b>Completed</b>	<b>Completed</b>	<b>Completed</b>		
				
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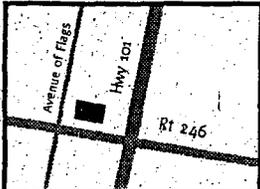
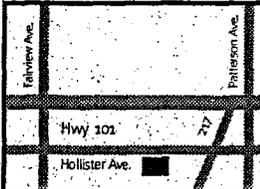
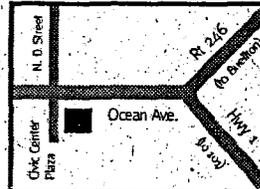
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## Tajiguas Landfill Expansion Project

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Fri. & Sat., Oct. 12 &

Information 344.331

October 12, 2001

NOTICE OF AVAILABILITY OF AND PUBLIC HEARINGS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED TAJIGUAS LANDFILL EXPANSION PROJECT 01-EIR-5

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borne assaults.

Tuesday's bombing plan included about 60 to 65 carrier-based Navy strike aircraft, about eight Air Force long-range bombers and several Air Force fighter-bombers, a senior defense official said. Their targets included caves thought to be hiding places for al-Qaida leaders, the official said, speaking on condition of anonymity.

Another U.S. official, also speaking on condition of anonymity, said the Taliban are collapsing in disarray. Many of their field commanders have fled on their own, without supplies, reinforcements, or meaningful contact with the senior leadership, the official said. Some are switching sides to the northern alliance.

U.S. intelligence believes that Taliban forces are also abandoning Konduz, their last stronghold in northern Afghanistan. They are moving south, through alliance-controlled territory, the official said.

On reports that the alliance is executing people, Fleischer said veteran diplomat James Dobbins is on his way to the region to give northern alliance officials a message from Bush "about respecting human rights and making certain that a climate that fosters respect for human life is created ... a climate and an environment where a future regime in Afghanistan can be multi-ethnic."

The United Nations reported that alliance troops had executed 100 Taliban fighters hiding in a school in the northern city of Mazar-Sharif on Saturday, and there were other reports of reprisals.

Asked if U.S. forces were doing anything to prevent a blood bath in newly captured territory, Clarke said: "What we've seen thus far in places where the Taliban and al-Qaida are leaving and ... the opposition groups are going in, they've been pretty uniformly welcomed. And things seem to be going well

**EXTENSION OF PUBLIC COMMENT PERIOD AND  
ADDITIONAL PUBLIC HEARING ON THE  
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED  
TAJIGUAS LANDFILL EXPANSION PROJECT  
01-EIR-5**

**PROJECT DESCRIPTION:** The County of Santa Barbara, Public Works Department, Solid Waste and Utilities Division (SWUD) proposes to expand the Tajiguas Landfill to provide 15 years of additional waste disposal capacity.

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- **Thursday, November 8, Santa Maria, County Government Center, Board of Supervisors' Hearing Room, 511 East Lakeside Drive, Santa Maria, CA**
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Such "gatekeeping" policies are used to keep costs down and coordinate care.

But at Harvard Vanguard, the system was unpopular with doctors and patients alike, said Dr. Steven Pearson of Harvard Medical School, and a decision was made to drop it. A study by Pearson and his colleagues found that patients did not rush to specialists.

The study, published in New England Journal of Medicine,



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- Cooking, laundering, bathing, dressing
- Carefully selected staff, supervised,
- Located here in Lompoc

Call Jim Small for a brochure  
514 North "H" St., Suite

**ATTN: VANDENBERG**

Vandenberg Village District field personnel hydrants to flush Vandenberg Village from thru November 9, 2001 until 4:00 P.M.

Vandenberg Village recoloring water while within their area. There are 24 to 48 hours.

**TO AVOID STAINS, LAUNDRY OR DISH WATER RUNS CLEAR**

Please call the Vandenberg Services District office for information or to find out more in your area.

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For more information call 882-3600 • or visit our web site at [www.publicworkssb.org](http://www.publicworkssb.org)

**Tajiguas Landfill Expansion Project**



RECEIVED

STATE OF CALIFORNIA  
County of Santa Barbara

OCT 15 2001

S.B. COUNTY  
PLANNING & DEVELOPMENT

\_\_\_\_\_, first being duly sworn,  
deposes and says:

**PROOF OF PUBLICATION**

This affidavit is notification that the following business published advertising and/or pre-print inserts in the indicated Lompoc Record Publications on the dates listed below.

\_\_\_\_\_ company has placed advertising  
in the LOMPOC RECORD ( ), VALLEY REVIEW ( ), SPACE & MISSILE TIMES ( )  
in the form of...

30.75 inches of ROP advertising (color? \_\_\_\_\_ )

\_\_\_\_\_ pre-print inserts  
on these dates.

17 Oct 2001 Lompoc Record  
17 Oct 2001 Santa Maria Times  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I hereby certify (or declare) under penalty of perjury that the foregoing is true and correct.

Signed Paula Anderson Date 10/12 2001

Title Adv. Sales Rep.



LOMPOC RECORD PUBLICATIONS • 115 North "H" Street • Lompoc, California 93436

\_\_\_\_\_  
(Signature)

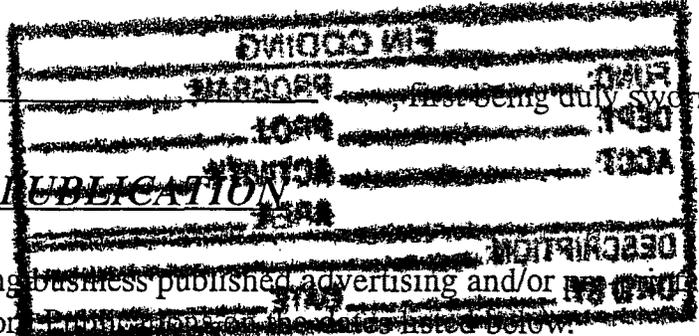
Subscribe and sworn to before me on \_\_\_\_\_.

\_\_\_\_\_  
Notary Public in and for said County and State

STATE OF CALIFORNIA  
County of Santa Barbara

deposes and says:

**PROOF OF PUBLICATION**



This affidavit is notification that the following business published advertising and/or inserts in the indicated Lompop Record Publications on the dates listed below.

SB Co. Solid Waste company has placed advertising

in the LOMPOC RECORD ( ), VALLEY REVIEW ( ), SPACE & MISSILE TIMES ( )  
in the form of...

34 inches of ROP advertising (color? \_\_\_\_\_ )

\_\_\_\_\_ pre-print inserts

on these dates. 4 Nov. 2001 Lompop Record

4 Nov. 2001 Santa Maria Times

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I hereby certify (or declare) under penalty of perjury that the foregoing is true and correct.

Signed [Signature] Date 11/5 2001

Title Adv. Sales Rep.



LOMPOC RECORD PUBLICATIONS • 115 North "H" Street • Lompop, California 93436

\_\_\_\_\_  
(Signature)

Subscribe and sworn to before me on \_\_\_\_\_.

\_\_\_\_\_  
Notary Public in and for said County and State

being held at the Juvenile and their teachers and employees of what their children are doing in Resources Center in San Luis at the school so they will tell their rooms.

In  
Mil



October 12, 2001  
**NOTICE OF AVAILABILITY OF AND PUBLIC HEARINGS ON THE  
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For more information call 882-3600 • or visit our web site at [www.publicworkssb.org](http://www.publicworkssb.org)

## Tajiguas Landfill Expansion Project

**M.I.D.**  
 becoming the ninth unanimous rookie pick in the NL. The others were Frank Robinson (1956), Orlando Cepeda (1958), Willie McCovey (1959), Vince Coleman (1985), Benito Santiago (1987), Mike Piazza (1993), Raul Mondesi (1994) and Scott Rolen (1997).

Pujols set an NL rookie record with 130 RBIs, and led the Cardinals with a .329 average, 37 homers and 112 runs. He won the award one day after St. Louis teammate Mark McGwire announced his retirement.

**Every Tuesday from 5-9 pm**

**FREE**

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in Crab plus: Choice of Clam, enough Bread, Fettuccine or Corn-On-The-Cob.

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per person

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**AUTHENTIC HOMESTYLE COOKING**  
At Great Prices!

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Dancing-Cocktails and Monday Night Football

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**MUCH MORE**  
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### Prostate Cancer Program

Free Educational Series Presents

## "How I Survived Prostate Cancer"

A Patient's Perspective

Thursday, November 8th at 2:30 p.m.  
Burtness Auditorium at Cottage Hospital  
For information: 682-7300

Cancer Center of Santa Barbara



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Psychotherapy  
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Santa Barbara, CA 93101  
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Ever wonder where your trash goes when it leaves the curb?

Does it just go "Away"? Where is "Away"? In southern Santa Barbara County, "Away" is the Tajiguas Landfill where a majority of the municipal solid waste goes for disposal.

The County of Santa Barbara Public Works Department has prepared a Draft Environmental Impact Report (EIR) that has evaluated the environmental impacts of the proposed expansion of the Tajiguas Landfill which will extend its useful life an additional 15 years.

The Draft EIR and the supporting Technical Reports are now available for your review and comments. We encourage your participation in this process.

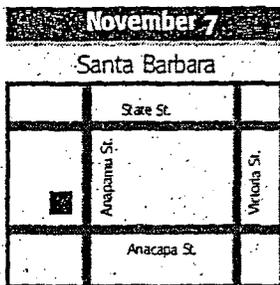
The documents may be reviewed at County Planning and Development offices, County Public Works offices and all County and City libraries. Copies are available for purchase at Kinkos in Santa Barbara and Santa Maria, and at the Alternative Copy Shop in Santa Barbara.

All Santa Barbara County residents are encouraged to attend any of the four Public Comment Meetings sponsored by Public Works.

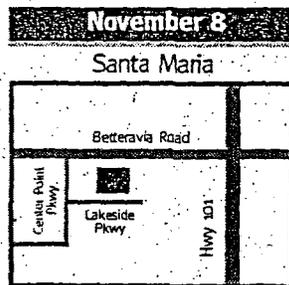
These meetings are held so that residents may provide formal public comment on the environmental analysis in the Draft EIR. We are interested in your opinions and concerns.

We are planning for the future. This is your chance to get involved.

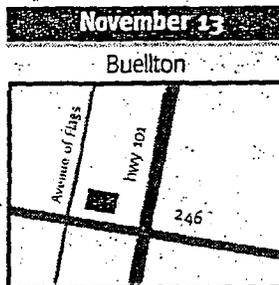
## Public Comment Meeting dates and locations:



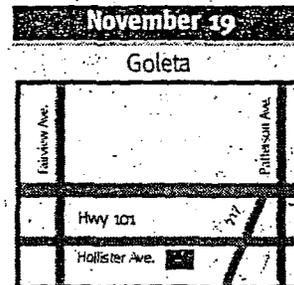
Santa Barbara Public Library  
Faulkner Gallery  
40 E. Anapamu Street



County Government Center  
Board of Supervisors Hearing Room  
511 East Lakeside Drive



Pea Soup Andersen's Restaurant  
376 Avenue of Flags



Goleta Valley Community Center  
5679 Hollister Ave

All meetings will start at 6:30 p.m.

The Draft EIR is available for review at the following County locations

County of Santa Barbara Planning & Development • 123 E. Anapamu Street, Santa Barbara or 674 Foster Road, Suite C, Santa Maria  
County of Santa Barbara Public Works Solid Waste & Utilities Division • 109 E. Victoria Street, Santa Barbara

For more information call 882-3600 • or visit our web site at [www.publicworkssb.org](http://www.publicworkssb.org)

## Tajiguas Landfill Expansion Project



**NOTICE OF AVAILABILITY OF AND PUBLIC HEARINGS ON THE  
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED  
TAJIGUAS LANDFILL EXPANSION PROJECT  
01-EIR-5**

**Project Description:** The County of Santa Barbara, Public Works Department, Solid Waste and Utilities Division (SWUD) proposes to expand the Tajiguas Landfill to provide 15 years of additional waste disposal capacity. [short, 2 line max, project description].

**Project Location:** The project site is located approximately 26 miles west of the City of Santa Barbara on the Gaviota Coast, commonly known as 14470 Calle Real, APNs 081-150-019, -021 and -026 in the Gaviota area, 3rd Supervisorial District.

**Public Hearing and Comment:** Santa Barbara County is soliciting comments on the adequacy and completeness of the analysis and proposed mitigation measures described in 01-EIR-5. You may comment by providing testimony at the public hearings at the meetings listed below and/or submitting written or oral comments to the project planner identified below prior to the close of public comment on November 26, 2001 at 5:00 p.m.

**Public Meetings Locations:**

For solicitation of comments on the adequacy of the Draft Environmental Impact Report (EIR)

Wednesday, November 7, Santa Barbara, Santa Barbara Public Library, Central Branch, Faulkner Gallery, 40 East Anapamu Street, Santa Barbara, CA

Thursday, November 8, Santa Maria, County Government Center, Board of Supervisors' Hearing Room, 511 East Lakeside Drive, Santa Maria, CA

Tuesday, November 13, Buellton, Anderson's Pea Soup Restaurant, Ballroom, 376 Avenue of the Flags, Buellton, CA

Monday, November 19, Goleta, Goleta Community Center, 5679 Hollister Avenue, Goleta, CA

All meetings will take place at 6:30 p.m.

**Project Details:** The County of Santa Barbara, Public Works Department, Solid Waste and Utilities Division (SWUD) proposes to expand the Tajiguas Landfill to provide 15 years of additional waste disposal capacity. The Draft EIR analyzes both a Front Canyon and Back Canyon Configuration at project level. The Tajiguas Landfill is expected to reach its existing capacity in 2005. The proposed expansion of the Tajiguas Landfill is to increase the solid waste disposal capacity to meet the waste disposal needs of southern Santa Barbara County and the Santa Ynez and Cuyama Valleys until 2020.

**Environmental Review Findings:** SWUD has prepared a Draft Environmental Impact Report (01-EIR-5) pursuant to requirements of the State Guidelines for the Implementation of the California Environmental Quality Act (CEQA) and the County of Santa Barbara Guidelines for the Implementation of CEQA. SWUD has prepared a Draft EIR for the proposed project due to the potential for unavoidable, significant adverse effects to result from project implementation. The Draft EIR prepared for the project identifies and discusses potential impacts, mitigation measures, residual impacts and monitoring requirements for identified subject areas. Significant effects on the environment are anticipated in the following areas: Biological Resources, Cultural Resources, Visual Resources, and Air Quality. If the project description changes, a reevaluation will be required to consider the changes. If you challenge this environmental document in court, you may be limited to raising only those issues raised by you or others in written correspondence or in hearings on the proposed project.

**Document Availability:** The Draft EIR may be obtained and all documents referenced in the Draft EIR may be reviewed at the Santa Barbara Planning & Development offices located at 123 E. Anapamu Street, Santa Barbara OR 624 Foster Road, Suite C, Santa Maria and at the Public Works Department, Solid Waste and Utilities Division offices located at 109 E. Victoria Street, Santa Barbara. The Draft documents are also available for review at all County and City libraries and copies are available for purchase at Kinko's Copies located at 23 South Hope Avenue, Santa Barbara, (805) 569-5100 and 2142 South Bradley, Santa Maria (805) 922-6324 and the Alternative Copy Shop, 209 East Anapamu Street, Santa Barbara (805) 963-7731.

**How to Comment:** Please provide comments to the project planner, Kathy Kefauver, Solid Waste and Utilities Division, at 109 East Victoria Street, Santa Barbara, CA 93101, PHONE # (805) 882-3614, FAX # (805) 882-3601 prior to the close of public comment period on November 26, 2001 at 5:00 p.m. or provide testimony at the public hearings on the dates and times specified above. Please limit comments to environmental issues such as traffic, biology, noise, etc. You will receive notice of the dates of future public hearings before the Board of Supervisors to consider project approval or denial, which is estimated to be in February-March 2002.

*In compliance with the Americans with Disabilities Act, if you need special assistance to participate in any of these hearings, please contact Solid Waste and Utilities Division Staff (805) 882-3600. Notification at least 48 hours prior to the hearing will enable SWUD to make reasonable arrangements.*

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## EXTENSION OF PUBLIC COMMENT PERIOD AND ADDITIONAL PUBLIC HEARING ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED TAJIGUAS LANDFILL EXPANSION PROJECT 01-EIR-5

**PROJECT DESCRIPTION:** The County of Santa Barbara, Public Works Department, Solid Waste and Utilities Division (SWUD) proposes to expand the Tajiguas Landfill to provide 15 years of additional waste disposal capacity.

**PROJECT LOCATION:** The project site is located approximately 26 miles west of the City of Santa Barbara on the Gaviota Coast, commonly known as 14470 Calle Real, APNs 081-150-019, -021 and -026 in the Gaviota area, 3rd Supervisorial District.

**PUBLIC HEARING AND COMMENT:** Santa Barbara County is soliciting comments on the adequacy and completeness of the analysis and proposed mitigation measures described in 01-EIR-5. You may comment by providing testimony at the public hearings at the meetings listed below and/or submitting written or oral comments to the project planner identified below. The close of public comment has been extended to December 14, 2001 at 5:00 p.m.

### PUBLIC MEETINGS LOCATIONS:

For solicitation of comments on the adequacy of the Draft Environmental Impact Report (EIR)

**Thursday, November 8,**  
Santa Maria, County Government Center,  
Board of Supervisors Hearing Room,  
511 East Lakeside Drive, Santa Maria, CA

**Monday, November 19,**  
Goleta, Goleta Community Center,  
5679 Hollister Avenue, Goleta, CA

**Tuesday, November 13,**  
Buellton, Anderson's Pea Soup Restaurant, Ballroom,  
376 Avenue of the Flags, Buellton, CA

**Wednesday, November 28,**  
Lompoc City Hall, City Council Chambers,  
100 Civic Center Plaza, Lompoc, CA

ALL MEETINGS WILL TAKE PLACE AT 6:30 P.M.

**PROJECT DETAILS:** The County of Santa Barbara, Public Works Department, Solid Waste and Utilities Division (SWUD) proposes to expand the Tajiguas Landfill to provide 15 years of additional waste disposal capacity. The Draft EIR analyzes both a Front Canyon and Back Canyon Configuration at project level. The Tajiguas Landfill is expected to reach its existing capacity in 2006. The proposed expansion of the Tajiguas Landfill is to increase the solid waste disposal capacity to meet the waste disposal needs of southern Santa Barbara County and the Santa Ynez and Cuyama Valleys until 2020.

**ENVIRONMENTAL REVIEW FINDINGS:** SWUD has prepared a Draft Environmental Impact Report (01-EIR-5) pursuant to requirements of the State Guidelines for the Implementation of the California Environmental Quality Act (CEQA) and the County of Santa Barbara Guidelines for the Implementation of CEQA. SWUD has prepared a Draft EIR for the proposed project due to the potential for unavoidable, significant adverse effects to result from project implementation. The Draft EIR prepared for the project identifies and discusses potential impacts, mitigation measures, residual impacts and monitoring requirements for identified subject areas. Significant effects on the environment are anticipated in the following areas: Biological Resources, Cultural Resources, Visual Resources, and Air Quality. If the project description changes, a reevaluation will be required to consider the changes. If you challenge this environmental document in court, you may be limited to raising only those issues raised by you or others in written correspondence or in hearings on the proposed project.

**DOCUMENT AVAILABILITY:** If a copy is not attached, the Draft EIR may be obtained and all documents referenced in the Draft EIR may be reviewed at the Santa Barbara Planning & Development offices located at 123 E. Anapamu Street, Santa Barbara OR 624 Foster Road, Suite C, Santa Maria and at the Public Works Department, Solid Waste and Utilities Division offices located at 109 E. Victoria Street, Santa Barbara. The Draft documents are also available for review at all County and City libraries and copies are available for purchase at Kinko's Copies located at 23 South Hope Avenue, Santa Barbara, (805) 569-5100 and 2142 South Bradley, Santa Maria (805) 922-6324 and the Alternative Copy Shop, 209 East Anapamu Street, Santa Barbara (805) 963-7731.

**HOW TO COMMENT:** Please provide written comments to the project planner, Kathy Kefauver, Solid Waste and Utilities Division at 109 East Victoria Street, Santa Barbara, CA 93101, PHONE # (805) 882-3614, FAX # (805) 882-3601 prior to the close of public comment period on December 14, 2001 at 5:00 p.m. or provide testimony at the public hearings on the dates and times specified above. Please limit comments to environmental issues such as traffic, biology, noise, etc. You will receive notice of the dates of future public hearings before the Board of Supervisors to consider project approval or denial, which is estimated to be in spring of 2002.

*In compliance with the Americans with Disabilities Act, if you need special assistance to participate in any of these hearings, please contact Solid Waste and Utilities Division Staff (805) 882-3600. Notification at least 48 hours prior to the hearing will enable SWUD to make reasonable arrangements.*



APPENDIX C  
MITIGATION MONITORING  
AND REPORTING PLAN

## Tajiguas Landfill Expansion Project Mitigation Monitoring and Reporting Plan

**CLASS I IMPACTS – SIGNIFICANT AND UNAVOIDABLE ADVERSE ENVIRONMENTAL IMPACTS** of the project for which the decision makers must issue a “statement of overriding considerations” under Section 15093 of the State CEQA Guidelines (as amended) if the project is approved.

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
Biological Resources	1. Seeps and rock outcrops, habitat for sensitive plant species, and chaparral and oak woodland, habitat for Plummer's baccharis, Hoffmann's nightshade and Santa Barbara honeysuckle, would be eliminated.	<p>A survey shall be conducted to identify sensitive plant species identified in Table 3.4-2 in areas to be cleared of native vegetation. The survey for the Gaviota tarplant (<i>Hemizonia increscens ssp. villosa</i>) shall be conducted during the months of May through late summer. In the event sensitive plant species (i.e., Santa Barbara honeysuckle, Gaviota tarplant, etc) are identified, the following measures shall be implemented:</p> <ul style="list-style-type: none"> <li>• Plants shall be salvaged and/or propagules shall be relocated to an appropriate location in the Pila Creek watershed or the Baron Ranch, as identified by the biologist.</li> <li>• Transplanted or propagated plants shall be maintained for a minimum of 5 years, or until the biologist determines that the plants have been successfully established (plants are vigorous, they flower and produce seed).</li> </ul>	BC/FC	Significant	SWUD
Biological Resources	1. Loss of an estimated 100 to 150 mature coast live oak trees.	An oak tree replacement plan shall be prepared to replace oak trees identified for removal. Any oak trees that are removed and/or damaged (more than 25% of root zone disturbed) shall be replaced on a 10:1 basis with 1-gallon size saplings grown from locally obtained acorns.	BC/FC	Significant	SWUD

## Tajiguas Landfill Expansion Project Mitigation Monitoring and Reporting Plan

**CLASS I IMPACTS – SIGNIFICANT AND UNAVOIDABLE ADVERSE ENVIRONMENTAL IMPACTS** of the project for which the decision makers must issue a “statement of overriding considerations” under Section 15093 of the State CEQA Guidelines (as amended) if the project is approved.

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
		<p>Trees shall be planted prior to winter rains, irrigated and maintained until established (5 years). The plantings shall be protected from predation by wild and domestic animals, and from human interference by the use of staked fencing and gopher fencing during the maintenance period. In the event that an oak tree(s) does not survive for 5 years, it shall be replaced.</p> <p>An oak tree protection program, prepared by a County-approved biologist, shall be implemented. The program shall include, but not be limited to, the following components:</p> <ul style="list-style-type: none"> <li>• No grading or development shall occur within the drip lines of oak trees.</li> <li>• All oak trees within 25 feet of proposed ground disturbances shall be temporarily fenced with chain-link or other satisfactory material throughout all grading and construction activities. The fencing shall be installed 6 feet outside the drip line of each oak tree, and shall be staked every 6 feet.</li> <li>• Within 6 feet of any oak tree drip line, the following shall be prohibited: <ul style="list-style-type: none"> <li>- Parking, storage or operation of construction equipment;</li> </ul> </li> </ul>			

## Tajiguas Landfill Expansion Project Mitigation Monitoring and Reporting Plan

**CLASS I IMPACTS – SIGNIFICANT AND UNAVOIDABLE ADVERSE ENVIRONMENTAL IMPACTS** of the project for which the decision makers must issue a “statement of overriding considerations” under Section 15093 of the State CEQA Guidelines (as amended) if the project is approved.

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
		<ul style="list-style-type: none"> <li>- Stockpiling of fill soil, rocks or construction materials;</li> <li>- Placement of artificial surface, pervious or impervious.</li> <li>• If any roots encountered are 1 inch in diameter or greater, they shall be cleanly cut under the direction of a County-approved arborist/biologist.</li> <li>• Any trenching required within the drip line or sensitive root zone of any specimen tree shall be done by hand.</li> </ul>			
Biological Resources	1. The San Diego woodrat would be affected by the loss of mature chaparral, which provides nesting and foraging habitat for this species.	A survey for desert woodrat shall be conducted in mature chaparral prior to vegetation removal. In the event desert woodrat is found on the project site, a capture and relocation effort shall be conducted to move woodrats to suitable adjacent habitat.	BC/FC	Significant	USFWS/SWUD
Biological Resources	<p>1. Approximately 71 acres of habitat, including 38 acres of mature chaparral and 5 acres of degraded coastal sage scrub, would be removed.</p> <p>2. Landfill operations in</p>	To compensate for native habitats disturbed by the expansion, a County-approved biologist shall prepare and implement a revegetation plan (e.g., a ratio of not less than 1:1 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.	BC/FC	Significant	CIWMB/ LEA SWUD

## Tajiguas Landfill Expansion Project Mitigation Monitoring and Reporting Plan

**CLASS I IMPACTS – SIGNIFICANT AND UNAVOIDABLE ADVERSE ENVIRONMENTAL IMPACTS** of the project for which the decision makers must issue a “statement of overriding considerations” under Section 15093 of the State CEQA Guidelines (as amended) if the project is approved.

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
	<p>the northern portion of project site would encroach on the buffer area between the landfill and undisturbed native habitats along north site boundary.</p> <p>3. Seeps and rock outcrops, habitat for sensitive plant species, and chaparral and oak woodland, habitat for Plummer's baccharis, Hoffmann's nightshade and Santa Barbara honeysuckle, would be eliminated.</p> <p>4. Increased human presence and activity could lead some sensitive bird and mammal species to avoid or abandon foraging/breeding habitat in adjacent foothill areas.</p> <p>5. Loss of an estimated</p>	<p>Species selection shall be dependent upon the nature of the habitat.</p>			

## Tajiguas Landfill Expansion Project Mitigation Monitoring and Reporting Plan

**CLASS I IMPACTS – SIGNIFICANT AND UNAVOIDABLE ADVERSE ENVIRONMENTAL IMPACTS** of the project for which the decision makers must issue a “statement of overriding considerations” under Section 15093 of the State CEQA Guidelines (as amended) if the project is approved.

Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
	<p>100 to 150 mature coast live oak trees.</p> <p>6. The San Diego woodrat would be affected by the loss of mature chaparral, which provides nesting and foraging habitat for this species.</p>				
Biological Resources	<p>1. Maintenance of the in-channel sedimentation basins would result in residual impacts to the red-legged frogs that inhabit the basins.</p> <p>2. The red-legged frog would be disturbed by management of the in-channel sedimentation basins.</p>	<p>To reduce impacts to California red-legged frogs that reside in the in-channel sedimentation basins, the following actions shall be implemented:</p> <p>a) The basin scheduled for maintenance shall be drained between mid-August and late-September. Maintenance activities for either basin shall occur October through November after draining the basin or following a survey by a qualified biologist that confirms tadpoles have left the basin. Should SWUD demonstrate a need to conduct activities outside this period, the activities shall be subject to review and approval by the USFWS.</p> <p>b) At least 15 days prior to the onset of draining or maintenance activities, the SWUD shall submit the name(s) and credentials of biologists</p>	BC/FC	Significant	SWUD/USACOE/ CDFG/USFWS

## Tajiguas Landfill Expansion Project Mitigation Monitoring and Reporting Plan

**CLASS I IMPACTS – SIGNIFICANT AND UNAVOIDABLE ADVERSE ENVIRONMENTAL IMPACTS** of the project for which the decision makers must issue a “statement of overriding considerations” under Section 15093 of the State CEQA Guidelines (as amended) if the project is approved.

Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
		<p>who conduct activities specified in the following measures to the USFWS. No project activities shall begin until SWUD receives verbal/written approval from the USFWS that the biologist(s) is qualified to conduct the work.</p> <p>c) Before any draining or maintenance activities begin on the sediment basin, a USFWS-approved biologist shall conduct a training session for all landfill personnel involved with these activities. At a minimum, the training shall include a description of the California red-legged frog and its habitat, and the general measures that are being implemented to conserve the California red-legged frog as they relate to the project. Brochures, books, and briefings may be used in the training session, provided that a qualified person is present to answer any questions.</p> <p>d) A USFWS-approved biologist shall survey the sediment basin at least 2 weeks before draining the basin. If California red-legged frogs, tadpoles, or eggs are found, the approved biologist shall contact the USFWS to determine the appropriate level of consultation.</p> <p>e) To obtain water for dust control (and prior to sediment removal), water shall be pumped on alternate days. Water shall be pumped only from July through November or as directed by a</p>			

## Tajiguas Landfill Expansion Project Mitigation Monitoring and Reporting Plan

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
		<p>qualified biologist. The intake shall be placed within a floating, screened cage (3 feet by 3 feet by 3 feet) constructed of 0.25-inch mesh wire. To prevent adult frogs from climbing into the cage from below, the upper 12 inches of the cage may be covered with sheet metal flashing that extends above and below the water line and is bent at 90 degrees to form a 6-inch lip around the top of the cage.</p> <p>f) Maintenance activities (sediment removal) in the basins shall be conducted when the basins are as dry as possible. A temporary barrier (silt fencing or other appropriate material) shall be placed between the two in-channel sedimentation basins to exclude red-legged frog from the work area. A qualified biologist, approved by USFWS, shall perform a survey of soil cracks immediately prior to initiation of sediment removal. Any California red-legged frogs found should be captured and relocated to the other basin. Each night following sediment removal, the remaining soil cracks shall be searched in preparation for the next day's work. Sediment removal, once initiated, shall proceed as quickly as possible.</p> <p>g) A USFWS-approved biologist shall be present prior to and during draining and maintenance until such a time as all removal of</p>			

## Tajiguas Landfill Expansion Project Mitigation Monitoring and Reporting Plan

**CLASS I IMPACTS – SIGNIFICANT AND UNAVOIDABLE ADVERSE ENVIRONMENTAL IMPACTS** of the project for which the decision makers must issue a “statement of overriding considerations” under Section 15093 of the State CEQA Guidelines (as amended) if the project is approved.

Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
		<p>California red-legged frogs, instruction of workers, and habitat disturbance has been completed. After this time, the SWUD shall designate a person to monitor onsite compliance with all impact minimization measures. The USFWS-approved biologist shall ensure that this individual receives training outlined above (in measure c) and is trained in the identification of California red-legged frogs. The monitor and the USFWS-approved biologist shall have the authority to halt any action that might result in impacts that exceed the levels anticipated by the USFWS during review of the proposed action. If work is stopped, the USFWS shall be notified immediately by approved biologist or onsite biological monitor.</p> <p>h) All fueling and maintenance of vehicles and other equipment shall occur at least 20 meters from any riparian habitat or water body. SWUD shall ensure that contamination of habitat does not occur during such operations. Prior to the onset of work, the USFWS shall ensure that SWUD has prepared a plan to allow a prompt and effective response to any accidental spills. All workers shall be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.</p> <p>i) Native riparian and upland vegetation on the</p>			

## Tajiguas Landfill Expansion Project Mitigation Monitoring and Reporting Plan

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
		<p>upper banks of the basins shall remain in place to provide cover for red-legged frogs except where the equipment will access the basins during sediment removal activities (e.g., a ratio of not less than 1:1 for each disturbed acre of existing habitat). To the extent feasible, sediment removal shall occur in the bottom of the basins, below the high water mark. A revegetation plan to enhance riparian wetland and upland vegetation in Pila Creek upstream of the sediment basins shall be prepared. A species list and restoration-monitoring plan shall be included with the project proposal for review and approval by the USFWS. Such a plan must include, but not be limited to, location of the restoration, species to be used, restoration techniques, time of year the work will be done, identifiable success criteria for completion, and remedial actions if the success criteria are not achieved.</p> <p>j) Stream contours shall be returned to their original condition at landfill closure, unless consultation with the USFWS has determined that it is not beneficial to the species or is not feasible.</p> <p>k) Access to the southern sediment basin shall be from the north. The size of staging areas, and the total area of the activity shall be limited to</p>			

## Tajiguas Landfill Expansion Project Mitigation Monitoring and Reporting Plan

**CLASS I IMPACTS – SIGNIFICANT AND UNAVOIDABLE ADVERSE ENVIRONMENTAL IMPACTS** of the project for which the decision makers must issue a “statement of overriding considerations” under Section 15093 of the State CEQA Guidelines (as amended) if the project is approved.

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
		<p>the minimum necessary to achieve the project goal. Routes and boundaries shall be clearly marked. Where impacts occur in these staging areas and access routes, restoration shall occur as identified in measures (i) and (j).</p> <p>l) To control erosion during and after project implementation, the applicant shall implement best management practices (BMPs) as identified by the RWQCB.</p> <p>m) During pumping of water from the in-channel sediment basins, intakes shall be completely screened with wire mesh size set by the size of the frog larvae to prevent California red-legged frogs from entering the pump system. The screen box on the intake pipe shall be kept clean to maintain low water velocities across all screens. The wetted surface area of the box shall be designed based on pump rates and targeted water velocities across the screens. Upon completion of pumping activities, any barriers to flow shall be removed in a manner that would allow flow to resume with the least disturbance to the substrate.</p> <p>n) A USFWS-approved biologist shall permanently remove from within the project area any individuals of exotic species, such as bullfrogs, crayfish, and centrarchid fishes, to the maximum extent possible. SWUD shall have</p>			

## Tajiguas Landfill Expansion Project Mitigation Monitoring and Reporting Plan

**CLASS I IMPACTS – SIGNIFICANT AND UNAVOIDABLE ADVERSE ENVIRONMENTAL IMPACTS** of the project for which the decision makers must issue a “statement of overriding considerations” under Section 15093 of the State CEQA Guidelines (as amended) if the project is approved.

Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
		the responsibility to ensure that these activities are in compliance with the California Fish and Game code.			
Biological Resources	<p>1. Landfill operations in the northern portion of project site would encroach on the buffer area between the landfill and undisturbed native habitats along north site boundary.</p> <p>2. Increased human presence and activity could lead some sensitive bird and mammal species to avoid or abandon foraging/breeding habitat in adjacent foothill areas.</p>	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.	BC/FC	Significant	CIWMB/LEA/ RWQCB SWUD
Biological Resources	<p>1. Landfill operations in the northern portion of project site would encroach on the buffer area between the landfill and undisturbed native habitats along north site boundary.</p> <p>2. Increased human</p>	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.	BC/FC	Significant	CIWMB/LEA/ RWQCB SWUD

## Tajiguas Landfill Expansion Project Mitigation Monitoring and Reporting Plan

**CLASS I IMPACTS – SIGNIFICANT AND UNAVOIDABLE ADVERSE ENVIRONMENTAL IMPACTS** of the project for which the decision makers must issue a “statement of overriding considerations” under Section 15093 of the State CEQA Guidelines (as amended) if the project is approved.

Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
	presence and activity could lead some sensitive bird and mammal species to avoid or abandon foraging/breeding habitat in adjacent foothill areas.				
Cultural Resources	1. Site CA-SBA-3494 would be directly disturbed, as it is within the footprint of the proposed project.	<p>All known or potential cultural sites that are subject to ground disturbances shall be subject to a Phase 1 archaeological survey pursuant to County Archaeological Guidelines. If required, a Phase 2 subsurface investigation and Phase 3 data recovery program shall be performed if significant resources will be encountered and potential impacts are unavoidable. Surveys will take place as far in advance of landfill expansion activities as feasible to avoid delaying landfill operations.</p> <p>In the event cultural remains are encountered during grading, work shall be stopped immediately or redirected until a County-qualified archaeologist and Native American representative are retained by the applicant to evaluate the significance of the find pursuant to Phase 2 investigations of the County Archaeological Guidelines. If remains are found to be significant, they shall be subject to a Phase 3 mitigation program, consistent with County Archaeological Guidelines.</p>	BC/FC	Significant	CIWMB/LEA/ SWUD

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**CLASS I IMPACTS – SIGNIFICANT AND UNAVOIDABLE ADVERSE ENVIRONMENTAL IMPACTS** of the project for which the decision makers must issue a “statement of overriding considerations” under Section 15093 of the State CEQA Guidelines (as amended) if the project is approved.

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
		SWUD shall develop and conduct a training for all landfill personnel. Personnel shall be made aware of the sensitivity of cultural resources at the landfill. These resources will be designated as "off-limits," with instructions to avoid them.			
Visual Resources	<p>1. During the operations period of the proposed landfill expansion, the landfill would be visible from the landfill access road, Highway 101 in the immediate vicinity of the landfill and from the Pacific Ocean.</p> <p>2. In the scenic and visually sensitive area of the project site, the visual characteristics of the completed project would result in significant visual effects.</p> <p>3. At project completion, the landfill would be visible from Viewpoints 4 and 5. This is considered a significant and unavoidable impact.</p>	<p>At final closure the landfill shall be contoured to be consistent with the surrounding terrain. It shall be vegetated with species that include appropriate local native plant species.</p> <p>Native sycamore trees from local seed or cutting stock shall be planted in Pila Creek, downstream of the landfill, in sufficient quantity to vegetate the area.</p> <p>An oak tree replacement plan shall be prepared to replace oak trees identified for removal. Any oak trees that are removed and/or damaged (more than 25% of root zone disturbed) shall be replaced on a 10:1 basis with 1-gallon size saplings grown from locally obtained acorns.</p> <p>Trees shall be planted prior to winter rains, irrigated and maintained until established</p>	BC/FC	Significant	CIWMB/LEA/ RWQCB SWUD

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
		(5 years). The plantings shall be protected from predation by wild and domestic animals, and from human interference by the use of staked fencing and gopher fencing during the maintenance period. In the event that an oak tree(s) does not survive for 5 years, it shall be replaced.			
Air Quality	<p>1. The allowable NO<sub>x</sub> and PM<sub>10</sub> emission increase threshold will be exceeded onsite as a result of project operations.</p> <p>2. Onsite mobile source exhaust and stationary source combustion of landfill gas will result in emissions of NO<sub>x</sub>. These emissions are treated by the dispersion modeling as if the initially generated NO completely converts to NO<sub>2</sub>. Based on modeling results, ambient air quality standards for NO<sub>2</sub> will be exceeded.</p>	<p>Mobile source emissions shall be reduced through implementation of the following:</p> <ul style="list-style-type: none"> <li>a. Engines shall be turned off when the idling period will exceed 10 minutes.</li> <li>b. All vehicles and equipment shall be regularly maintained.</li> <li>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.</li> <li>d. Scrapers and compactors shall be retrofitted with diesel particulate filters (DPFs).</li> <li>e. The maximum number of scrapers operating simultaneously shall be limited to four.</li> <li>f. Transfer trucks shall be used to haul waste from the transfer stations to the Tajiguas Landfill, thereby reducing the number of truck trips to the landfill.</li> </ul>	BC/FC	Significant	CIWMB, LEA, RWQCB, SBCAPCD, SWUD

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
	<p>3. Onsite mobile source exhaust and stationary source combustion of landfill gas will result in emissions of PM<sub>10</sub>. Based on modeling results, ambient air quality standards for premitigation 24-hour PM<sub>10</sub> concentrations will be exceeded.</p>	<p>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:</p> <ul style="list-style-type: none"> <li>a. The tub grinder or other grinder shall be used a maximum of 4 hours per day when scrapers are in use.</li> <li>b. When no scrapers are in use, the tub grinder may be used up to a maximum of 8 hours per day.</li> </ul> <p>Dust generated by landfill activities shall be controlled through implementation of the following dust control measures:</p> <ul style="list-style-type: none"> <li>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.</li> <li>b. Traffic speed shall be limited to 15 mph on all roads.</li> <li>c. Soil stockpiled for more than two days shall be covered, moistened, or treated with soil binders to prevent dust generation.</li> <li>d. In areas not in active use, exposed soil</li> </ul>			

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
		<p>shall be moistened or shall be revegetated by seeding and watering, or soil binders shall be applied.</p> <p>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.</p> <p>f. Paved roads shall be vacuum swept as needed.</p> <p>g. Monitoring wind speed.</p> <p>h. Monitoring PM<sub>10</sub> at the landfill boundary.</p> <p>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.</p>			
Air Quality	1. Based on modeling results, the potential carcinogenic risk on and near an 800-meter segment of the project site boundary would exceed the significance threshold of 10-in-1-million.	A buffer, approximately 250 to 320 meters (approximately 800 to 1,050 feet) east-west by 800 meters north-south (approximately 2,600 feet, and a total of 50 acres) on the Baron Ranch, adjacent to the east boundary of Tajiguas Landfill, shall have public access restrictions. These restrictions would assure that the public could not access an area where 24-hour PM <sub>10</sub> or	BC/FC	Significant	CIWMB, LEA, RWQCB, SBCAPCD, SWUD

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
		1-hour NO <sub>2</sub> concentrations could potentially be greater than ambient air quality standards according to the results of air dispersion modeling.			

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
Geology	Slope failure could damage environmental control systems, disrupt operations and pose a threat to onsite personnel. Portions of cut slopes within moderately to extremely weathered materials may become unstable if inclined steeper than 2:1. However, studies conducted at the landfill site indicate that cut slopes in the Gaviota Formation bedrock have adequate stability under both static and seismic conditions.	<p>The landfill design shall include the following:</p> <ul style="list-style-type: none"> <li>a) A detailed slope-stability report shall be prepared by a geologist/soils engineer to determine maximum cut-slopes, based on in-field observations of bedrock conditions. Cut-slopes shall not exceed 2:1 unless the slope-stability report concludes that steeper slopes will be stable. In that case, slopes may exceed 2:1, provided the slopes adhere to the design standards identified in the report.</li> <li>b) A detailed geological and/or soils engineering study shall be prepared to determine landfill structural design criteria, as required by CCR Title 27, when the final landfill excavation and fill plans are being developed.</li> </ul>	BC/FC	Less than significant.	CIWMB, LEA, RWQCB, SWUD
Geology	There is the potential for the underlying expansive soils to damage the overlying facilities. However, expansive soils would be removed prior to placement of landfill liner, waste, roads or other facilities.	Expansive soils shall be excavated prior to placement of waste fill. In the event expansive soils are used as fill under sensitive structures or pavements, geotechnical engineering practices (i.e., compaction, drainage and watering controls) shall be implemented.	BC/FC	Less than significant.	CIWMB, LEA, RWQCB, SWUD

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
Biological Resources	<ol style="list-style-type: none"> <li>1. Habitat quality along the northerly reach of Pila Creek may be affected due to increased human presence and the potential for introduction and expansion of invasive, non-native plants.</li> <li>2. Mountain lions in the project area would be affected through the loss of foraging and denning habitat and increased human presence during landfill operations.</li> <li>3. Ringtails could be affected through loss of foraging and breeding habitat and increased human presence.</li> </ol>	To protect oak/riparian habitat in the northern portion of the project site, all ground disturbance upstream of the back canyon sediment basins shall be prohibited within a 50-foot setback from either side of the top-of-bank (e.g., excluding existing road crossings) or oak/riparian vegetation canopy, whichever is greater, along Pila Creek (a sensitive riparian habitat area).	BC/FC	Less than significant.	SWUD

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
Biological Resources	1. During the landfill closure/postclosure period, subsequent to the period of operation, human use and disturbance in the area will gradually diminish. The area will be revegetated and established as open space.	<p>An oak tree replacement plan shall be prepared to replace oak trees identified for removal. Any oak trees that are removed and/or damaged (more than 25 percent of root zone disturbed) shall be replaced on a 10:1 basis with 1-gallon size saplings grown from locally obtained acorns. Trees shall be planted prior to winter rains, irrigated and maintained until established (5 years). The plantings shall be protected from predation by wild and domestic animals, and from human interference by the use of staked fencing and gopher fencing during the maintenance period. In the event that an oak tree(s) does not survive for 5 years, it shall be replaced.</p> <p>An oak tree protection program, prepared by a County-approved biologist, shall be implemented. The program shall include, but not be limited to, the following components:</p> <ul style="list-style-type: none"> <li>• No grading or development shall occur within the drip lines of oak trees.</li> <li>• All oak trees within 25 feet of proposed ground disturbances shall be temporarily fenced with chain-link or other satisfactory material throughout all grading and construction activities. The fencing shall be installed 6 feet outside the drip line of each oak tree, and shall be staked every</li> </ul>	BC/FC	Less than significant.	SWUD

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
		<p>6 feet.</p> <ul style="list-style-type: none"> <li>• Within 6 feet of any oak tree drip line, the following shall be prohibited:               <ul style="list-style-type: none"> <li>- Parking, storage or operation of construction equipment;</li> <li>- Stockpiling of fill soil, rocks or construction materials;</li> <li>- Placement of artificial surface, pervious or impervious.</li> </ul> </li> <li>• If any roots encountered are 1 inch in diameter or greater, they shall be cleanly cut under the direction of a County-approved arborist/biologist.</li> <li>• Any trenching required within the drip line or sensitive root zone of any specimen tree shall be done by hand.</li> </ul>			
Biological Resources	1. Tidewater gobies could be indirectly affected by increased sedimentation and adverse effects to water quality in nearshore waters.	Erosion control measures shall continue to be implemented. Erosion control methods could include silt fencing, straw bales, hydroseeding with appropriate native plant species from the project vicinity, or use of sandbags in conjunction with other methods. Hydroseeding, if used, shall be applied prior to the rainy season.	BC/FC	Less than significant.	RWQCB/SWUD
Biological Resources	1. Habitat quality along the northerly reach of Pila	To compensate for native habitats disturbed by the expansion, a County-approved biologist	BC/FC	Less than significant.	RWQC/CIWMB/LEA/SWUD

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
	<p>Creek may be affected due to increased human presence and the potential for introduction and expansion of invasive, non-native plants.</p> <p>2. Mountain lions in the project area would be affected through the loss of foraging and denning habitat and increased human presence during landfill operations.</p> <p>3. Ringtails could be affected through loss of foraging and breeding habitat and increased human presence.</p> <p>4. California horned lark, loggerhead shrike, Cooper's hawk and white-tailed kite would be affected by disturbance to grassland, chaparral and coastal sage scrub habitats.</p> <p>5. During the landfill closure/postclosure period,</p>	<p>shall prepare and implement a revegetation plan (e.g., a ratio of not less than 1:1 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.</p>			

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
	<p>subsequent to the period of operation, human use and disturbance in the area will gradually diminish. The area will be revegetated and established as open space.</p> <p>6. The American peregrine falcon would be affected by disturbance to grassland and scrub habitat, which is foraging habitat for this species.</p>				
Biological Resources	<p>1. Mountain lions in the project area would be affected through the loss of foraging and denning habitat and increased human presence during landfill operations.</p> <p>2. Ringtails could be affected through loss of foraging and breeding habitat and increased human presence.</p>	<p>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.</p> <p>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.</p>	BC/FC	Less than significant.	CIWMB, LEA, RWQCB, SWUD

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
Biological Resources	<p>1. The number of individuals and species may be reduced because of limited resources at the landfill and competition for limited habitat areas. Birds may exert predatory pressure on other species, such as the California red-legged frog.</p> <p>2. The red-legged frog population in the in-channel sedimentation basins could experience predation by gulls and crows that are attracted to the landfill.</p> <p>3. Tidewater gobies could be indirectly affected through predation by gulls that congregate around the terminal lagoons on surrounding drainages and at the landfill.</p>	<p>To reduce nuisance birds at the landfill, a Bird Management Plan shall be developed. The plan shall include, but not be limited to, the following measures:</p> <ul style="list-style-type: none"> <li>a) Landfill personnel shall be assigned to bird management from dawn until all refuse has been buried and the landfill closed for the day. Personnel shall be trained in bird identification and behavior.</li> <li>b) The working face shall be maintained as small as safely practicable, considering the types and numbers of landfill equipment operating.</li> <li>c) The landfill shall be inspected regularly for cracks or fissures which can attract birds. Repairs shall be implemented as necessary.</li> <li>d) Extremely odiferous waste shall be buried as soon as possible after unloading.</li> <li>e) Application of a minimum 6-inch-thick layer of compacted soil or approved ADC shall be applied during the day and/or at the end of each working day.</li> <li>f) The following actions to deter birds at the landfill may include one or more of the following:</li> </ul>	BC/FC	Less than significant.	CIWMB, LEA, RWQCB, USFWS, CDFG, SWUD

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
		1) Propane cannons and noisemakers. 2) Distress calls. 3) Gull "decoys" displayed in distressed positions. 4) Remote control airplanes. 5) Overhead lines or wires. 6) Kites. 7) Flash tape and streamers. 8) Balloons. 9) Bird trainers (e.g., <i>JUMPO</i> <sup>TM</sup> ). 10) Raptors. 11) Dogs. 12) Depredation.  g) SWUD shall determine the feasibility of using a large cage or netting as a bird deterrent at the landfill working face.			
Biological Resources	Removal of nectar sources and larval food plants, such as milkweed, could affect the Monarch butterfly.	To reduce impacts to Monarch butterflies that may roost in nearby eucalyptus trees along Highway 101, revegetation plantings shall include adult nectar sources and larval food plants, such as milkweed.	BC/FC	Less than significant.	CIWMB, LEA, RWQCB, SWUD
Biological Resources	Landfill expansion would result in intensive human use of the northern portion of the project site, but	An oak tree replacement plan shall be prepared to replace oak trees identified for removal. Any oak trees that are removed and/or damaged (more than 25 percent of root zone disturbed)	BC/FC	None	SWUD

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
	such use will diminish at closure.	<p>shall be replaced on a 10:1 basis with 1-gallon size saplings grown from locally obtained acorns. Trees shall be planted prior to winter rains, irrigated and maintained until established (5 years). The plantings shall be protected from predation by wild and domestic animals, and from human interference by the use of staked fencing and gopher fencing during the maintenance period. In the event that an oak tree(s) does not survive for 5 years, it shall be replaced.</p> <p>An oak tree protection program, prepared by a County-approved biologist, shall be implemented. The program shall include, but not be limited to, the following components:</p> <ul style="list-style-type: none"> <li>• No grading or development shall occur within the drip lines of oak trees.</li> <li>• All oak trees within 25 feet of proposed ground disturbances shall be temporarily fenced with chain-link or other satisfactory material throughout all grading and construction activities. The fencing shall be installed 6 feet outside the drip line of each oak tree, and shall be staked every 6 feet.</li> <li>• Within 6 feet of any oak tree drip line, the following shall be prohibited:</li> </ul>			

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
		<ul style="list-style-type: none"> <li>- Parking, storage or operation of construction equipment;</li> <li>- Stockpiling of fill soil, rocks or construction materials;</li> <li>- Placement of artificial surface, pervious or impervious.</li> <li>• If any roots encountered are 1 inch in diameter or greater, they shall be cleanly cut under the direction of a County-approved arborist/biologist.</li> <li>• Any trenching required within the drip line or sensitive root zone of any specimen tree shall be done by hand.</li> </ul>			
Cultural Resources	<p>1. Unknown surface and/or subsurface cultural resources could be discovered during ground disturbing activities.</p> <p>2. Closure and postclosure activities could indirectly impact sites SBA-iso-645, CA-SBA-92 and/or CA-SBA-1990 by the continuation of human activities in the area.</p>	<p>All known or potential cultural sites that are subject to ground disturbances shall be subject to a Phase 1 archaeological survey pursuant to County Archaeological Guidelines. If required, a Phase 2 subsurface investigation and Phase 3 data recovery program shall be performed if significant resources will be encountered and potential impacts are unavoidable. Surveys will take place as far in advance of landfill expansion activities as feasible to avoid delaying landfill operations.</p> <p>In the event cultural remains are encountered</p>	BC/FC	Less than significant.	CIWMB, LEA, RWQCB, SWUD

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
		<p>during grading, work shall be stopped immediately or redirected until a County-qualified archaeologist and Native American representative are retained by the applicant to evaluate the significance of the find pursuant to Phase 2 investigations of the County Archaeological Guidelines. If remains are found to be significant, they shall be subject to a Phase 3 mitigation program, consistent with County Archaeological Guidelines.</p> <p>SWUD shall develop and conduct a training program for all landfill personnel. Personnel shall be made aware of the sensitivity of cultural resources at the landfill. These resources will be designated as "off-limits," with instructions to avoid them.</p>			
Cultural Resources	<p>1. Site SBA-iso-645 could be indirectly impacted by the continuation of human activities at the landfill.</p> <p>2. Sites CA-SBA-92 and CA-SBA-1990 could be indirectly impacted by the continuation of human activities in the area related to operation of the landfill.</p>	<p>In the event cultural remains are encountered during grading, work shall be stopped immediately or redirected until a County-qualified archaeologist and Native American representative are retained by the applicant to evaluate the significance of the find pursuant to Phase 2 investigations of the County Archaeological Guidelines. If remains are found to be significant, they shall be subject to a Phase 3 mitigation program, consistent with County Archaeological Guidelines.</p>	BC/FC	Less than significant.	CIWMB, LEA, RWQCB, SWUD

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
		SWUD shall develop and conduct a training program for all landfill personnel. Personnel shall be made aware of the sensitivity of cultural resources at the landfill. These resources will be designated as "off-limits," with instructions to avoid them.			
Nuisances	<p>1. During landfill operations, resident and displaced rodents have the potential to inhabit or get lodged in landfill equipment and structures and could expose onsite personnel to disease.</p> <p>1. Birds are attracted to the solid waste at the landfill. When in large concentrations, they have the potential to affect the health and safety of humans and other animals.</p> <p>2. Insects such as flies and mosquitoes could be attracted by ponded water or uncovered solid waste.</p>	<p>To reduce potential vector habitat or harborage, good housekeeping practices shall be implemented at the landfill. Good housekeeping practices shall include, but are not limited to, the following measures:</p> <ul style="list-style-type: none"> <li>a) The working face shall be maintained as small as safely practicable, considering the types and numbers of landfill equipment operating.</li> <li>b) Extremely odiferous waste shall be buried as soon as possible after unloading.</li> <li>c) Waste at the active working face shall be compacted.</li> <li>d) Disturbance at previously covered cells shall be avoided.</li> <li>e) Application of a minimum of a 6-inch-thick layer of compacted soil or ADC shall be applied during the day and/or at the end of each working day.</li> <li>f) Structures and areas of human activity shall be kept clean.</li> </ul>	BC/FC	Less than significant.	CIWMB, LEA, RWQCB, SWUD

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
	<p>4. The Southeast Corner Modification could result in nuisance impacts, including odors, litter and dust, and attraction of vectors and birds.</p>	<ul style="list-style-type: none"> <li>g) Trash shall be deposited in appropriate closed containers and removed for proper disposal.</li> <li>h) Tools, miscellaneous equipment, and other items that could commonly attract vectors shall be stored in closed containers and/or within an enclosed structure.</li> <li>i) Drainage control structures (sedimentation ponds, drainage ditches, etc.) shall be maintained to preclude mosquito breeding habitat, vectors or pests, consistent with the California Red-legged frog management plan.</li> <li>j) The landfill shall be inspected monthly to identify areas of substandard soil cover. These areas shall be corrected as needed, including repair of cracks or holes in the cover caused by landfill operations or weather conditions.</li> <li>k) The working face, buildings, and storage containers shall be inspected monthly for signs of vector activity. Repairs to the working face, buildings or storage containers shall be implemented as necessary, and buildings or storage containers, would require repair or rodent traps.</li> <li>l) In the event that a vector problem</li> </ul>			

## Tajiguas Landfill Expansion Project Mitigation Monitoring and Reporting Plan

**CLASS II IMPACTS – SIGNIFICANT ADVERSE ENVIRONMENTAL IMPACTS THAT CAN BE FEASIBLY MITIGATED OR AVOIDED** of the project for which the decision makers must make “findings” under Section 15091 of the State CEQA Guidelines (as amended) if the project is approved.

Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
		should occur, appropriate measures, such as cleaning and securing a building or container, or the use of a professional or licensed exterminator, shall be used.			
Nuisances	<p>1. Birds are attracted to the solid waste at the landfill. When in large concentrations, they have the potential to affect the health and safety of humans and other animals.</p> <p>2. The Southeast Corner Modification could result in nuisance impacts, including odors, litter and dust, and attraction of vectors and birds.</p>	<p>To reduce nuisance birds at the landfill, a Bird Management Plan shall be developed. The plan shall include, but not be limited to, the following measures:</p> <ul style="list-style-type: none"> <li>a) Landfill personnel shall be assigned to bird management from dawn until all refuse has been buried and the landfill closed for the day. Personnel shall be trained in bird identification and behavior.</li> <li>b) The working face shall be maintained as small as safely practicable, considering the types and numbers of landfill equipment operating.</li> <li>c) The landfill shall be inspected regularly for cracks or fissures which can attract birds. Repairs shall be implemented as necessary.</li> <li>d) Extremely odiferous waste shall be buried as soon as possible after unloading.</li> </ul>	BC/FC	Less than significant.	CIWMB, LEA, RWQCB, USFWS, CDFG, SWUD

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		<ul style="list-style-type: none"> <li>e) Application of a minimum 6-inch-thick layer of compacted soil or approved ADC shall be applied during the day and/or at the end of each working day.</li> <li>f) The following actions to deter birds at the landfill shall include one or more of the following:               <ul style="list-style-type: none"> <li>1) Propane cannons and noisemakers.</li> <li>2) Distress calls.</li> <li>3) Gull "decoys" displayed in distressed positions.</li> <li>4) Remote control airplanes.</li> <li>5) Overhead lines or wires.</li> <li>6) Kites.</li> <li>7) Flash tape and streamers.</li> <li>8) Balloons.</li> <li>9) Bird trainers (e.g., JUMPO™).</li> <li>10) Raptors.</li> <li>11) Dogs.</li> <li>12) Depredation.</li> </ul> </li> <li>g) SWUD shall determine the feasibility of using a large cage or netting as a bird deterrent at the landfill working face.</li> </ul>			

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
Nuisances	<p>1. There is the potential for odors from the transport of waste to the landfill to be a nuisance along the roadways leading to the landfill (i.e., Highway 101).</p> <p>2. Litter from uncovered waste loads, could become a nuisance along County roads and highways.</p> <p>3. There is the potential for litter from illegal dumping in the vicinity of the landfill. This has not occurred previously and is not expected to become a problem.</p> <p>4. Litter from the landfill working face could blow offsite and become a nuisance.</p> <p>5. The Southeast Corner Modification could result in nuisance impacts, including odors, litter and dust, and attraction of</p>	<p>To reduce nuisance litter at the landfill and surrounding areas, the following measures shall be required:</p> <p>a) Signs displaying antilittering laws and requirements shall be posted in both English and Spanish at the landfill entrance and scalehouse. The signs shall include requirements for covering loads and notification that an additional "untarped" fee shall be charged for uncovered loads.</p> <p>b) All waste haul trucks shall be tarped from the point of origin to prevent littering and odor nuisance.</p> <p>c) During periods of high winds (greater than 25 miles per hour [mph]), application of cover material shall occur more frequently.</p> <p>d) As feasible, the working face shall be temporarily relocated to wind-protected areas during periods of high wind (greater than 25 mph).</p> <p>e) Litter fences shall be installed downwind of the working face of the landfill.</p>	BC/FC	Less than significant.	LEA/SWUD

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	vectors and birds.	<ul style="list-style-type: none"> <li>f) The landfill perimeter fence shall be maintained to provide litter control.</li> <li>g) Litter crews shall be used to routinely check the various fences for litter control effectiveness and to remove litter.</li> <li>h) Roads leading to the landfill shall be inspected daily for litter and illegally dumped waste by landfill managers and supervisors as they travel to and from the landfill site. Road inspections shall include the landfill access road and Highway 101 for a distance of 1/4 mile east and west of the landfill access road intersection. Litter crews will be dispatched on an as-needed basis.</li> <li>i) Onsite drainage channels shall be cleaned prior to the start of the rainy season (November 1 of each year) and periodically, as needed, to prevent offsite migration of accumulated litter.</li> </ul>			
Nuisances	1. There is the potential for odors from the transport of waste to the landfill to be a nuisance along the roadways	Odors generated by the landfill shall be kept to a minimum, with a goal of retaining odors on the site. The following odor control measures	BC/FC	Less than significant.	LEA/SWUD

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	<p>leading to the landfill (i.e., Highway 101).</p> <p>2. Odors generated by the exposed waste at the landfill working face have the potential to be detected offsite.</p> <p>3. Odors associated with landfill gas during landfill operations and closure/postclosure activities have the potential to be detected offsite.</p> <p>4. Odors associated with landfill gas have the potential to be detected after the placement of final cover.</p> <p>5. The Southeast Corner Modification could result in nuisance impacts, including odors, litter and dust, and attraction of vectors and birds.</p> <p>6. There is the potential for odors from landfill gas</p>	<p>shall be implemented:</p> <p>a) Extremely odiferous waste shall be buried as soon as possible after unloading.</p> <p>b) The landfill shall be inspected regularly for cracks or fissures. Repairs shall be implemented as necessary.</p>			

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
	to occur during the closure/postclosure period. However, the generation of landfill gas would diminish over time, and the landfill gas collection system is expected to reach an efficiency of 95 percent.				
Nuisance	1. There is the potential for dust that is generated by landfill operations to result in offsite impacts.	Dust generated by landfill activities shall be controlled through implementation of the following dust control measures: <ul style="list-style-type: none"> <li>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.</li> <li>b. Traffic speed shall be limited to 15 mph on all roads.</li> <li>c. Soil stockpiled for more than two days shall be covered, moistened, or treated with soil binders to prevent dust generation.</li> <li>d. In areas not in active use, exposed soil shall be moistened</li> </ul>	FC/BC	Less than significant.	CIWMB/LEA/ RWQCB/SWUD

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
		<p>or shall be revegetated by seeding and watering, or soil binders shall be applied.</p> <p>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.</p> <p>f. Paved roads shall be vacuum swept as needed.</p> <p>g. Monitoring wind speed.</p> <p>h. Monitoring PM<sub>10</sub> at the landfill boundary.</p>			
Land Use	1. There is the potential for the proposed project to impact residential use in the vicinity, including the Arroyo Quemada community.	Mitigation Measures under Geology, Water Resources, Nuisances, Visual Resources, Noise, Air Quality, and Health and Safety would be required.	BC/FC	Less than significant.	LEA/SWUD
Land Use	2. The Southeast Corner Modification has the potential to impact future	Mitigation Measures under Nuisances, Noise, and Air Quality would be required.	BC/FC	Less than significant.	LEA/SWUD

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
	use of the landfill site, after the completion of landfill operations. Based on requirements for closure, such impact would not be significant.				
Land Use	3. There is the potential for the proposed project to result in impacts to other land uses in the vicinity.	Mitigation Measures under Geology, Water Resources, Nuisances, Visual Resources, Noise, and Air Quality would be required.	BC/FC	Less than significant.	LEA/SWUD
Visual Resources	Security lighting from the scalehouse would be visible from Viewpoint 4 and may be visible from Viewpoint 5.	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-9).	BC/FC	Less than significant.	SWUD
Visual Resources	From Viewpoint 3, a portion of the top of the landfill would be visible in the distance, in front of the cut slope, but will be indistinguishable after revegetation.	At final closure the landfill shall be contoured to be consistent with the surrounding terrain. It shall be vegetated with species that include appropriate local native plant species. Native sycamore trees from local seed or cutting stock shall be planted in Pila Creek, downstream of the landfill.  An oak tree replacement plan shall be prepared to replace oak trees identified for removal.	BC/FC	Less than significant.	CIWMB/LEA/ RWQCB/SWUD

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		Any oak trees that are removed and/or damaged (more than 25% of root zone disturbed) shall be replaced on a 10:1 basis with 1-gallon size saplings grown from locally obtained acorns. Trees shall be planted prior to winter rains, irrigated and maintained until established (5 years). The plantings shall be protected from predation by wild and domestic animals, and from human interference by the use of staked fencing and gopher fencing during the maintenance period. In the event that an oak tree(s) does not survive for 5 years, it shall be replaced.			
Traffic	This is the potential for project-related trucks and other vehicles to affect either truck traffic safety or total traffic safety (accidents) in the vicinity of the landfill. At the landfill access road intersection, trucks and other vehicles will turn across traffic on Highway 101, either as they enter or exit the landfill.	A permanent stop sign and speed dots shall be installed and maintained at the landfill exit to Highway 101. All vehicles exiting the landfill site shall be required to make a complete stop prior to entering the Highway.  To caution motorists approaching the intersection at Highway 101 and the Tajiguas Landfill entrance road, two signs, one for the northbound lanes and one for the southbound lanes of Highway 101 shall be provided. The signage shall be as follows: <i>Caution - Trucks Entering the Highway.</i>	BC/FC	Less than significant.	CIWMB/LEA/ RWQCB/SWUD

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
Health and Safety	<p>1. There is the potential for surface fire from an adjacent wildland fire or onsite storage of petroleum products. However, the surface of the landfill is relatively barren, and there are established landfill safety procedures and provision of adequate water reserves for fire protection.</p> <p>2. There is the potential for fire related to onsite storage of petroleum products.</p> <p>3. There is the potential for subsurface fire from a landfill design flaw, lack of control of incoming waste, or faulty performance of the landfill gas collection system.</p>	<p>To minimize fire hazards, the following measures shall be implemented:</p> <ul style="list-style-type: none"> <li>a. Fire suppression equipment such as fire extinguishers, dedicated water storage, and fire hydrants shall be provided in compliance with County Fire Department and OSHA standards.</li> <li>b. Landfill equipment shall be inspected and cleaned on a regular basis to reduce the potential for vehicle fires.</li> <li>c. Water trucks shall be maintained full of water and available for fire suppression at all times.</li> <li>d. Access roads shall be maintained to allow emergency vehicles access to the working face.</li> <li>e. Stockpile areas shall be accessible for fire suppression.</li> <li>f. A "No Smoking" policy shall be strictly enforced at the Landfill.</li> <li>g. The landfill footprint, wood stockpiles, and a 15-foot area along all access roads shall be cleared of weeds and errant debris.</li> </ul>	BC/FC	Less than significant.	CIWMB/LEA/ Caltrans/SWUD

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
Health and Safety	1. During landfill operations and closure/postclosure, there is the potential for a breach of site security that results in unauthorized dumping and/or scavenging.	The security fence shall be inspected and repaired as necessary. The entrance gate shall remain locked when the landfill is closed.	BC/FC	Less than significant.	CIWMB/LEA/ RWQCB/SWUD
Health and Safety	1. There is the potential for subsurface fire from a landfill design flaw, lack of control of incoming waste, or faulty performance of the landfill gas collection system.  2. During landfill operations and closure/postclosure, the methane in landfill gas has the potential to ignite and/or explode if it is confined, with resulting personal injury and structural damage. Landfill gas also may escape through the landfill surface.  3. There is the potential	The operator shall install monitoring systems and monitor LFG. If monitoring indicates that impacts are occurring, appropriate corrective actions shall be implemented. These actions include, but are not limited to, the following:  a. The LFG collection system shall be adjusted to increase LFG control. b. One or more additional LFG collectors shall be installed to increase gas collection. c. The operator shall place additional daily, intermediate and final cover to control fugitive gas emissions.	BC/FC	Less than significant.	CIWMB/LEA/ RWQCB/SWUD

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
	for uncollected landfill gas to escape through the landfill surface. However, landfill gas collection efficiency is expected to reach approximately 95 percent.				
Health and Safety	<p>1. During landfill operations and closure/postclosure, the methane in landfill gas has the potential to ignite and/or explode if it is confined, with resulting personal injury and structural damage. Landfill gas also may escape through the landfill surface.</p> <p>2. There is the potential for uncollected landfill gas to escape through the landfill surface. However, landfill gas collection efficiency is expected to reach approximately 95 percent.</p> <p>3. During operations and</p>	The operator shall routinely inspect landfill cover materials for cracks and/or fissures. Cracks and fissures shall be repaired.	BC/FC	Less than significant.	CIWMB/LEA/ RWQCB/SWUD

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
	closure/postclosure, there are potential health and safety impacts associated with use of heavy equipment, including bodily injury, noise and dust.				
Health and Safety	1. There is the potential for worker safety impacts due to the steeper sides of the waste prism and the requirement for narrow switchbacks for the Front Canyon configuration.	For the Front Canyon configuration, there shall be one or more onsite personnel to direct vehicles and equipment on the landfill as they travel to and from the working face. SWUD shall develop procedures that include, but are not limited to, issues of timing and right-of-way. These shall be modified as necessary specific to actual conditions and incidents that may occur.	FC	Less than significant.	CIWMB/LEA/ RWQCB/SWUD
Health and Safety	1. There is the potential for resident and displaced rodents to inhabit or become lodged in landfill equipment and structures and, as a result, expose onsite personnel to disease.	To reduce potential vector habitat or harborage, good housekeeping practices shall be implemented at the landfill. Good housekeeping practices shall include, but are not limited to, the following measures:  a) The working face shall be maintained as small as safely practicable, considering the types and numbers of landfill equipment operating.  b) Extremely odiferous waste shall be buried as soon as possible after unloading.	BC/FC	Less than significant.	CIWMB/LEA/ RWQCB/SWUD

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
		<ul style="list-style-type: none"> <li>c) Waste at the active working face shall be compacted.</li> <li>d) Disturbance at previously covered cells shall be avoided.</li> <li>e) Application of a minimum of a 6-inch-thick layer of compacted soil or ADC shall be applied during the day and/or at the end of each working day.</li> <li>f) Structures and areas of human activity shall be kept clean.</li> <li>g) Trash shall be deposited in appropriate closed containers and removed for proper disposal.</li> <li>h) Tools, miscellaneous equipment, and other items that could commonly attract vectors shall be stored in closed containers and/or within an enclosed structure.</li> <li>i) Drainage control structures (sedimentation ponds, drainage ditches, etc.) shall be maintained to preclude mosquito breeding habitat, vectors or pests, consistent with the California Red-legged frog management plan.</li> <li>j) The landfill shall be inspected monthly to identify areas of substandard soil cover. These areas</li> </ul>			

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		<p>shall be corrected as needed, including repair of cracks or holes in the cover caused by landfill operations or weather conditions.</p> <p>k) The working face, buildings, and storage containers shall be inspected monthly for signs of vector activity. Repairs to the working face, buildings or storage containers shall be implemented as necessary, and buildings or storage containers, would require repair or rodent traps.</p> <p>l) In the event that a vector problem should occur, appropriate measures, such as cleaning and securing a building or container, or the use of a professional or licensed exterminator, shall be used (NUI-1).</p>			
Health and Safety	1. The Southeast Corner Modification would involve excavation and removal of compacted waste and soil from a portion of the existing landfill. The material would be transported to another area of the landfill for disposal. Health and safety risks are related to	An Excavation Plan shall be prepared for the Southeast Corner Modification to address operations associated with the excavation and removal of in-place waste. It shall include procedures and sequencing to maintain stability of the excavation area. Further, a Health and Safety Plan shall be developed to address the specific worker-associated activities of waste removal and relocation.	BC/FC	Less than significant.	CIWMB/LEA/ RWQCB/SWUD

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	the excavation of buried waste and potential for fire, worker exposure to infectious waste, and potential hazards associated with exposure of methane gas to atmospheric oxygen.				
Health and Safety	There is the potential for rodent populations to increase during the postclosure period, with associated potential health impacts. See Mitigation Measures in Section 3.6 - Nuisances	To reduce potential vector habitat or harborage, good housekeeping practices shall be implemented at the landfill. Good housekeeping practices shall include, but are not limited to, the following measures: a) The working face shall be maintained as small as safely practicable, considering the types and numbers of landfill equipment operating. b) Extremely odiferous waste shall be buried as soon as possible after unloading. c) Waste at the active working face shall be compacted. d) Disturbance at previously covered cells shall be avoided. e) Application of a minimum of a 6-inch-thick layer of compacted soil or ADC shall be applied during the day and/or at the end of each working day.	BC/FC	Less than significant.	CIWMB/LEA/ RWQCB/SWUD

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		<ul style="list-style-type: none"> <li>f) Structures and areas of human activity shall be kept clean.</li> <li>g) Trash shall be deposited in appropriate closed containers and removed for proper disposal.</li> <li>h) Tools, miscellaneous equipment, and other items that could commonly attract vectors shall be stored in closed containers and/or within an enclosed structure.</li> <li>i) Drainage control structures (sedimentation ponds, drainage ditches, etc.) shall be maintained to preclude mosquito breeding habitat, vectors or pests, consistent with the California Red-legged frog management plan.</li> <li>j) The landfill shall be inspected monthly to identify areas of substandard soil cover. These areas shall be corrected as needed, including repair of cracks or holes in the cover caused by landfill operations or weather conditions.</li> <li>k) The working face, buildings, and storage containers shall be inspected monthly for signs of vector activity. Repairs to the working face, buildings or storage containers shall be</li> </ul>			

**Tajiguas Landfill Expansion Project  
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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
		implemented as necessary, and buildings or storage containers, would require repair or rodent traps. 1) In the event that a vector problem should occur, appropriate measures, such as cleaning and securing a building or container, or the use of a professional or licensed exterminator, shall be used.			

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**CLASS III IMPACTS – IMPACTS FOUND NOT TO BE SIGNIFICANT**

Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
Geology	Fault rupture of ground surface directly underlying landfill facilities could damage environmental controls (liner systems, LCRS, landfill gas controls), structures and access roads. Faults mapped within the proposed landfill footprint are considered inactive and are not a constraint on landfill shallow landslides.	None required.	BC/FC	None	
Geology	Liquefaction could result in slope failure or foundation failure. However, the subsurface materials of Tertiary sedimentary rocks and dense soils are not typically susceptible to liquefaction.	None required.	BC/FC	None	
Geology	Shallow landslides in natural slopes could affect access or other landfill operations if they result in blocking roadways. Onsite	Grading and drainage improvements of natural slopes adjacent to the landfill components shall include construction methods to control shallow landslides. The construction methods shall include limiting the size of exposed cut area, diversion of storm water runoff away	BC/FC	None	CIWMB/LEA/RWQCB/ SWUD

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**CLASS III IMPACTS – IMPACTS FOUND NOT TO BE SIGNIFICANT**

Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
	procedures that include limiting the size of exposed cut areas, diversion of storm water runoff and early identification of problem areas for remediation will minimize the impact of shallow landslides.	from potential landslides, and identification of area for drainage.			
Geology	There is the potential for failure of waste fill slopes or landfill liner systems related to an earthquake. This is reduced when landfill design incorporates an <i>engineered buttress fill</i> along the west refuse toe.	None required.	BC/FC	None	
Geology	Erosion could result in soil loss, with adverse slope stability effects, clogging of drainage systems and/or downstream sedimentation. However, stormwater management systems, interim erosion protection during construction and operations, and	None required.	BC/FC	None	

## Tajiguas Landfill Expansion Project Mitigation Monitoring and Reporting Plan

### CLASS III IMPACTS – IMPACTS FOUND NOT TO BE SIGNIFICANT

Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
	permanent drainage and erosion control structures will reduce discharges of stormwater and occurrence of erosion.				
Geology	Differential settlement of the landfill could create sags and depressions in the final cover system and create ponding or cracks, impede drainage, and impair the function of surface structures such as roads, pipelines, landfill gas controls and drainage facilities. However, ongoing monitoring and maintenance during closure and postclosure would find and repair such potential early on.	None required.	BC/FC	None	
Geology	Settlement of landfill foundation materials could result in other landfill settlement. This is negligible, as foundation materials are primarily Tertiary sedimentary rocks, which	None required.	BC/FC	None	

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	are not susceptible to seismically-induced settlement.				
Geology	Differential settlement of the landfill foundation could affect the leachate collection and removal system. However, this system will be placed on soil that overlies bedrock and is not subject to settlement.	None required.	BC/FC		
Geology	There is the potential for impacts related to excavation and relocation of waste during the Southeast Corner Modification. However, an excavation plan would be prepared to maintain stability, and run-on/runoff controls would prevent excessive rainfall from entering the area.	None required.	BC/FC	None	
Water Resources	Surface water quantity could be adversely affected, but would not be significant, as runoff	None required.	BC/FC	None	

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### CLASS III IMPACTS – IMPACTS FOUND NOT TO BE SIGNIFICANT

Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
	would be slightly less with the proposed project than under natural conditions. Further, surface runoff from the landfill and water from offsite flow and surface seeps would be conveyed to perimeter ditches and conveyed away from the landfill.				
Water Resources	Surface water quality could be adversely affected. This would not be significant, as drainage control measures at the landfill reduce soil loss compared to natural conditions. Also, surface water would be directed away from the working face, and precipitation that infiltrates would be collected by the leachate collection and recovery system and used for dust control.	None required.	BC/FC	None	
Water Resources	Groundwater quality could be affected by	None required.	BC/FC	None	

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	abandonment of monitoring wells, seepage of leachate, landfill gas migration, or spillage of liquids and subsequent migration of surface fluids into groundwater. This impact will be minimized through continued implementation of ongoing procedures that include limiting the depth of excavation, maintenance and monitoring of the landfill gas and leachate collection and recovery systems, sealing of abandoned wells, and secondary containment of stored fuels and oils.				
Water Resources	Groundwater quantity has the potential to be affected if proposed project resulted in a substantial depletion of groundwater resources. However, existing sources of water will	None required.	BC/FC	None	

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### CLASS III IMPACTS – IMPACTS FOUND NOT TO BE SIGNIFICANT

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	continue to be utilized and new sources are being investigated, and overall water use will be substantially the same as under existing conditions.				
Water Resources	The proposed project would not utilize groundwater or surface water resources beyond the Safe Yield of the supply formations. Water use would be substantially the same as for existing operations.	None required.	BC/FC	None	
Water Resources	Activities associated with the Southeast Corner Modification could affect water requirements or drainage. Temporary run-on/runoff controls will be established to control drainage, and water use will be within existing requirements for overall project activities.	None required.	BC/FC	None	
Water Resources	Landfill closure/postclosure could result in excessive	None required.	BC/FC	None	

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**CLASS III IMPACTS – IMPACTS FOUND NOT TO BE SIGNIFICANT**

<b>Environmental Topic</b>	<b>Impact Description</b>	<b>Mitigation Measure</b>	<b>Back Canyon/ Front Canyon (BC/FC)</b>	<b>Residual Impact</b>	<b>Enforcement Agency</b>
	sediment transport or runoff from the drainage basins. However, procedures will include routine inspection of cover and drainage systems and water quality monitoring programs.				
Water Resources	Potential impacts to groundwater during closure/postclosure would be avoided by installation of final cover and ongoing operation of the GLCRS and LFG systems, as well as groundwater monitoring.	None required.	BC/FC	None	
Biological Resources	Some birds (gulls, crows) are expected to be taken as a result of bird management measures.	None required.	BC/FC	None	
Biological Resources	Seagull populations could be affected by bird management measures.	None required.	BC/FC	None	
Biological Resources	1. Landfill expansion would result in intensive human use of the northern portion of the project site, but such use	To compensate for native habitats disturbed by the expansion, a County-approved biologist shall prepare and implement a revegetation plan (e.g., a ratio of not less than 1:1 for each disturbed acre). The plan shall utilize native	BC/FC	None	CIWMB/LEA/RWQCB/ SWUD

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	will diminish at closure. 2. Swainson's hawk and bank swallows could be affected by disturbance to habitat.	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.			
Biological Resources	Activities associated with the Southeast Corner Modification could affect species that utilize that area of the landfill for habitat.	None required.	BC/FC	None	
Land Use	The proposed expansion of the landfill could impact nearby recreational uses, primarily coastal recreational resources and uses within the Los Padres National Forest.	None required.	BC/FC	None	
Land Use	The proposed project could affect agriculture in the site vicinity. Based on topography and site considerations such impact would not be significant.	(See Mitigation Measures in Sections 3.6 - Nuisances and 3.11 - Air Quality.)	BC/FC	None	
Visual	The Southeast Corner	None required.	BC/FC	None	

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Environmental Topic	Impact Description	Mitigation Measure	Back Canyon/ Front Canyon (BC/FC)	Residual Impact	Enforcement Agency
Resources	Modification would result in lowering the southeast corner of the landfill from its present elevation to 400 feet above mean sea level, or less.				
Noise	<p>1. Noise from landfill construction and operation activities could affect identified sensitive receptors (residences) in the vicinity of the landfill.</p> <p>2. There is the potential for noise associated with the Southeast Corner Modification to affect identified sensitive receptors (residences) in the vicinity of the landfill.</p> <p>3. Noise from excavation and blasting of the north and west borrow areas could affect sensitive nearby receptors.</p> <p>4. Noise associated with closure/postclosure</p>	Landfill equipment, including mufflers, shall be maintained to reduce noise levels.	BC/FC	None	CIWMB/LEA/RWQCB/ SWUD

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	activities could affect identified sensitive receptors (residences) in the vicinity of the landfill. However, noise levels during closure/postclosure would be much less than during landfill operations.				
Traffic	The proposed project would result in an increase from an average 137 to 180 total vehicle trips per day added to the projected 40,000 average daily traffic on Highway 101.	None required.	BC/FC	None	
Traffic	Landfill-related traffic at the intersection of the landfill access road and Highway 101 comprises less than 3% of total traffic during morning, noon or evening peak-hour traffic. This percent of total traffic would not increase as a result of the proposed project.	None required.	BC/FC	None	

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Traffic	At the intersection of the landfill access road and Highway 101, stopping sight distance is a safety factor. There is sufficient sight distance at the intersection to meet safety criteria.	To caution motorists approaching the intersection at Highway 101 and the Tajiguas Landfill entrance road, two signs, one for the northbound lanes and one for the southbound lanes of Highway 101 shall be provided. The signage shall be as follows: <i>Caution - Trucks Entering the Highway.</i>	BC/FC	None	CIWMB/LEA/RWQCB/ Caltrans/SWUD
Traffic	<p>1. On Highway 101, the length of traffic gaps for northbound traffic is a safety factor for vehicles to turn from the landfill access road into southbound traffic. There is the potential for impacts related to the length of traffic gaps.</p> <p>2. During closure and postclosure, the potential for impacts related to traffic volume, stopping sight distance and traffic gaps would be less than during project operations.</p>	<p>A permanent stop sign and speed dots shall be installed and maintained at the landfill exit to Highway 101. All vehicles exiting the landfill site shall be required to make a complete stop prior to entering the Highway.</p> <p>To caution motorists approaching the intersection at Highway 101 and the Tajiguas Landfill entrance road, two signs, one for the northbound lanes and one for the southbound lanes of Highway 101 shall be provided. The signage shall be as follows: <i>Caution - Trucks Entering the Highway.</i></p>	BC/FC	None	CIWMB/LEA/RWQCB/ Caltrans/Public Works
Traffic	Vehicles and equipment associated with the Southeast Corner	None required.	BC/FC	None	

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	Modification could contribute to offsite traffic.				
Traffic	There is the potential for onsite impacts related to vehicles and equipment associated with on-going operations and the Southeast Corner Modification.	All vehicles within the landfill site shall comply with the posted speed limit of 15 mph.  For the Front Canyon configuration, there shall be one or more onsite personnel to direct vehicles and equipment on the landfill as they travel to and from the working face. SWUD shall develop procedures that include, but are not limited to, issues of timing and right-of-way. These shall be modified as necessary specific to actual conditions and incidents that may occur.	BC/FC	None	
Air Quality	Based on modeling results, the potential chronic and acute noncarcinogenic health risks along the project site boundary and at residences in the vicinity of the landfill would be below the EPA and CAPCOA significance criteria of 1.0.	None required.	BC/FC	None	
Air Quality	Odors generated by waste and landfill gas could result in offsite impacts.	None required.	BC/FC	None	

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Air Quality	There is the potential for dust that is generated by landfill operations to result in offsite impacts.	None required.	BC/FC	None	
Health and Safety	There is the potential for liquid waste, hazardous waste, infectious waste, septic tank pumpings and/or liquid sewage sludge to enter the landfill in waste loads. However, in-place operational procedures and load checking reduce this potential impact to less than significant.	None required.	BC/FC	None	
Health and Safety	The potential for subsurface fire would be present but diminished during landfill closure/postclosure.	None required.	BC/FC	None	
Health and Safety	Potential health and safety issues related to landfill workers arise from prolonged exposure to dust and noise, improperly disposed hazardous or medical	None required.	BC/FC	None.	

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	waste, and operation of heavy machinery. SWUD follows existing OSHA policies, accepted safety standards and provides ongoing safety training.				
Health and Safety	There are potential worker safety issues associated with ongoing activities. However, existing policies and procedures include emergency response training, provision of personal protective equipment, and placement of emergency equipment, such as fire extinguishers.	None required.	BC/FC	None	



