Attachment C

TO: Santa Barbara County Board of Supervisors

FROM: Alex Tuttle, Supervising Planner/Environmental Hearing Officer

Planning and Development

Planner Contact: Joddi Leipner, Santa Barbara County Public Works, prepared with assistance from Padre Associates, Inc.

Resource Recovery and Waste Management

DATE: August 11, 2017 (revised October 26, 2017)

RE: Environmental Impact Report (EIR) Addendum for the Tajiguas Resource Recovery Project, which amends the Subsequent Environmental Impact Report (12EIR-00000-00002, SCH #2012041068 and EIR Revision Letter and Errata dated May 27, 2016).

Location: The project is located at the Tajiguas Landfill approximately 26 miles west of the City of Santa Barbara. The Tajiguas Landfill is approximately 1,600 feet north of U.S. Highway 101. The street address for the Tajiguas Landfill is 14470 Calle Real, Santa Barbara, California 93117, with approximately 4.48 acres of the Landfill located on a portion of the western boundary of the neighboring County-owned property (Baron Ranch, 14550 Calle Real, Santa Barbara, California 93117).

1.0 INTRODUCTION

Since approval of the Tajiguas Landfill Expansion Project in 2002, the RRWMD staff has been considering potential alternatives to landfilling. This effort has included two feasibility studies, development of a request for proposals, a proposal review process, and a comprehensive public outreach effort that has included over 140 presentations to stakeholders between 2008 and 2016. The culmination of this research and public dialogue is the modification of the approved Tajiguas Landfill Project to include the construction and operation of a Resource Recovery Project at the Tajiguas Landfill to further recover recyclable material from the waste stream and to provide an alternative to burying organic waste. A Subsequent EIR (12EIR-00000-00002, SCH #2012041068 and EIR Revision Letter and Errata dated May 27, 2016) were prepared for the Tajiguas Resource Recovery Project (TRRP). The Subsequent EIR (SEIR) was certified and the TRRP was approved by the Board of Supervisors on July 12, 2016[1].

After the Board of Supervisors certified the SEIR and approved the TRRP on July 12, 2016, County staff discovered that part of the Anaerobic Digestion (AD) Facility, as designed to be outside the Coastal Zone, would be partially located within the Coastal Zone. The AD Facility has not yet been constructed. The TRRP project description has been revised, primarily to relocate that AD Facility and related facilities outside of the Coastal Zone. Other associated changes to the project description include decommissioning and installing replacement Landfill Gas (LFG) Control System equipment and a Comprehensive Plan Amendment. The relocation of the AD Facility and these other changes to the project description are described in more detail in Section 4.0 (Revised TRRP Project Description) below.

[1] Project approval included approval of the Commingled Source Separated Recyclables (CSSR) optional element.

Overall, the project's geographic scope remains generally the same because the project involves rearranging certain facilities to different locations within the permitted Landfill operational area to be outside the Coastal Zone. Also, the previously approved disturbance was 23.9 acres and the proposed disturbance is 27.6 acres for the revised TRRP, and the difference is relatively small in comparison to the approximately 497-acre Landfill property within which the project is located.

2.0 BACKGROUND

2.1 STATE CEQA GUIDELINES SECTIONS 15162 AND 15164

CEQA (Public Resources Code § 21000 et seq.) and the State CEQA Guidelines provide guidance on the appropriate document for revisions to a previously certified EIR. Section 15162 of the State CEQA Guidelines states the following:

a. When an EIR has been certified or a Negative Declaration adopted, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following;

   (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

   (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

   (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:

      (A) The project will have one or more significant effects not discussed in the previous EIR;

      (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

      (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

      (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

State CEQA Guidelines Section 15164 specifies that the lead agency "shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred". An addendum need not be circulated for public review but can be included in or attached to the Final EIR. The decision-making body must consider the addendum with the Final EIR prior to making a decision on the project. As required in the State CEQA Guidelines Section 15164(e), a brief explanation of the decision not to prepare a subsequent EIR is provided below, and this explanation is supported by substantial evidence.

Findings Pursuant to Public Resources Code Section 21166 and State CEQA Guidelines Sections 15162 and 15164

Changes to the TRRP have been proposed and are described in Section 4, including physical modifications to the facilities, and a Comprehensive Plan Amendment. The certified Final SEIR retains informational value despite project changes and is relevant to the decision-making process. Based on the analysis contained in this SEIR Addendum, no substantial changes to the TRRP are proposed that would cause new significant environmental effects or a substantial increase in severity of previously identified significant effects. As discussed in detail in Section 5 of this SEIR Addendum, updated studies/analyses provide substantial evidence that the project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects as compared to the project approved by the Board of Supervisors on July 12, 2016 and analyzed in the SEIR (12EIR-00000-00002 [SCH #2012041068]) and Revision Letter and Errata (dated May 27, 2016) certified on July 12, 2016.

No substantial changes have occurred with respect to the circumstances under which the TRRP is being undertaken that would require major revisions to the SEIR due to the involvement of new significant environmental effects, or a substantial increase in the severity of previously identified significant effects. As noted in Section 4, project changes are proposed to move the footprint of some of the TRRP facilities outside the Coastal Zone. The change does not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable due diligence at the time the SEIR was certified as complete shows a) that the Revised TRRP will have significant effects not discussed in the SEIR for the approved project, b) that significant effects will be substantially more severe than previously shown, c) that mitigation measures or alternatives have been found feasible that would reduce significant impacts and which the County has declined to adopt, or d) that there are considerably different mitigation measures or alternatives that will substantially reduce significant project effects and which the County has declined to adopt.

Pursuant to Public Resources Code Section 21166 and State CEQA Guidelines Section 15164(a), an addendum fulfills the requirements of CEQA because although there would be changes and additions to the TRRP, none of the conditions in Section 15162 requiring a new SEIR have occurred. Therefore, it is the finding of the Planning and Development Department (as the Environmental Hearing Officer for the project pursuant to the County's CEQA

Guidelines), that this SEIR Addendum may be used to fulfill the environmental review requirements of the changes to the TRRP.

Because the project revisions meet the conditions for the application of Public Resources Code Section 21166 and State CEQA Guidelines Section 15164, preparation of a new subsequent EIR or EIR is not required. The Board of Supervisors will consider this SEIR Addendum with the certified Final SEIR in approving amendments to the TRRP contracts and in taking any other discretionary action required to move forward with the project.

2.2 EXISTING CEQA DOCUMENTATION

As discussed in Section 1.4 of the certified Final SEIR, the Tajiguas Landfill has been in operation since 1967 for the disposal of municipal solid waste (MSW). The initial siting, design and operation of the Landfill was not subject to review under CEQA as the Landfill predates adoption of CEQA in 1970. The Tajiguas Landfill also predates adoption of the Coastal Act, which designated coastal zones in California in 1976.

Facilities that support operation of the Landfill include the Landfill administrative offices (trailers), fuel tanks, material storage containers, scale house, groundwater and surface water environmental control systems, maintenance facility, Tajiguas Landfill Energy Project (LFG Control System including wells, collection pipelines, engine, flare and supporting facilities), water storage tanks and other related facilities. The existing LFG Control System includes a LFG collection and monitoring system comprised of a network of wells and pipelines installed in the buried solid waste, which are connected to an engine that converts LFG to energy, and a gas-burning flare. The primary purpose of the LFG Control System is to reduce LFG emissions from buried waste, specifically methane, and minimize air quality and groundwater quality impacts.

Several environmental documents have been prepared over the years to address approvals/permits associated with expansion and operation of the Tajiguas Landfill and to address other minor design or operational changes at the Landfill. The environmental documents (EIRs) for current Landfill expansion and operations include:

- Tajiguas Landfill Expansion Project EIR (01-EIR-05) certified by the Board of Supervisors on August 13, 2002.
- November 8, 2006 Addendum to 01-EIR-05 accepted by the Board of Supervisors on December 5, 2006.
- Tajiguas Landfill Reconfiguration and Baron Ranch Restoration Project Subsequent EIR (08EIR-00000-00007) certified by the Board of Supervisors on May 5, 2009.
- An SEIR (12EIR-00000-00002) and Revision Letter and Errata dated May 27, 2016 which was certified by the Board of Supervisors on July 12, 2016 for the TRRP.

3.0 APPROVED PROJECT DESCRIPTION IN THE SEIR

The project description of the approved TRRP is summarized below. Please refer to Section 3.0 of the certified Final SEIR (as modified by the EIR Revision Letter and Errata dated May 27, 2016) for a complete description of the approved project. The approved TRRP includes the processing of commingled source separated recyclables (CSSR) at the Materials Recovery Facility (MRF) identified as an "optional element" in the SEIR. Excluding installation of Well no. 6 and relocating Landfill operational facilities to the eastern side of the Landfill per the certified SEIR, the TRRP has not been constructed. Proposed changes to the previously approved TRRP are discussed in Section 4 of this SEIR Addendum.

3.1 PROJECT PROPONENT AND LEAD AGENCY

The project proponent and Lead Agency is the Santa Barbara County Public Works Department, Resource Recovery & Waste Management Division (RRWMD), located at 130 E. Victoria Street, Suite 100, Santa Barbara, California 93101.

3.2 PROJECT LOCATION AND SURROUNDING LAND USES

The TRRP will be located at the Tajiguas Landfill. The Tajiguas Landfill is located in a coastal canyon known as Cañada de la Pila, approximately 26 miles west of the City of Santa Barbara. The Tajiguas Landfill is approximately 1,600 feet north of U.S. Highway 101. U.S. Highway 101, the Union Pacific Railroad tracks, and the Pacific Ocean are located south of the Landfill. Properties that are adjacent to the Landfill site are used primarily for agriculture or open space. The residential community of Arroyo Quemada is located on the coast, approximately 2,000 feet southeast of the Tajiguas Landfill.

The Landfill property encompasses approximately 497 acres on Assessor Parcel Numbers (APN) 081-150-019, -026 and -042. The Solid Waste Facility Permit identifies a Landfill operational area boundary of 357 acres, which includes approximately 4.5 acres on APN 081-150-032. The TRRP facilities were approved to be located on APN 081-150-019, on the existing developed operations deck, which until recently housed the Landfill administration facilities. During construction, Landfill administration facilities were approved to be temporarily relocated to an inland area of the Landfill northeast of the Landfill top deck. The composting area was approved to occupy approximately 5 acres on APN 081-150-019 and APN 051-150-026, while water storage facilities were approved to be located on APN 081-150-042.

3.3 PROJECT OBJECTIVES

The primary objectives of the TRRP (as identified in the SEIR) are:

a. Reduce landfill dependence by diverting municipal solid waste (MSW) that is not currently recycled from landfill disposal to:

   1. Meet or exceed the requirements of Assembly Bill 341 which requires all jurisdictions to recycle 75 percent of their waste by 2020;

   2. Provide a long-term solution (minimum operational life of 20 years) to the region's solid waste management needs to meet or exceed CalRecycle's 15-year disposal capacity requirement; and

3. Substantially extend the life of the Tajiguas Landfill.

b. Locate the proposed project elements in reasonable proximity to existing developed solid waste facilities to:

1. Ensure that the project elements can function together effectively and efficiently; and

2. Ensure that the facility is reasonably accessible to all communities currently served by the Tajiguas Landfill while minimizing environmental and community impacts.

c. Provide long-term financial stability to limit impacts to the affected rate payers[2].

Additional Project Objectives include:

A. Process MSW currently disposed of at the Tajiguas Landfill with a diversion rate goal of 60 percent.

B. Maximize the reduction of future greenhouse gas emissions associated with the transportation, processing and disposal of MSW consistent with CalRecycle's Anaerobic Digestive Initiative and Assembly Bill 32.

C. Provide green energy to the region by specifically producing energy that is certified as "Renewable Portfolio Standard" eligible as defined by the California Energy Commission.

D. Provide a cost-effective tipping fee for solid waste management services compared to alternative disposal methods[3].

E. Construct and operate a project that can adapt to the changing waste management needs of the region.

F. Provide a safe and humane work environment for all employees.

3.4 PROJECT CHARACTERISTICS

A detailed description of the approved TRRP can be found in Section 3.4 of the certified Final SEIR. Section 4.0 of this SEIR Addendum describes proposed changes to TRRP components.

The TRRP was analyzed in the SEIR and approved to process MSW from the communities currently served by the Tajiguas Landfill. The TRRP was designed to modify the processing of MSW delivered to the Tajiguas Landfill from unincorporated areas of the south coast of Santa Barbara, Santa Ynez and New Cuyama Valleys and, the cities of Santa Barbara, Goleta, Buellton and Solvang. The approved TRRP includes processing source separated organic waste (SSOW) from the region's existing and future recycling programs and CSSR.

[2] As a part of the 2009 Vendor Request for Proposal (RFP) process, financial stability was determined to be reached through the Design, Build, Own, Operate and Transfer (DBOOT) model, whereby, upon the expiration of the contract term, the County of Santa Barbara and the cities of Santa Barbara, Goleta, Buellton and Solvang (collectively the "Public Participants") have the exclusive option to acquire the Facility for a payment of $1.00 to better position the rate payers into the future. Financial stability may also be achieved through public financing and ownership of the facilities.

[3] As part of the Vendor RFP process conducted in 2009, a cost-effective tipping fee was determined to be less than $100/ton.

The approved TRRP includes a MRF comprised of an approximate 66,500 sf building to sort MSW into three streams:

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

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

- Bio-gas (primarily composed of methane [CH_4] and carbon dioxide [CO_2]) – that would be used to power two (2) 1,537 horsepower onsite combined heat and power (CHP) engines driving electric power generators that would generate approximately 1+ net megawatts (MW) of renewable power continuously. The Energy Facility would be located on the south side of the AD Facility; and
- Digestate - that can then be cured into compost and/or soil amendments. The curing would require an approximately 5 acre area (located at one or more sites on the Landfill's permitted operations and/or waste disposal footprint). The compost and/or soil amendments would be marketed for agricultural or landscape use or used for reclamation projects.

The approved MRF has a design capacity of up to 930 tons/day of MSW or up to approximately 290,000 tons/year (up to 311 operating days/year), including up to 40,000 tons/year of CSSR. Up to 126,000 tons/year (290 tons/day) of recyclable material would be recovered and sold for reuse. Up to 104,000 tons/year (333 tons/day) of residue from the MRF and residue from the AD Facility which is not suitable for composting were approved to be landfilled. Residue ineligible for disposal in the Landfill (i.e., hazardous waste or e-waste), will be transported to an appropriate recycling or disposal facility.

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

The TRRP facilities were approved to be located approximately 3,200 feet north of U.S. Highway 101 on the existing Tajiguas Landfill operations deck, that until early 2017 housed the Landfill administrative office, two crew trailers, engineering trailer, hazardous material storage, electronic-waste storage, equipment storage and parking, employee parking, maintenance facility and three fuel storage tanks.

Construction of the approved MRF was estimated to require approximately twelve months to complete following 4 months of grading and site preparation. Construction of the approved AD Facility was projected to take approximately twelve months to complete and would

be completed concurrently with the MRF. Construction work would generally be conducted during daylight hours, in compliance with the County permitted Landfill construction hours of 6:00 am to 8:00 pm, Monday through Saturday, and 7:00 am to 6:00 pm on Sunday.[4] Non-daylight work hours on weekdays or daytime work on Saturdays and holidays may occur to minimize conflicts with ongoing Landfill waste disposal operations, make up schedule deficiencies and/or to complete critical construction activities safely, such as MRF equipment installation and testing. If necessary to meet specific construction requirements, two 8-hour shifts, Monday through Friday between the hours of 6 a.m. and 10 p.m., and potentially on Saturdays and holidays may be implemented.

As discussed in Section 3.5.10 of the certified Final SEIR, the approved TRRP also included modifications to Landfill operations and facilities including a reduction in the volume of waste buried annually, extension of the Landfill life, reduction in the number of Landfill staff, relocation of the Landfill administrative offices, fuel storage, equipment storage and other related facilities, construction of a new water tank and relocation of the Landfill maintenance facility. No changes to the operations of the County's recycling and transfer stations (see Section 3.5.11 of the certified Final SEIR) were approved with the exception of changes in association with the approved CSSR optional element (processing of CSSR collected at the South Coast Recycling and Transfer Station at the TRRP MRF).

4.0 REVISED TRRP PROJECT DESCRIPTION

As noted in Section 1.0 of this SEIR Addendum, the TRRP was approved by the Board of Supervisors on July 12, 2016, but the facilities have not yet been constructed (excluding Well no. 6). Table 1 summarizes the proposed changes to the TRRP, as compared to that described in Section 3 (Project Description) of the certified Final SEIR, and a textual description of some of these changes follows. These changes are the basis of the environmental analysis of this SEIR Addendum. The primary changes to the project description consist of:

- Relocation of the approved but unconstructed AD Facility from the approved location on the operations deck to the east side of the Landfill (east of the Composting Area) to a previously disturbed and graded area within the Landfill's permitted operational area boundary (see Appendix F). The revised location is approximately 2,200 feet east of the approved location and 180 feet inland of the Coastal Zone boundary. The revised AD Facility location has been disturbed by Landfill operations for at least 12 years pursuant to the Tajiguas Landfill Expansion Project and the Solid Waste Facilities Permit covering the area. Grading was performed as part of installation of the Phase 1A and 1B liner systems for groundwater protection in 2005 and 2007, which lowered the ridgeline elevation from 676 to 645 feet above mean sea level (msl) (see Appendix I). A perimeter road and drainage facilities were also constructed (see Appendix H, noting a 5-acre disturbance area at Baron Ranch, which is the revised AD Facility site). The oblique aerial photographs in Appendix F show where the AD Facility would be located on a highly disturbed portion of the Baron Ranch parcel within the Pila Creek watershed (in front of the ridgeline), and not

[4] Sunday construction limited to maximum of 20 days/year.

within the Arroyo Quemado watershed (beyond the ridgeline) that substantially contains the remainder of Baron Ranch. Proposed changes to the TRRP have been designed to provide a 10-foot buffer between the Coastal Zone boundary and the MRF, to ensure no construction work occurs within the Coastal Zone (see Figures 2 and 3).

- Decommissioning of the existing Tajiguas Landfill Energy Project (LFG Control System) engine and flare (see "Leased Area Power Plant" on SEIR Figure 3-3), and adding a new LFG Control System engine and flare as part of the TRRP, which are proposed to be located adjacent to and used by the MRF (see Section 4.9) in a portion of the area previously approved for locating the AD Facility, and outside the Coastal Zone. The replacement engines and flare would be located approximately 1,800 feet northwest of their existing location, and at least 40 feet inland of the Coastal Zone boundary (see Figure 3, Keynote 4).
- Comprehensive Plan Amendment resulting in a net reduction of 51.07 acres to the Waste Disposal Facility Overlay. This net reduction includes removing 55.55 acres of dense native vegetation (including a designated Environmentally Sensitive Habitat area) ~~subtracted~~ from the Overlay (see Appendix G), and adding 4.48 acres of existing Landfill operational area ~~added~~ containing previously graded areas, a perimeter road and drainage facilities (see Appendix F) to the Overlay (encompassing the revised AD Facility site) (see Figures 1, 11 and 12).

A map showing a general overview of the proposed TRRP changes is provided in Figure 1, including the Revised TRRP construction disturbance area associated with the relocation of the AD Facility, and the revised Waste Disposal Facility Overlay boundary. Figures 2 through 10 provide site plans and elevation drawings of the revised MRF, AD Facility and Composting Area. Figure 11 shows the current Waste Disposal Facility Overlay boundary, and Figure 12 shows the proposed changes to the Waste Disposal Facility Overlay boundary. Note that all Figures have been moved to Attachment 1.

Relocation of the AD Facility has required changes to its design to suit the revised location and modifications to the MRF and ancillary facilities affected by physically separating the MRF and AD Facility. With the proposed Waste Disposal Facility Overlay boundary change, all of the TRRP facilities would be located within the Waste Disposal Facility Overlay. There have been no changes to the TRRP benefits and TRRP objectives as described in Section 1 of the certified Final SEIR.

Table 1. Summary of TRRP Changes

Component	Tajiguas Resource Recovery Project as described in the Certified Final SEIR	Revised TRRP
General		
Amendment to the Waste Disposal Facility Overlay	Not proposed.	Amendment to 1) reduce the net area within the Waste Disposal Facility Overlay by 51.07 acres and 2) extend the Waste Disposal Facility Overlay to encompass the revised location of the AD Facility

Component	Tajiguas Resource Recovery Project as described in the Certified Final SEIR	Revised TRRP
Construction Disturbance Area (acres)	23.9 (22.5 previously disturbed by Landfill activities)	27.6 (25.1 previously disturbed by Landfill activities)
TRRP Earthwork (with 15% compaction)	142,600 cubic yards of cut, 102,765 cubic yards of fill	31,420 cubic yards of cut (8,000 for the MRF, 23,420 for the ADF) 103,100 cubic yards of fill (46,970 for the MRF, 56,130 for the ADF)
MRF and AD Facility combined building area	130,100 square feet	135,050 square feet
Parking spaces	72, bus parking area	62, bus parking area
Electrical balance (MW-hours/year)	14,905 generated by solar panels and AD Facility CHP engines, 6,595 consumed, 8,301 net produced	16,571 generated by solar panels and AD Facility CHP engines, 9,616 consumed, 6955 net produced
MRF		
Location	Within the Landfill Solid Waste Facility Permit Operational area on the Operations deck (APN 081-150-019)	No change
Site area (acres)	~6 (combined MRF and AD Facility area)	5.8 (MRF only)
Building area (square feet)	66,500	No change
Maximum building height (feet)	51.3	No change
Building skylights	Included	Deleted
Bio-filters (odor control)	Two – 6,300 sf at ground level and 4,200 sf on the AD Facility Roof	Two – 6,600 sf and 4,620 sf located at ground level
Rolling bed (paper) dryer	Included, using waste heat from the Energy Facility adjacent to the AD Facility	Included, using waste heat from the replacement LFG Control System engines adjacent to the MRF
Treated water tank	6,500 gallons	Deleted
AD Facility		
Location	Within the Landfill Solid Waste Facility Permit Operational area on the operations deck (APN 081-150-019)	Within the Landfill Solid Waste Facility Permit Operational area east of the Composting Area. (APN 081-150-019, APN 081-150-026 and APN 081-150-032)
Site area (acres)	~6 (combined MRF and AD Facility area)	3.9 (AD Facility only)
Building area (square feet)	63,600	68,550
Maximum building height (feet)	37.0	No change
Building skylights	Included	Deleted
Bio-filters	Two roof-top – 4,200 sf each	Two at grade – 4,320 sf each
Energy Facility	2,900 sf building adjacent to the ADF, housing two 1,573 BHP CHP engines, with flare extending 62 feet above the MRF/AD Facility floor elevation (394 feet above mean sea level [msl])	1,900 sf building adjacent to the ADF, housing two 1,573 BHP CHP engines, with flare extending 54 feet above the flare pad finished grade (590 feet above msl), and 39 feet above the AD Facility finished floor elevation (605 feet above msl)

Component	Tajiguas Resource Recovery Project as described in the Certified Final SEIR	Revised TRRP
Organic waste conveyor to ADF	Included	Deleted (organic waste would be transported by truck replacing truck trips that were proposed to transport digestate from the ADF to the Composting Area under the approved TRRP)
Digestate conveyor to Composting Area	Not proposed (digestate transported by truck)	Included, ~110 feet long (truck trips associated with digestate transport under the approved TRRP would transport organic waste recovered by the MRF instead)
Mobile equipment (includes Composting Area)	One scrubber-sweeper, two wheeled loaders, post AD screening, trommel screen, plastic film sorter, windrow turner, tub grinder	Two scrubber-sweepers, two wheeled loaders, post AD screening, trommel screen, plastic film sorter, windrow turner, tub grinder
Other Components		
Fire water tank (northwest of the MRF) capacity (gallons)	220,000 (33.5 feet in diameter, 33 feet tall)	256,000 (36 feet in diameter, 33 feet tall)
Composting Area Runoff Collection Tank	325,000 gallons (50 feet in diameter, 24 feet tall), located 1,500 feet north of the Composting Area	436,000 gallons (42 feet in diameter, 42 feet tall), located 700 feet north of the Composting Area (formerly the planned location of the Landfill maintenance building)
Fire water tank near Composting Area	Not proposed	256,000 gallons (36 feet in diameter, 33 feet tall), located adjacent to the Composting Area Runoff Collection Tank
Relocated Landfill maintenance facility	650 feet north of the Composting Area, outside the buried waste footprint	Located on the operations deck, immediately east of the MRF site and outside the buried waste footprint
Above-ground power line between the MRF and AD Facility sites	Not proposed	Included (approximately 2,550 linear feet of power line and support poles)

4.1 WASTE DISPOSAL FACILITY OVERLAY COMPREHENSIVE PLAN AMENDMENT

The Tajiguas Landfill has a Waste Disposal Facility Overlay in the Comprehensive Plan Land Use Element recognizing its use as a landfill (see Figure 11). RRWMD is requesting that the Overlay be amended to fully encompass the footprint of the revised AD Facility on 4.48 acres designated as agricultural land use. The County Land Use Element (page 82) specifies, "a site providing regional public services within a Rural or Inner-Rural Area shall be given one of the following Designations: "Institution/Government Facility"; "Public Utility" (e.g., a wastewater treatment plant site); "Cemetery"; "Special Area" (e.g., for recognition and preservation of a historic or archaeologic site); or, "Waste Disposal Facility." Such designation shall be applied to a proposed site through amendment of the pertinent Land Use Element map, either concurrent with or following the acquisition of the site by the public agency and prior to any development pertaining to the facility."

While the additional area would be added to the Waste Disposal Facility Overlay and while it is currently within the operational area boundary identified in the Solid Waste Facility Permit, it is not within the permitted waste disposal footprint and would not be used for waste disposal. The area was previously graded and is currently used for Landfill operations (perimeter road and drainage facilities) and with implementation of the Revised TRRP would be specifically used for the AD Facility (see Appendices F, H and I).

The Revised TRRP includes a proposed Comprehensive Plan Amendment to provide a net reduction of 51.07 acres within the Overlay, by ~~removing from the Overlay~~ no longer including approximately 55.55 acres on APN 081-150-026 (see Appendix G) not needed for solid waste disposal operations, and adding to the Overlay approximately 4.48 acres to encompass the footprint of the revised AD Facility. As noted below, the area added to the Overlay is within the Landfill Solid Waste Facility Permit operational area and has been subject to prior disturbance associated with landfill operations following approval of the Tajiguas Landfill Expansion Project in 2002. The 55.55-acre area proposed to be removed from the Overlay supports dense native vegetation recently designated as Environmentally Sensitive Habitat in the Gaviota Coast Plan.

4.2 EARTHWORK

As noted in Table 1, the volume of earthwork completed as part of construction of the Revised TRRP would be substantially less than the amount identified and analyzed in the certified Final SEIR. The decrease in the total cut volume (a reduction of approximately 111,180 cubic yards) is associated with planned Landfill operations through 2017 that will have substantially reduced the required amount of excavation needed in the West Borrow Area where the MRF would be located. Borrow soil from this area has and will continue to be used for ongoing Landfill cover activities.

Excavation of the West Borrow Area for use as cover material for the Tajiguas Landfill has occurred since Landfill operations began in 1967. The impact of excavation and use of West Borrow Area soil was studied and analyzed in the Environmental Impact Report for the Landfill Expansion Project in 2002 (01-EIR-5)[5]. These Landfill earthwork operations have and will continue during the delay in TRRP construction. Since some of the soil in this area has and will continue to be removed and utilized for Landfill cover material, the amount of grading needed to construct the MRF would also be reduced.

The area proposed for grading associated with the revised AD Facility was previously graded as a part of the Tajiguas Landfill Expansion Project for the Phase 1A and 1B Liners and to establish a perimeter landfill access road and drainage as discussed in the Tajiguas Landfill Expansion EIR (01-EIR-5). The original ridgeline at the revised AD Facility site was lowered from a maximum elevation of approximately 676 feet to approximately 645 feet above msl (see Appendix I) as part of installation of the Phase 1B Liner.

4.3 BUILDING AREA

The total building area will increase by approximately 5,000 sf. The increase is due to a change in AD Facility design. In the revised location, the concrete digester bunkers will run along one side of the AD Facility Mixing Hall rather than both sides resulting a minor increase in the building area.

[5] Table 2-5 (page 2-41) of 01-EIR-5 identified that up to 200,000 cubic yards of material would be excavated from the West Slope Borrow Area for Landfill cover and further noted that the quantity used will vary depending on the need for low permeability soil. The total quantity of available material was estimated at 600,000 cubic yards.

4.4 PARKING SPACES

Design changes associated with the Revised TRRP would reduce the number of parking spaces from 72 to 62. Based on anticipated staffing as analyzed in the certified Final SEIR (see Table 3-5), the maximum number of staff expected to be on-site is 59. An employee vanpool was included as part of the approved TRRP, and is anticipated to achieve an equivalent average vehicle occupancy of 2.5 for workers and 1.6 for administrative staff (see Section 4.9.2.4 of the certified Final SEIR). Therefore, 26 parking spaces are required for TRRP staff (52 workers/2.5 + 7 administrative staff/1.6).

The approved TRRP would also provide parking for Landfill operations staff, which includes 14 full-time employees and two contract employees, which is reduced as compared to current Landfill operations. Overall, the Revised TRRP would provide 62 parking spaces, which is adequate for both TRRP staff (26 spaces) and Landfill operations staff (16 spaces).

4.5 MRF TREATED WATER TANK

The 6,500 gallon treated water tank previously proposed to be located adjacent to the MRF (see keynote 15 in Figure 3-5 of the certified Final SEIR) will not be constructed. The purpose of this tank was to provide storage of chlorinated water for domestic purposes following treatment of groundwater at the approved water treatment facility (see keynote 14 in Figure 3-5 of the certified Final SEIR). Instead, all water used for fire protection, process, and domestic purposes will be chlorinated by the water treatment facility (see keynote 3 on Figure 3) prior to entering the water storage tank located northwest of the MRF (see component 2 on Figure 2). This design change has eliminated the need for a treated water tank. Chlorination of groundwater is a component of the approved TRRP and would continue to be conducted under the Revised TRRP.

4.6 FIRE WATER STORAGE TANKS

Relocation of the AD Facility requires construction of an additional fire protection water storage tank on the east side of the Landfill (Keynote 8 on Figure 2) to meet County Fire Department requirements for fire protection (fire protection to both the MRF and AD Facility was previously provided by the single storage tank northwest of the MRF). The additional tank to serve the relocated AD Facility will be located on the pad that was proposed for the Landfill maintenance facility and the Landfill maintenance building will be located on the operations deck, immediately east of the MRF site and outside the buried waste footprint. The tank will be 36 feet in diameter and 33 feet tall (256,000 gallons).

The fire water storage tank serving the MRF will also be increased in size from 220,000 gallons (33.5 feet in diameter, 33 feet tall) to 256,000 (36 feet in diameter, 33 feet tall). The increase in volume is due to the need to provide additional freeboard within the tank to address American Water Works Association seismic standards updated since the SEIR was certified (i.e. to address earthquake-induced sloshing which can impact the tank roof). The additional tank at the revised AD Facility site has also been designed to address earthquake-induced sloshing.

4.7 COMPOSTING AREA RUNOFF COLLECTION TANK

The composting runoff collection tank which was previously proposed to be located on a pad at 690 feet above msl will be relocated to the approved location of the Landfill maintenance building at 630 feet above msl, adjacent to the AD Facility fire water storage tank discussed in Section 4.6 (Keynote 7 on Figure 2). The tank will be increased in volume from 325,000 gallons (50 feet in diameter, 24 feet tall), located 1,500 feet north of the composting area to 436,000 gallons (42 feet in diameter, 42 feet tall), located 700 feet north of the Composting Area. Similar to the fire water storage tanks, the increase in volume is required to address updated seismic standards.

4.8 ABOVE-GROUND POWER LINE

Under the approved project, a combination of energy generated from combustion of bio-gas in the AD Energy Facility, roof-mounted solar panels and the regional power grid was proposed to power the MRF. The energy sources would remain the same with the Revised TRRP. With the relocation of the AD Facility to the eastern side of the Landfill, a new power line (see Figure 2) is required to connect the two facilities so a portion of the AD Facility-generated power not delivered to the grid may reduce the MRF's reliance on the grid during peak periods, and serve as a backup energy source if grid power is interrupted.

The certified Final SEIR identified that service to the MRF and AD Facility would be connected to the existing Southern California Edison (SCE) high voltage power transmission lines located immediately south of the Landfill. The certified Final SEIR identified that existing transmission poles to the site would provide a suitable transmission line routing, however upgraded lines would need to be restrung. Under the Revised TRRP, service would continue to be provided by SCE with power required to each facility. Existing power lines run along the eastern and western boundary of the Landfill (certified Final SEIR Figure 3-4). Use of these existing poles is planned as discussed in the certified Final SEIR (page 3-24); however, SCE is responsible for construction of the power lines and determining whether the existing poles and/or pole locations will be maintained or replaced in association with the execution of an interconnection agreement and completion of a field survey. It is anticipated that the existing poles/pole locations will be used.

4.9 LANDFILL FACILITY CHANGES

As discussed in Section 3.4 of this SEIR Addendum, implementation of the approved TRRP included changes in Landfill facilities including relocation of Landfill operations trailers, fuel tanks and material storage, construction of a new water tank, and relocation of the Landfill maintenance facility. As identified in Table 1 and the SEIR, the Landfill maintenance facility was analyzed and approved for relocation to an area east of the Landfill top deck. Under the Revised TRRP, the maintenance facility would be relocated to the area of the operations deck northeast of the MRF (see Figure 3).

Continued operation of the Tajiguas Landfill (including its required environmental control systems), with the modifications discussed in Section 3.5.10 of the certified SEIR, was previously identified as a part of the TRRP. The existing LFG Control System, constructed in 1999 is located at the southern end of the Landfill within the Coastal Zone and operates under

Conditional Use Permit (95-CP-046) and Coastal Development Permit (95-CDP-118)[6]. The permitted system includes a LFG collection system connected to an electrical power plant (Caterpillar engine) and gas-burning flare and related facilities (e.g., blower, metal building, radiators, gas cooling system, transformer and transmission lines connection to the regional power grid). The Coastal Development Permit also provides the "horizontal wells will be installed with refuse as it is deposited from the initiation of the [Landfill] project through completion of the landfill." The engine destroys potential pollutants through thermal combustion and generates electricity. The flare destroys potential pollutants through thermal combustion.

The Revised TRRP includes decommissioning some of the existing LFG Control System in place (engine and flare) and installing new GE Jenbacher engines (or equivalent) to provide up to 2.8 megawatts of electricity, one John Zink ZTOF-type enclosed flare (or equivalent) and one switchgear/transformer on the operations deck just south of the MRF building, outside of the Coastal Zone (see Keynotes 4 and 16 on Figure 3). The new engines and flare would be connected to the existing LFG collection network of wells and pipelines ~~and~~ adjacent to their location consistent with on-going LFG collection system deployment for Landfill operations, and would be connected to the existing electrical distribution network. The power transmission lines serving the MRF would also serve the new engines and supporting equipment.

The new engines would each be housed in a 756 square foot container with noise attenuating features, and provided with engine exhaust silencers and acoustical gaskets on the doors. The engines would be provided with APCD-required control systems (selective catalytic reduction, SCR) to reduce oxides of nitrogen (NO_x) emissions. The new flare would be six feet in diameter and 50 feet in height, and located on a concrete pad. The switchgear and transformers would also be located on a concrete pad. Up to 2.8 megawatts of electricity would be produced by the facility and excess power would be distributed to the regional power grid.

The engine exhaust would be blended with ambient air to produce hot air, and ducted to the approved MRF rolling bed dryer to dry paper. Exhaust air from the rolling bed dryer would be ducted to a baghouse to filter particulate matter originating from both the engine exhaust and the paper dried in the rolling bed dryer. Under the approved TRRP, the AD Facility CHP engines were to be used to provide waste heat (exhaust) for the rolling bed dryer.

Like the existing permitted LFG Control System, the updated LFG Control System would be operated by Landfill staff in compliance with Title 27 Section 20921 of the California Code of Regulations and would operate 24 hours per day. Periodic maintenance and inspections would be performed on all of the equipment and a continuous operating and emissions monitoring system would be installed to and inform all pertinent personnel in the case of operational failure.

[6] A system to control LFG emissions from the Landfill was first recommended by the Santa Barbara County Air Pollution Control District (APCD) during preparation of the 1987 Tajiguas Landfill Expansion EIR and was included as a recommended mitigation measure in the 1987 EIR: "The following mitigation measures are suggested for this project to reduce are quality impacts... 1. The County Public Works Department shall install a Landfill gas recovery system that will capture approximately 90 percent of the gas generated by the landfill" (87-EIR-8, page V-134).

5.0 COMPARATIVE EVALUATION OF ENVIRONMENTAL IMPACTS

Section 4 of the certified Final SEIR provides a detailed discussion of the impacts of constructing and operating the TRRP. This Section focuses on potential changes in environmental impacts associated with implementation of the Revised TRRP. Specifically, impacts attributable to the Revised TRRP are compared with the analysis and findings within the certified Final SEIR to determine if new significant impacts or increased severity in previously identified significant impacts will occur. Table 2 provides a comparison of the impacts of the approved TRRP as analyzed in the certified Final SEIR to the Revised TRRP. As noted in Table 2, for a majority of the impacts identified in the certified Final SEIR, the Revised TRRP impacts would the same or reduced as compared to the approved TRRP. For certain impacts noted in Table 2, additional detailed analysis is provided in sections that follow Table 2.

As discussed in the following sections, updated visual simulations have been prepared to assist in the revised visual resources analysis, updated/amended technical studies have been prepared for air quality, geologic processes and water resources, and Padre Associates biologists and archaeologists have also completed surveys of the revised construction disturbance area.

Table 2. Comparison of the Impacts of the Approved TRRP and the Revised TRRP

Impact Description	Approved TRRP	Revised TRRP
Impact TRRP VIS-1: Project implementation would not significantly alter the visual setting from public vantage points (View 2, View 7 and View 8)	Less than significant (Class III)	Less than significant (Class III), see discussion in Section 5.1.2.
Impact TRRP VIS-2: Project implementation would significantly alter the visual setting as seen from U.S. Highway 101, (View 6), an eligible scenic highway	Significant, but mitigable (Class II)	Significant, but mitigable (Class II), see discussion in Section 5.1.2. Mitigation measures ***MM TRRP VIS-1a: Building Exterior Color*** and ***MM TRRP VIS-1b: Landscape Screening*** would continue to be applicable.
Impact TRRP VIS-3: Project implementation would result in an adverse but less than significant change in the visual setting as seen from private views	Less than significant (Class III)	Less than significant (Class III), see discussion in Section 5.1.2.
Impact TRRP VIS-4: Project-related construction activities could result in less than significant lighting and glare impacts	Less than significant (Class III)	Less than significant (Class III), see discussion in Section 5.1.2.
Impact TRRP VIS-5: Project operation could result in less than significant lighting and glare impacts	Less than significant (Class III)	Less than significant (Class III), see discussion in Section 5.1.2.
Impact TRRP VIS-6: Project-related extension of life of the Tajiguas Landfill would delay final closure of the back canyon area of the landfill site and result in an adverse but less than significant extension of the Landfill aesthetic impacts further in time	Less than significant (Class III)	Less than significant (Class III), visual impacts related to the extension of Landfill life would not change as compared to the approved TRRP, because processing and diversion of solid waste from the Landfill would not change and the life of the Tajiguas Landfill would continue to be extended, no change in impacts.

Impact Description	Approved TRRP	Revised TRRP
Impact TRRP VIS-CUM-1: Project implementation, combined with other related cumulative projects, could degrade the visual character/quality of scenic vistas from U.S. Highway 101 along the Gaviota Coast	Significant (Class I) Cumulative; Project Contribution Not Considerable with Mitigation (Class II)	Significant (Class I) Cumulative; Project Contribution Not Considerable with Mitigation (Class II), the Revised TRRP visibility from U.S. Highway 101 would be reduced (see Section 5.1.2), the Hart residence would not be constructed and no new projects are proposed in the TRRP viewshed. New cumulative projects are located in Goleta and would not increase cumulative visual resources impacts along the Gaviota Coast, no change in cumulative impacts (Class I).
Impact TRRP AQ-1: Construction of project facilities would result in criteria air pollutant emissions that would not significantly affect regional air quality	Less than significant (Class III)	Less than significant (Class III), see discussion in Section 5.2.2.
Impact TRRP AQ-2: Operation of project facilities would result in criteria air pollutant emissions that would not significantly affect regional air quality	Less than significant (Class III)	Less than significant (Class III), see discussion in Section 5.2.2.
Impact TRRP AQ-3: Normal operation of project facilities would result in criteria air pollutant emissions that would not cause or contribute to exceedances of ambient air quality standards	Less than significant (Class III)	Less than significant (Class III), see discussion in Section 5.2.2.
Impact TRRP AQ-4: Short-term operational scenarios of the flare and CHP engines would result in criteria pollutant emissions that would not cause or substantially contribute to exceedances of air quality standards	Less than significant (Class III)	Less than significant (Class III), see discussion in Section 5.2.2.
Impact TRRP AQ-5: Operation of project facilities would result in emissions of toxic air contaminants, but emissions would not result in significant health risks at adjacent land uses	Less than significant (Class III)	Less than significant (Class III), see discussion in Section 5.2.2.
Impact TRRP AQ-6: Construction of project facilities would generate greenhouse gas (GHG) emissions that would result in a less than significant contribution to global climate change	Less than significant (Class III)	Less than significant (Class III): construction equipment activity would be less due to a reduction in earthwork, which would also reduce GHG emissions from construction equipment and motor vehicles, reduction in impacts.
Impact TRRP AQ-7: Implementation of the TRRP would reduce GHG emissions associated with landfill disposal by diversion of organic waste that would produce landfill gas emissions, and export of electricity that would offset GHG emissions associated with electricity generation	Beneficial (Class IV)	Beneficial (Class IV), see discussion in Section 5.2.2.
Impact TRRP AQ-8: Implementation of the TRRP would reduce GHG emissions by improved recovery and recycling of materials	Beneficial (Class IV)	Beneficial (Class IV), see discussion in Section 5.2.2.
Impact TRRP AQ-9: Odors generated by solid waste processing in the TRRP facilities may create a less than significant nuisance air quality impact	Less than significant (Class III)	Less than significant (Class III), see discussion in Section 5.2.2.
Impact TRRP AQ-10: H_2S and organic sulfides may be produced in the anaerobic digesters and resulting compost but would not result in exceedances of SBCAPCD Rule 310 limits	Less than significant (Class III)	Less than significant (Class III): these compounds would be produced during handling and processing of organic waste which would not change under the Revised TRRP, no change in impacts.
Impact TRRP AQ-11: Project-related extension of life of the Tajiguas Landfill would extend the duration of air pollutant emissions associated with Landfill operations and associated NO_x, NO_2 and 24-hour PM_{10} air quality impacts	Significant and unavoidable (Class I)	Significant and unavoidable (Class I), air quality impacts related to the extension of Landfill life would not change as compared to the approved TRRP because processing and diversion of solid waste from the Landfill would not change and the life of the Tajiguas Landfill would continue to be extended, no change in impacts.

Impact Description	Approved TRRP	Revised TRRP
Impact TRRP AQ-12: Decommissioning of project facilities would result in criteria air pollutant emissions that would not significantly affect regional air quality	Less than significant (Class III)	Less than significant (Class III), although the Revised TRRP includes relocating the AD Facility and other changes discussed in Table 1, decommissioning would involve the same activities discussed in Section 3.5.13 of the certified Final SEIR, no change in impacts.
Impact TRRP AQ-13: Decommissioning of project facilities would result in GHG emissions that would not significantly affect the overall GHG reduction associated with the project	Less than significant (Class III)	Less than significant (Class III), although the Revised TRRP includes changes in locations of facilities, decommissioning activities would be the same because no new facilities are proposed. GHG emissions would not increase because emissions sources and decommissioning operations would be the same, no change in impacts.
Impact TRRP AQ-CUM-1: Project construction emissions would contribute to construction emissions generated by the cumulative projects and would not significantly affect regional air quality	Less than significant (Class III) Cumulative Impact; Project Contribution Not Considerable (Class III)	Less than significant (Class III) Cumulative Impact; Project Contribution Not Considerable (Class III), the Revised TRRP contribution to cumulative construction emissions would be reduced (see Section 5.2.2), and new cumulative public projects are not anticipated to result in significant construction-related emissions. In addition, the new cumulative projects would be constructed later in time (2019 or later) as the TRRP, no change in cumulative impacts (Class III).
Impact TRRP AQ-CUM-2: Criteria pollutant emissions generated by project operation would contribute to emissions generated by the cumulative projects and would not significantly affect regional air quality	Less than significant (Class III) Cumulative Impact; Project Contribution Not Considerable (Class III)	Less than significant (Class III) Cumulative Impact; Project Contribution Not Considerable (Class III), the TRRP contribution to cumulative operational emissions would remain less than 55 pounds per day NO_x and ROC. The County's Environmental Thresholds and Guidelines Manual indicates projects that would exceed the long-term threshold for NOx or ROC (55 pounds per day) would have significant cumulative impacts. Since the project operation emissions would not exceed the long-term threshold, the project's incremental contribution to cumulative impacts would not be considerable, no change in cumulative impacts (Class III).
Impact TRRP AQ-CUM-3: Odors generated by project operation could contribute to odors generated by the cumulative projects and result in a less than significant nuisance at local land uses	Less than significant (Class III) Cumulative Impact; Project Contribution Not Considerable (Class III)	Less than significant (Class III) Cumulative Impact; Project Contribution Not Considerable (Class III), the contribution of the TRRP to cumulative odor impacts would remain less than significant (see Section 5.2.2), and no new cumulative projects would produce odors that would affect the same receptors, no change in cumulative impacts (Class III).
Impact TRRP BIO-1: Implementation of the proposed project would result in the permanent loss of approximately 3.33 acres of non-native and native vegetation communities within the project impact area which would be an adverse but less than significant biological impact	Less than significant (Class III)	Less than significant (Class III), see discussion in Section 5.3.2.
Impact TRRP BIO-2: Construction activities may adversely affect sensitive vegetation located adjacent to the direct impact area	Significant, but mitigable (Class II)	Significant, but mitigable (Class II): based on a biological survey conducted on May 11, 2017, no additional sensitive vegetation is located in or near the revised construction disturbance area, no change in impacts. Mitigation measure ***MM TRRP BIO-1: Construction Requirements*** would continue to be applicable.
Impact TRRP BIO-3: Construction activities would result in an adverse but less than significant direct loss of wildlife habitat and adverse but less than significant impact to wildlife habitat located adjacent to the direct impact area	Less than significant (Class III)	Less than significant (Class III), see discussion in Section 5.3.2.

Impact Description	Approved TRRP	Revised TRRP
Impact TRRP BIO-4: Construction activity may significantly affect nesting migratory birds and/or raptors	Significant, but mitigable (Class II)	Significant, but mitigable (Class II): the overall duration of construction equipment activity would be less due to the reduction in earthwork, which would also reduce the potential to disturb nesting birds and raptors, reduction in impacts. Mitigation measure ***MM TRRP BIO-2: Breeding Bird Protection*** would continue to be applicable.
Impact TRRP BIO-5: Project construction activities would result in a less than significant loss of special-status plant species	Less than significant (Class III)	Less than significant (Class III): based on a biological survey conducted on May 11, 2017, no additional special-status plant species occur within the revised construction disturbance area, no change in impacts.
Impact TRRP BIO-6: Project construction activities would result in an adverse but less than significant loss of California red-legged frog upland dispersal habitat	Less than significant (Class III)	Less than significant (Class III), see discussion in Section 5.3.2.
Impact TRRP BIO-7: Construction-related loss of habitat may result in an adverse but less than significant reduction in foraging opportunities for transient special-status birds	Less than significant (Class III)	Less than significant (Class III), see discussion in Section 5.3.2.
Impact TRRP BIO-8: Project-related habitat loss could adversely affect American Badger and Ringtail	Significant, but mitigable (Class II)	Significant, but mitigable (Class II): based on a biological survey conducted on May 11, 2017, no additional habitat for these species occurs within the revised construction disturbance area, no change in impacts. Mitigation measure ***MM TRRP BIO-3: American Badger and Ringtail Surveys*** would continue to be applicable.
Impact TRRP BIO-9: Project-related habitat loss could significantly impact the San Diego desert woodrat	Significant, but mitigable (Class II)	Significant, but mitigable (Class II): based on a biological survey conducted on May 11, 2017, no additional habitat for San Diego desert woodrat occurs within the revised construction disturbance area, no change in impacts. Mitigation measure ***MM TRRP BIO-4: San Diego Desert Woodrat Relocation*** would continue to be applicable.
Impact TRRP BIO-10: Project-related removal of trees and rock outcrops may eliminate and/or disturb habitat for sensitive bat species	Significant, but mitigable (Class II)	Significant, but mitigable (Class II): based on a biological survey conducted on May 11, 2017, no additional habitat for bat species occurs within the revised construction disturbance area, no change in impacts. Mitigation measure ***MM TRRP BIO-5: Avoidance of Bat Maternity Colonies*** would continue to be applicable.
Impact TRRP BIO-11: Operation of the proposed project may result in an adverse but less than significant impact to common wildlife species	Less than significant (Class III)	Less than significant (Class III): operational activities including motor vehicle activity, human presence, noise and attraction of opportunistic species would be the same as compared to the approved TRRP, no change in impacts.
Impact TRRP BIO-12: Operation of the proposed project may significantly impact transient California red-legged frogs	Significant but mitigable (Class II)	Significant but mitigable (Class II), see discussion in Section 5.3.2. Mitigation measure ***MM TRRP BIO-6: Avoidance and Minimization Measures for California Red-legged Frog and Sensitive Mammal Species*** would continue to be applicable.
Impact TRRP BIO-13: Operation of the proposed project may significantly impact ringtail, San Diego desert woodrat and American badger	Significant, but mitigable (Class II)	Significant, but mitigable (Class II): operational activities including nighttime mobile equipment and motor vehicle activity would be the same as compared to the approved TRRP, no change in impacts. Mitigation measure ***MM TRRP BIO-6: Avoidance and Minimization Measures for California Red-legged Frog and Sensitive Mammal Species*** would continue to be applicable.

Impact Description	Approved TRRP	Revised TRRP
Impact TRRP BIO-14: The project-related construction disturbance and habitat loss may result in an adverse but less than significant impact on habitat connectivity and wildlife corridors	Less than significant (Class III)	Less than significant (Class III): construction activities would occur approximately 170 feet closer to a potential wildlife movement corridor (Arroyo Quemado), but would not reduce the value of this corridor because vegetation in proximity to the corridor would not be removed and Landfill operations already occur along the ridgeline to the west, no change in impacts.
Impact TRRP BIO-15: Operation of the proposed project may result in an adverse but less than significant impact on habitat connectivity and wildlife corridors	Less than significant (Class III)	Less than significant (Class III): operational activities would occur approximately 170 feet closer to a potential wildlife movement corridor (Arroyo Quemado), but would not reduce the value of this corridor, because vegetation in proximity to the corridor would not be removed and Landfill operations already occur along the ridgeline to the west, no change in impacts.
Impact TRRP BIO-16: Project-related extension of life of the Tajiguas Landfill would extend biological impacts further in time	Class I Impact (delay in the Landfill cover revegetation, Class II (indirect impacts to ringtail and mountain lion), and Class III (invasive plants, nuisance birds and common wildlife)	Class I Impact (delay in the Landfill cover revegetation, Class II (indirect impacts to ringtail and mountain lion), and Class III (invasive plants, nuisance birds and common wildlife). Biological resources impacts related to the extension of Landfill life would not change as compared to the approved TRRP, because processing and diversion of solid waste from the Landfill would not change and the life of the Tajiguas Landfill would continue to be extended, no change in impacts.
Impact TRRP BIO-17: Decommissioning activities would result in indirect impacts to adjacent native vegetation and wildlife habitat, and temporarily affect California red-legged frog dispersal habitat	Less than significant (Class III)	Less than significant (Class III), although the Revised TRRP includes relocating the AD Facility and other changes discussed in Table 1, decommissioning would involve the same activities discussed in Section 3.5.13 of the certified Final SEIR. However, the decommissioning disturbance area may be increased similar to the small increase in the construction disturbance area. This increased area would not support native vegetation or provide suitable habitat for California red-legged frog, and this species is not anticipated to be present during decommissioning. This small incremental increase in the disturbance area would not be substantial, and this impact would remain less than significant (Class III).
Impact TRRP BIO-CUM-1: Implementation of the project combined with other cumulative projects could result in significant impacts to transient California red-legged frogs	Class I Cumulative Impact; Project Contribution Not Considerable with Mitigation (Class II)	Class I Cumulative Impact; Project Contribution Not Considerable with Mitigation (Class II), the contribution of the TRRP to cumulative impacts to transient California red-legged frogs would not increase (see Section 5.3.2). New cumulative projects are not expected to result in additional impacts to this species, no change in cumulative impacts (Class I).
Impact TRRP BIO-CUM-2: Implementation of the project combined with other cumulative projects could result in significant direct and indirect cumulative loss of native plant communities, sensitive habitats and sensitive plants	Class II Cumulative Impact; Project Contribution Not Considerable with Mitigation (Class II)	Class II Cumulative Impact; Project Contribution Not Considerable with Mitigation (Class II), the contribution of the TRRP to cumulative impacts to native plant communities, sensitive habitats and sensitive plants would not increase (see Section 5.3.2). The Las Vegas & San Jose Creek at Calle Real Drainage Improvements Project may result in additional impacts to native plant communities and sensitive habitats; however, cumulative impacts would remain mitigable with implementation of CEQA-required mitigation measures, no substantial change in cumulative impacts (Class II).

Impact Description	Approved TRRP	Revised TRRP
Impact TRRP BIO-CUM-3: Implementation of the project combined with other cumulative projects could result in a significant loss of foraging habitat for special-status birds	Class II Cumulative Impact; Project Contribution Not Considerable (Class III)	Class II Cumulative Impact; Project Contribution Not Considerable (Class III), the contribution of the TRRP to cumulative impacts to foraging habitat for special-status birds would not substantially increase (see Section 5.3.2). The Las Vegas & San Jose Creek at Calle Real Drainage Improvements Project may result in additional impacts to special-status bird foraging habitat; however, cumulative impacts would remain mitigable with implementation of CEQA-required mitigation measures, no substantial change in cumulative impacts (Class II).
Impact TRRP BIO-CUM-4: Implementation of the project combined with other cumulative projects could result in significant impacts to American badger and ringtail	Class II Cumulative Impact; Project Contribution Not Considerable with Mitigation (Class II)	Class II Cumulative Impact; Project Contribution Not Considerable with Mitigation (Class II), the contribution of the TRRP to cumulative impacts to American badger and ringtail would not increase because no additional habitat would be affected. The Las Vegas & San Jose Creek at Calle Real Drainage Improvements Project may result in additional impacts to American badger and ringtail; however, cumulative impacts would remain mitigable with implementation of CEQA-required mitigation measures, no substantial change in cumulative impacts (Class II).
Impact TRRP BIO-CUM-5: Implementation of the project combined with other cumulative projects could result in a permanent loss and significant degradation of San Diego desert woodrat habitat	Class II Cumulative Impact; Project Contribution Not Considerable with Mitigation (Class II)	Class II Cumulative Impact; Project Contribution Not Considerable with Mitigation (Class II), the contribution of the TRRP to cumulative impacts to San Diego desert woodrat habitat would not increase because no additional habitat would be affected. New cumulative projects are not located within suitable San Diego desert woodrat habitat and would not result in additional impacts to this species, no change in cumulative impacts (Class II).
Impact TRRP BIO-CUM-6: Implementation of the project combined with other cumulative projects could result in a significant loss and/or disturbance of roosting habitat for sensitive bat species	Class II Cumulative Impact; Project Contribution Not Considerable with Mitigation (Class II)	Class II Cumulative Impact; Project Contribution Not Considerable with Mitigation (Class II), the contribution of the TRRP to cumulative impacts to roosting habitat for sensitive bat species would not increase because no additional habitat would be affected. The Las Vegas & San Jose Creek Drainage Improvements Project may result in additional impacts to habitat for sensitive bat species; however, cumulative impacts would remain mitigable with implementation of CEQA-required mitigation measures, no substantial change in cumulative impacts (Class II).
Impact TRRP HAZ-1: Construction activities associated with the proposed project may result in an adverse but less than significant inadvertent discharge of small quantities of hazardous materials	Less than significant (Class III)	Less than significant (Class III): construction equipment activity would be less due to a reduction in earthwork, which would also reduce the potential for inadvertent discharge of hazardous materials, reduction in impacts.
Impact TRRP HAZ-2: Use or storage of hazardous materials associated with project operations would not significantly affect the public or the environment	Less than significant (Class III)	Less than significant (Class III), no change in the types and quantities of hazardous materials is proposed, no change in impacts.
Impact TRRP HAZ-3: Operation of the AD Facility could result in an accidental release of bio-gas which could result in an adverse but less than significant increase in the risk of fire or explosion	Less than significant (Class III)	Less than significant (Class III), see discussion in Section 5.4.2.
Impact TRRP HAZ-4: With implementation of the proposed landfill gas (LFG) barrier and monitoring system and the existing LFG collection system there is a less than significant potential for LFG to collect within the MRF and/or AD Facility and reach flammable concentrations	Less than significant (Class III)	Less than significant (Class III): the MRF and relocated AD Facility would be equipped with a LFG barrier and monitoring system, no change in impacts.

Impact Description	Approved TRRP	Revised TRRP
Impact TRRP HAZ-5: Hazardous materials may be encountered during construction and released to the environment	Significant, but mitigable (Class II)	Significant, but mitigable (Class II): although the construction disturbance area would increase by 3.7 acres, the additional areas disturbed have not been used for hazardous materials storage, such that the potential for discovery of hazardous materials during construction would not increase, no change in impacts. Mitigation measure ***MM TRRP HAZ-1: Hazardous Materials Assessment and Remediation*** would continue to be applicable.
Impact TRRP HAZ-6: The proposed project would not significantly interfere with emergency response and evacuation of the Landfill site	Less than significant (Class III)	Less than significant (Class III): no changes in traffic volumes, staffing or vehicle access are proposed that could affect emergency response or evacuation, no change in impacts.
Impact TRRP HAZ-7: The project would increase site structural development, introduce new fuel sources, new ignition sources and increase the number of personnel at the Landfill site in a high fire hazard area, which could significantly increase fire risk	Significant, but mitigable (Class II)	Significant, but mitigable (Class II): structural development, staffing and fire prevention practices would remain the same, no change in impacts. Mitigation measure ***MM TRRP HAZ-2: Fire Protection and Prevention Plan*** would continue to be applicable.
Impact TRRP HAZ-8: Project-related extension of the life of the Tajiguas Landfill would extend Landfill-related hazards (e.g., storage and use of hazardous materials, subsurface Landfill fire, risk of fire due to petroleum product storage and unauthorized dumping) further in time	Significant, but mitigable (Class II)	Significant, but mitigable (Class II), hazardous materials impacts related to the extension of Landfill life would not change as compared to the approved TRRP, because processing and diversion of solid waste from the Landfill would not change and the life of the Tajiguas Landfill would continue to be extended, no change in impacts.
Impact TRRP HAZ-9: Decommissioning activities may expose contaminated soils and/or result in discharges of small quantities of hazardous materials	Less than significant (Class III)	Less than significant (Class III), although the Revised TRRP includes relocating the AD Facility and other changes discussed in Table 1, decommissioning would involve the same activities discussed in Section 3.5.13 of the certified Final SEIR. The potential for exposure of contaminated soils and discharge of hazardous materials would not increase because waste management operations and decommissioning activities would be the same, no change in impacts.
Impact TRRP HAZ-CUM-1: Hazardous materials use, storage and disposal associated with the project combined with the cumulative projects would contribute to potentially significant hazards	Class II Cumulative Impact; Project Contribution Not Considerable with Mitigation (Class II)	Class II Cumulative Impact; Project Contribution Not Considerable with Mitigation (Class II), the contribution of the TRRP to cumulative impacts associated with hazardous materials would not increase because operation of the MRF and AD Facility with regard to usage, storage and disposal of hazardous materials would not change. Remediation of the Shell Hercules site which was identified as a cumulative project potentially contributing to cumulative hazardous material impacts has been completed. New cumulative projects may result in additional impacts related to construction; however, these projects are not located in close proximity to the TRRP and are subject to state and federal regulations regarding use, storage and disposal of hazardous materials, no substantial change in cumulative impacts (Class II). Mitigation measure ***MM TRRP HAZ-1: Hazardous Materials Assessment and Remediation*** would continue to be applicable.
Impact TRRP HAZ-CUM-2: The project combined with the cumulative projects could contribute to a significant increase in fire hazard in the region	Class II Cumulative Impact; Project Contribution Not Considerable with Mitigation (Class II)	Class II Cumulative Impact; Project Contribution Not Considerable with Mitigation (Class II), the contribution of the TRRP to cumulative fire hazard impacts would not increase because sources of ignition and fire prevention measures would not change. New cumulative projects would not be located in high fire hazard areas and not result in additional impacts, no change in cumulative impacts (Class II). Mitigation measure ***MM TRRP HAZ-2: Fire Protection and Prevention Plan***, would continue to be applicable.

Impact Description	Approved TRRP	Revised TRRP
Impact TRRP G-1: Earthwork associated with project construction and application of reclaimed water on graded slopes may result in unstable slopes that may generate landslides	Significant but mitigable (Class II)	Significant but mitigable (Class II), see discussion in Section 5.5.2. Mitigation measure ***MM TRRP G-1: Slope Stability Control*** would be fully implemented, but would not apply to the relocated AD Facility site.
Impact TRRP G-2: Placement of the Composting Area on the Landfill top deck would not significantly compromise the stability of waste fill slopes	Less than significant (Class III)	Less than significant (Class III): no change in the Composting Area location or compost volume has been proposed, no change in impacts.
Impact TRRP G-3: Grading and irrigation of the manufactured slope west of the proposed MRF/AD Facility site would not result in severe erosion and would not significantly affect the stability of the existing mapped landslides	Less than significant (Class III)	Less than significant (Class III): the relocated AD Facility would not be affected by potential erosion of this slope, reduction in impacts.
Impact TRRP G-4: The proposed facilities would not be impacted by fault rupture but may be subject to adverse but less than significant damage due to seismic ground-shaking	Less than significant (Class III)	Less than significant (Class III): relocated TRRP components would not be located near any active faults or earthquake fault zones, no change in impacts.
Impact TRRP G-5: The proposed facilities have a less than significant potential for damage due to seismic liquefaction	Less than significant (Class III)	Less than significant (Class III): relocated TRRP components would not be located in areas conducive to liquefaction, no change in impacts.
Impact TRRP G-6: The use of expansive soils for fill may result in significant damage to the MRF, AD Facility and maintenance building	Significant but mitigable (Class II)	Significant but mitigable (Class II), see discussion in Section 5.5.2. Mitigation measure ***MM TRRP G-2: Expansive Soils*** would continue to be applicable, but would not apply to the relocated AD Facility site.
Impact TRRP G-7: Differential settlement, associated with previously buried MSW and as a result of the differing soil types across the proposed building area, could significantly impact the MRF and AD Facility structure	Significant but mitigable (Class II)	Significant but mitigable (Class II), see discussion in Section 5.5.2. Mitigation measure ***MM TRRP G-3: Differential Settlement Control-MRF/AD Facility Site*** would be fully implemented, but would not apply to the relocated AD Facility site.
Impact TRRP G-8: Settlement associated with existing and planned solid waste disposal in the Tajiguas Landfill top deck area could significantly impact the operation of the Composting Area	Significant, but mitigable (Class II)	Significant, but mitigable (Class II): no change in the Composting Area location or compost volume has been proposed, the relocated AD Facility would not be located on the waste footprint, no change in impacts. Mitigation measure ***MM TRRP G-4: Settlement Control-Composting Area*** would continue to be applicable.
Impact TRRP G-9: Project-related extension of the life of the Tajiguas Landfill would extend the duration of less than significant erosion and sedimentation impacts	Less than significant (Class III)	Less than significant (Class III), geologic processes impacts related to the extension of Landfill life would not change as compared to the approved TRRP, because processing and diversion of solid waste from the Landfill would not change and the life of the Tajiguas Landfill would continue to be extended, no change in impacts.
Impact TRRP CR-1: Ground disturbance associated with implementation of the proposed project may result in damage to unknown archeological resources at the Landfill site	Significant but mitigable (Class II)	Significant but mitigable (Class II), see discussion in Section 5.6.2. Mitigation measure ***MM TRRP CR-1: Evaluation and Protection of Discovered Resources*** would continue to be applicable.

Impact Description	Approved TRRP	Revised TRRP
Impact TRRP CR-2: Project-related extension of the life of the Tajiguas Landfill would extend indirect impacts to archeological sites further in time	Significant but mitigable (Class II)	Cultural resources impacts related to the extension of Landfill life would not change as compared to the approved TRRP, because processing and diversion of solid waste from the Landfill would not change and the life of the Tajiguas Landfill would continue to be extended, no change in impacts. Implementation of cultural resource mitigation measures included in 01-EIR-05 (cultural resource training program for Landfill staff, additional archeological investigation if sites are impacted by closure or post-closure activities, and stopping or redirecting work if resource are discovered) would continue to be applicable.
Impact TRRP CR-CUM-1: Ground disturbance associated with the proposed project combined with disturbance associated with the cumulative projects could result in significant disturbance of unreported cultural resources –	Class II Cumulative Impact; Project Contribution Not Considerable with Mitigation (Class II)	Class II Cumulative Impact; Project Contribution Not Considerable with Mitigation (Class II), the contribution of the TRRP to cumulative impacts to cultural resources would not increase (see Section 5.6.2). New cumulative projects could result in additional impacts to cultural resources; however, cumulative impacts would remain mitigable with compliance with the County's cultural resources guidelines and implementation of CEQA-required mitigation measures, no substantial change in cumulative impacts (Class II). Mitigation measure ***MM TRRP CR-1: Evaluation and Protection of Discovered Resources*** would continue to be applicable.
Impact TRRP N-1: Project-related construction could generate short-term noise that would result in an adverse but less than significant impact on noise-sensitive receptors on adjacent agriculturally zoned land	Less than significant (Class III)	Less than significant (Class III): although the total amount of earthwork would be reduced, peak day construction activity and associated noise would not change. The nearest noise-sensitive receptor (planned Hart residence) would not be constructed, reduction in impacts.
Impact TRRP N-2: Project-related vehicle traffic on U.S. Highway 101 would result in an adverse but less than significant increase in noise levels at noise-sensitive receptors near the Landfill	Less than significant (Class III)	Less than significant (Class III): project-related traffic and associated noise would not change, no change in impacts.
Impact TRRP N-3: Noise associated with operation of project facilities would result in an adverse but less than significant impact on noise-sensitive land uses near the Landfill	Less than significant (Class III)	Less than significant (Class III), see discussion in Section 5.7.2.
Impact TRRP N-4: Vibration associated with operation of project facilities would result in an adverse but less than significant impact on residential land uses near the Landfill	Less than significant (Class III)	Less than significant (Class III): with relocation of the AD Facility to the eastern side of the Landfill, operational activities and associated vibration would be increased in this area as compared to the approved TRRP. The AD Facility would be located approximately 3,500 feet from the nearest off-site structure (Baron Ranch residence) since the planned Hart residence would not be constructed. The calculated vibration from the AD Facility at the Baron Ranch residence is a peak particle velocity of 0.000388 inches/second, which is orders of magnitude below the human annoyance threshold (0.01), no change in impacts.
Impact TRRP N-5: Project-related extension of the life of the Tajiguas Landfill would extend adverse but less than significant Landfill operational noise impacts further in time	Less than significant (Class III)	Less than significant (Class III), noise impacts related to the extension of Landfill life would not change as compared to the approved TRRP, because processing and diversion of solid waste from the Landfill would not change and the life of the Tajiguas Landfill would continue to be extended, no change in impacts.

Impact Description	Approved TRRP	Revised TRRP
Impact TRRP N-6: Heavy equipment and vehicles used during decommissioning would generate noise that may affect noise-sensitive receptors near the Landfill	Less than significant (Class III)	Less than significant (Class III), although the Revised TRRP includes changes in location of the AD Facility and other changes discussed in Table 1, decommissioning would involve the same activities discussed in Section 3.5.13 of the certified Final SEIR. Noise levels from equipment and vehicles used in the decommissioning would be the same as discussed in the certified Final SEIR, no change in impacts.
Impact TRRP N-CUM-1: Future (2036) traffic on U.S. Highway 101 associated with forecast growth combined with project-related vehicle traffic could contribute to an adverse but less than significant cumulative increase in noise levels along the highway corridor	Class III Cumulative Impact; Project Contribution Not Considerable (Class III)	Class III Cumulative Impact; Project Contribution Not Considerable (Class III), the contribution of the TRRP to cumulative traffic noise impacts would not increase because project trip generation would not change. New cumulative projects would not result in substantial traffic volumes on U.S. Highway 101 in the Landfill area because they are public works infrastructure projects that do not generate operational traffic, no change in cumulative impacts (Class III).
Impact TRRP N-CUM-2: Noise associated with construction and operation of project facilities combined with noise generated by other cumulative projects would result in adverse but less than significant noise levels at noise-sensitive land uses near the Landfill property	Class III Cumulative Impact; Project Contribution Not Considerable (Class III)	Class III Cumulative Impact; Project Contribution Not Considerable (Class III), the contribution of the TRRP to cumulative noise impacts would not increase (see Section 5.7.2). Activity at the Shell Hercules site, which was the closest cumulative project to the Landfill will be limited to erosion repair and new additional cumulative projects are not located in proximity to the Landfill and would not increase cumulative noise levels, no change in cumulative impacts (Class III).
Impact TRRP LU-1: The project could result in land use conflicts with adjacent and nearby residential, agricultural and recreational uses	Significant but mitigable (Class II)	Significant but mitigable (Class II), see discussion in Section 5.8.2. Mitigation measures provided for visual impacts, biological resources impacts, hazardous materials, geologic processes, cultural resources impacts and water resources impacts would be fully implemented.
Impact TRRP LU-2: Project-related extension of the life of the Tajiguas Landfill would extend land use conflicts further in time	Less than significant (Class III)	Less than significant (Class III), land use conflicts related to the extension of Landfill life would not change as compared to the approved TRRP, because processing and diversion of solid waste from the Landfill would not change and the life of the Tajiguas Landfill would continue to be extended, no change in impacts.
Impact TRRP T-1: Implementation of the proposed project would generate construction-related traffic which could result in an adverse but less than significant impact to traffic operations on U.S. Highway 101 and the U.S. Highway 101/Landfill access road	Less than significant (Class III)	Less than significant (Class III): project-related construction traffic and potential traffic congestion would not change, no change in impacts.
Impact TRRP T-2: Operation of the proposed project would generate additional traffic which could result in an adverse but less than significant impact on U.S. Highway 101 traffic operations (level of service)	Less than significant (Class III)	Less than significant (Class III): project-related operational traffic and associated impacts on U.S. Highway 101 operations would not change, no change in impacts.
Impact TRRP T-3: Implementation of the proposed project would generate additional traffic which could result in an adverse but less than significant impact on the Landfill access road/U.S. Highway 101 intersection level of service	Less than significant (Class III)	Less than significant (Class III): project-related operational traffic and associated traffic congestion at the Landfill access road/U.S. Highway 101 intersection would not change, no change in impacts.
Impact TRRP T-4: Implementation of the proposed project would generate additional traffic at the existing U.S. Highway 101/Landfill access road intersection which could result in adverse but less than significant traffic safety impacts	Less than significant (Class III)	Less than significant (Class III): project-related operational traffic and associated traffic safety impacts at the Landfill access road/U.S. Highway 101 intersection would not change, no change in impacts.

Impact Description	Approved TRRP	Revised TRRP
Impact TRRP T-5: Project-related extension of the life of the Tajiguas Landfill would extend the duration of less than significant traffic level of service and safety impacts at the U.S. Highway 101/Landfill access road intersection associated with Landfill operations	Less than significant (Class III)	Less than significant (Class III), traffic impacts related to the extension of Landfill life would not change as compared to the approved TRRP, because processing and diversion of solid waste from the Landfill would not change and the life of the Tajiguas Landfill would continue to be extended, no change in impacts.
Impact TRRP T-6: Decommissioning activities would generate traffic which could result in an adverse but less than significant impact to traffic operations on U.S. Highway 101 and the U.S. Highway 101/Landfill access road	Less than significant (Class III)	Less than significant (Class III), although the Revised TRRP includes relocating the AD Facility and other changes discussed in Table 1, decommissioning would involve the same activities discussed in Section 3.5.13 of the certified Final SEIR. Traffic impacts would not change because decommissioning vehicle trip generation would be the same, no change in impacts.
Impact TRRP T-CUM-1: Traffic generated as a result of implementation of the proposed project combined with traffic generated by the cumulative projects and background growth could result in an adverse but less than significant impact on U.S. Highway 101 traffic operations (level of service)	Class III Cumulative Impact; Project Contribution Not Considerable (Class III).	Class III Cumulative Impact; Project Contribution Not Considerable (Class III), the contribution of the TRRP to cumulative traffic impacts would not increase because project trip generation would not change. New cumulative projects would not result in substantial traffic volumes on U.S. Highway 101 in the Landfill area because they are public works infrastructure projects that do not generate operational traffic, no change in cumulative impacts (Class III).
Impact TRRP T-CUM-2: Traffic generated as a result of implementation of the proposed project combined with traffic generated by the cumulative projects and background growth could result in an adverse but less than significant impact on the Landfill access road/U.S. Highway 101 intersection	Class III Cumulative Impact; Project Contribution Not Considerable (Class III)	Class III Cumulative Impact; Project Contribution Not Considerable (Class III), the contribution of the TRRP to cumulative traffic impacts would not increase because project trip generation would not change. Activity at the Shell Hercules site, which was the closest cumulative project to the Landfill will be limited to erosion repair and new cumulative projects would not result in substantial traffic volumes at the Landfill access road/U.S. Highway 101 intersection because they are public works infrastructure projects that do not generate operational traffic, no change in cumulative impacts (Class III).
Impact TRRP T-CUM-3: Traffic generated as a result of implementation of the proposed project combined with traffic generated by long-term growth (2036) could result in an adverse but less than significant impact on U.S. Highway 101 traffic operations (roadway level of service)	Class III Cumulative Impact; Project Contribution Not Considerable (Class III)	Class III Cumulative Impact; Project Contribution Not Considerable (Class III), the contribution of the TRRP to cumulative traffic impacts would not increase because project trip generation would not change and 2036 traffic volumes were projected in the certified Final SEIR to be within acceptable levels of service with implementation of the TRRP, no change in cumulative impacts (Class III).
Impact TRRP T-CUM-4: Traffic generated as a result of implementation of the proposed project combined with traffic generated by long-term growth (2036) could result in an adverse but less than significant impact on the Landfill access road/U.S. Highway 101 intersection	Class III Cumulative Impact; Project Contribution Not Considerable (Class III)	Class III Cumulative Impact; Project Contribution Not Considerable (Class III), the contribution of the TRRP to cumulative traffic impacts would not increase because project trip generation would not change and the effect on 2036 intersection level of service would be the same as discussed in the certified Final SEIR, no change in cumulative impacts (Class III).
Impact TRRP WR-1: The proposed project would introduce impervious surfaces and modify drainage patterns, but would not result in a flooding impact or damage downstream drainage structures	Less than significant (Class III)	Less than significant (Class III), see discussion in Section 5.9.2.
Impact TRRP WR-2: Increased water demand and project-related increases in groundwater pumping would result in an adverse but less than significant impact to local groundwater supplies	Less than significant (Class III)	Less than significant (Class III), see discussion in Section 5.9.2.

Impact Description	Approved TRRP	Revised TRRP
Impact TRRP WR-3: Project-related increases in groundwater pumping would not significantly degrade groundwater quality	Less than significant (Class III)	Less than significant (Class III): based on the Revised Hydrogeologic and Water Supply Analysis Report (Appendix D), Landfill wells (including new Well no. 6) are not hydraulically connected to the ocean, such that seawater intrusion would not occur, no change in impacts.
Impact TRRP WR-4: Project-related increases in groundwater pumping would not result in significant interference or adversely affect groundwater production of other wells	Less than significant (Class III)	Less than significant (Class III), see discussion in Section 5.9.2.
Impact TRRP WR-5: Project-related increases in groundwater pumping would not significantly impact rising groundwater at springs, and stream baseflow	Less than significant (Class III)	Less than significant (Class III): based on the Revised Hydrogeologic and Water Supply Analysis Report (Appendix D), pumping from Well no. 5 to serve the TRRP would increase, but would not exceed the safe yield or reduce rising groundwater, no change in impacts.
Impact TRRP WR-6: Construction and operation of proposed Well no. 6 may enable landfill gas migration into groundwater which could significantly degrade groundwater quality	Significant, but mitigable (Class II)	Significant, but mitigable (Class II): Well no. 6 has been installed in compliance with mitigation measure ***MM TRRP WR-1*** to avoid landfill gas migration, no change in impacts.
Impact TRRP WR-7: Storm run-off from proposed facility sites during the construction period may significantly degrade surface water quality	Significant, but mitigable (Class II)	Significant, but mitigable (Class II): the construction disturbance area would be 3.7 acres larger, but the reduction in earthwork is anticipated to reduce the duration of exposed soils and the potential for impacts associated with storm water run-off, overall no change in impacts. Mitigation measure ***MM TRRP WR-2: Construction Storm Water Quality BMPs*** would continue to be applicable.
Impact TRRP WR-8: Operation of the proposed project may significantly impact surface water quality through discharge of contaminated storm water, inadvertent discharge of AD Facility percolate, wastewater disposal, and leaks or spills from fueling activities	Significant, but mitigable (Class II)	Significant, but mitigable (Class II): operation of the MRF and AD Facility will not change under the Revised TRRP, such that operational water quality impacts associated with storm water run-off, and inadvertent discharges would be the same, no change in impacts. Mitigation measure ***MM TRRP WR-3: Industrial Storm Water Permit Compliance and Spill Prevention*** would continue to be applicable.
Impact TRRP WR-9: Operation of the Composting Area could adversely affect surface water quality	Significant, but mitigable (Class II)	Significant, but mitigable (Class II): the operation of the Composting Area under the Revised TRRP has not changed and includes collection of storm water from a 24-hour, 25-year event in a collection tank, without discharge to surface waters. This tank would be increased in volume from 325,000 to 436,000 gallons to address updated seismic standards. Operational water quality impacts associated with storm water run-off would be the same, no change in impacts. Mitigation measure ***MM TRRP WR-4: Water Quality Monitoring and Corrective Action Plan*** would continue to be applicable.
Impact TRRP WR-10: Project-related extension of life of the Tajiguas Landfill would extend less than significant Landfill drainage impacts further in time	Less than significant (Class III)	Less than significant (Class III), drainage impacts related to the extension of Landfill life would not change as compared to the approved TRRP, because processing and diversion of solid waste from the Landfill would not change and the life of the Tajiguas Landfill would continue to be extended, no change in impacts.
Impact TRRP WR-11: Project-related extension of life of the Tajiguas Landfill would extend less than significant groundwater and water supply impacts further in time	Less than significant (Class III)	Less than significant (Class III), groundwater and water supply impacts related to the extension of Landfill life would not change as compared to the approved TRRP, because processing and diversion of solid waste from the Landfill would not change and the life of the Tajiguas Landfill would continue to be extended, no change in impacts.

Impact Description	Approved TRRP	Revised TRRP
Impact TRRP WR-12: Project-related extension of life of the Tajiguas Landfill would extend less than significant surface water quality impacts further in time	Less than significant (Class III)	Less than significant (Class III), surface water quality impacts related to the extension of Landfill life would not change as compared to the approved TRRP, because processing and diversion of solid waste from the Landfill would not change and the life of the Tajiguas Landfill would continue to be extended, no change in impacts.
Impact TRRP WR-13: Decommissioning activities would not significantly degrade surface water quality	Less than significant (Class III)	Less than significant (Class III), although the Revised TRRP includes changes in location of the AD Facility and other changes discussed in Table 1, decommissioning would involve the same activities discussed in Section 3.5.13 of the certified Final SEIR. Ground disturbance associated with decommissioning would continue to be minimal, as building pads, foundations and paving would remain in place and best management practices would continue to be implemented., no change in impacts.
Impact TRRP WR-CUM-1: The proposed project combined with other cumulative projects could increase impermeable surfaces, resulting in a less than significant increase in runoff and less than significant increase in drainage/flooding impacts	Class III Cumulative Impact; Project Contribution Not Considerable (Class III)	Class III Cumulative Impact; Project Contribution Not Considerable (Class III), the contribution of the TRRP to drainage/flooding impacts would not increase (see Section 5.9.2). The Hart residence would not be constructed and new cumulative projects are not located in the Landfill area and would not increase cumulative impacts to the Pila Creek watershed (Class III), no change in impacts.
Impact TRRP WR-CUM-2: Increased groundwater production from the proposed project combined with groundwater demands associated with the cumulative projects would result in an adverse but less than significant impact on regional groundwater supplies	Class III Cumulative Impact; Project Contribution Not Considerable (Class III)	Class III Cumulative Impact; Project Contribution Not Considerable (Class III), the TRRP contribution to impacts on groundwater supplies would not increase because groundwater pumping would not exceed the safe yield of affected formations (see Section 5.9.2). As discussed in Section 6.0 of Appendix D, no cumulative projects within a three-mile radius of Well #6 will likely derive water from the Sespe-Alegria bedrock source. Well #5, installed in the Vaqueros Formation will provide water to the project, but will not exceed the safe yield for the formation. Additionally, there are no wells installed in the Vaqueros Formation in the immediately adjacent watershed nor any cumulative projects that would draw water from the Vaqueros Formation. Cumulative groundwater supply impacts and other associated groundwater pumping impacts would remain less than significant, no change in impacts.
Impact TRRP WR-CUM-3: Project-related construction activities and post-construction use of the proposed project combined with other cumulative projects may result in significant surface water quality impacts in the Pila Creek watershed	Class II Cumulative Impact; Project Contribution Not Considerable with Mitigation (Class II)	Class II Cumulative Impact; Project Contribution Not Considerable with Mitigation (Class II), the TRRP contribution to impacts to surface water quality would not increase because storm water run-off and inadvertent discharges would not change. The Hart residence would not be constructed and no other cumulative projects are proposed within the Pila Creek watershed, no change in impacts. Mitigation measures ***MM TRRP WR-2, MM TRRP WR-3 and MM TRRP WR-4*** would continue to be applicable.
Impact TRRP NUI-1: MRF and/or AD Facility operations may attract and harbor vectors that may result in an adverse but less than significant public health/nuisance impact	Less than significant (Class III)	Less than significant (Class III): the design and operation of the MRF and AD Facility has not changed with respect to vector impacts and a vector management plan would be implemented, no change in impacts.
Impact TRRP NUI-2: municipal solid waste and/or SSOW may contain pathogens that may result in an adverse but less than significant impact to public health	Less than significant (Class III)	Less than significant (Class III): the design and operation of the MRF and AD Facility has not changed with respect to pathogens and a vector management plan would be implemented, no change in impacts.

Impact Description	Approved TRRP	Revised TRRP
Impact TRRP NUI-3: Tipping of municipal solid waste indoors at the MRF would reduce the potential for off-site transport of litter from the Landfill working face resulting in a beneficial impact	Beneficial (Class IV)	Beneficial (Class IV): municipal solid waste would continue to be tipped in the MRF, no change in impacts.
Impact TRRP NUI-4: Project-related extension of life of the Tajiguas Landfill would extend significant public health/nuisance impacts (potential for illegal dumping and dust) further in time	Significant but mitigable (Class II)	Significant but mitigable (Class II), health/nuisance impacts related to the extension of Landfill life would not change as compared to the approved TRRP, because processing and diversion of solid waste from the Landfill would not change and the life of the Tajiguas Landfill would continue to be extended, no change in impacts.
Impact TRRP NUI-CUM-1: Implementation of the proposed project combined with other cumulative projects in the region could generate adverse but less than significant cumulative nuisance litter impacts	Class III Cumulative Impact; Project Contribution Not Considerable (Class III)	Class III Cumulative Impact; Project Contribution Not Considerable (Class III), the contribution of the TRRP to cumulative nuisance litter impacts would not increase because operation of the MRF and AD Facility with regard to litter control would be the same. The new cumulative projects do not involve waste management or development that may generate substantial litter, or harbor pathogens or vectors, and would not increase cumulative impacts (Class III).
Environmental Justice. Due to the lack of minority or low-income populations in the Landfill area, disproportionate impacts would not occur. Due to the lack of minority and/or low-income populations and large number of populations potentially affected by aesthetics impacts from U.S. Highway 101, aesthetics impacts would not adversely affect minority and/or low-income populations with greater severity or magnitude.	No Impact	No impact, the status of the area has not changed with respect to environmental justice, no change in impacts.
Agricultural and Forestry Resources. The TRRP would not displace agricultural lands and is not expected to generate any conflicts with any adjacent agricultural activities. Continued implementation of the mitigation measures identified in the Tajiguas Landfill Environmental Documents and various compliance plans (storm water, odors, litter, vectors, etc.) for operation of the Landfill with regards to land use, air quality and nuisances would continue to minimize conflicts with the ongoing agricultural operations in the area. Agricultural impacts would remain less than significant. All proposed facilities would be located within the existing Landfill site, and would not result in any changes in forest land zoning or conversion of forest lands or timberlands.	Less than significant (Class III)	Less than significant (Class III), the proposed increase in the construction disturbance area would not would not result in the loss of agricultural or forest lands, and would not increase conflicts with adjacent agricultural activities because the additional area disturbed is not prime soils/farmland and has been disturbed by prior permitted Landfill operations. Rezoning of the inland area of the Landfill from Unlimited Agriculture to AG-II-100 is not a changed circumstance or new information of major importance warranting a new SEIR because agricultural impacts were considered in the certified Final SEIR and both the prior zoning and current zoning is agricultural, no change in impacts.
Paleontological Resources. Construction of the TRRP would occur in previously disturbed areas in engineered fill and on top of the historic waste disposal area where no paleontological resources occur. Therefore, the project would not impact significant or unique paleontological resources.	Less than significant (Class III)	Less than significant (Class III), proposed changes to the construction disturbance area would not include areas where paleontological resources may occur, no change in impacts.
Energy. Operation of the MRF and AD facility would consume approximately 6,595 megawatt-hours per year of electricity. However, the proposed roof-top solar panels and two CHP engines running on bio-gas would generate approximately 14,905 megawatt-hours per year, resulting in a net gain of 8,310 megawatt-hours per year of renewable energy. Overall, the project would be a net energy producer and the project would represent a beneficial energy impact.	Beneficial (Class IV)	Beneficial (Class IV), electricity generated by the solar panels and the AD Facility would increase to 16,571 MW-hours/year, and the amount of electricity consumed by TRRP facilities would increase to 9,616 MW-hours/year. Net electricity production would be 6,955 MW-hours/year and the project would remain a net energy producer, no change in impacts.

Impact Description	Approved TRRP	Revised TRRP
Mineral Resources. The TRRP would not conflict with oil and gas production or prevent access to petroleum resources in the project area, or conflict with sand/aggregate production or restrict access to these resources in the project area.	Less than significant (Class III)	Less than significant (Class III), the proposed increase in the construction disturbance area would not result in conflicts with petroleum production or reduced access to mineral resources because these resources are not present within the geologic formations affected by the revised construction disturbance area, no change in impacts.
Public Facilities. The TRRP would represent a beneficial impact to public facilities by providing a 20-year management solution for the region's solid waste disposal needs. The project would not require the construction or expansion of off-site utilities. The TRRP would not significantly increase the demand for police protection services, health care services and educational facilities.	Less than significant (Class III)	Less than significant (Class III), proposed changes to the TRRP would not result in any need for expansion of off-site utilities, or increases in staffing that may increase demand for public services because the operational parameters of the project would not change, no change in impacts.
Recreation. Employment opportunities associated with operating and maintaining the TRRP facilities may generate some demand for recreational facilities; however, this demand would be dispersed over a large geographical area, such that any demands on a single facility would be negligible and construction of new recreational facilities would not be required. The Landfill site is visible from trails at the Arroyo Hondo Preserve and Baron Ranch, and the project may result in adverse aesthetics impacts to these trails. These potential aesthetics impacts are addressed in Section 4.1 of the certified Final SEIR.	Less than significant (Class III)	Less than significant (Class III): proposed changes to the TRRP do not included increases in staffing that may increase demand for recreational facilities and the no direct impact to recreational facilities will occur because the construction disturbance area would be 1,400 feet from the approved trail, no change in impacts. Aesthetics impacts to trail users are discussed in Section 5.1.2 of this SEIR Addendum and odor impacts are discussed in Section 5.2.2.

Since the Final SEIR was certified on July 12, 2016, the following changes to the environmental setting have occurred:

- On June 27, 2017, the Board of Supervisors approved the relocation of the lower (southern) section of the Baron Ranch Trail from the east side of Arroyo Quemado to the west side (see new alignment in Figure 17). The northern portion of the trail is in the same location as studied in the certified Final SEIR. The approved lower Trail realignment would not result in new significant impacts as the AD Facility would not be visible from the relocated portion of the Trail (see Section 5.1.2), the revised bio-gas explosion over-pressure hazard zone would not affect the relocated Trail (see Section 5.4.2), and trail users would not be subject to significant nuisance odors (see Section 5.2.2). Therefore, the relocated Trail is not a changed circumstance, or new information of substantial importance resulting in a new significant impact or a substantial increase in the severity of an existing impact requiring preparation of a new EIR.
- The Gaviota Coast Plan was adopted by the Board of Supervisors on November 8, 2016, and went into effect within inland areas on December 9, 2016. The Plan includes the following land use changes:

- A portion of the Landfill property (southwest and southeast corners of APN 081-150-019) have been included in the Critical Viewshed Corridor Overlay, designated to protect near-field views to the south and portions to the north of U.S. Highway 101. As discussed in Section 5.1.2, this designation does not result in new aesthetics impacts or substantially increase the severity of significant aesthetics impacts.
- The inland area of the Landfill has been rezoned from Unlimited Agriculture (under Ordinance 661) to AG-II-100 under the Santa Barbara County Land Use and Development Code (LUDC). The inland area of the Landfill remains exempt from the LUDC pursuant to Section 35.10.040.G.1.b. As discussed in Table 2, this change in Zoning District would not result in new or changed agricultural impacts.
- The southern boundary of the Waste Disposal Facility Overlay was moved approximately 300 to 400 feet northward ~~and outside.~~ The Overlay is not being adjusted along the Coastal Zone boundary or into the Coastal Zone as part of the Revised TRRP. As discussed in Section 4.1, the Revised TRRP would be located within the Waste Disposal Facility as amended. As discussed in Section 5.3.1, the area designated as ESH was not affected by the approved TRRP and would not be affected by the Revised TRRP.
- The inland portion of the Arroyo Quemado creek corridor was included in the Environmentally Sensitive Habitat (ESH) Overlay. The ESH Overlay area includes the northeast corner of APN 081-150-026, within the boundary of the Waste Disposal Facility Overlay.

Therefore, adoption of the Gaviota Coast Plan is not considered a changed circumstance or new information of substantial importance resulting in a new or substantially increased previously identified significant impact requiring the preparation of a new EIR.

- The County purchased two parcels south of the Landfill (APNs 081-150-033 and -034) in March 2016, following completion of the Final SEIR but prior to its certification in July 2016. The northern parcel includes the partially constructed Hart residence which was considered as a private viewing location and an air quality and noise sensitive receptor in the certified Final SEIR. These parcels which are visible from U.S. Highway 101 and within the Gaviota Coast Plan Critical Viewshed Overlay, will be retained in open space. The purchase of these parcels is not considered a changed circumstance or new information of substantial importance requiring a new SEIR because it eliminates and reduces several impacts, as further discussed below, including aesthetics and noise.
- U.S. Highway 101 (formerly identified as an eligible scenic highway in the certified Final SEIR) was designated by Caltrans on December 13, 2016 as the Gaviota Coast State Scenic Highway. The officially designated segment includes

21 miles of Highway 101 from the City of Goleta's western boundary, to Route 1 at Las Cruces Ranch Road near Lompoc. As discussed in Section 5.1.2, this change in scenic highway designation does not result in any new impacts, as views from U.S. Highway 101 were considered sensitive and are fully addressed.

- The Landfill operations trailers and supporting facilities (e.g., fuel tanks, storage containers, and water tanks) have been relocated to the east side of the Landfill to the approved location analyzed in the certified Final SEIR (see certified Final SEIR Figure 3-14).
- Well No. 6 has been installed as analyzed in the certified Final SEIR.
- A final cover system and related closure infrastructure has been installed over the southern portion of the Landfill as analyzed in the Landfill Expansion EIR (01-EIR-05).
- Waste cells have been developed, waste filling has continued, and borrow areas have been excavated for daily cover as approved and analyzed in the Landfill Expansion EIR (01-EIR-5) and the Landfill Reconfiguration SEIR (08EIR-0000-00007).
- Since the Final SEIR was completed, agricultural production has been temporarily discontinued at Baron Ranch due to the senescence of orchards present when the County acquired the property. Reestablishment of agricultural uses is anticipated on the eastern side of Arroyo Quemado, which is the reason the Baron Ranch Trail is in the process of being be relocated to the west of the Arroyo Quemado drainage, away from orchard areas. Temporary discontinuation of agriculture is not a changed circumstance that results in a new significant visual impact associated with recreational opportunities at Baron Ranch. Public access is currently and will continue to be limited to the Baron Ranch Trail, and visual impacts associated with the relocated Trail have been fully addressed in this Addendum (see Section 5.1.2) and no new visual impacts were identified.
- The Revised TRRP includes extending the Comprehensive Plan's Waste Disposal Facility Overlay over 4.48 acres of designated agricultural land use area. This area has not been used for agriculture, and instead is currently used for Landfill operations (including an existing road and drainage), and is within the Landfill's existing Solid Waste Facilities Permit area. The Overlay amendment allows developing the AD Facility for waste disposal operations at the Landfill. The prior certified Final SEIR analyzed the effects of allowing development of the AD Facility at the Landfill. That analysis is relevant to the AD Facility relocation and the associated Comprehensive Plan Amendment because, as shown throughout this Addendum, the prior SEIR analysis already adequately addresses the actual uses and environmental impacts that will result from the proposed relocation to the 4.48-acre area under the Revised TRRP. Also, the Overlay amendment removes approximately 55.55 acres from the Waste Disposal Facilities Overlay that is not needed for waste disposal and is mapped

as environmentally sensitive habitat in the Gaviota Coast Plan. The factors in CEQA Guidelines Section 15162 are not triggered because the changes do not cause a new or increased significant impact.

- Changes in market conditions (such as foreign government policies on accepting United States recyclables) are not a changed circumstance and do not trigger the factors in CEQA Guidelines Section 15162, because fluctuations in the market for recyclables existed and were known at the time the SEIR was prepared, and market fluctuations do not change the feasibility of the alternatives, particularly aerobic digestion and source-separation alternatives that are infeasible and will not substantially reduce significant effects on the environment. A processing facility (such as the TRRP) would still be needed. Also, anaerobic digestion through the AD Facility is a widely acceptable method of composting, and carbon farming would be enhanced by compost produced at the AD Facility that would otherwise be discarded as waste in the landfill. The certified final SEIR covered these issues and analyzed a reasonable range of alternatives. That analysis remains relevant and unaffected by these issues.
- Delay in implementing the approved TRRP could have occurred with or without revisions to the project. It is not a changed circumstance or new information. At the time of the final SEIR's certification, it was known that existing Landfill operations occurred on their existing projected timeline. Also, it was known that variability would occur in the Landfill's closure projections, which is also affected by a multitude of other factors including compaction rates, selection of cover materials, new markets for buried materials, changes in consumer purchasing and disposal behaviors, economy-wide impacts, and new technologies. The SEIR adequately covered these issues in its analyses of operations and projections, and a brief delay in implementing the TRRP project does not cause a new or increased significant impact from the Landfill's eventual future closure.

Cumulative Projects

A list of Planning and Development projects was obtained for the Gaviota Coast Plan area on August 2, 2017. In addition, the County's Citizens Access website, the County Public Works Department website and Santa Barbara County Association of Governments website were reviewed with respect to cumulative projects analyzed in the certified Final SEIR. The list of cumulative projects in Section 3.6 of the certified Final SEIR was based on information available in late 2015. Based on a review of the certified Final SEIR list and information sources listed above, most of the projects previously identified are either still under review, approved, constructed or withdrawn. Withdrawn projects include the Santa Barbara County Rail Siding Project (no longer programmed for Federal funding) and the Hart single-family residence (parcel obtained by Santa Barbara County). New cumulative projects in proximity to the Gaviota Coast Planning area include public works projects located in Goleta; Hollister Avenue Class I Bike Path, Old Town Sidewalks Infill and Las Vegas & San Pedro Creeks at Calle Real Drainage Improvements. Cumulative impacts are included in Table 2.

5.1 VISUAL RESOURCES/AESTHETICS

5.1.1 Setting

The setting information provided in Section 4.1.1 of the certified Final SEIR remains relevant to describe the visual resources and aesthetics environment at and in the vicinity of the Landfill site. ~~However,~~ The revised location of the AD Facility is within an area where the existing visual qualities have been significantly modified by approved Landfill grading associated with the Tajiguas Landfill Expansion Project. At the revised AD Facility site, the ridgeline elevation was lowered from a maximum elevation of approximately 676 to 645 feet above msl as part of the Phase 1B Liner installation (see Appendix I) and developed with a perimeter road and drainage facilities. The following analysis considers changes in the environmental setting identified in Section 5.0 above, including realignment of the lower Baron Ranch Trail, designation of the Critical Viewshed Corridor Overlay, purchase of the Hart parcel, and designation of U.S. Highway 101 as the Gaviota Coast State Scenic Highway. Changes in impacts associated with changes in the visual resource setting are discussed for each previously identified visual resources impact below.

5.1.2 Impact Analysis

The certified Final SEIR (Section 4.1.2) assessed visual impacts from eight public viewing locations (see certified Final SEIR Figure 4.1-1):

View 1. Entrance to the Arroyo Quemada community, selected as representative of residential viewers. Note that TRRP facilities (approved or revised) would not be visible from View 1.

View 2. Landfill access road entrance, selected as representative of mobile viewers (motor vehicles, bicycles).

View 3. U.S. Highway 101, 2.4 miles west of the approved MRF/AD Facility site, selected as representative of mobile viewers.

View 4. U.S. Highway 101, 1.4 miles southeast of the approved MRF/AD Facility site, selected as representative of mobile viewers.

View 5. Pacific Ocean offshore of the Landfill, selected as representative of offshore recreational viewers.

View 6. U.S. Highway 101, 3,100 feet south of the approved MRF/AD Facility site, selected as representative of mobile viewers.

View 7. Upper (northern) Baron Ranch Trail, 1.3 miles north-northeast of the approved MRF/AD Facility site, selected as representative of recreational viewers.

View 8. Upper Outlaw Trail, 0.6 miles north-northwest of the approved MRF/AD Facility site, selected as representative of recreational viewers.

Revised TRRP elements that have the potential to affect the visual impact analysis included in the certified Final SEIR primarily include: the relocation of the AD Facility and supporting infrastructure, relocation of tanks, increase in the tank sizes and the addition of a new fire water storage tank, relocation of the Landfill maintenance facility, construction of the LFG Control System engines and flare south of the MRF and construction of a new above-ground power line between the MRF and the relocated AD Facility. The relocated AD Facility flare and proposed LFG Control System flare would not produce external flames such as those typically associated with petroleum production facilities (e.g., "candlestick flare"). Terrain modeling and/or photo-simulation analysis was conducted for all viewpoints assessed in the certified Final SEIR to re-assess changes in visual impacts associated with these project description changes (see Figures ~~14~~ 13 through ~~17~~ 16, and Appendix E).

As noted above, representative views were selected from a variety of viewpoints and for a variety of viewer types. Viewpoints were selected based on field visits to the Landfill and surrounding areas, walking the hiking trails to find appropriate vantage points, reviewing topographic maps and aerial photographs, and reviewing prior locations identified in the prior environmental documents prepared for the Landfill expansion and reconfiguration projects. Viewpoints were selected to capture appropriate locations where the Landfill and TRRP facilities would potentially be most visible. Line-of-sight profiles were created and if the line-of-sight profiles showed that the facilities would not be obscured/blocked by existing topography, visual modeling/photo-simulations were completed to compare existing and permitted conditions to post-project conditions. The modeled views were then assessed with respect to the County's Visual Aesthetics Impact Guidelines to determine the significance of the visual change.

The certified Final SEIR identified no impacts from View 3 (U.S. Highway 101, 2.4 miles west), 4 (U.S. Highway 101, 1.4 miles southeast) and 5 (Pacific Ocean offshore). Based on the line-of-sight profiles, views of the TRRP from these locations were determined to be entirely obscured by intervening topography and vegetation. Because of the narrow canyon setting of the Landfill, the Revised TRRP facilities would continue to be obscured by intervening topography and vegetation from these views and no new visual impact would occur. Updated line-of-sight-profiles demonstrating that Revised TRRP facilities would be blocked by existing topography are provided for these views in Appendix E.

Impact TRRP VIS-1 (View 2, View 7 and View 8):

View 2 (Landfill Access Road Entrance, see Appendix E). Approved TRRP. View 2 consists of the most direct view of the Landfill from the Landfill access road near the intersection of U.S. Highway 101 and the most prominent feature of this view is the south face (front face) of the Landfill, which at full build out will have a maximum permitted elevation of 620 feet above msl. The approved TRRP adds the Composting Area (compost piles and tanks) on top of the top deck of the Landfill. No other approved TRRP facilities would be visible from View 2. The addition of the Composting Area was considered to be a small change in the visual condition of the Landfill as seen from this view, and a less than significant impact (Class III).

Revised TRRP. The Composting Area would remain in the same location as studied in the certified Final SEIR and would continue to represent a small change in the visual condition of the Landfill as seen from View 2 (see certified Final SEIR Figure 4.1-3). Because of the

height of the approved Landfill and the intervening topography and vegetation, none of the other TRRP facilities (AD Facility, MRF) would be visible from this viewing location. Therefore, the visual impact from View 2 associated with the Revised TRRP would be same as the approved TRRP and less than significant (Class III).

View 7 (Upper [northern] Baron Ranch Trail). Approved TRRP This representative view is from the upper portion of the Baron Ranch Trail northeast of the Landfill property. Although the (lower) southern section of the trail has been approved for realignment, this portion of the trail will remain in the same location as studied in the certified Final SEIR. Figure 13 provides a comparison of the approved TRRP and the Revised TRRP from View 7. As indicated in the certified Final SEIR, under the approved TRRP, the Composting Area Runoff Collection Tank would be visible approximately 8,000 feet away from the Trail. The distant view of this tank was considered to not result in a significant impact because it would not be completely incongruous with the visual setting of the area, and would not block views. No other TRRP facilities would be visible from this location.

Revised TRRP. Under the Revised TRRP, the Composting Area Runoff Collection Tank would be increased in volume, but would be constructed at a lower elevation (630 feet msl as compared to 690 feet msl), and would no longer be visible from View 7. The majority of the relocated AD Facility and associated facilities would not be visible due to intervening topography (ridge separating the Arroyo Quemado and Pila Creek watersheds, see Figure 13). However, a small portion of the top of the AD Facility would be visible through a small dip in the ridgeline (see call out on Figure 13). The AD Facility would be lower in elevation as compared to the approved Composting Area Runoff Collection Tank. The distance between View 7 and the relocated AD Facility would be approximately 1.5 miles, such that it would represent a very minor component of the overall viewshed. The relocated AD Facility would not obstruct public views, and would not be incompatible with surrounding uses (which include the Landfill perimeter access road and existing electrical lines). The AD Facility and associated facilities would displace less than three acres of non-native vegetation, located within Landfill operational areas, with no loss of native chaparral vegetation or open space, which are considerations in assessing the significance of visual impacts in the County's Environmental Thresholds and Guidelines Manual.

Changes in visual character and quality would be minor due to the small area affected and extreme viewing distance (1.5 miles). Therefore, the Revised TRRP would not create a new significant environmental effect or a substantial increase in the severity of **Impact TRRP VIS-2** and the overall impact to View 7 would remain less than significant (Class III).

The analysis in the certified Final SEIR focused on views from the upper portion of the Baron Ranch Trail because views from the lower section of the trail (which was located on the east side of Arroyo Quemado) would be blocked by intervening topography. As noted in Section 5.0, since the certification of the Final SEIR, lower Baron Ranch Trail has been approved and permitted for relocation from the east side of Arroyo Quemado to the west side. Development of the relocated trail is in progress and the existing trail alignment in the southern portion of the ranch will be abandoned. In addition, the Revised TRRP involves re-locating the AD Facility and associated facilities to the eastern boundary of the Landfill, within 1,400 feet of the approved relocated lower Baron Ranch Trail.

To determine whether the revised AD Facility would be visible from the relocated Trail, an additional line-of-sight profile was generated~~. The location of this additional line-of-sight profile is~~ (see Figure 14). The location for the additional line-of-sight profile was selected because it represents the closest point to the revised AD Facility location where local topography allows a clear view from the relocated Trail to the ridgeline. The location of this additional line-of-sight profile is along the relocated Trail, approximately 1,450 feet east of the revised AD Facility location and approximately 1.4 miles south of View 7. Due to intervening topography (ridgeline separating the Arroyo Quemado and Pila Creek watersheds), the AD Facility (including the flare, tanks, CHP engine stacks and above-ground power line) would not be visible from this representative location on the lower Baron Ranch Trail (see Figure 14). Therefore, the Revised TRRP would not create a new significant environmental effect or a substantial increase in the severity of **Impact TRRP VIS-1**. Also, the relocated Trail alignment is not considered a changed circumstance or new information of substantial importance showing a new significant impact or change in severity of an existing significant impact since the Revised TRRP facilities would not be visible from the new alignment.

View 8 (Upper Outlaw Trail). Approved TRRP. Figure 15 provides a comparison of the approved TRRP and the Revised TRRP from View 8. The view from the Upper Outlaw Trail toward the Pacific Ocean (View 8) includes the disturbed Landfill area including the back canyon (Phase 3) disposal area in the foreground and the top deck area in the background (see SEIR Figure 4.1-9, Existing Conditions). Under the approved TRRP, the development of the Composting Area would alter the view from the interim condition and permitted conditions by introducing an additional element of man-modified landscape.

However, approved TRRP facilities visible from this location (composting windrows and stockpiles, Composting Area Runoff Collection Tank, the relocated Landfill maintenance facility) would not block views of the ocean as they would be just below the elevation of the topographic features to the south. Additionally, project-related view modifications would be an insubstantial element of the view relative to the landscape which has already been and will continue to be substantially modified by Landfill operations and will continue to appear as a man-altered landscape during operation and after closure.

Revised TRRP. Changes in the view from Upper Outlaw Trail on Arroyo Hondo Preserve associated with the Revised TRRP were remodeled and include the addition of the relocated AD Facility (including percolate tanks, energy facility, flares and other associated infrastructure), newly proposed fire water tank and above-ground power line, deletion of the Landfill maintenance facility, and relocation of the Composting Area Runoff Collection Tank and increase in the tank size (see Figure 15). While additional TRRP facilities would be added to the viewshed from this location, consistent with analysis in the certified Final SEIR, the Revised TRRP-related view modifications would be an insubstantial element of the view relative to the landscape which has already been, and will continue to be substantially modified by permitted Landfill operations, and will continue to appear as a man-altered landscape during operation and after closure. The AD Facility would not obstruct public views, would not be incompatible with surrounding uses (which include the Landfill), it would not result in the removal of significant amounts of vegetation or the loss of important open space, or substantial alteration of visual character or quality.

Therefore, as compared to the approved TRRP, impacts resulting from the Revised TRRP from View 8 in the interim Landfill development condition and at Landfill buildout would be increased (see Figure 15) but remain less than significant.

~~Although the approved potable water tank and recycled water tanks (see Figure 2) would be located within the newly designated Critical Viewshed Corridor Overlay, they would not be visible from U.S. Highway 101. Therefore~~ The Overlay designation is not considered new information of critical importance or a changed circumstance requiring a new SEIR. Overall, the Revised TRRP would not result in a substantial increase in the severity of **Impact TRRP VIS-1** (Views 2, 7 and 8), and would remain less than significant (Class III) and thus would not result in a new significant impact.

Impact TRRP VIS-2 (U.S. Highway 101, View 6):

Approved TRRP. Figure 16 provides a comparison of the approved TRRP and the Revised TRRP from View 6 (U. S. Highway 101 south of the Landfill). U.S. Highway 101 was previously identified as an eligible scenic highway and is now a designated scenic highway. As analyzed in the certified Final SEIR under the approved TRRP, the AD Facility and MRF would be visible between two hills as an incongruous element of the background view particularly due to, the light color of the proposed structures. The duration of the view (a few seconds) was identified as brief and limited as the topography of the surrounding hills would obscure the view from perspectives further north or south. However, without proper aesthetic treatment, the introduction of the MRF and AD Facility was considered to have a potentially significant visual impact from View 6 (Class II).

Revised TRRP. The relocated AD Facility would be east of the Composting Area and not visible from U.S. Highway 101 due to the limited view corridor and intervening topography and vegetation. The relocated Landfill maintenance facility and the new above-ground power line would be to the north and east of the MRF and not visible from U.S. Highway 101 due to the limited view corridor and intervening topography and vegetation. The MRF would remain on the operations deck with the same floor elevation and building heights as assessed in the certified Final SEIR. The LFG Control System engines, exhaust stacks and flare would be located along the southwest area of the MRF building. The MRF would continue to be visible from U.S. Highway 101 under the Revised TRRP, but the MRF building would be approximately 300 feet farther north of U.S. Highway 101 than the AD Facility (previously located south of, and in front, the MRF from View 6) assessed in the certified Final SEIR.

The view impacts on U.S. Highway 101 were already known, analyzed, considered, and addressed in the certified Final SEIR, therefore, the Revised TRRP and the change in the designation of U.S. Highway 101 from an eligible scenic highway to a designated scenic highway would not create a new significant environmental effect or a substantial increase in the severity of **Impact TRRP VIS-2** and is not new information or a changed circumstance requiring a new supplemental or subsequent EIR.

Although the approved potable water tank and recycled water tank (see Figure 2) would be located within the newly designated Critical Viewshed Corridor Overlay, they would not be visible from View 6 (see Figure 16) or from any other views from U.S. Highway 101 (see Appendix E) because of intervening topography and vegetation. Therefore, the Overlay

designation is not considered new information of critical importance or a changed circumstance showing new significant impacts or requiring a new SEIR.

Under the Revised TRRP, **Impact TRRP VIS-2** would be reduced (see Figure 16) as compared to the approved TRRP. However, because of the number of viewers and the sensitivity of the views from U.S. Highway 101, **Impact TRRP VIS-2** would remain significant, but mitigable (Class II). Mitigation measures ***MM TRRP VIS-1a*** and ***1b*** continue to be relevant and when implemented, would mitigate impacts from the Revised TRRP to less than significant.

Impact TRRP VIS-3 (Private Views):

Approved TRRP. TRRP facilities would not be visible from View 1 (Arroyo Quemada community entrance), but would be visible from private property in the project area including a residence under construction on APN 081-150-034 (Hart property) which borders the Landfill property immediately to the south. However, the impact to private views was considered an adverse but less than significant impact. The impact was determined to be further reduced by the implementation of mitigation measures ***MM TRRP VIS-1a*** and ***1b***.

Revised TRRP. Since the certification of the Final SEIR, the Hart property has been acquired by Santa Barbara County. Therefore, the private residence would not be constructed, and there would not be an adverse impact on views at this location. The purchase of the Hart property is not considered a changed circumstance or new information of substantial importance requiring a new SEIR because its purchase eliminated this impact. Revised facilities (including the relocated AD Facility, the new above-ground power line, and the LFG Control System engines) would not be visible from any private residences, including the Arroyo Quemada community (View 1) and the caretaker residence at County-owned Baron Ranch. Based on the changes in the environmental setting (purchase of the Hart property), **Impact TRRP VIS-3** has been eliminated, and mitigation measures ***MM TRRP VIS-1a*** and ***1b*** are not required for **Impact TRRP VIS-3** (still required for **Impact MM VIS-2**).

Impact TRRP VIS-4 (Construction Lighting and Glare):

Approved TRRP. Construction lighting may be required for certain operations, which could affect nighttime viewing areas such as Refugio State Beach. Due the temporary nature of this lighting and distance to the Landfill, these impacts were considered less than significant (Class III)

Revised TRRP. The types of construction activities that would occur under the Revised TRRP would be the same as the approved TRRP, except additional construction activities will be conducted on the east side of the Landfill property and construction activities would be reduced on the west side of the Landfill. The Revised TRRP would not create any new lighting and glare impacts associated with short-term construction, and any such impacts would be the same as the less than significant impact (Class III) identified in the certified Final SEIR. Therefore, the Revised TRRP would not create a new significant environmental effect or a substantial increase in the severity of **Impact TRRP VIS-4** as compared to the approved TRRP identified in the certified Final SEIR.

Impact TRRP VIS-5 (Operational Lighting and Glare):

Approved TRRP. Several TRRP elements were identified as having the potential to create less than significant lighting and glare impacts. These elements included: translucent sky lights (with internal retractable blinds), exterior lighting (dark sky compliant), and roof top solar panels (with anti-reflective coatings that have a reflectivity or albedo of 30 percent or less). Due to the measures incorporated into the project to reduce the potential for nighttime lighting to spill off the site or skyward, nighttime lighting from the approved TRRP was determined to be a less than significant impact (Class III).

Revised TRRP. Skylights to be provided with the MRF and AD Facility buildings under the approved TRRP have been eliminated, which would further reduce the potential for night-time lighting impacts. The relocated AD Facility flare and proposed LFG Control System flare would not produce external flames; therefore, there would be no impact to the night sky from these elements of the TRRP. Moreover, the flares are not a changed circumstance since the AD Facility flare was part of the approved TRRP and the existing LFG Control System includes a flare, and thus the SEIR analysis is still relevant to these facilities. Overall, lighting and glare impacts would remain less than significant (Class III) and reduced under the Revised TRRP. Therefore, the Revised TRRP would not create a new significant environmental effect or a substantial increase in the severity of **Impact TRRP VIS-5** as compared to the approved TRRP identified in the certified Final SEIR.

5.1.3 Mitigation Measures

The Revised TRRP would be subject to the mitigation measures provided in Section 4.1.2.4 of the certified Final SEIR (**Impact TRRP VIS-2 - *MM TRRP VIS-1a: Building Exterior Color*** and ***MM TRRP VIS-1b: Landscape Screening***). These measures remain relevant and applicable to the Revised TRRP, and will be included in the Mitigation Monitoring and Reporting Plan for the Revised TRRP as amended.

5.1.4 Residual Impacts

Implementation of the mitigation measures provided in the certified Final SEIR would reduce visual resources/aesthetics impacts (**Impact TRRP VIS-2**) of the Revised TRRP to a level of less than significant.

5.2 AIR QUALITY

5.2.1 Setting

The setting information provided in Section 4.2.1 of the certified Final SEIR has not changed and remains relevant to describe the air quality of the Landfill area, except, except for the changes in the regulatory environment and impact assessment methodology described in this Addendum that have occurred since the Final SEIR was completed.

The Air Quality and Greenhouse Gas Technical Report (dated October 2015) prepared by AECOM Environment (currently AECOM Technical Services) for the approved TRRP (Appendix C of the certified Final SEIR) has been updated to reflect changes in sources and emissions associated with the Revised TRRP, and is attached to this SEIR Addendum as Appendix A (Air Quality Technical Memorandum). This Memorandum was prepared consistent

with the Air Quality and Greenhouse Gas Technical Report prepared for the approved TRRP, in accordance with recent guidance provided by the APCD, and in compliance with current APCD guidelines for air quality impact analysis and health risk assessment.

Ambient background pollutant concentrations used in the criteria pollutant modeling were updated based on more recent (2013-2015) ambient air quality monitoring data. For some criteria pollutants, the resultant average of ambient air quality data for these three years was higher than the three year average used in the certified Final SEIR. Updated meteorological data from the Las Flores Canyon monitoring station was used with the AERMOD model.

As noted in Section 5.0, the Hart residence (nearest residence assessed in the certified Final SEIR) will not be constructed because the County has purchased APN 081-150-034. Therefore, the nearest residence in the Arroyo Quemada community was used as the maximum exposed residential receptor for the health risk assessment. The revised odor analysis also includes the approved relocation of the lower portion of the Baron Ranch Trail as an odor receptor.

5.2.2 Impact Analysis

Changes in the TRRP addressed in the Air Quality Technical Memorandum focus on the revised location and emissions parameters of air pollutant point sources that were all components of the approved TRRP and included in the certified Final SEIR analysis, including the ADF Energy Facility CHP engine stacks, emergency generator stack, flare stacks, rolling bed dryer, bio-filters and fuel storage tanks. In addition, revised emission estimates included minor changes to mobile equipment (addition of a scrubber-sweeper and small changes in horsepower ratings of other equipment). The proposed LFG Control System replacement engines and flare were included in the Revised TRRP modeling of ambient air pollutant concentrations, and modeling conducted for the health risk assessment. In addition, as required by the APCD, updated models were used. The AERMOD model for air dispersion modeling replaced the ISCST3 model used for the approved TRRP and the HARP2 model used for health risk assessment replaced the HARP model used for the approved TRRP.

Impact TRRP AQ-1 (Construction Air Pollutant Emissions):

Approved TRRP. Construction activities would involve sources of air pollutants, including heavy equipment, heavy-duty trucks and worker vehicles. SBCAPCD Rule 202 D.16 applies to projects that include a stationary source that requires an Authority to Construct permit, and includes a 25 tons per year threshold for criteria pollutant emissions, except carbon monoxide. This threshold is used to determine the significance of construction emissions of the proposed project. Maximum construction emissions during a 12-month time period would not exceed the 25 tons/year threshold, and are considered a less than significant impact (Class III).

Revised TRRP. Construction of the Revised TRRP would involve much less earthwork (see Table 1 and Section 4.2) and all other sources would be similar to those analyzed for the approved TRRP. Standard emissions reduction measures recommended by the SBCAPCD and included in the approved TRRP analysis and the Revised TRRP analysis would be implemented during project construction and the project would not exceed the 25 tons/year threshold. Therefore, the Revised TRRP would not result in a new significant impact under **Impact TRRP AQ-1**. Due to the reduction in earthwork, construction-related emissions and air quality impacts would be reduced, and remain less than significant (Class III) as compared to the approved TRRP.

Impact TRRP AQ-2 (Operational Air Pollutant Emissions):

Approved TRRP. Project operation would generate air pollutant emissions from on-site equipment used to handle, sort and process solid waste, on-site motor vehicles used to transport solid waste, and off-site motor vehicles to transport employees, solid waste and recyclables. Overall, project operations emissions would not exceed any County thresholds, and would have less than significant impacts to regional air quality (Class III).

Revised TRRP. Minor changes in on-site mobile equipment (addition of a scrubber-sweeper and small changes in horsepower ratings of other equipment) associated with the Revised TRRP would result in very small changes in criteria air pollutant emissions (see Tables 3 and 4) and would not exceed County operational or motor vehicle pollutant emission thresholds listed in Tables 3 and 4. Truck trips associated with transporting digestate from the AD Facility to the Composting Area were addressed in the air quality impact analysis of the certified Final SEIR. Under the Revised TRRP, these trips would no longer be needed as the digestate would be delivered to the Composting Area by a conveyor. Under the Revised TRRP, these trips would be replaced by trucks transporting organic waste recovered from the MRF to the AD Facility. The tonnage of organic waste from the MRF that would be transported by truck to the AD Facility (Revised TRRP) has been estimated to be the same as the tonnage of digestate that would have been transported to the Composting Area (under the approved TRRP) by the project vendor. Although the tonnage of organic waste would be reduced by anaerobic digestion (primarily through the production of bio-gas during the 28-day AD cycle), percolate water added throughout the AD cycle has been estimated to equal the loss of mass resulting from anaerobic digestion, such that the mass of produced digestate would be essentially the same as the original organic waste. Therefore, the number of truck trips and trip length associated with transporting organic waste or digestate between the MRF and AD Facility/Composting Area sites would not change under the Revised TRRP. Therefore, the Revised TRRP would not result in a new significant impact or alter the significance of **Impact TRRP AQ-2** (Class III) as compared to the approved TRRP.

Table 3. Summary of Operational Air Pollutant Emissions (Approved/Revised TRRP)

Source	Maximum Daily Emissions (pounds/day)					
	ROC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
On-site equipment and vehicles	39.91/39.71	37.21/37.49	125.9/181.1	12.26/13.74	46.12/28.77	23.56/22.14
Off-site vehicles	5.73/5.73	4.98/4.98	30.71/30.71	0.09/0.09	5.45/5.45	1.62/1.62
Total Emissions	**45.64/45.44**	**42.91/42.47**	**156.58/211.8**	**12.35/13.83**	**51.57/34.22**	**25.71/23.76**
Santa Barbara County CEQA Threshold[1]	55	55	–	–	80	–
Significant Impact (Approved/Revised TRRP)	No/No	No/No	No/No	No/No	No/No	No/No

[1] Thresholds are from the County's *Environmental Thresholds and Guidelines Manual,* based on the APCD's New Source Review Rule.

Table 4. Summary of Operational Motor Vehicle Emissions (Approved/Revised TRRP)

Source	Maximum Daily Emissions (pounds/day)					
	ROC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
On-site equipment and vehicles	0.06/0.06	0.14/0.14	0.19/0.19	0.005/0.005	13.11/2.09	1.31/0.53
Off-site vehicles	5.73/5.73	4.98/4.98	30.71/30.71	0.09/0.09	5.45/5.45	1.62/1.62
Total Emissions	**5.79/5.79**	**5.12/5.12**	**30.90/30.90**	**0.09/0.09**	**24.89/7.54**	**3.56/2.15**
Santa Barbara County CEQA Threshold[1]	25	25	–	–	–	–
Significant Impact (Approved/Revised TRRP)	No/No	No/No	No/No	No/No	No/No	No/No

[1] Thresholds are from the County's *Environmental Thresholds and Guidelines Manual* (updated July 2015)

Impact TRRP AQ-3 (Normal Operations - Exceedances of Ambient Air Quality Standards):

Approved TRRP. An air dispersion model (ISCST3) was used with one year of meteorological data to determine ground level concentrations of pollutants emitted by the project for comparison to the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). The results of the certified Final SEIR NAAQS analysis for the approved TRRP are included in Table 5, and provide a comparison of the modeled concentrations (project contribution + background) to the NAAQS. As shown in Table 5, the modeled project contribution (from all sources), when combined with the appropriate ambient background concentration, were below the NAAQS for all pollutants. Project-related emissions were deemed to not cause or contribute to an exceedance of the NAAQS, and air quality impacts were considered less than significant (Class III).

The results of the CAAQS analysis are provided in Table 6. The modeled project contribution (from all sources), when combined with the appropriate ambient background concentration, were below the CAAQS for all pollutants. Project-related emissions were determined to not cause or contribute to an exceedance of the CAAQS, and air quality impacts were considered less than significant (Class III). Regarding PM_{10}, the certified Final SEIR specifically noted that Santa Barbara County is in non-attainment status for the California standards for PM_{10}, and Table 4.2-2 in the SEIR showed ambient background monitoring data from 2013 at 55 ug/m^3 and 51.4 ug/m^3 for PM_{10}, which each exceed the 50 ug/m^3 CAAQS. The certified Final SEIR further concluded in **Impact TRRP AQ-11** that the project would cause exceedances of the 24-hour CAAQS for PM_{10} and that the project would cause a significant and unavoidable impact related to PM_{10}. Mitigation measures (see Section 4.2.2.2 of the certified Final SEIR) were identified that would mitigate the impacts to the maximum extent feasible. However, the residual impacts were acknowledged as remaining Class I, significant and unavoidable, for PM_{10}.

Revised TRRP. Modifications to emissions source locations and characteristics proposed under the Revised TRRP, updated meteorological data, and updated background ambient concentrations were analyzed using updated modeling software and resulted in changes to the modeled ambient air pollutant concentrations, as shown in Tables 5 and 6. Regarding the NAAQS modeling, the contribution of the Revised TRRP to ambient air pollutant concentrations would be greater than the approved TRRP for SO_2 (annual), CO (8-hour), NO_2, and $PM_{2.5}$ (annual). However, the NAAQS would not be exceeded for any of the criteria pollutant categories (see Table 5). The project-related emissions would not cause or contribute to an exceedance of the NAAQS, the impacts would remain Class III, less than significant impact, and the Revised TRRP would not result in a new significant air quality impact.

Regarding the CAAQS modeling, the updated analyses generally show that the Revised TRRP criteria pollutant levels do not exceed the CAAQS, except related to PM_{10}. As more fully discussed below, when these results are compared to the certified Final SEIR's analysis, they do not show a new significant impact or an increase in the severity of a previously identified significant impact because PM_{10} was already identified as a Class I impact in the certified Final SEIR. CEQA findings were adopted related to a significant and unavoidable PM_{10} air quality impact, mitigation measures were identified for mitigating impacts to the maximum extent feasible, and the residual impacts were acknowledged as remaining Class I, significant and unavoidable. In addition, the updated analyses show that ambient background PM_{10} levels are at or near the CAAQS PM_{10} limits. This is not a changed circumstance or new information showing a significant impact because it was considered in the certified Final SEIR. The certified Final SEIR noted that Santa Barbara County was in non-attainment status for CAAQS PM_{10} and Table 4.2-2 in the certified Final SEIR showed multiple exceedances of the CAAQS limit for PM_{10} in the ambient background monitoring data from 2013. Table 4.2-9 in the certified Final SEIR analyzed project emissions using different ambient background data from 2010-2012 that was below the CAAQS; however, project emissions were nonetheless considered against the known background PM_{10} CAAQS exceedances and it was known that they would inherently contribute to those background exceedance conditions.

As more fully discussed below, in light of the minor and reduced PM_{10} contributions from the Revised TRRP compared to the approved TRRP, and considering that the certified Final SEIR already discussed CAAQS exceedances and concluded that PM_{10} was a Class I impact, there would not be a new significant effect or substantial increase in severity of a previously identified significant effect. The remainder of this subsection provides an additional discussion of these updated air quality analyses comparing the Revised TRRP to the approved TRRP and certified Final SEIR analysis of **Impact TRRP AQ-3**.

As noted in the CAAQS modeling results in Table 6, all air pollutant concentrations are less than the CAAQS, except for the concentration at one receptor location of the particulate matter less than 10 microns (PM_{10}) CAAQS that was identified at the western property boundary. The 24-hour ambient PM_{10} background level used in the modeling is already at the CAAQS (50 ug/m^3), which is higher than the background values used in Table 4.2-9 of the certified Final SEIR (34 ug/m^3). However, the Revised TRRP's modeled emissions have a small and substantially lower project contribution compared to the approved TRRP (3.8 ug/m^3 Revised TRRP; compared to 12.9 ug/m^3 approved TRRP). With background PM_{10} levels at the CAAQS, any project 24-hour PM_{10} contribution, even the comparatively lower and very small contribution by the Revised TRRP, would exceed the PM_{10} CAAQS.

The certified Final SEIR also specifically addressed exceedances of the 24-hour CAAQS limit for PM10 in **Impact TRRP AQ-11**. The certified Final SEIR discussed that the approved TRRP would extend the life of the Landfill and increase the likely duration of CAAQS PM_{10} 24-hour exceedances identified in prior environmental documents, which were deemed significant and unavoidable impacts of the approved TRRP related to Landfill operations (certified Final SEIR p. 4.2-69.) The certified Final SEIR's analysis of **Impact TRRP AQ-11** conservatively assumed that the PM_{10} air quality impacts would remain significant and unavoidable (certified Final SEIR p. 4.2-69, 4.2-21, 4.2-22). CEQA findings were adopted noting this significant and unavoidable impact, and mitigation measures from the prior Tajiguas Landfill Expansion Project were identified that would continue to mitigate the impacts to the maximum extent feasible, while also acknowledging that the residual impacts would remain significant and unavoidable (see approved TRRP CEQA Findings p. 8). A statement of overriding considerations was adopted for the significant and unavoidable PM_{10} impacts (certified Final SEIR p. 2-64; approved TRRP CEQA Findings p. 29).

The Revised TRRP contribution to ambient 24-hour PM_{10} concentrations (3.8 ug/m^3) constitutes a very small contribution to the Landfill site, for which an exceedance of the 24-hour PM10 CAAQS is an existing and documented significant and unavoidable impact. Also, the 24-hour PM_{10} contribution of the Revised TRRP (3.8 ug/m^3) would be substantially less than the contribution of the approved TRRP (12.9 ug/m^3). Based on this, the prior Certified SEIR's analysis considered and addressed TRRP-related PM_{10} CAAQS exceedances, and the minor PM_{10} contributions under the Revised TRRP would not cause a new significant effect or substantial increase in severity of a previously identified significant effect.

The certified SEIR noted that the sampled ambient background PM_{10} levels from 2010 to 2012 (as well as the approved TRRP's contributions to the background levels) were below the CAAQS (see certified Final SEIR Table 4.2-9 on p. 4.2-53). Nonetheless, the certified Final SEIR considered the approved TRRP's criteria pollutant contributions against a backdrop of known ambient background exceedances of the PM_{10} CAAQS, and thus considered that project contributions would exceed the CAAQS.

First, the certified Final SEIR considered that Santa Barbara County was in non-attainment status for CAAQS PM_{10} (certified Final SEIR p. 4.2-3 ["The County violates . . . the California standard for PM_{10}"]). Therefore, background exceedances in Santa Barbara County were known to occur, and it was known that any PM_{10} contribution from the approved TRRP would contribute to those exceedances. These conditions remain unchanged for the Revised TRRP.

Second, the certified Final SEIR considered ambient background monitoring data from 2013 that showed exceedances of the CAAQS for PM_{10} (certified Final SEIR p.4.2-5, Table 4.2-2). Although this 2013 data ultimately was not used to analyze **Impact TRRP AQ-3** (see certified Final SEIR Table 4.2-9 on p. 4.2-53), the certified Final SEIR nonetheless identified multiple PM_{10} CAAQS exceedances in 2013, with maximum PM_{10} concentrations of 55 and 51.4 ug/m^3 sampled at the El Capitan Beach and Las Flores Canyon sampling stations, respectively, which both exceed the 50 ug/m3 CAAQS. Thus, it was known that any project contribution would add to those exceedances. In fact, the Revised TRRP data shows relatively lower background ambient conditions. Compared to the multiple exceedances from 2013 analyzed in the certified Final SEIR, the updated Revised TRRP analysis showed only one day of background levels (i.e., one sample) at Las Flores Canyon at the CAAQS for PM_{10} (50 ug/m^3). The updated ambient background samples did not exceed the CAAQS.

Based on this, the results showing that the Revised TRRP's ambient background PM_{10} levels were at or near the CAAQS limit (along with minor Revised TRRP contributions) would not be considered a substantial changed circumstance or new information of substantial importance warranting the preparation of another subsequent environmental impact report for the project. Such additional environmental analysis is unnecessary because the prior SEIR was prepared and certified under a scenario of known ambient background PM_{10} exceedances where even a small amount of project emissions would contribute to exceeding the CAAQS for PM_{10}. Also, the Revised TRRP would not cause a new significant impact or increase the severity of a previously identified significant impact related to PM_{10}, because the certified Final SEIR had already covered approved TRRP emissions contributing to the above-noted known PM_{10} ambient background exceedances.

In addition to the certified Final SEIR previously considering the CAAQS exceedance, a small contribution by the project, alone, would not necessarily be considered a significant impact. Santa Barbara County's thresholds of significance state that a significant adverse air quality impact "may" occur when the project equals or exceeds the state or federal ambient air quality standards for any criteria pollutant as determined by modeling. This language is permissive and allows the County discretion for project-specific significance considerations and determinations where, as here, the Revised TRRP 24-Hour PM_{10} contributions are small and actually reduced from the approved TRRP.

Also, the County's thresholds for air quality impacts are based on the APCD's guidance, because it is the trustee agency for local air quality. The APCD Environmental Review Guidelines for implementation of CEQA (revised April 30, 2015) acknowledge that "Thresholds of significance provide general guidance for determining significant impacts, but are not ironclad definitions of significant impacts. Each project must be judged individually for its potential for significant impacts, based on specific circumstances and evidence." APCD (Michael Goldman, APCD Engineering Division Manager) was consulted to determine the significance of the Revised TRRP's contribution to exceedances of the PM_{10} CAAQS. Mr. Goldman stated that project PM_{10} contributions less than 10 percent of the CAAQS (5 ug/m^3 [24 hour] and 2 ug/m^3 [annual]) demonstrate that a project would not create a violation of the CAAQS (e-mail to Matt Dunn, AECOM, April 26, 2017). Table 6 shows the project contribution is less than these values (3.8 and 1.0 ug/m^3 respectively).

The Revised TRRP would also actually improve air quality over the approved TRRP in many regards. For example, replacement of the existing LFG Control System engine with modern engines equipped with a NO_x control system (SCR) would result in a substantial reduction in NO_x emissions associated with operating the existing LFG Control System. Engine management control systems provided with the proposed modern engines are expected to reduce reactive organic compound (ROC) emissions as well. Based on a comparison of potential-to-emit emissions presented in the APCD permit to operate (no. 9788) for the existing engine and flare to total emissions for the Revised TRRP (with replacement of the LFG Control System engine and flare), overall NO_x emissions would be reduced by up to 180.6 pounds per day and ROC emissions reduced by up to 71.5 pounds per day. This emissions reduction would also represent a reduction in the County's stationary source emissions inventory summarized in the APCD's 2016 Ozone Plan, and contribute towards reaching attainment of the 8-hour ozone CAAQS by Santa Barbara County.

Based on the evidence provided above, major revisions to the certified Final SEIR are not needed since the Revised TRRP would not result in a new significant air quality impact or increase in the severity of a previously identified significant impact, and no new information of substantial importance shows significant impacts that were not analyzed in the certified Final SEIR related to **Impact TRRP AQ-3**.

Impact TRRP AQ-4 (Maintenance Scenarios - Exceedances of Ambient Air Quality Standards):

Approved TRRP. Hourly emissions were estimated for three short-term maintenance scenarios as requested by the APCD to represent unusual circumstances that would produce greater emissions for short periods. An air dispersion model (ISCST3) was used with one year of meteorological data to determine ground level pollutant concentrations for comparison to the NAAQS and CAAQS. Table 4.2-10 of the certified Final SEIR indicates that the NAAQS and CAAQS would not be exceeded, and impacts would be less than significant (Class III).

Revised TRRP. The modeling of ambient air pollutant concentrations associated with short-term maintenance events was updated using the AERMOD model, and pollutant source modifications associated with the Revised TRRP. These are the same scenarios analyzed in the certified Final SEIR. Three maintenance scenarios were modeled:

1. The AD Facility flare combusting bio-gas while one AD Facility CHP engine is shut-down, with the second AD Facility CHP engine and the proposed LFG Control System engines operating normally. This short-term maintenance scenario would occur approximately 5 percent of the year.
2. One AD Facility CHP engine during start-up and SCR burn-in while burning propane, with the second AD Facility CHP engine and proposed LFG Control System engines operating normally. This short-term maintenance scenario would occur approximately 1.8 percent of the year.
3. One of the proposed LFG Control System engines during start-up and SCR burn-in while burning propane, with the second engine and the AD Facility CHP engines operating normally. This short-term maintenance scenario would occur approximately 1.8 percent of the year.

These maintenance scenarios would be rare and do not characterize the actual operation of the Revised TRRP. However, they would occur for maintenance purposes and have been evaluated at the request of the APCD.

Table 5. Normal Operations: Air Dispersion Modeling Results – NAAQS (µg/m³)

Pollutant	Averaging Period	Approved TRRP				Revised TRRP				
		Project Contribution	Ambient Background	Total Concentration	Percent of NAAQS	Project Contribution	Ambient Background	Total Concentration	Percent of NAAQS	Exceed the NAAQS?
SO_2	1-hour	5.6[2]	65.5	71.1	36.2	3.6	50.7	54.3	27.6	No
	24-hour	0.9	62.9	62.9	17.9	0.6	36.2	36.7	10.3	No
	Annual	0.05	4.0	4.0	5.0	0.21	1.1	1.3	1.6	No
CO	1-hour	1127.5	689.7	1817.1	4.5	667.6	689.7	1357.3	3.4	No
	8-hour	140.9	574.7	715.6	7.2	190.2	574.7	764.9	7.6	No
NO_2[1]	1-hour[3]	80.9	23.8	104.7	55.7	106.4	16.9	123.3	65.6	No
	Annual	1.4	3.9	5.3	5.3	1.7	3.8	5.5	5.5	No
PM_{10}	24-hour	11.2	34.0	45.2	30.1	3.3	50.0	53.3	35.6	No
$PM_{2.5}$	24-hour	8.2	16.0	24.2	69.2	2.4	17.0	19.4	55.4	No
	Annual	0.3	9.0	9.0	77.6	1.0	9.2	10.2	85.1	No

[1] 1-hour NO_2 impacts multiplied by 0.8 and annual NO_2 impacts multiplied by 0.75 to represent Tier 2 NO_x/NO_2 conversion.

[2] 99th percentile modeled concentration. Proper form of standard is 3-year average of the 99th percentile of the daily maxima.

[3] 98th percentile modeled concentration. Proper form of standard is 3-year average of the 98th percentile of the daily maxima.

Table 6. Normal Operations: Air Dispersion Modeling Results – CAAQS (µg/m3)

Pollutant	Averaging Period	Approved TRRP				Revised TRRP				
		Project Contribution	Ambient Background	Total Concentration	Percent of CAAQS	Project Contribution	Ambient Background	Total Concentration	Percent of CAAQS	Exceed the CAAQS?
SO_2	1-hour	6.8	191.3	198.1	30.2	3.8	290.8	294.7	45.0	No
	24-hour	0.9	62.9	63.8	60.8	0.8	36.2	37.0	35.2	No
CO	1-hour	1141.8	689.7	1831.5	8.0	687.8	689.7	1377.4	6.0	No
	8-hour	169.7	574.7	744.4	7.4	216.9	574.7	791.6	7.9	No
NO_2	1-hour	150.8	65.8	216.6	63.9	126.5	43.3	169.8	50.1	No
	Annual	1.4	3.9	5.3	9.3	1.7	3.8	5.5	9.7	No
PM_{10}	24-hour	12.9	34.0	46.9	93.8	3.8	50.0	53.8	107.6	Yes*
	Annual	0.5	13.3	13.8	69.0	1.0	19.0	20.0	100.0	No
$PM_{2.5}$	Annual	0.3	9.0	9.3	77.5	1.0	9.2	10.2	85.1	No

All short-term results are the highest modeled value. Annual results are the highest annual average.

*The ambient background is equal to the 24-hour CAAQS. Because the project contribution would not exceed 10% of the CAAQS and a significant PM_{10} impact was identified for the Tajiguas Landfill, the contribution would be considered less than significant (see discussion under **Impact TRRP AQ-3**).

Tables 7 and 8 indicate the NAAQS and CAAQS would not be exceeded during short-term maintenance events associated with operation of the Revised TRRP. Therefore, the Revised TRRP would not result in a new significant impact, and **Impact TRRP AQ-4** would remain less than significant (Class III).

Impact TRRP AQ-5 (Human Health Risk):

Approved TRRP. An air dispersion model (ISCST3) was used with one year of meteorological data to determine ground level concentrations of toxic air contaminants emitted by the project. The HARP model was then used to identify cancer risk and non-cancer health hazards at the nearest residence (planned Hart residence), which represents the maximum exposed residence (MEIR) and the Alisal Resort and Ranch which represents the maximum exposed worker (MEIW). A summary of cancer risk and non-cancer health impact risk values are presented in Table 9 for approved TRRP sources. Project-related cancer risk and health hazard index values are less than the SBCAPCD thresholds, and are considered a less than significant impact.

A facility-wide summary of cancer risk and non-cancer health impact risk values are presented in Table 10 for existing and proposed sources of toxic air contaminant emissions at the Landfill, including the existing LFG Control System engine and flare. The facility-wide results indicate the maximum acute hazard index would be 1.56 at the property boundary, which exceeds the significance threshold (1.0). Acute hazard risk is a short-term health risk and based on maximum 1-hour toxic air contaminant concentrations estimated by air dispersion modeling. As a short-term risk, persons could be exposed to this risk at the property line and not necessarily while residing or working at adjacent land uses. Therefore, a property line receptor was used as a worst-case exposure scenario. While the facility-wide health risk assessment indicates the acute hazard index threshold would be exceeded at the property boundary, this area is uninhabited, inaccessible (steep terrain with dense vegetation) and the area is not reasonably accessible by the public and individuals would not be exposed to this risk. Therefore, facility-wide toxic air contaminant emissions would not result in a significant health risk impact (Class III).

Revised TRRP. An updated health risk assessment was completed based on changes in emissions source locations and characteristics proposed under the Revised TRRP, and using updated modeling software. The assessment included a Revised TRRP scenario which included all proposed TRRP sources of toxic air contaminants including the replacement LFG Control System engines and flare. Consistent with the certified Final SEIR, the health risk assessment included a facility-wide scenario, which includes existing Landfill sources. Table 10 indicates the acute hazard index threshold (1.0) would be exceeded at the Landfill property boundary for both the approved and Revised TRRP, but would be reduced under the Revised TRRP (from 1.56 to 1.04). Consistent with the approved TRRP as documented in the certified Final SEIR, this exceedance would occur in an uninhabited area of steep terrain and dense vegetation, not reasonably accessible to the public, such that individuals would not be exposed to this risk. Therefore, **Impact TRRP AQ-5** would remain less than significant (Class III). Also, the Revised TRRP would not result in a new significant health risk or increased severity in a

previously identified significant health risk. Rather, as noted above, the Revised TRRP would result in reduced health risk as compared to the approved TRRP.

Impacts TRRP AQ-7 and AQ-8 (Greenhouse Gas [GHG] Emissions):

Approved TRRP. The project would involve diverting organic waste from the Landfill and produce electricity that would reduce GHG emissions associated with waste management at the Tajiguas Landfill by at least 963,876 metric tons over the period of 2015 through 2066, resulting in a beneficial GHG impact (**Impact TRRP AQ-7**, Class IV). In addition, the TRRP vendor has estimated that the additional GHG reduction benefits of recycling materials recovered by the MRF processing activities would be 67,675 $MTCO_2e$ over the life-cycle of the waste diverted, resulting in a beneficial GHG impact (**Impact TRRP AQ-8**, Class IV).

Revised TRRP. Changes to the approved TRRP that would affect the project's contribution to new GHG emissions are limited to the addition of a scrubber-sweeper and small changes in horsepower ratings of other mobile equipment. Overall, the Revised TRRP would have the same level of GHG emissions and beneficial global climate change impacts as the approved TRRP because these minor changes are negligible as compared to the reduction in future GHG emissions (reduced Landfill methane emissions) associated with implementation of the TRRP. Under the Revised TRRP, although organic waste diversion would start later in time due to the delay in construction, the AD Facility would continue to divert organic waste and the associated methane production from the Landfill, substantially reducing GHG emissions generated by decomposing waste.

The Revised TRRP would also continue to reduce GHG through the enhanced recovery of other recyclable materials. Because the MRF and AD Facility processes and capacity would not change, the large GHG emissions reduction associated with the approved TRRP would still result with implementation of the Revised TRRP. Therefore, the Revised Project would not result in a new significant air quality impact related to GHG emissions and overall, GHG emissions and related global climate change impacts would remain beneficial (**Impacts TRRP AQ-7** and **AQ-8**, Class IV).

Table 7. Results of Short-Term Maintenance Event Modeling of Ambient Pollutant Concentrations Revised TRRP: NAAQS (µg/m³)

Pollutant: Averaging Period	Scenario 1			Scenario 2			Scenario 3			Less than NAAQS?
	Project Contribution	Total Concentration	Percent of NAAQS	Project Contribution	Total Concentration	Percent of NAAQS	Project Contribution	Total Concentration	Percent of NAAQS	
SO_2: 1-hour	3.6	54..3	27.6	–	–	–	3.5	54.2	27.6	Yes
SO_2: 24-hour	0.8	36.9	10.4	–	–	–	0.6	36.7	10.3	Yes
CO: 1-hour	667.6	1357.3	3.4	667.6	1357.3	3.4	687.2	1376.9	3.4	Yes
CO: 8-hour	190.2	764.9	7.6	190.2	764.9	7.6	190.4	765.1	7.7	Yes
NO_2: 1-hour	106.4	123.3	65.6	106.4	123.3	65.6	106.4	123.4	65.6	Yes

Table 8. Results of Short-Term Maintenance Event Modeling of Ambient Pollutant Concentrations Revised TRRP: CAAQS (µg/m³)

Pollutant: Averaging Period	Scenario 1			Scenario 2			Scenario 3			Less than CAAQS?
	Project Contribution	Total Concentration	Percent of CAAQS	Project Contribution	Total Concentration	Percent of CAAQS	Project Contribution	Total Concentration	Percent of CAAQS	
SO_2: 1-hour	4.3	295.1	45.0	–	–	–	4.3	295.1	45.0	Yes
SO_2: 24-hour	0.9	37.0	35.2	–	–	–	0.8	37.0	35.2	Yes
CO: 1-hour	687.8	1377.4	6.0	687.4	1377.0	6.0	687.8	1377.4	6.0	Yes
CO: 8-hour	216.9	791.6	7.9	216.9	791.6	7.9	217.4	792.1	7.9	Yes
NO_2: 1-hour	126.5	169.8	50.1	126.4	169.7	50.1	126.4	169.7	50.1	Yes

Table 9. Summary of the Results of the Revised TRRP Health Risk Assessment (Approved/Revised TRRP)

Receptor Type	Maximum Cancer Risk (per million)	Maximum Acute Hazard Index	Maximum Chronic Hazard Index
Point of Off-site Maximum Contact	--	0.49/0.40	--
Maximum Exposed Individual (Residential)	0.92/0.67	0.14/0.16	0.02/0.006
Maximum Exposed Individual (Worker)	0.03/0.11	0.01/0.05	<0.01/0.011
APCD Significance Threshold	**10**	**1.0**	**1.0**

Table 10. Summary of the Results of the Facility-Wide Health Risk Assessment (Approved/Revised TRRP)

Receptor Type	Maximum Cancer Risk (per million)	Maximum Acute Hazard Index	Maximum Chronic Hazard Index
Point of Off-site Maximum Contact	--	**1.56/1.04**	--
Maximum Exposed Individual (Residential)	5.86/3.48	0.62/0.69	0.11/.033
Maximum Exposed Individual (Worker)	0.24/0.20	0.06/0.90	0.03/0.028
APCD Significance Threshold	**10**	**1.0**	**1.0**

Impact TRRP AQ-9 (Odors):

Approved TRRP. As identified in the certified Final SEIR, the Santa Barbara County Thresholds and Guidelines Manual does not provide an odor threshold but requires odor impacts to be analyzed. For the TRRP, a nuisance odor impact was considered potentially significant based on all of the following three guidelines; concentration of the odor (greater than 5 Odor Units/m^3), the frequency (greater than 175 hours per year or 2 percent) and the number of receptors (considerable number). Odor impact modeling was conducted using the ISCST3 air dispersion model and odor emission rates for the approved TRRP sources, including the bio-filter exhausts and compost windrows. The results of the odor impact analysis indicated the 5.0 OU/m^3 odor guideline would be exceeded at the each of the three receptors (lower Baron Ranch Trail, Arroyo Quemada community, and planned Hart residence). However, the frequency of the exceedance would be below 175 hours/year. Therefore, nuisance odor impacts would be less than significant (Class III).

Revised TRRP. An updated odor analysis was completed based on the revised location of the AD Facility, the approved lower Baron Ranch Trail alignment and other TRRP changes described in Section 4 of this SEIR Addendum. Note that the Hart residence was not included as an odor receptor as it would not be constructed. This analysis utilized the same odor guideline adopted for the approved TRRP. Table 11 shows that detectable odors would occur at the approved Baron Ranch Trail alignment on the west side of Arroyo Quemado for 207 hours per year, which exceeds the 175 hours per year guideline. However, 166 of the 207 hours per year (80 percent) would occur during nighttime and early morning (9 p.m. to 6 a.m.).

Use of the Baron Ranch Trail is restricted to daylight hours (8 a.m. to sunset)[7]. Due to trail use restrictions, the public would not be present when 80 percent of the detectable odors would occur (detectable odors would occur only for 41 hours per year when the trail may be in use). The 175 hours per year guideline would not be exceeded when the public may be present. Therefore, **Impact TRRP AQ-9** would remain less than significant (Class III). The Revised TRRP would not result in a new significant air quality impact related to odor as compared to the approved TRRP.

Table 11. Odor Impact Analysis Summary (Approved/Revised TRRP)

Receptor	Total Hours per Year over 5 Odor Units/m^3	Public Exposure Hours per Year over 5 Odor Units/m^3	Significant Nuisance Odor Impact?
Lower Baron Ranch Trail (existing)	15/--	15/--	**No/No**
Lower Baron Ranch Trail (relocated alignment)	--/207	--/41	**No/No**
Arroyo Quemado community	15/102	15/102	**No/No**

Clean Air Plan Consistency

The Revised TRRP would remain consistent with the APCD's 2013 Clean Air Plan and 2016 Ozone Plan as it would not generate substantial employment opportunities, would not increase Landfill capacity that could induce population growth to cause an exceedance of future growth projections on which the Clean Air Plan is based, would not require a change in zoning that could result in development, and would not inhibit implementation of the control measures of the 2013 Clean Air Plan and 2016 Ozone Plan.

Based on the analysis conducted above, the Revised TRRP would not result in any new significant environmental effects to air quality or a substantial increase in the severity of previously identified significant effects.

5.2.3 Mitigation Measures

With the exception of **Impact TRRP AQ-11**, air quality impacts would remain less than significant and no mitigation measures are required. Air quality measures included in the project description (Section 3.5.9.3 of the certified Final SEIR) and identified in the Final EIR for Statewide AD Facilities (see pages 4-65 and 4-66 of the certified Final SEIR) would remain applicable to the Revised TRRP.

5.2.4 Residual Impacts

Residual air quality impacts from the Revised TRRP would remain less than significant.

[7] Draft Final Mitigated Negative Declaration Baron Ranch Trail Realignment (Santa Barbara County Parks Department, April 2017). The MND was adopted and the project approved by the Board of Supervisors on June 27, 2017.

5.3 BIOLOGICAL RESOURCES

5.3.1 Setting

The setting information provided in Section 4.3.1 of the certified Final SEIR has not changed and remains relevant to describe the biological resources and regulatory environment of the Landfill site and surrounding areas, except as otherwise provided in this section. As discussed in Section 5.0, since approval of the certified Final SEIR, a small area in the northeast corner of Landfill parcel APN 081-150-026 has been designated as ESH. This ESH area was not affected by the approved TRRP and would not be affected by the Revised TRRP. Therefore, the ESH designation is not considered a changed circumstance or new information of substantial importance requiring a new SEIR.

A construction disturbance area was delineated for the approved TRRP (see certified Final SEIR Figure 3-14) and a revised construction disturbance area has been delineated for the Revised TRRP (see Figure 2). The total construction disturbance area would be increased by 3.7 acres under the Revised TRRP as compared to the approved TRRP. The new areas of disturbance include the AD Facility site and the power line alignment between the MRF and AD Facility site. An additional survey of the 3.7 acres of disturbance was completed by a biologist from Padre Associates on May 11, 2017 to provide additional site-specific setting information for the revised impact analysis. Padre Associates' biologists have assisted the County with biological surveys and monitoring at the Landfill and Baron Ranch for over 15 years and the biologist conducting the survey holds a recovery permit for California red-legged frog issued by the U.S. Fish and Wildlife Service (USFWS), and is approved under the County's Section 7 Biological Opinion for the Tajiguas Landfill Reconfiguration and Baron Ranch Restoration Project.

Revised AD Facility Site Biological Setting. ~~The revised AD Facility site construction disturbance area includes the existing disturbed cut slope east of the Landfill top deck and the perimeter access road analyzed in the Tajiguas Landfill Expansion EIR (01-EIR-05). All of these areas have been previously disturbed by prior Landfill activities.~~ The revised AD Facility is proposed to be located along the boundary between the Tajiguas Landfill and the Baron Ranch. The area proposed for grading associated with the revised AD Facility was previously graded as a part of the Tajiguas Landfill Expansion Project for the Phase 1A and Phase 1B liners and to establish a perimeter landfill access road and drainage as discussed in the Tajiguas Landfill Expansion EIR (01-EIR-05). In 2010 (Federal Register, March 17, 2010, pp. 12816-12959), after the grading had already occurred on the Tajiguas Landfill and Baron Ranch as discussed above, the USFWS designated 1,636,609 acres of critical habitat for the California red-legged frog in 48 units. Included in that designation is Unit STB-6: Arroyo Quemado to Refugio Creek encompassing 11,985 acres of land. By definition of the Unit (Arroyo Quemado to Refugio Creek) and according the USFWS as described in the Federal Register, the Unit boundaries are meant to follow watershed boundaries from the State of California's CALWATER watershed classification system (version 2.2) using the smallest (planning watersheds) watershed designation (Federal Register, March 17, 2010, page 12838). The use of the watershed boundary as the unit boundary is further supported by the consultation history for the Biological Opinion for the Tajiguas Landfill Reconfiguration and Baron Ranch Restoration project. Although the Biological Opinion was issued prior to the 2010 Federal Register

publication of the critical habitat, the critical habitat designation was in progress, and the USFWS noted "Service and Corps staff clarified that the western boundary of California red-legged frog proposed Critical Habitat Unit STB-6 is the ridgeline at the eastern border of the Tajiguas Landfill". The revised AD Facility site is located west of the ridgeline in the Pila Creek watershed, and not within the Arroyo Quemado watershed.

The cut slope affected by earthwork is dominated by non-native plant species typical of disturbed areas, including slender wild oat (*Avena barbata*), rip-gut grass (*Bromus diandrus*) and Russian thistle (*Salsola tragus*). A few scattered native plants occur on this slope, primarily cliff aster (*Malacothrix saxatilis*). The area east of the cut slope and extending to the planned eastern limits of earthwork supports slender wild oats and rip-gut grass with occasional milk thistle (*Silybum marianum*) and summer mustard (*Hirschfeldia incana*). This vegetation is considered ruderal (composed of weedy species that have recently colonized disturbed areas) based on the field survey and vegetation mapping conducted for the certified Final SEIR. Note that slender wild oat, rip-gut grass, Russian thistle, milk thistle and summer mustard are considered invasive species by the California Invasive Plant Council.

Small isolated patches of native mixed scrub vegetation are located adjacent to the planned limits of earthwork, which are dominated by common species including California sagebrush (*Artemisia californica*), giant wild-rye (*Leymus condensatus*) and saw-tooth goldenbush (*Hazardia squarrosa*).

Power Line Alignment Biological Setting. The power line alignment lies in areas that have been disturbed by permitted Landfill operations analyzed in the Tajiguas Landfill Expansion EIR (01-EIR-05) and the Tajiguas Landfill Reconfiguration and Baron Ranch Restoration SEIR (08EIR-00000-00008) and subsequently hydroseeded with native plant species to minimize erosion. Dominant species in these areas include California buckwheat (*Eriogonum fasciculatum*), deer weed (*Acmispon glaber*), California golden-bush (*Encelia californica*) and white sweet-clover (*Melilotus albus*).

None of the native plants within the revised AD Facility site or along the power line alignment are designated as sensitive or special-status on a local, state or federal level.

5.3.2 Impact Assessment

As noted above and in Table 1, the total construction disturbance area (which includes the area of direct earthwork and the area where construction equipment will operate) would be increased by 3.7 acres under the Revised TRRP. The locations where construction disturbance would be greater under the Revised TRRP are part of active permitted Landfill operations previously analyzed in 01-EIR-05. Earthwork for the revised AD Facility would extend beyond the existing cut slope east of the Landfill perimeter road by up to 25 feet, in previously disturbed areas that have since been partially colonized by ruderal vegetation that generally serves as low quality wildlife habitat. Earthwork would not extend outside the Landfill operational boundary and would be within previously disturbed areas.

Impact TRRP BIO-1 (Permanent Loss of Non-native and Native Vegetation):

Approved TRRP. Implementation of the approved TRRP would result in the permanent loss of approximately 3.33 acres of vegetation communities, including 1.09 acres of native vegetation communities/cover types (*Ceanothus megacarpus* chaparral and rock outcrops) and 2.24 acres of ruderal areas dominated by non-native plant species. Due to the small area of anticipated permanent loss of these common native vegetation communities, permanent impacts were considered adverse but less than significant (Class III).

Revised TRRP. Proposed changes would result in a net increase of 0.5 acres of ruderal vegetation removed by earthwork, including reductions at the MRF site and increases at the revised AD Facility site. However, about 0.2 acres of this impact would be temporary as this area would be available for colonization by ruderal vegetation following construction of a retaining wall and backfill east of the AD Facility digester building. Thus, the total permanent removal due to construction earthwork would be 0.3 acres. Also, less than 0.1 acres of hydroseeded vegetation dominated by native species would be removed by power pole installation. Most of this impact would be temporary, because vegetation would recolonize the construction area.

Fuel management (as required by the Uniform Fire Code), would be required around the relocated AD Facility. Assuming management would be required within 100 feet of the AD Facility, approximately 1.3 acres would need to be managed. A portion of the fire management area (0.4 acres) is within the existing disturbed operational area boundary. Approximately 0.9 acres extends into previously undisturbed areas, however, 0.8 acres in the previously undisturbed area is comprised of ruderal vegetation and 0.1 acres consists of mixed scrub containing common native species. A portion of this fuel management area falls within the certified Final SEIR biological study 200 foot buffer area.

Overall, the incremental increase in vegetation loss compared to the prior analysis in the certified Final SEIR (from construction and fuel management) would be comprised of 1.7 acres of ruderal vegetation (0.2 acres would be temporary) and 0.1 acres of native mixed scrub. Therefore, the incremental increase in permanent loss of vegetation would be 1.6 acres (0.3 acres from construction, 1.3 acres from fuel management), and the total amount of vegetation permanently removed under the Revised TRRP would be 4.93 acres as compared to 3.33 acres under the approved TRRP. Approximately 0.8 acres of the 1.6 acres would be located in previously disturbed areas.

The County of Santa Barbara CEQA Thresholds and Guidelines Manual (Section 6.C.3.b, page 26) identifies impacts presumed to be less than significant, including removal of small acreages of non-native grassland if wildlife values are low, areas of historical disturbance, small pockets of habitats already significantly fragmented or isolated, and degraded or disturbed and areas of primarily ruderal species resulting from pre-existing man-made disturbance.

The affected vegetation is primarily non-native grassland (dominated by slender wild oat and rip-gut grass), common in the region and mostly comprised of non-native and invasive plant species, previously disturbed by permitted Landfill operations, and the Revised TRRP disturbance area is small relative to the acreage of this vegetation in the surrounding areas.

Additionally, the certified Final SEIR analyzed most of the Revised TRRP construction disturbance area as part of the Proposed Impact Area for the approved TRRP and a 200-foot Buffer Study Area for the approved TRRP, which showed that those buffer areas are consistent with vegetation in the approved TRRP's earthwork areas (certified Final SEIR p. 4.3-7, Figure 4.3-1). The small amount of incremental increase in vegetation loss, compared to the overall vegetation loss analyzed in the certified Final SEIR, would not result in a new significant impact or substantially increase the severity or alter the significance of **Impact TRRP BIO-1** (Class III) as compared to the approved TRRP.

Impact TRRP BIO-3 (Permanent Loss of and Indirect Impacts to Wildlife Habitat):

Approved TRRP. The approved TRRP would result in the permanent loss of 3.33 acres of habitat for common wildlife species during clearing and grubbing prior to construction, primarily near the western and eastern ridges of Cañada de la Pila. Project construction activities would result in indirect temporary impacts to wildlife habitat and common wildlife species, such as increased fugitive dust, elevated noise levels, and increased human activity within and adjacent to the TRRP facility sites. Indirect construction-related impacts to common wildlife species were considered an adverse but less than significant impact (Class III) because the project would affect only a small amount of native habitat, other undeveloped areas of the Landfill property and neighboring properties are available for use by common wildlife species, and the project is not expected to reduce common wildlife populations below self-sustaining levels.

Revised TRRP. Proposed changes (primarily earthwork and fuel management activities at the eastern Landfill boundary) would result in a net increase in wildlife habitat loss, including 1.7 acres of ruderal vegetation (0.2 acres would be temporary) and 0.1 acres of native mixed scrub. Construction-related indirect temporary impacts would slightly increase due to relocation of the AD Facility. Based on the County of Santa Barbara CEQA Thresholds and Guidelines Manual (Section 6.C.3.b), **Impact TRRP BIO-3** would remain less than significant (Class III) due to the small area of new disturbance, historical disturbance of the entire area, and low habitat value, fragmented, ruderal vegetation. When compared to the prior SEIR's analysis of habitat impacts, the addition of a small amount of incremental habitat loss would not result in a new significant impact or substantially increase the severity of **Impact TRRP BIO-3** as affected vegetation/wildlife habitat is primarily non-native grassland consisting of previously disturbed and fragmented patches with low habitat value.

Impact TRRP BIO-6 (Loss of California Red-legged Frog Upland Dispersal Habitat):

Approved TRRP. California red-legged frogs (CRLF) are present in Arroyo Quemado and Arroyo Hondo and the Landfill is within a potential dispersal corridor between these two known locations. The certified Final SEIR acknowledged that CRLF have been known to occur within the immediate vicinity of the project impact area and at the Landfill. The certified Final SEIR also considered that the approved TRRP would permanently remove a small amount of native vegetation on the western ridge of Cañada de la Pila that would serve as upland dispersal habitat for CRLF to pass through during their movement from one breeding habitat area to another. Due to the lack of permanent or semi-permanent water near any of the proposed facility locations, the frogs would only be expected as transients. The removal of this

native vegetation would expand the area of exposed ground for frogs to cross during overland movement, increasing the chances of predation. However, impacts to CRLF were considered less than significant (Class III) in the SEIR considering the very low likelihood of the presence of a CRLF within these upland areas and the small amount of proposed native vegetation removal.

Revised TRRP. ~~Earthwork for the revised AD Facility would extend up to 25 feet east of the ridgeline between the Tajiguas Landfill and baron Ranch, including approximately 2.0 acres of CRLF Critical Habitat Unit STB-6 within the Landfill's permitted operational area. A small portion of the relocated AD Facility (about 0.7 acres of the 2.0 acres) would also lie within CRLF Critical Habitat Unit STB-6.~~ The revised AD Facility location has been and currently remains substantially disturbed (see Appendix F) by previously approved grading to install the Phase 1A and 1B liners (see Appendix I) and a perimeter road and drainage facilities (see Appendix H) all as a part of the Tajiguas Landfill Expansion Project as identified the 01-EIR-05 (certified August 13, 2002). The ridgeline east of the facility is part of a 2:1 cut slope and the ridgeline elevation was lowered from a maximum peak elevation of approximately 676 to 645 feet above msl as part of the previously approved Tajiguas Landfill Expansion Project (see Appendix I.)

Based on a site-specific survey of the revised AD Facility site conducted by a Padre biologist on May 11, 2017, the existing cut slope affected by earthwork is dominated by non-native plant species typical of disturbed areas, including slender wild oat (*Avena barbata*), rip-gut grass (*Bromus diandrus*) and Russian thistle (*Salsola tragus*). A few scattered native plants occur on this slope, primarily cliff aster (*Malacothrix saxatilis*). The area east of the cut slope (ridgeline) and extending to the planned eastern limits of earthwork supports slender wild oats and rip-gut grass with occasional milk thistle (*Silybum marianum*) and summer mustard (*Hirschfeldia incana*). This vegetation is considered ruderal (composed of weedy species that have recently colonized disturbed areas).

The AD Facility construction disturbance area does not contain CRLF aquatic breeding habitat, aquatic non-breeding habitat or upland habitat. It is unlikely to provide dispersal habitat for CRLF due to limited vegetative cover, highly altered topography and proximity to heavy equipment activity areas. To assist with CRLF habitat preservation in areas not needed for Landfill operations, the Revised TRRP includes a Comprehensive Plan Amendment that will adjust the boundaries of the Waste Disposal Facility Overlay by removing approximately 50 acres of CRLF Critical Habitat Unit STB-6 from the Waste Disposal Facility Overlay.

~~Critical habitat designated by the U.S. Fish and Wildlife Service for CRLF includes Unit STB-6, which is comprised of the Arroyo Quemado, Tajiguas Creek and Canada del Refugio watersheds, and encompasses a total area of 11,985 acres. The boundaries of STB-6 are based on approximate~~ As noted above the boundaries of STB-6 are based on watershed boundaries and includes areas with low habitat value, such as off-site orchards and row crops, and previously disturbed portions of the ~~Landfill~~ Baron Ranch that will be used for the Revised TRRP. ~~The western boundary~~ As a part of ~~Unit STB-6 is~~ the Baron Ranch Restoration Project, over 50 acres of CRLF aquatic breeding habitat, non-breeding aquatic and riparian habitat, and upland habitat has been enhanced/restored within ~~the Landfill property from Baron Ranch~~ critical habitat boundary.

~~Areas designated as critical habitat by the U.S. Fish and Wildlife Service are used by federal agencies to review projects pursuant to the Federal Endangered Species Act.~~ Therefore, although the federal designation may signal the presence of potentially sensitive habitat, it does not necessarily follow that any environmental effects from a project within that federal demarcation will result in a significant impact pursuant to CEQA, which is determined on a case-by-case basis due to the complexity of biological resource issues.

The Revised TRRP's impact on ~~2~~ 0.3 acres (east of the current ridgeline) of previously disturbed low value upland dispersal habitat is negligible compared to the ~~nearly 12,000~~ 11,985 acres of land that were designated by the USFWS within ~~the~~ Unit STB-6 ~~unit~~ and the overall 1,636,609 acres of critical habitat included within all units designated by the U.S. Fish and Wildlife Service for CRLF. As more particularly discussed below, the Revised TRRP activities would not result in a new significant impact or increase in severity of a previously identified significant impact pursuant to CEQA.

A total of 35 focused CRLF surveys at the Landfill have been completed since the SEIR was finalized (December 2015). In all 35 surveys combined, a total of 21 CRLFs were observed in water/drainage features at the southern end of the Landfill and in the back canyon area of the Landfill. These features are located at least 2,000 feet from the revised AD Facility location and captured frogs were relocated to Baron Ranch in compliance with the Landfill's current Biological Opinion for the Reconfiguration Project.

As noted in the certified Final SEIR, the Biological Opinion for the Landfill Reconfiguration Project will expire once reconfiguration-related construction activities are complete. The Landfill began operations in 1967 and since the original discovery of the CRLF in the Landfill's in-channel sedimentation basins[8] in 1998, Landfill operations have coexisted with the local CRLF population and the construction disturbance area encompassing the Revised TRRP area has been previously disturbed by Landfill activities.

As noted in Section 4.3.1 of the certified Final SEIR, the Landfill site, including the approved TRRP and Revised TRRP locations, is within a potential CRLF dispersal corridor between Arroyo Quemado and Arroyo Hondo. The Revised TRRP would result in a net increase in permanent vegetation loss of 1.6 acres compared to the approved TRRP (1.5 acres ruderal vegetation, 0.1 acres native mixed scrub) removed by earthwork, which could temporarily increase the area of exposed ground for California red-legged frogs to cross during overland movement, and could increase the chances of predation. However, based on the survey conducted by the Padre Associates biologist, the affected ruderal vegetation currently provides little cover and no shade, moisture, cooler temperatures, prey base or predator avoidance for dispersing CRLF, and the area affected is small relative to the upland dispersal habitat available. The likelihood of CRLF occurring within affected upland areas is low because the disturbance area is located approximately 1,500 feet from Arroyo Quemado, and the affected area (0.3 acres within designated critical habitat, 1.6 acres of permanent vegetation ~~is low quality and there is only a small area of affected vegetation~~ loss) is small in comparison to

[8] The in-channel sedimentation basins were removed as a part of the approved Tajiguas Landfill Reconfiguration and Baron Ranch Restoration Project in compliance with the regulatory agency permits and the certified Subsequent EIR (08EIR-00000-00007).

the roughly 300 acres between the Landfill and Arroyo Quemado available for CRLF heading west towards Arroyo Hondo.

As noted above, the certified Final SEIR acknowledged and reviewed the approved TRRP's impacts on the upland dispersal habitat of CRLF within the Landfill, which included the permanent loss of 3.33 acres of vegetation. The certified Final SEIR concluded that those impacts would be less than significant. The Revised TRRP's impacts are consistent with that analysis, including the minor addition of 1.6 acres of permanent vegetation loss.

Additionally, the certified Final SEIR analyzed most of the Revised TRRP construction disturbance area as part of the Proposed Impact Area for approved TRRP and a 200-foot Buffer Study Area for the approved TRRP, which showed that the buffer areas are consistent with vegetation in the approved TRRP earthwork areas (certified Final SEIR p. 4.3-7, Figure 4.3-1).

While the mapped boundary for Unit STB-6 partially includes the revised location of the AD Facility, the information in the Federal Register designating critical habitat for CRLF and in the Biological Opinion for the Tajiguas Landfill Reconfiguration Project notes that the boundary of Unit STB-6 is meant to extend only up to the watershed boundary of Arroyo Quemado, and not into the Pila Creek watershed. Also, as noted by USFWS, "In some cases, precisely mapping critical habitat boundaries is impractical or impossible, because the required descriptions for these precise boundaries would be unwieldy." (http://www.fws.govc/sacramento/es/critical-habitat/Home/Documents/critiicial habitat.pdf, last visited October 10, 2017). Because the revised AD Facility location is within the Pila Creek watershed, the facility will not be located in an area intended as designated critical habitat for CRLF. Earthwork for the revised AD Facility would extend up to 25 feet east of the ridgeline between the Tajiguas Landfill and Baron Ranch, including approximately 0.3 acres (east of the current ridgeline) which falls within the mapped boundary of CRLF Critical Habitat Unit STB-6 within the Landfill's permitted operational area.

The Revised TRRP's impacts are consistent with the certified Final SEIR's prior analysis of CRLF dispersal habitat impacts, and the impacts would not exceed the significance threshold provided by County of Santa Barbara CEQA Thresholds and Guidelines Manual Section 6.C.3.a (substantially limit or fragment range and movement of animals). Thus, **Impact TRRP BIO-6** would remain less than significant (Class III), particularly considering the low quality vegetation composed of non-native grassland and ruderal species resulting from previous man-made disturbance, the adjacent ongoing Landfill operations, and the small area of affected vegetation. (See County of Santa Barbara CEQA Thresholds and Guidelines Manual Sections 6.C.3.b and 6.C.3.c). Therefore, the Revised TRRP would not substantially increase the severity of **Impact TRRP BIO-6**, or result in new significant impacts to dispersing CRLF.

Impact TRRP BIO-7 (Loss of Foraging Habitat for Transient Special-Status Birds):

Approved TRRP. Sharp-shinned hawk, ferruginous hawk, northern harrier, white-tailed kite and loggerhead shrike have been observed at the Landfill site or vicinity and may forage within the approved TRRP impact area. The certified Final SEIR identified permanent loss of 3.33 acres of vegetation and concluded that the impacts to these species from the approved TRRP are less than significant (Class III) due to the small area of habitat removal as compared to their typical foraging area, and the lack of suitable nesting habitat at the Landfill site.

Revised TRRP. Proposed changes (primarily earthwork and fuel management activities at the eastern Landfill boundary) would result in a net increase in wildlife habitat loss, including 1.7 acres of ruderal vegetation (0.2 acres would be temporary) and 0.1 acres of native mixed scrub. Due to the low quality (composed of non-native grassland, adjacent to ongoing Landfill operations) and small area of affected habitat, the incremental increase in impacts would be negligible, and the impacts of the Revised TRRP would not exceed the significance threshold provided by County of Santa Barbara CEQA Thresholds and Guidelines Manual Section 6.C.3.a (substantially reduce or eliminate species diversity or abundance). Therefore, **Impact TRRP BIO-7** would remain less than significant (Class III). Additionally, the certified Final SEIR analyzed most of the Revised TRRP construction disturbance area as part of the approved TRRP's Proposed Impact Area and 200-foot Buffer Study Area, which showed that those areas are consistent with vegetation loss under the approved TRRP's earthwork areas (certified Final SEIR p. 4.3-7, Figure 4.3-1). Therefore, the Revised TRRP would not substantially increase the severity of **Impact TRRP BIO-7**, or result in new significant impacts to transient special-status birds.

Impact TRRP BIO-12 (Impacts to Transient California Red-legged Frogs):

Approved TRRP. Due to the disturbed and relatively barren nature of the Landfill site and lack of breeding habitat, CRLF do not inhabit the Landfill, including TRRP facility sites. However, CRLF may be present while making overland dispersal movements, which typically occur at night and/or during or following rain events. With implementation of the TRRP, nighttime activities would occur at the operations deck area in association with operation of the MRF and AD Facility, including use of the paved roads between the Landfill entrance and the MRF/AD Facility site by employees and for transport of commodities from the MRF.

The potential for CRLF to be present in the vicinity of project operations is considered low. However, if present, conflicts with equipment activity and motor vehicle use may occur (particularly at night) and direct impacts (crushing) to transient frogs would be potentially significant by mitigated to less than significant (Class II) with the implementation of **MM TRRP BIO-6**, as stated in the certified Final SEIR.

Revised TRRP. Proposed changes include separating the AD Facility from the MRF, which would require recovered organic waste to be trucked to the AD Facility, typically when digesters are being loaded and unloaded (daytime, 7 a.m. to 4 p.m.) as the AD Facility has limited storage capacity. However, the AD Facility would be located adjacent to the Composting Area, which would eliminate truck trips transporting digestate to the Composting Area. Overall, nighttime equipment and motor vehicle activity would not increase, such that there would be no increase in the severity of a previously identified significant impact or new significant impact, and an increase in mortality of transient CRLF would not occur.

As nighttime equipment and motor vehicle activity would not increase, impacts on the dispersal of transient CRLF would not change relative to the prior analysis in the certified Final SEIR. **Impact TRRP BIO-12** would remain mitigated to less than significant (Class II), with the implementation of **MM TRRP BIO-6**, which will remain applicable and would be implemented consistent with the certified Final SEIR to continue reducing **Impact TRRP BIO-12** to be less than significant.

Based on the analysis conducted above, the Revised TRRP would not result in any new significant environmental effects to biological resources or a substantial increase in the severity of previously identified significant effects.

5.3.3 Mitigation Measures

The Revised TRRP would be subject to the mitigation measures provided in Section 4.3.2.4 of the certified Final SEIR:

- **Impact TRRP BIO-2:** ***MM TRRP BIO-1: Construction Requirements.***
- **Impact TRRP BIO-4:** ***MM TRRP BIO-2: Breeding Bird Protection.***
- **Impact TRRP BIO-8:** ***MM TRRP BIO-3: American Badger and Ringtail Surveys.***
- **Impact TRRP BIO-9:** ***MM TRRP BIO-4: San Diego Desert Woodrat Relocation.***
- **Impact TRRP BIO-10:** ***MM TRRP BIO-5: Avoidance of Bat Maternity Colonies.***
- **Impact TRRP BIO-12:** ***MM TRRP BIO-6: Avoidance and Minimization Measures for California Red-legged Frog and Sensitive Mammal Species.***

These measures remain relevant and applicable to the Revised TRRP, and will be included in the Mitigation Monitoring and Reporting Plan for the Revised TRRP as amended.

5.3.4 Residual Impacts

Implementation of the mitigation measures provided in the certified Final SEIR would reduce biological resources impacts of the Revised TRRP to a level of less than significant.

5.4 HAZARDS AND HAZARDOUS MATERIALS

5.4.1 Setting

The majority of the setting information provided in Section 4.4.1 the certified Final SEIR has not changed and remains relevant to describe the potential hazards and regulatory environment of the Landfill area. However, the proximity of the public to TRRP facilities has increased due to the approved relocation of lower Baron Ranch Trail and the relocation of the AD Facility. The hazardous materials assessment and remediation of the operations deck as required by mitigation measure ***MM TRRP HAZ-1*** has been completed.

5.4.2 Impact Assessment

Impact TRRP HAZ-3 (Risk of Bio-gas Explosion):

Approved TRRP. Bio-gas generated in the anaerobic digesters consists of methane and carbon dioxide, with small amounts of H_2S and ammonia. Bio-gas itself is not flammable and will not burn unless oxygen is present within a specific range of concentrations. The methane in bio-gas is flammable when mixed with air in concentrations of 5 to 15 percent. Above or below these concentrations methane is not flammable. In open spaces, bio-gas readily mixes with air, reducing its potential to reach flammable concentrations. The MRF and AD Facility would be

equipped with methane monitors and alarms that would identify methane buildup and potentially flammable conditions.

A worst-case explosion risk analysis (based on U.S. EPA requirements) was conducted assuming the failure of control and monitoring systems, and release of bio-gas forming a vapor cloud containing 427 pounds of methane. Assuming hypothetical ignition (e.g., from a very hot material or welding/cutting activity) and calm atmospheric conditions for dispersion, the methane would ignite very quickly and produce a flash flame. The rapid combustion would result in an expansion of the ignited gases and subsequently produce a pressure wave (referred to as overpressure). Typically, a regulatory agency acceptable level of concern for this hazard is an overpressure of 1 pound per square inch (psi) in the atmosphere. The 1 psi overpressure hazard zone would be approximately 400 feet downwind (in a circular radius) of the AD Facility, which would be entirely contained within the Landfill property (see Final SEIR Figure 4.4-1).

The probability of a bio-gas explosion is anticipated to be low, and contingent on multiple failures/errors of equipment and operating procedures. Since the explosion footprint would not affect areas beyond the Landfill property, and would therefore not affect the general public, and the probability of multiple failures/errors of equipment is low, this impact is considered less than significant (Class III).

Revised TRRP. The 400 foot radius bio-gas explosion over-pressure hazard zone associated with the revised AD Facility is shown on Figure 17. The zone would extend approximately 180 feet beyond the Solid Waste Facility Permit Boundary onto the Baron Ranch. The hazard zone as measured from the bio-gas source location within the AD Facility is limited to publicly inaccessible areas, since the only trails and roads present are in the Landfill's permitted operational area consistent with certified Final SEIR analysis, and would be approximately 1,200 feet west of the proposed relocation of the Baron Ranch Trail (see Figure 17). Consistent with the certified Final SEIR, this impact would remain less than significant as the hazard zone would remain on County-owned property, would not impact areas accessible to the general public and the probability of occurrence is low. This finding is consistent with Appendix G of the State CEQA Guidelines, as a significant hazard to the public or environment through reasonably foreseeable upset conditions would not occur. Consistent with the certified Final SEIR, **Impact TRRP HAZ-3** would remain less than significant (Class III).

Based on the analysis conducted above, the Revised TRRP would not result in any new significant environmental effects from hazards or hazardous materials or a substantial increase in the severity of previously identified significant effects, and the approved lower Baron Ranch Trail realignment would not be considered a changed circumstance or new information of substantial importance requiring preparation of a new SEIR.

5.4.3 Mitigation Measures

The Revised TRRP would be subject to the mitigation measures provided in Section 4.4.2.4 of the certified Final SEIR:

- **Impact TRRP HAZ-5:** ***MM TRRP HAZ-1: Hazardous Materials Assessment and Remediation.***
- **Impact TRRP HAZ-7:** ***MM TRRP HAZ-2: Fire Protection and Prevention Plan.***

These measures remain relevant and applicable to the Revised TRRP, and will be included in the Mitigation Monitoring and Reporting Plan for the Revised TRRP as amended.

5.4.4 Residual Impacts

Implementation of the mitigation measures provided in the certified Final SEIR would reduce hazards and hazardous materials impacts of the Revised TRRP to a level of less than significant.

5.5 GEOLOGICAL PROCESSES

5.5.1 Setting

The geologic conditions in the project area as described in Section 4.5.1 of the certified Final EIR have not changed, and information provided remains relevant to describe the current geologic setting. An additional geotechnical investigation (Addendum Report dated May 1, 2017) was prepared by Earth Systems Southern California following certification of the Final SEIR (see Appendix B). The focus of the Addendum Report is the revised AD Facility location and Composting Area Runoff Collection Tank site. Boring conducted as part of the Addendum Report indicates the revised AD Facility site is underlain by approximately 50 feet of artificial fill, over Rincon Formation bedrock. The artificial fill includes approximately 24 feet of stockpiled soil which is used as Landfill cover and will be completely used for ongoing Landfill operations prior to construction of the AD Facility.

Originally, the Composting Area Runoff Collection Tank was to be located east of the Landfill perimeter road on Vaqueros Formation sandstone. Under the Revised TRRP, the Composting Area Runoff Collection Tank would be located on artificial fill along with a newly proposed fire water tank in the approved location of the Landfill maintenance facility. Boring conducted as part of the Addendum Report indicates the water tank site is underlain by 33.5 to 38 feet of artificial fill over Rincon Formation bedrock.

5.5.2 Impact Analysis

Impact TRRP G-1 (Slope Stability/Landslides):

Approved TRRP. A numerical slope stability analysis was conducted by GeoSolutions for the cut slope west of the proposed MRF/AD Facility site, the fill slope south of the proposed MRF/AD Facility site, and the fill slope west of the proposed maintenance building site. The numerical slope stability analysis was performed utilizing SLOPE/W, a software program that uses limit equilibrium theory to compute the factor of safety of earth slopes. The results of laboratory testing on representative samples of soil and rock material from the slope areas were used in the analysis. The engineering standard for permanent slopes is a factor of safety of 1.5 for static conditions, and 1.1 for pseudo-static (seismic) conditions.

The slope stability analysis indicates the minimum safety standards are met for both static and pseudo-static conditions, such that significant slope stability/landslide impacts would not occur. However, slope erosion by storm flows may substantially affect slope stability over time. Impacts to the proposed MRF, AD Facility and maintenance building associated with landslides and seismically-induced slope failures are considered potentially significant (Class II).

Revised TRRP. The proposed cut slope above the revised AD Facility site and the fill slope below the water tank site were assessed for both static and seismic slope stability in the Addendum Report. The slope stability analysis indicates the proposed cut slope above the revised AD Facility site would exceed the minimum safety factors; 1.74 for static stability and 1.32 for seismic stability. The existing fill slope below the water tank site exceeds the minimum safety factors; 1.62 for static stability and 1.13 for seismic stability. Therefore, slope stability impacts associated these revised components of the TRRP would not be significant. This finding is consistent with Section 10 of the County's Environmental Thresholds and Guidelines Manual, as site-specific geologic information indicates the relocated AD Facility site and water tank site are not susceptible to landslides. As identified in the certified Final SEIR, the slopes west of the MRF site may be adversely affected by storm flows and remain subject to potentially significant erosion.

The Revised TRRP would reduce the severity but not the significance of **Impact TRRP G-1** (still Class II) by removing the AD Facility from the west slope area subject to storm flow-induced erosion.

Impact TRRP G-6 (Expansive Soils):

Approved TRRP. Laboratory testing of soil samples of the Rincon Formation at the Landfill site indicate these soils have a medium expansion index. Additional fill at the operations deck is proposed to be Rincon Formation-derived soils from the west borrow area. Without proper engineering design, use of these soils could significantly impact the structural integrity of the proposed MRF and AD Facility buildings. The proposed maintenance building would be constructed on fill derived from the Sespe Formation (typically with a moderate shrink-swell potential) and may also be significantly affected by expansive soils (Class II).

Revised TRRP. This previously significant impact would not occur at the revised AD Facility site, as the Addendum Report indicates documented fill soils upon which the AD Facility would be constructed are not sufficiently expansive to require specialized foundation materials or systems. The MRF would remain subject to significant impacts associated with expansive soils under the Revised TRRP. The maintenance building would be relocated to near the MRF and subject to expansive soil impacts. The Revised TRRP would reduce the severity but not the significance of **Impact TRRP G-6** (still Class II) by removing the AD Facility from areas supporting expansive soils.

Impact TRRP G-7 (Differential Settlement):

Approved TRRP. The eastern portion of the MRF/AD Facility site (primarily parking areas) would be constructed over the buried solid waste footprint. A settlement analysis was performed to determine the potential settlement of the refuse during the 20-year design life of the facilities on the operations deck. Primary settlement of the refuse below the operations deck is assumed to have occurred due to the passage of time. Approximately 1.26 to 2.94 feet of total settlement is anticipated in areas overlying buried solid waste at the MRF/AD Facility site. Buildings are proposed to be constructed within the area underlain by artificial fill or Rincon Shale, which is anticipated to experience much lower total and annual settlement rates (0.15 to 0.38 feet). However, settlement at the MRF/AD Facility site has the potential to significantly affect the project structures and operation of the facilities (Class II).

Revised TRRP. This previously significant impact would not apply to the revised AD Facility site, as the site is not underlain or adjacent to previously buried solid waste and not subject to substantial differential settlement. The eastern portion of the MRF site would remain subject to differential settlement under the Revised TRRP. The Revised TRRP would reduce the severity but not the significance of **Impact TRRP G-7** (still Class II) by removing the AD Facility from areas subject to substantial differential settlement.

Based on the analysis conducted above, the Revised TRRP would not result in any new significant environmental effects related to geological processes or a substantial increase in the severity of previously identified significant effects. Overall, geological processes impacts would be reduced.

5.5.3 Mitigation Measures

The Revised TRRP would be subject to the mitigation measures provided in Section 4.5.2.4 of the certified Final SEIR:

- **Impact TRRP G-1:** ***MM TRRP G-1: Slope Stability Control.***
- **Impact TRRP G-6:** ***MM TRRP G-2: Expansive Soils.***
- **Impact TRRP G-7:** ***MM TRRP G-3: Differential Settlement Control – MRF/AD Facility Site.***
- **Impact TRRP G-8:** ***MM TRRP G-4: Settlement Control – Composting Area.***

These measures remain relevant and applicable to the Revised TRRP, and will be included in the Mitigation Monitoring and Reporting Plan for the Revised TRRP as amended. However, ***MM TRRP G-1, G-2 and G-3*** would not apply to the revised AD Facility site.

5.5.4 Residual Impacts

Implementation of the mitigation measures provided in the certified Final SEIR would reduce geologic processes impacts of the Revised TRRP to a level of less than significant.

5.6 CULTURAL RESOURCES

5.6.1 Setting

Regulatory Setting. Information provided in Section 4.6.1 of the certified Final SEIR has not changed and remains relevant to describe the cultural resources setting for areas potentially affected by the Revised TRRP. As a part of the prior Cultural Resources Study, on June 4, 2013, 24 Native American contacts identified by the Native American Heritage Commission were contacted and requested to respond with any comments or concerns regarding the TRRP. Two responses were received in June 2013. New tribal consultation requirements pursuant to AB 52 (Section 21080.3.1 of the California Public Resources Code) became effective on July 1, 2015, after release of the Draft SEIR (dated August 2014). This regulation requires that prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project, the lead agency shall begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if:

- The California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe, and
- The California Native American tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation.

Preparation of an addendum does not trigger tribal consultation pursuant to AB 52; however, since an amendment to the Comprehensive Plan Land Use Element Waste Facility Disposal Overlay is proposed as a part of the Revised TRRP, the Santa Barbara County Planning and Development Department initiated tribal consultation pursuant to SB 18 on June 1, 2017.

AD Facility Site and Power Line Alignment Cultural Setting. A Phase I archeological field survey was conducted by Padre Associates archeologist Val Kirstine on May 11, 2017 for the portion of the revised construction disturbance area not previously surveyed for the Cultural Resources Study prepared for the certified Final SEIR. These areas are the slope east of the Landfill perimeter road to be affected by earthwork for the revised AD Facility and the alignment for the above-ground power line. All additional areas surveyed have been previously disturbed by permitted Landfill operations. No cultural materials were found during the field survey.

5.6.2 Impact Analysis

Impact TRRP CR-1 (Disturbance of Unknown Archeological Resources):

Approved TRRP. Based on past archeological field surveys and those conducted for the project, no evidence of archeological resources were found in areas that would be affected by project-related ground disturbance. However, excavation at the tank sites has the potential to encounter unknown buried cultural resources.

Revised TRRP. The revised construction disturbance area includes a small net increase in the area of ground disturbance, all within areas previously disturbed by permitted Landfill development. No evidence of cultural resources was found during the survey of the revised construction disturbance area, and thus impacts would be the same as the approved TRRP. The Revised TRRP would not substantially increase the potential to discover unreported cultural resources, and no change in the significance of **Impact TRRP CR-1** (Class II) would occur. This finding is consistent with Section 8.B of the County's Environmental Thresholds and Guidelines Manual, as important archeological resources would not be impacted.

Based on the analysis conducted above, the Revised TRRP would not result in any new significant environmental effects to cultural resources or a substantial increase in the severity of previously identified significant effects.

5.6.3 Mitigation Measures

The Revised TRRP would be subject to the mitigation measure provided in Section 4.6.2.4 of the certified Final SEIR (**Impact TRRP CR-1 - *MM TRRP CR-1: Evaluation and Protection of Discovered Resources***). This measure remains relevant and applicable to the Revised TRRP, and will be included in the Mitigation Monitoring and Reporting Plan for the Revised TRRP as amended.

5.6.4 Residual Impacts

Implementation of the mitigation measure provided in the certified Final SEIR would reduce cultural resources impacts of the Revised TRRP to a level of less than significant.

5.7 NOISE

5.7.1 Setting

Setting information provided in Section 4.7.1 of the certified Final SEIR has not changed and remains relevant to describe the noise environment of the TRRP area. The noise setting of the certified Final SEIR includes noise generated by mobile equipment associated with existing Landfill operations, which is the primary source of noise. Noise generated by the existing LFG Control System engine and flare are not included in the setting as noise levels generated by this equipment at the property line are negligible in comparison to mobile equipment noise.

Since the noise analysis was completed, the County purchased the two parcels immediately south of the Landfill (APNs 081-150-033, -034). The northern parcel includes the partially constructed Hart residence which was considered a noise-sensitive receptor in the certified Final SEIR noise impact analysis. These parcels will be retained in open space. Therefore, this residence is no longer considered a noise receptor and is not addressed in the revised noise impact analysis.

5.7.2 Impact Analysis

Impact TRRP N-3 (Operational Noise):

Approved TRRP. Noise would be generated from many of the project facilities, including the MRF (sorting equipment, mobile equipment), the AD Facility (mobile equipment, screening equipment), the composting area (mobile equipment, grinder), and from the energy facility (CHP engines). Composite reference noise levels were developed for each major project facility, and noise levels were estimated for each facility at each noise-sensitive receiver, based on the respective operating hours for each facility. The resulting noise levels were then combined to produce a 65 dBA CNEL noise contour, and a combined noise level at each noise-sensitive receiver. These combined noise levels are conservatively high since they do not account for any noise reduction due to intervening topography between project facilities and noise-sensitive receptors.

As shown in Table 4.7-7 of the certified Final SEIR, noise levels at sensitive receptors are projected to be below 65 dBA CNEL criteria and the resulting increase above existing Landfill operations noise is projected to be no greater than 1 to 2 dBA. Project-related operations noise would result in a less than significant noise impact.

Revised TRRP. Changes to the TRRP affecting noise impacts include relocation of the AD Facility (including the energy facility) to an area east of the Composting Area and the proposed replacement LFG Control System engines and flare adjacent to the MRF. No changes in on-site truck trips would occur, and mobile equipment changes would be minor (addition of a scrubber-sweeper and small changes in horsepower ratings of other equipment). Therefore, mobile source noise would not affect the revised noise analysis. The noise impact analysis of the certified Final SEIR was revised to address the revised AD Facility location, and add the proposed replacement LFG Control System engines and flare to the estimated MRF noise levels. Based on information provided by the manufacturer, the proposed LFG Control System engine containers are equivalent to a masonry building with regard to noise attenuation.

The resulting noise values (dBA L_{eq}) were converted to 24 hour (dBA CNEL) noise values based on equipment operating hours. CNEL noise values at the four noise-sensitive receptors were estimated based on distance attenuation (geometric divergence) to each of the primary TRRP components (see Table 12). These levels were then logarithmically added (with existing Landfill noise) to estimate the overall Revised TRRP noise at each receptor. The overall Revised TRRP operational noise at the four noise-sensitive receptors would be the same (as modified by the July 2016 EIR Revision and Errata Letter, and rounded to the nearest decibel) as the approved TRRP, and less than the 65 dBA CNEL threshold for noise-sensitive uses. The Revised TRRP would not substantially increase the severity of **Impact TRRP N-3** (Class III), or result in a new significant impact.

Table 12. Revised TRRP Operational Noise Impact Summary (dBA CNEL)

Noise Receiver	MRF with Replacement LFG Control System Engines	AD Facility	ADF Energy Facility	Composting Area	Existing Landfill Operations	Total Project Noise Level	Significance Threshold
Arroyo Hondo residence	55	39	24	43	57	**59**	**65**
Arroyo Quemada community	53	43	28	46	58	**60**	**65**
Baron Ranch residence	52	43	28	46	57	**59**	**65**
Calle Real residences	47	37	22	39	53	**54**	**65**

Based on the analysis conducted above, the Revised TRRP would not result in any new significant environmental effects to noise levels or a substantial increase in the severity of previously identified significant effects.

5.7.3 Mitigation Measures

Consistent with the approved TRRP, the Revised TRRP would not result in significant noise impacts and mitigation is not required.

5.7.4 Residual Impacts

Consistent with the certified Final SEIR, significant noise impacts were not identified and mitigation is not required. Therefore, residual impacts would be the same as TRRP impacts and less than significant.

5.8 LAND USE

5.8.1 Setting

The majority of the setting information provided in Section 4.8.1 of the certified Final SEIR has not changed and remains relevant to describe the land use setting of the project area. However, since certification of the SEIR and approval of the TRRP, the County adopted the Gaviota Coast Plan. The Plan has been adopted in the inland portion of the planning area but has not yet been adopted in the Coastal Zone. Changes to the land use setting at the Landfill property resulting from adoption of the Plan include:

- A portion of the Landfill property (southwest and southeast corners of APN 081-150-019) have been included in the Critical Viewshed Corridor Overlay.
- The inland area of the Landfill has been rezoned from Unlimited Agriculture (under Ordinance 661) to AG-II-100.
- An area within the northeast corner of the Waste Disposal Facility Overlay (APN 081-150-026) has been designated as environmentally sensitive habitat (ESH).

Other changes to the land use setting include:

- The County purchased two parcels south of the Landfill (APNs 081-150-033 and -034).
- The lower section of the Baron Ranch Trail has been approved for relocation from the east side of Arroyo Quemado to the west side (see new alignment in Figure 17).
- U.S. Highway 101 (formerly an eligible scenic highway) has been designated by Caltrans as the Gaviota Coast State Scenic Highway. The officially designated segment includes 21 miles of Highway 101 from the City of Goleta's western boundary, to Route 1 at Las Cruces Ranch Road near Lompoc.

5.8.2 Impact Analysis

In addition to changes to the TRRP facilities, the Revised TRRP includes a Comprehensive Plan Amendment to adjust the boundary of the Land Use Element Waste Disposal Facility Overlay (see SEIR Addendum Section 4.1).

The land use impact analysis of the certified Final SEIR was based on the assessment of conflicts with adjacent land uses associated with environmental impacts of the TRRP. The Revised TRRP would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects as discussed in Sections 5.1 through 5.7 and 5.9. Therefore, the Revised TRRP would not result in any new significant land use conflicts or a substantial increase in the severity of previously identified significant effects.

5.8.3 Consistency with Land Use and Environmental Plans

The TRRP was previously analyzed for consistency with the Comprehensive Plan in Section 4.8.2.5 of the certified Final SEIR. A revised analysis is included below and is based on information contained in the certified Final SEIR as modified by this Addendum. As the overall objectives of the Revised TRRP have not changed with respect to reducing landfilling, increased recycling, diversion of organics and reducing greenhouse gases, the Revised TRRP remains consistent with Statewide Waste Management and Reduction Legislation and Climate Action Strategy. With the revised analyses contained in this SEIR Addendum, the revised project also remains consistent with the Clean Air Plan and Basin Plan.

The ~~following~~ analysis ~~of shows the~~ in Attachment 2 addresses consistency of the Revised TRRP with applicable County policies, including the Gaviota Coast Plan adopted after certification of the SEIR. No new significant impact or increase in severity of a previously identified significant impact would occur related to conflicts with land use plans, policies, or regulations. Further, the adoption of the Gaviota Coast Plan policies is not a substantial change in circumstances under which the project is undertaken or new information of substantial importance that would require major SEIR revisions because the Gaviota Coast Plan (pages 7-14 and 7-15) and the Final EIR prepared for the Plan (page 4.9-29) specifically acknowledged the TRRP was proposed and would increase solid waste diversion rates and significantly reduce greenhouse gas emissions.

5.8.4 Mitigation Measures

Visual resources (Section 4.1), biological resources (Section 4.3), hazards and hazardous materials (Section 4.4), geologic processes (Section 4.5), cultural resources (Section 4.6) and water resources (Section 4.10) mitigation measures provided in the certified Final SEIR remain relevant and applicable to the Revised TRRP to address land use conflicts.

5.8.5 Residual Impacts

Implementation of the mitigation measures provided in the certified Final SEIR would reduce land use impacts of the Revised TRRP to a level of less than significant.

5.9 WATER RESOURCES

5.9.1 Setting

Setting information provided in Section 4.10.1 of the certified Final SEIR has not changed and remains relevant to describe the water resources and regulatory environment of the Landfill area. Since certification of the Final SEIR and approval of the project, Well no. 6 has been drilled and completed in compliance with mitigation measure ***MM TRRP WR-1***. Two technical studies prepared for the certified Final SEIR have been revised to address the Revised TRRP, including the Hydrology and Hydraulic Analysis Report (Appendix L of the certified Final SEIR) and the Hydrogeologic and Water Supply Impact Analysis Report (Appendix O of the certified Final SEIR). The following revised impact analysis is based on these reports, which are attached to this SEIR Addendum as Appendices C and D.

5.9.2 Impact Analysis

Impact TRRP WR-1 (Flood Hazard to Downstream Structures):

Approved TRRP. Peak storm flows from the 24-hour, 100-year event under existing + project conditions would be 404 cfs at the southern boundary of the Tajiguas Landfill property, which is less than existing conditions (409 cfs). However, peak storm flows from the 100-year event under future + project conditions (357 cfs) would be slightly greater than future (no project) conditions (353 cfs). The Landfill access road culvert and the U.S. Highway 101 culvert appear to have been adequately sized for a 100-year event under existing and future + project conditions. The Union Pacific Railroad culvert appears to have been adequately sized for a 25-year event under pre-landfill conditions, but appears to have adequate capacity for the 100-year event under both existing + project and future + project conditions (HDR Engineering, 2013). In addition, the project-related addition of impervious surfaces would be much less than 25 percent of the Landfill site (County threshold). Impervious surfaces and drainage modifications associated with proposed project would result in a less than significant impact to drainage facilities and would not result in flooding.

Revised TRRP. Based on HEC-HMS modeling conducted by HDR Engineering for the Revised TRRP, peak run-off generated by a 100-year storm would be slightly less than the approved TRRP, and less than existing conditions (see Table 13). Consistent with the certified Final SEIR, impervious surfaces and drainage modifications associated with the Revised TRRP would result in a less than significant impact to drainage facilities and would not result in flooding. Peak storm flow rates would be less than the approved TRRP, and **Impact TRRP WR-1** would remain less than significant (Class III).

Table 13. Comparison of Peak Storm Flow Rates

Landfill Condition	Approved TRRP as Compared to the Revised TRRP	Peak Flow, 100-year Event (cfs)		
		Access Road Culvert	U.S. Highway 101 Culvert	Union Pacific Railroad Culvert
Pre-landfill	NA	566	568	609
Existing (interim spillway and basin in Pila Creek channel)	NA	409	451	493
Existing + project	Approved TRRP	404	447	488
	Revised TRRP	403	445	487
Future (final contours, interim spillway removed)	NA	353	399	442
Future + project	Approved TRRP	357	403	445
	Revised TRRP	355	401	444

Impact TRRP WR-2 (Water Demand):

Approved TRRP. The total water demand for the project is estimated to be 11.5 acre-feet/year. The water demand for the MRF and AD Facility is planned to be derived from a new supply well (Well no. 6) installed in the Sespe-Alegria Formation, located approximately 800 feet north of the MRF/AD Facility site. Proposed Well no. 6 would replace former Well no. 4 which was destroyed as part of Landfill reconfiguration and is not included in the baseline Landfill water supply estimate.

Water demand for proposed composting operations would primarily be provided from the reuse of collected storm water and any excess moisture conditioning water collected within the composting area. During the summer months, some supplemental water may be required to offset evaporation (0.6 acre-feet/year), which would be supplied by Well no. 5 located in close proximity to the proposed composting area. Overall, the estimated total Landfill (with project) water demand (42.5 acre-feet/year) would be less than the estimated total water supply (with proposed Well no. 6) (42.8 to 56.5 acre-feet/year).

Similar to Well no. 4, proposed Well no. 6 is proposed to be completed in the Sespe-Alegria Formation. Consequently, it is assumed that proposed Well no. 6, as a replacement well for Well no. 4, will have a similar yield (20 acre-feet/year, of which 6.3 acre-feet/year was pumped), and groundwater level response from pumping will be similar, i.e., no significant change in groundwater pumping level.

Supplemental water required for the composting area would be supplied by existing Well no. 5, completed in the Vaqueros Formation. The Vaqueros is considered an important water source in the area. Geosyntec (see Final SEIR Appendix O) estimated a safe yield value of 4 acre-feet/year for the Vaqueros Formation located within the Landfill watershed. Since the water demand of 0.6 acre-feet/year is far less than the 4 acre-feet/year safe yield for the Vaqueros Formation and the Landfill would have a water supply surplus; no significant impacts are expected associated with project-related increase in groundwater pumping from Well no. 5. Overall, increases in groundwater production required to meet project demands would not significantly impact local groundwater supplies.

Revised TRRP. The estimated total water demand for the Revised TRRP remains at 11.5 acre-feet/year, but the source of the water from the local groundwater resources for the TRRP facilities would be different than analyzed in the certified Final SEIR. Under the Revised TRRP, the AD Facility would be served by Well no. 5 which draws from the Vaqueros Formation. TRRP water use from Well no. 6 would decrease from 10.9 to 7.5 acre-feet/year (6.8 acre-feet/year for the MRF and 0.7 acre-feet/year for the Composting Area) under the Revised TRRP. It is anticipated that Well no. 5 would provide 4.0 acre-feet/year; 3.5 acre-feet/year for the AD Facility and 0.5 acre-feet/year for the Composting Area. These values are within the safe yield of these wells based on the analysis provided in Appendix O of the certified Final SEIR, and recent pump tests of Well no. 6.

Note that use of Well no. 5 for permitted Landfill operations and construction would be reduced as needed to ensure the 4.0 acre-feet/year safe yield of the Vaqueros Formation is not exceeded. In this case, other water sources would be used for Landfill operations such as Well

no. 6, Well no. 3 and the GLCRS interceptor trench. As the estimated total water demand would not change, water supplies remain adequate to serve the Revised TRRP as indicated by Table 4.10-1 of the certified Final SEIR. The incremental increase in water production from Well no. 5 to serve the Revised TRRP would not result in a new significant impact or increase the severity of a previously identified significant impact. **Impact TRRP WR-2** would remain less than significant (Class III).

Impact TRRP WR-4 (Groundwater Pumping Interference with Other Wells):

Approved TRRP. Proposed increased pumping in Well no. 5 (Vaqueros Formation) equates to an additional 0.4 gallons per minute (gpm). The nearest Vaqueros well is the Aera Well located in Cañada de la Huerta, located approximately 2,500 feet west of Well no. 5. The County's Environmental Thresholds and Guidelines Manual indicates that a reasonable radius of influence for a Vaqueros Formation well is 800 feet. Based on the low estimated demand for the project (additional 0.4 gpm) and the fact that the closest neighboring well is located greater than 800 feet away from Well no. 5, well interference is not anticipated.

Proposed pumping in new Well no. 6 to be completed in the Sespe-Alegria Formation equates to a long-term pumping rate of approximately 6.75 gpm. The nearest neighboring Sespe-Alegria wells are located within Baron Ranch (wells A and C) and are approximately 3,500 feet away. The County's Environmental Thresholds and Guidelines Manual does not indicate a reasonable radius of well influence for the Sespe-Alegria Formation. It is estimated that after 20 years of pumping, groundwater level drawdown (well interference) would be approximately 6.5 feet at the Baron Ranch well locations. Wells A and C are 585 and 561 feet deep, respectively and have 411 and 226 feet of water column above the reported pump depths, respectively. Therefore, the estimated drawdown from the pumping of proposed Well no. 6 would not substantially impact the water column (and related groundwater production) in the Baron Ranch Sespe-Alegria wells. Overall, the potential for well interference is low, and considered a less than significant impact.

Revised TRRP. The AD Facility would be relocated to near Well no. 5 which would be used to supply water for the bio-filters, wash-down, domestic uses and the flare scrubber. Therefore, the estimated TRRP water use from Well no. 5 would increase from 0.6 to 4.0 acre-feet/year or 2.5 gallons/minute. As the nearest Vaqueros Formation well (Aera well in Cañada de la Huerta) is located approximately 2,500 feet from Well no. 5, well interference is not anticipated. As water use for Well no. 5 would increase, TRRP water use from Well no. 6 would decrease from 10.9 to 7.5 acre-feet/year or 4.6 gallons/minute. Based on the distance to the nearest Sespe-Alegria wells (Baron Ranch Wells A and C, located approximately 3,600 feet from Well no. 6), well interference is not anticipated under the approved or Revised TRRP. Increased pumping from Well no. 5 would not result in a new significant impact or increase the severity of a previously identified significant impact. No change in the significance of **Impact TRRP WR-4** (Class III) would occur under the Revised TRRP.

Based on the analysis conducted above, the Revised TRRP would not result in any new significant environmental effects to water resources or a substantial increase in the severity of previously identified significant effects.

5.9.3 Mitigation Measures

The Revised TRRP would be subject to the mitigation measures provided in Section 4.10.2.4 of the certified Final SEIR:

- **Impact TRRP WR-7** (see Table 2): ***MM TRRP WR-2: Construction Storm Water Quality BMPs.***
- **Impact TRRP WR-8** (see Table 2): ***MM TRRP WR-3: Industrial Storm Water Permit Compliance and Spill Prevention.***
- **Impact TRRP WR-9** (see Table 2): ***MM TRRP WR-4: Water Quality Monitoring and Corrective Action Plan.***

These measures remain relevant and applicable to the Revised TRRP, and will be included in the Mitigation Monitoring and Reporting Plan for the Revised TRRP as amended. Note that ***MM TRRP WR-1*** has already been implemented for installation of Well no. 6.

5.9.4 Residual Impacts

Implementation of the mitigation measures provided in the certified Final SEIR would reduce water resources impacts of the Revised TRRP to a level of less than significant.

ATTACHMENT 1

FIGURES

ATTACHMENT 2

POLICY CONSISTENCY ANALYSIS

REQUIREMENT	DISCUSSION
Comprehensive Plan Designation	
Agriculture II (A-II): This designation applies to acreages of farm lands and agricultural uses located outside Urban, Inner Rural and Rural Neighborhood areas. General agriculture is permitted, including but not limited to livestock operations, grazing, and beef production as well as more intensive agriculture uses.	**Potentially Consistent/In Conformity:** The Tajiguas Landfill has been in operation since 1967, operates under a Solid Waste Facilities Permit, and is within the Waste Disposal Facility Overlay. The Overlay recognizes the operation of the Landfill facility as an allowable use within the Agricultural land use designation. The Revised TRRP would not change the underlying land use designation. The inland Tajiguas Landfill property is exempt from zoning requirements, pursuant to LUDC Section 35.10.040.G.1.b.
Land Use Development	
Land Use Development Policy 4: 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., water, sewer, roads, etc.) are available to serve the proposed development. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the proposed project. Lack of available public or private services or resources shall be grounds for denial of the project or reduction in the density otherwise indicated in the land use plan. **Gaviota Coast Plan Policy LU-5: Development of Non-Agricultural Uses.** Development of non-agricultural uses on land designated for agriculture, including land divisions and changes to a non-agricultural land use/zoning designation, shall only be permitted subject to all of the following: 1. Non-agricultural uses shall be compatible with continued existing agricultural use on the premises and on adjacent lands; 2. Non-agricultural uses shall avoid prime agricultural land or locate development contiguous with or in close proximity to existing developed areas able to accommodate the use; 3. Non-agricultural uses shall not have a significant adverse impact on biological resources, visual resources, and coastal resources (including public access, recreation and coastal dependent uses); and, 4. For properties located in the Coastal Zone, the proposed non-agricultural use and proposed land divisions shall be consistent with Coastal Land Use Plan Policies 8-2, 8-3 and 8-4 and Coastal Act Sections 30241-30242.	**Potentially Consistent/In Conformity:** Services currently exist at the Landfill and would continue to serve the Landfill, including the changes associated with the Revised TRRP. The *Hydrology and Hydraulic Analysis Report* and the *Hydrogeologic and Water Supply Impact Analysis Report*, (Appendices C and D), were updated to address the Revised TRRP. The AD Facility would be served by Well No. 5 which draws from the Vaqueros Formation. TRRP water use from Well No. 6 would decrease to 7.5 acre-feet/year as a result of this project. The use of Well No. 5 would not exceed 4.0 acre-feet/year, which is considered the safe yield for this well. In addition to Well Nos. 5 and 6, the Landfill water sources include Well No. 3 and the GLCRS interceptor trench. As a result, the groundwater resources present at the site are anticipated to be adequate to serve the project. The Revised TRRP includes the installation and operation of two advanced self-contained commercial wastewater treatment units. Permits will be necessary from County Environmental Health Services for the operation of the wells and for the commercial wastewater treatment units. Roads are presently developed on-site and would continue to serve the Landfill and associated facilities. Electrical service to the site is currently available. In addition, the MRF and ADF would be equipped with solar panels, which are anticipated to generate approximately one megawatt of electricity. Adequate services would continue to be available to serve the reconfigured parcels. The project would not result in an increase in demand for libraries, police, fire or health services. ~~Regarding the project's consistency with Gaviota Coast Plan Policy LU-5: Development of Non-Agricultural Uses, the Revised TRRP would not disturb the integrity of agricultural operations on Baron Ranch or other neighboring properties. No agricultural use exists on the Landfill premises. While Baron Ranch has historically been used for agriculture, no active agricultural activities currently exist on the site. If agricultural activities resume on a portion of Baron Ranch in the future, activity would likely occur on the east side of creek. Therefore, the project will not impact agricultural uses on the premises or adjacent lands.~~

REQUIREMENT	DISCUSSION
	Regarding the project's consistency with Gaviota Coast Plan Policy LU-5: Development of Non-Agricultural Uses, the Revised TRRP would not result in the loss of agricultural land and would not increase conflicts with adjacent agricultural activities because the additional area disturbed is not prime soils/farmland, has never been cultivated, and has been disturbed by prior Landfill operations including the Tajiguas Landfill Expansion Project (01-EIR-05). Specifically, the area proposed for the AD Facility has been previously graded and is currently used for Landfill operations (perimeter road and drainage facilities). The Tajiguas Landfill is a non-agricultural use of the property; however, the inland Tajiguas Landfill property is exempt from zoning requirements, pursuant to LUDC Section 35.10.040.G.1.b. The Waste Disposal Facility Overlay specifically allows for operation of the Landfill on agriculturally zoned land. The project does not involve land with a prime soils designation, and the additional 4.48 acres being added to the Waste Disposal Facility Overlay contains only non-prime soils and classified as grazing land. The Revised TRRP is located outside of the Coastal Zone and will not have a new significant adverse impact on biological resources, visual resources, and coastal resources as compared to the project analyzed in the certified Final SEIR. As indicated throughout this policy consistency discussion, the Revised TRRP includes development that avoids Environmentally Sensitive Habitat to the maximum extent possible, avoids visually prominent areas to the maximum extent possible, minimizes infrastructure requirements, and maintains the landscape's prominent features.
Aesthetics/Visual Resources	
Land Use Element, Visual Resource Policy 2: In areas designated as rural on the land use plan maps, the height, scale, and design of structures shall be compatible with the character of the surrounding natural environment, except where technical requirements dictate otherwise. Structures shall be subordinate in appearance to natural landforms; shall be designed to follow the natural contours of the landscape; and shall be sited so as not to intrude into the skyline as seen from public viewing places. **Gaviota Coast Plan Policy VIS-2:** Development shall be visually subordinate to the natural and agricultural environment as seen from public viewing places. Visual subordinance shall be achieved through adherence to the Site Design Hierarchy and Design Guidelines. "Visually subordinate" is defined as development that is partially visible but not dominant or disruptive in relation to the surrounding landscape as viewed from a public viewing place. **Gaviota Coast Plan Policy VIS-8:** Walls and Fencing. Walls and fencing shall not be visually dominant or disruptive in relation to their surroundings. Highly reflective or bright materials or colors shall not be permitted, and use of natural materials such as unfinished wood allowed to weather shall be encouraged. **Gaviota Coast Plan Policy VIS-3: Skyline Intrusion.** Where feasible, development shall be sited so as not to intrude into the skyline as seen from public viewing places.	**Potentially Consistent/In Conformity:** The project is located within the existing Tajiguas Landfill property. Permitted operation of the Landfill has substantially modified the natural landforms and contours in the area of the proposed project. ~~The Revised TRRP involves relocating the AD Facility from the southern portion of the operations deck to the eastern edge of the top deck. Terrain modeling and photo simulation analysis were conducted to analyze visual resources and showed that the AD Facility would not be visible in the revised location from the Landfill access road entrance (View 2) due to intervening topography and vegetation. The AD Facility is not located on a ridgeline and would not intrude into the skyline as seen from public viewing places.~~ The Revised TRRP facilities would be obscured by existing topography and vegetation from U.S. Highway 101, 2.4 miles west of the approved MRF/AD Facility site (View 3), U.S. Highway 101, 1.4 miles southeast of the approved MRF/AD Facility site (View 4) and the Pacific Ocean offshore of the Landfill (View 5), as analyzed in the Final SEIR. Development associated with the Revised TRRP would not be visible from these locations.

REQUIREMENT	DISCUSSION
Gaviota Coast Plan Policy VIS-4: Ridgeline Development. Development shall be prohibited from locating on ridgelines to the maximum extent feasible, as implemented by the Ridgeline and Hillside Development Guidelines.	The Revised TRRP involves relocating the AD Facility from the southern portion of the operations deck to the eastern edge of the top deck. Terrain modeling and photo-simulation analysis were conducted to analyze visual resources and showed that the AD Facility would not be visible in the revised location from the Landfill access road entrance (View 2) due to intervening topography and vegetation. The AD Facility is not located on a ridgeline and would not intrude into the skyline as seen from public viewing places. Existing visual qualities of the AD Facility area have been significantly modified by Landfill grading associated with the Tajiguas Landfill Expansion project (01-EIR-05). At the revised AD Facility site, the ridgeline elevation was lowered from a maximum elevation of 676 feet to 645 feet above mean sea level as part of the Expansion Project's Phase 1B's liner installation and was developed with perimeter road and drainage facilities. The Composting Area on top of the top deck of the Landfill was analyzed in the certified Final SEIR and included in the approved TRRP and was considered to be a small change in the visual condition of the Landfill as seen from the Landfill access road entrance. Under the Revised TRRP, the Composting Area would continue to be located on the top deck and would be visually subordinate in relation to the surrounding landscape, including the Landfill operations, as viewed from a public viewing place. The MRF, AD Facility and supporting facilities (e.g. percolate tanks, bio-gas engines) would not be visible from the Landfill access road entrance due to intervening topography and vegetation, and would be visually subordinate. Further, the AD Facility would be located east of the Composting Area to reduce changes in landform and not intrude into the skyline as seen from public viewing places. The Composting Area Runoff Collection Tank would be constructed at a lower elevation than analyzed in the certified Final SEIR and not visible from the upper portion of the Baron Ranch Trail northeast of the Landfill property. It would not intrude into the skyline as seen from public viewing places and would not be located on a ridgeline. The certified SEIR identified no impacts from View 3 (U.S. Highway 101, 2.4 miles west), View 4 (U.S. Highway 101, 1.4 miles southeast), and View 5, (offshore in the Pacific Ocean) due to intervening topography and vegetation. View 7 includes the upper (northern) Baron Ranch Trail that will remain in the same location as studied in the certified SEIR (the lower section of the trail has been approved for realignment). The certified Final SEIR indicated that the Composting Area Collection Tank would be minimally visible from the upper portion of the Baron Ranch Trail northeast of the Landfill property (View 7). Under the Revised TRRP, while the Composting Area Collection Tank would be increased in volume, it would be constructed at a lower elevation and not visible from View 7. A small portion of the AD Facility would be visible through a small dip in the ridgeline from View 7. However, the AD Facility would be located approximately 1.5 miles from the View 7 location, would be visually subordinate as compared to the overall viewshed, and would not obstruct public views.

REQUIREMENT	DISCUSSION
	Development of the lower Baron Ranch trail has been approved and permitted for relocation from the east side of Arroyo Quemado to the west side. Development of this portion of the trail is in progress and the existing trail alignment in the southern portion of Baron Ranch will be abandoned. The relocation of the AD Facility and associated facilities would be a minimum of 1,400 feet from the approved, re-located lower Baron Ranch Trail. An additional line of sight profile (see Figure 14) was generated to determine whether the AD Facility could be seen from the relocated trail. This location is the closest point to the revised AD Facility where topography allows for clear view from the relocated trail to the ridgeline; however, the AD Facility and associated facilities would not be visible from this location due to intervening topography. Therefore, the AD Facility and associated structures in the Revised TRRP result in development that is visually subordinate to the natural landforms, is designed to follow natural contours, and does not intrude into the skyline. The Revised TRRP contains changes in the view from the Upper Outlaw Trail on Arroyo Hondo Preserve, which is 0.6 miles north-northwest of the approved MRF/AD Facility site (View 8). Specifically, changes in the view would be associated with the addition of the relocated AD Facility, fire-water tank and above-ground power line, deletion of the Landfill maintenance facility, and relocation of the Composting Area Runoff Collection Tank. Although these facilities would be added to the viewshed, the modifications associated with the Revised TRRP would be visually subordinate and an insubstantial element of the view relative to the landscape which has already been and will continue to be heavily modified by permitted Landfill operations. Existing views from this trail include the active Tajiguas Landfill. Regarding View 6, the relocated AD Facility, Composting Area, relocated Landfill maintenance facility and the new above-ground power line would not be visible from U.S. Highway 101 due to the limited view corridor and intervening topography and vegetation. The MRF would remain on the operations deck and would continue to be visible from U.S. Highway 101, but would be located approximately 300 feet farther north of U.S. Highway 101 than the AD Facility location analyzed for the original TRRP in the certified Final SEIR (previously located south of and in front of the MRF from View 6). Therefore, the location of the structure would result in a reduction of the facility's visibility from U.S. Highway 101. The only significant but mitigable visual impact (**Impact TRRP VIS-2**) identified in the certified Final SEIR involves altering the visual setting as seen from U.S. Highway 101. However, the visibility of the project would be reduced under the Revised TRRP as compared to the approved TRRP due to the relocation of the AD Facility. Additionally, technical requirements, such as the need for large equipment to operate within the buildings, determine the height, size and form of the project facilities. The project is visually subordinate as it is mostly hidden from public view by intervening topography. As such, the height, scale and design of structures associated with the Landfill would be compatible with the character of the surrounding manmade and natural environments.

REQUIREMENT	DISCUSSION
Gaviota Coast Plan Policy VIS-5: Lighting. The night sky and surrounding land uses shall be protected from excessive and unnecessary light associated with development.	**Potentially Consistent/In Conformity:** The approved TRRP included skylights in the MRF and AD Facility that would be fitted with blinds. These skylights have been deleted from the Revised TRRP which would reduce the potential for light to escape from the interior of the building and impact the night sky. Additionally, the relocated AD Facility flare and proposed LFG Control System flare would not produce external flames such as those typically associated with petroleum production facilities. ~~Consistent~~ As with the approved TRRP, the Revised TRRP would include exterior lighting with dark sky compliant, full cut-off lighting fixtures, consistent with this policy.
Gaviota Coast Plan Policy VIS-12: Critical Viewshed Corridor. Protection of the ocean and mountain views of the Gaviota Coast from Highway 101 is critically important. Therefore, a Critical Viewshed Corridor Overlay, providing more protective viewshed policies for development permits within the overlay, is designated for the Gaviota Coast. **Gaviota Coast Plan Policy VIS-13: Development Visibility.** Development within the Critical Viewshed Corridor shall be screened to the maximum extent feasible as seen from Highway 101. Screening shall be achieved through adherence to the Site Design Hierarchy and Design Guidelines. **Gaviota Coast Plan Policy VIS-14: Landscaping.** Non-agricultural landscaping, when mature, shall not obstruct public mountain or ocean views. **Gaviota Coast Plan Policy VIS-15: Ocean Views.** To the maximum extent feasible, development shall be sited and designed to preserve unobstructed broad views of the ocean from Highway 101, and shall be clustered to the maximum extent feasible. **Gaviota Coast Plan Policy VIS-17: Unobstructed Broad Views of the Ocean.** For properties within unobstructed broad views of the ocean, development shall be designed so that exposed structural elevations are at an appropriately proportioned mass and scale to the unobstructed broad views of the ocean.	**Potentially Consistent/In Conformity:** ~~A portion of the existing Landfill property (southwest and southeast corners of APN 081-150-019) were included in the Critical Viewshed Corridor Overlay as a part of the Gaviota Coast Plan adoption. The fire water storage tank and reclaimed water storage northwest of the MRF fall within the overlay boundary. Although the size of the fire water storage tank increased with the Revised TRRP, the tanks were a part of the approved project analyzed in the certified Final SEIR. The relocated AD Facility, Composting Area, relocated Landfill maintenance facility and the new above-ground power line would not be visible from U.S. Highway 101. The MRF would continue to be visible from U.S. Highway 101, but would be located approximately 300 feet farther north of U.S. Highway 101 than the AD Facility location analyzed for the original TRRP in the certified Final SEIR. In addition, the Composting Area Runoff Collection Tank and the fire water tank do not appear to be visible from U.S. Highway 101, and when looking towards Pila Creek, the tanks would not be seen.~~ ~~While the tanks located within the Critical Viewshed Corridor Overlay have to be elevated above the MRF to provide gravity flow to the MRF, the tanks would be located along an existing landfill access road in a saddle/depression between two ridges. In addition, the ridge on which the tanks are to be located is lower than the mountain backdrop. Therefore, ocean and mountain views of the Gaviota Coast from Highway 101 would be maintained.~~ The relocated AD Facility, Composting Area, relocated Landfill maintenance facility and the new above-ground power line would not be visible from U.S. Highway 101. The MRF would continue to be visible from U.S. Highway 101, but would be located approximately 300 feet farther north of U.S. Highway 101 than the AD Facility location analyzed for the original TRRP in the Final SEIR. In addition, the Composting Area Runoff Collection Tank and the fire water tank would not be visible from U.S. Highway 101, and when looking towards Pila Creek, the tanks would not be seen. While the tanks have to be elevated above the MRF to provide gravity flow to the MRF, the tanks would be located on the side of a ridge. The ridgeline associated with the location of the tanks is lower than the mountain backdrop. Therefore, ocean and mountain views of the Gaviota Coast from Highway 101 would be maintained. Further, since development associated with the Revised TRRP would not be visible from U.S. Highway 101, Gaviota Coast Plan Policies VIS-13 and VIS-14 are not applicable.

REQUIREMENT	DISCUSSION
	Views of the Revised TRRP are entirely obscured by intervening topography and vegetation from U.S. Highway 101 and the Pacific Ocean offshore of the Landfill (Views 3, 4, and 5). Further, the project would continue to be subject to the mitigation measures provided in the certified Final SEIR, including mitigation for landscape screening (***MM TRRP VIS-1b***). The facilities associated with the Revised TRRP would not block ocean views, as they would be below the elevation of topographic features to the south. Views from the lower section of Baron Ranch Trail would be blocked by intervening topography, including the ridgeline that separates the Arroyo Quemado and Pila Creek watersheds. A small portion of the AD Facility would be visible through a small dip in the ridgeline from View 7, but would not obstruct public views or be incompatible with surrounding uses. Further, the modifications to the Landfill associated with the project would be an insubstantial element of the view relative to the landscape which has already been, and will continue to be substantially modified by permitted Landfill operations.
Dev Std VIS-1: Fuel Management Zone Buffers. Structures shall be sited and designed to minimize the need for vegetation clearance for fuel management zone buffers.	**Potentially Consistent/In Conformity:** Revised TRRP facilities have been sited in landfill operational areas that do not support vegetation or are currently managed to reduce fire hazards, including the relocated AD Facility. However, the relocated AD Facility would be within 100 feet of currently unmanaged vegetation, and would require an expansion (about 1.3 acres) into the fuel management area. The relocated AD Facility has been sited to minimize the additional vegetation clearance required to the maximum extent feasible.
Air Quality	
Air Quality Supplement Policy A: Direct new urban development to areas within existing urbanized areas without endangering environmentally sensitive areas or open space resources. **Air Quality Supplement Policy E:** Improve the integration of long-range planning and project approval procedures with air quality planning requirements.	**Potentially Consistent/In Conformity:** Standard emission reduction measures recommended by the SBCAPCD, included in the approved TRRP and Revised TRRP analysis, would be implemented during project construction. The project would not exceed the 25 tons/year threshold for construction air pollutant emissions. Further, the NAAQS would not be exceeded for any of the criteria pollutant categories. In addition, minor changes in on-site mobile equipment would not exceed County operational or motor vehicle pollutant emissions thresholds. In the certified Final SEIR, truck trips associated with transporting digestate from the AD Facility to the Composting Area were addressed; however, under the Revised TRRP, these facilities would be adjacent to each other (digestate would be delivered to the Composting Area by a conveyor). The truck trips analyzed in the Final SEIR would be replaced with trips transporting organic waste from the MRF to the AD Facility. As such, the number of truck trips associated with transporting organic waste and digestate would not change as a result of the Revised TRRP. The Revised TRRP would also improve air quality over the approved TRRP in many regards. Replacement of the existing LFG Control System engine with modern engines equipped with a NO_x Control System would result in a reduction in NO_x emissions by up to 180.6 pounds per day and ROC emissions reduced by up to 71.5 pounds per day, which also represents a reduction in the County's stationary source emissions inventory.

REQUIREMENT	DISCUSSION
	During the Revised TRRP review, an updated health risk assessment was completed based on changes in emissions source locations. While the acute hazard index threshold is exceeded at the Landfill property boundary for both the approved and Revised TRRP, the impact would be reduced under the Revised TRRP. The exceedance would occur in an uninhabited area of steep terrain and dense vegetation, not reasonably accessible to the public, such that individuals would not be exposed to the risk. The project was also reviewed for greenhouse gas emissions, and the Revised TRRP would have the same level of GHG emissions as the approved TRRP. Like the approved TRRP, the Revised TRRP is beneficial because it will reduce overall future GHG emissions from the site (reduced Landfill methane emissions) and would enhance the recovery of recyclable materials. The Revised TRRP would also maintain compliance with air quality requirements since it would be consistent with the 2013 Clean Air Plan and the 2016 Ozone Plan.
Agriculture	
Agricultural Element Policy I.A: The integrity of agricultural operations shall not be violated by recreational or other non-compatible uses. **Agricultural Element, Policy II.D:** Conversion of highly productive agricultural lands whether urban or rural, shall be discouraged. The County shall support programs which encourage the retention of highly productive agricultural lands. **Gaviota Coast Plan Policy AG-I.A:** Protect and Support Agricultural Land Use. Land designated for agriculture shall be preserved and protected for agricultural use; the integrity of agricultural operations shall not be violated by non-compatible uses.	**Potentially Consistent/In Conformity:** There is no agriculture on the property, as the Tajiguas Landfill site has been used for the disposal of municipal solid waste since 1967. Areas affected by the project are either already disturbed or in open space. The Landfill site has an agricultural land use designation and is agriculturally zoned; however, acknowledgement of the site's use as a landfill is specified through the Waste Disposal Facility Overlay. ~~As part of the Revised TRRP, an amendment to the Waste Disposal Facility Overlay is proposed to include the relocated AD Facility. The area to be included (4.48 acres) was analyzed for disturbance in 01-EIR-05 and is part of the Landfill's permitted operational area.~~ Implementation of the mitigation measures identified in the Tajiguas Landfill environmental documents for the operation of the Landfill with regard to land use, air quality and nuisances would continue to minimize conflicts with the ongoing agricultural operations in the area. Furthermore, the 4.48 acres of land proposed to be added to the Waste Disposal Facility Overlay within the Baron Ranch parcel is previously disturbed land that is not used for agricultural purposes, and was reviewed under the Tajiguas Landfill Expansion Project EIR (01-EIR-05), which was certified by the Board of Supervisors on August 13, 2002. As indicated above under "Land Use", Baron Ranch has historically been used for agriculture but no active agricultural activities currently exist on the site. If agricultural activities resume on a portion of Baron Ranch in the future, activity would likely occur on the east side of creek. ~~The Revised TRRP would not disturb the existing of potential future integrity of agricultural operations on Baron Ranch or other neighboring properties.~~

REQUIREMENT	DISCUSSION
	The Gaviota Coast Plan was adopted on November 8, 2016 and took effect on December 9, 2016 in the inland area of the County. Chapter 7 of the Gaviota Coast Plan recognizes the Tajiguas Landfill as an existing facility and discusses the Tajiguas Resource and Recovery Project, including the construction of the AD Facility and MRF (Gaviota Coast Plan, page 7-14 and 7-15). Specifically, the Gaviota Coast Plan states that the TRRP would increase diversion rates to over 80%, generate additional electricity, and significantly reduce the region's greenhouse gas emissions. The Gaviota Coast Plan recognizes that the Tajiguas Landfill provides a necessary public service to the community, and is being closed in phases. The post-closure use of the Landfill is currently designated as open space. As indicated in this discussion above, the 4.48 acre addition to the Overlay consists of previously disturbed land that is not used for agricultural purposes, is located on a sloped area, and is considered non-prime agricultural land (classified as grazing land). Further, the Revised TRRP does not result in significant adverse impacts on biological resources, visual resources, and coastal resources. The Revised TRRP is located entirely outside of the coastal zone. The addition of the land to the Waste Disposal Facility Overlay would not disturb the existing or potential future integrity of agricultural operations on Baron Ranch or other neighboring properties. The proposed project would not affect agricultural operations and is in conformity with policies I.A, II.D, and AG-I.A.
Archaeology	
Land Use Element, Historical and Archaeological Sites Policy 1. All available measures, including purchase, tax relief, purchase of development rights, etc., shall be explored to avoid development on significant historic, prehistoric, archaeological, and other classes of cultural sites. **Land Use Element, Historical and Archaeological Sites Policy 2.** When developments are proposed for parcels where archaeological or other cultural sites are located, project design shall be required which avoids impacts to such cultural sites if possible. **Land Use Element, Historical and Archaeological Sites Policy 3.** When sufficient planning flexibility does not permit avoiding construction on archaeological or other types of cultural sites, adequate mitigation shall be required. Mitigation shall be designed in accord with guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission. **Land Use Element, Historical and Archaeological Sites Policy 4.** Off-road vehicle use, unauthorized collection of artifacts, and other activities other than development which could destroy or damage archaeological or cultural sites shall be prohibited. **Land Use Element, Historical and Archaeological Sites Policy 5.** Native Americans shall be consulted when development proposals are submitted which impact significant archaeological or cultural sites.	**Potentially Consistent/In Conformity:** There are no known historic sites within 0.5 mile radius of the project site, and there is no evidence of archaeological resources within the area of proposed ground disturbance. Excavation at the tank sites has the potential to encounter unknown buried cultural resources. Therefore, mitigation measure ***MM TRRP CR-1*** from the certified Final SEIR, which requires stop work and evaluation of materials in the unlikely event of the discovery of resources during construction, is required. With implementation of this measure, the project is in conformity with policies relating to cultural resources. The additional construction disturbance area associated with the Revised TRRP has been analyzed for cultural resources in a supplemental Phase 1 Archaeological Survey (May 15, 2017), conducted by Padre Associates, Inc. In addition, the following surveys were conducted near the project area: • A Phase 1 Survey was conducted on June 5, 2013 for the TRRP and the results were included in the certified Final SEIR that indicated that no cultural resource impacts would occur at the proposed project site. The Phase 1 Survey investigation included a records search at the Central Coast Information Center, Native American notification, historic map and records review, and a field survey.

REQUIREMENT	DISCUSSION
Gaviota Coast Plan Policy CS-1: Preserve and protect significant cultural, archaeological and historical resources to the maximum extent feasible. **Gaviota Coast Plan Action CS-4:** Native American Consultation. The County shall continue its consultations with the tribes identified by the Native American Heritage Commission (NAHC) pursuant to Assembly Bill 52 and Senate Bill 18 to ensure that cultural resources of concern to Native Americans are identified and taken into account in future development planning. **Gaviota Coast Plan Dev Std CS-1**: A Phase 1 archaeological survey shall be performed when identified as necessary by a County archaeologist or contract archaeologist. The survey shall include all areas of the project that would result in ground disturbance. The content, format, and length of the Phase 1 survey report shall be consistent with the nature and size of the project and findings of the survey.	• A Phase 1 Archaeological Survey was conducted in October 1986. The record search and survey indicated no presence of on-site cultural resources. One location in the Phase 1 Survey was selected for subsurface testing due to a potential probability of prehistoric use, and no cultural resources were encountered during testing. This survey was conducted for an expansion of the Tajiguas Landfill near the current project site that was processed in 1987. The results of the surveys indicate that no cultural resources are present, and as such, no impact to archaeological resources is anticipated. Also, the Certified SEIR and Approved TRRP included mitigation measures for evaluating and protecting discovered resources (***MM TRRP CR-1***). Although no impacts would occur to significant archaeological or cultural sites, P&D staff complied with consultation requirements pursuant to AB 52 (not applicable for this project) and SB 18, and particularly initiated consultation efforts with local Native American Tribes pursuant to Government Code Section 65352.3 (Senate Bill 18).
Biological Resources	
Gaviota Coast Plan Policy NS-2: Environmentally Sensitive Habitat (ESH) areas and important or sensitive biological and natural resources shall be protected to the maximum extent feasible. Where special-status plant and animal species are found pursuant to the review of a discretionary project, the habitat in which the sensitive species is located shall be preserved to the maximum extent feasible. **Gaviota Coast Plan Dev Std NS-2**: ESH Setbacks and Buffers. Mapped inland riparian ESH-GAV overlay areas shall have a development area setback buffer of 100 feet from the edge of either side of the top-of-bank of creeks or existing edge of riparian vegetation. **Gaviota Coast Plan Policy NS-7**: Riparian vegetation shall be protected to the maximum extent feasible. Riparian vegetation shall not be removed except where clearing is necessary for the maintenance of existing roads and/or free flowing channel conditions, the removal of invasive exotic species, stream/creek restoration, or the provision of essential public services. Any unavoidable riparian vegetation removal conducted in compliance with the activities identified by this policy shall be conducted in compliance with the Environmentally Sensitive Habitat and resource protection policies and provisions of the Gaviota Coast Plan and the Comprehensive Plan. **Gaviota Coast Plan Policy NS-9**: With the exception of local, state, or federal resource agency permitted activities, natural stream channels and conditions shall be maintained in an undisturbed state to the maximum extent feasible in order to protect banks from erosion, enhance wildlife passageways, and provide natural greenbelts. **Gaviota Coast Plan Policy NS-11**: Biological impacts shall be avoided to the maximum extent feasible. In cases where adverse impacts to biological resources cannot be avoided after impacts have been minimized, restoration shall be required. A minimum replacement ratio shall be required to compensate for the destruction of native habitat areas or biological resources. The area or units to be restored, acquired, or dedicated for a permanent protective easement shall exceed the biological	**Potentially Consistent/In Conformity:** A biological field survey was conducted on May 11, 2017 to characterize vegetation and wildlife habitats in areas not previously surveyed for the certified Final SEIR that would be affected by the Revised TRRP. The locations where construction disturbance would be greater under the Revised TRRP are mostly part of active permitted Landfill operations previously analyzed in 01-EIR-05 ~~and 08EIR-00000-00007~~. The total construction disturbance area would be increased by 3.7 acres under the Revised TRRP. ~~As discussed below, the Revised TRRP would not affect areas designates as ESH and would not affect riparian vegetation or stream corridors.~~ ~~Earthwork for the revised AD Facility would extend beyond the existing cut slope east of the existing Landfill access road by up to 25 feet, in previously disturbed areas. However, earthwork would not extend outside the Landfill operational boundary. Earthwork would not extend outside the Landfill operational boundary, though would result in a net increase of 0.5 acres of ruderal vegetation to be removed (0.2 acres of this disturbance will be temporary in nature and re-colonized by vegetation and wildlife). Approximately 0.1 acres of hydro-seeded vegetation dominated by native species would be removed by power pole installation. Most of this disturbance would be temporary, and vegetation would be expected to re-colonize the construction area.~~ ~~The Revised TRRP involves separating the AD Facility from the MRF. Fuel management (as required by the Uniform Fire Code), would be required around the relocated AD Facility. Assuming management would be required within 100 feet of the AD Facility, approximately 1.3 acre would need to be managed. A portion of the fire management area (0.4 acres) is within the existing disturbed operational area boundary. Approximately 0.9 acres extends into previously undisturbed areas; however, 0.8 acres in the previously undisturbed area is comprised of low value ruderal vegetation and 0.1 acres consists of mixed scrub containing common native species. A portion of this fuel management area falls within the certified~~

REQUIREMENT	DISCUSSION
value of that which is destroyed. Where onsite restoration is infeasible or not beneficial with regard to long-term preservation of habitat, an offsite easement and/or alternative mitigation measures that provide adequate quality and quantity of habitat and will ensure long-term preservation shall be required. **Gaviota Coast Plan Policy LU-10**: Development Siting. Development shall be sited to the maximum extent possible to: 1) avoid environmentally sensitive habitat, 2) avoid visually prominent areas, 3) minimize infrastructure requirements and/or redundancy, and 4) minimize fragmentation of the landscape. **Gaviota Coast Plan Dev Std NS-2**: ESH Setbacks and Buffers. Mapped riparian ESH-GAV overlay area shall have a development area setback buffer of 100 feet from the edge of either side of the top-of-bank of creeks or the existing edge of riparian vegetation, whichever is further. Development within other ESH areas shall be required to include setbacks or undeveloped buffer zones from these areas as part of the proposed development, except where setbacks or buffers would preclude reasonable use of the parcel. In determining the location, width and extent of setbacks and/or buffer areas, the County's biological resources and/or vegetation maps and other available data shall be used (e.g., maps, studies, or observations). Appropriate public recreational trails may be allowed within setbacks or buffer areas. Required buffers for ESH-GAV may be adjusted upward or downward on a case-by-case basis but shall not preclude reasonable use of a parcel. The buffer shall be established based on an investigation of the following factors and, when appropriate, after consultation with the Department of Fish and Wildlife and Regional Water Quality Control Board, if required, in order to protect the biological productivity and water quality of streams: demonstration of a net environmental benefit; existing vegetation, soil type and stability of stream corridors; how surface water filters into the ground; slope of the land on either side of the stream; location of the 100 year flood plain boundary; and consistency with adopted Gaviota Coast Plan and Comprehensive Plan policies.	~~Final SEIR biological study 200 foot buffer area. Overall, the incremental increase in vegetation loss would be 1.7 acres of ruderal vegetation (0.2 acres would be temporary) and 0.1 acres of native mixed scrub, and thus the total permanent increase would be 1.6 acres from Revised TRRP compared to the approved TRRP.~~ Earthwork for the revised AD Facility would extend beyond the existing cut slope east of the existing Landfill access road by up to 25 feet, in previously disturbed areas that have since been partially colonized by ruderal vegetation and generally serve as low quality wildlife habitat. Earthwork would not extend outside the Landfill operational boundary; however, it would result in a net increase of 0.5 acres of ruderal vegetation to be removed (0.2 acres of this disturbance will be temporary and re-colonized by vegetation and wildlife). Approximately 0.1 acres of hydro-seeded vegetation dominated by native species would be removed by power pole installation. Most of this disturbance would be temporary, and vegetation would be expected to re-colonize the construction area. The Revised TRRP involves separating the AD Facility from the MRF. However, the AD Facility and associated facilities would be located adjacent to the Composting Area, which would eliminate truck trips transporting digestate to the composting area between the two facilities. The area associated with the revised AD Facility was previously graded as part of the Tajiguas Landfill Expansion Project (01-EIR-05). The relocation of the AD Facility would require expansion of the existing fuel management area beyond the existing cut slope, which would include mowing or disking about 1.3 acres of ruderal vegetation. Of that, approximately 0.9 acres extends into previously undisturbed areas; however, 0.8 acres is comprised of ruderal vegetation and 0.1 acres consists of native mixed scrub vegetation. Overall, the incremental increase in vegetation loss would be 1.7 acres of ruderal vegetation (0.2 acres would be temporary) and 0.1 acres of native mixed scrub, and thus the total permanent increase in loss of vegetation would be 1.6 acres from Revised TRRP compared to the approved TRRP. 0.8 acres of which would be located in previously disturbed areas. The total amount of vegetation permanently removed under the Revised TRRP would be 4.93 acres as compared to 3.33 acres under the approved TRRP. Affected vegetation and wildlife habitat is primarily non-native grassland consisting of previously disturbed and fragmented patches with low habitat value. The Revised TRRP would be located at least 1,400 feet from Arroyo Quemado, which has been designated ESH. With the implementation of the Revised TRRP, the area designated as ESH in the northeastern area of the Landfill parcel (APN 081-150-026) would no longer be included in the Overlay. Work related to the project would not be performed in any ESH, riparian vegetation, or natural stream channel areas. All work would be performed within previously disturbed areas of the Landfill.

REQUIREMENT	DISCUSSION
	The Revised TRRP would meet all ESH setbacks and buffers since the ESH on the Landfill property is located on the northeast corner of APN 081-150-026 at Arroyo Quemado, which is at least 1,400 feet from the Revised TRRP. Therefore, the project meets the development area setback buffer of 100 feet from the edge of either side of the top-of-bank of creeks and from the existing edge of riparian vegetation. ~~Earthwork would extend into a California Red-Legged Frog (CRLF) Critical Habitat Unit; however, updated site-specific surveys for the Revised TRRP showed that all areas of earthwork were previously disturbed by permitted landfill operations, and were comprised of sparsely vegetated, upland, low value habitat, such that disturbance by the project would not significantly impact the CRLF or its habitat. CRLF have only been observed in water features at the southern end of the Landfill and in the back canyon area of the Landfill, which are located at least 2,000 feet from the Revised TRRP's location.~~ ~~The Revised TRRP would result in a net increase of 0.5 acres of ruderal vegetation removed by earthwork for construction (0.2 acres of this would be temporarily removed and re-vegetated after construction), plus 1.3 acres removed for wildfire fuel management, which would increase the area of exposed ground for CRLF to cross during overland movement. However, this earthwork and fuel management removal is minimal, is not located in water features or areas where CRLF have been observed, and the affected sparse, ruderal vegetation provides little cover for dispersing CRLF. As such, the likelihood of CRLF occurring within affected upland areas is low.~~ ~~As nighttime equipment and motor vehicle activity would not increase, impacts on the dispersal of transient CRLF would not change relative to the prior analysis in the certified Final SEIR. **Impact TRRP-BIO-12** would remain mitigated to less than significant (Class II), with the implementation of ***MM-TRRP-BIO-6***, which will remain applicable and would be implemented consistent with the certified Final SEIR to continue reducing **Impact TRRP-BIO-12** to be less than significant.~~ ~~The Revised TRRP has been designed to avoid and minimize disturbance of biological features. As such, biological impacts will be avoided to the maximum extent feasible. The Revised TRRP would not create new significant impacts that were not previously analyzed in the Final SEIR.~~ ~~In addition, approximately 50 acres of CRLF Critical Habitat would be removed from the Waste Disposal Facility Overlay as part of the Comprehensive Plan Amendment.~~ ~~Also, as discussed above, the Revised TRRP would be consistent with Policy LU-10(2), (3) and (4) by avoiding visually prominent areas, involving the minimal infrastructure needed for the Revised TRRP, and not resulting in fragmentation of the landscape since the project is located within the landfill's permitted boundaries.~~ ~~The proposed project would not increase impacts to biological resources compared to the Certified SEIR.~~ In 2010, after grading occurred on the Tajiguas Landfill and the Baron Ranch parcel, the U.S. Fish and Wildlife Service (USFWS) designated 1,636,609 acres of critical habitat for the

REQUIREMENT	DISCUSSION
	CRLF in 48 units. As described in the Federal Register by USFWS, the unit boundaries are meant to follow the watershed boundaries. The use of the watershed boundary as the unit boundary is further supported by the consultation history for the Biological Opinion for the Tajiguas Landfill Reconfiguration and Baron Ranch Restoration project. USFWS and the Army Corps of Engineers clarified that the western boundary of the California Red Legged Frog (CRLF) proposed Critical Habitat Unit STB-6 is the ridgeline at the eastern border of the Tajiguas Landfill. Updated site-specific surveys for the Revised TRRP showed that all areas of earthwork were previously disturbed, and were comprised of sparsely vegetated, upland, low value habitat, such that disturbance by the project would not significantly impact the CRLF or its habitat. CRLF were only observed in water features at the southern end of the Landfill and in the back-canyon area of the Landfill, which are located at least 2,000 feet from the Revised TRRP's location. The AD Facility and associated facilities would be located outside of the Arroyo Quemado watershed (approximately 1,400 feet north of Arroyo Quemado) and can be inferred to be located outside of an area designated as critical habitat, based on the Federal Register and Biological Opinion for the Tajiguas Landfill Reconfiguration Project. The Revised TRRP would result in a net increase of 0.5 acres of ruderal vegetation removed by earthwork for construction (0.2 acres of this would be temporarily removed and re-vegetated after construction), plus 0.3 acres removed for wildfire fuel management, which would increase the area of exposed ground for CRLF to cross during overland movement. However, this earthwork and fuel management removal is not located in water features or areas where CRLF were observed, and the affected sparse, ruderal vegetation provides little cover for dispersing CRLF. The AD Facility construction disturbance area does not contain CRLF aquatic breeding habitat, aquatic non-breeding habitat, or upland habitat, and is a highly altered area with only marginal dispersal habitat. CRLF may be present while making overland dispersal movements, which typically occur at night and/or during rain events. Since the AD Facility and Compositing Area would be adjacent to each other, night-time equipment and motor vehicle activity would not increase and dispersal of transient CRLF would not be adversely affected. The Revised TRRP has been designed to avoid and minimize disturbance of biological features. As such, the likelihood of CRLF occurring within affected upland areas is low, and biological impacts will be avoided to the maximum extent feasible. Although Federal designation may signal the presence of potentially sensitive habitat, biological resources are not necessarily significantly affected. The addition of 4.48 acres in the Waste Disposal Facility Overlay is on land that has been previously analyzed in 01-EIR-05 and graded to support landfill activities. In addition, the Comprehensive Plan Amendment would adjust the Waste Disposal Facility Overlay boundary by removing approximately 50 acres of CRLF Critical Habitat Unit STB-6 from the Overlay. The Revised TRRP would not create new significant impacts that were not previously analyzed in the Final SEIR.

REQUIREMENT	DISCUSSION
	Also, as discussed above, the Revised TRRP would be potentially consistent with Policy LU-10(2), (3) and (4) by avoiding visually prominent areas, involving the minimal infrastructure needed for the Revised TRRP, and not resulting in fragmentation of the landscape since the project is located within the Landfill's permitted boundaries. The Revised TRRP would not increase impacts to biological resources as compared to the approved TRRP as documented in the certified Final SEIR.
Gaviota Coast Plan Policy NS-6: Wildlife Corridors. Development shall avoid to the maximum extent feasible and otherwise minimize disruption of identified wildlife travel corridors.	**Potentially Consistent/In Conformity:** Although not identified in the Gaviota Coast Plan or Gaviota Coast Resources Study, Arroyo Quemado may function as a wildlife movement corridor. The Revised TRRP would be located at least 1,400 feet from Arroyo Quemado, thus avoiding any disruption to wildlife travel corridors to the maximum extent feasible. As noted above, surveys for the Revised TRRP showed that all areas of earthwork were previously disturbed, and were comprised of sparsely vegetated, upland, low value wildlife habitat, such that disturbance resulting from the project would not significantly impact wildlife, including the CRLF.
Recreation	
Gaviota Coast Plan Policy REC-4: Protect and Preserve Trail Alignments. All opportunities for public trails within the general alignments and locations identified on the Parks, Recreation and Trails (PRT) map shall be protected, preserved, provided for, and sited and designed using the considerations in Policy REC-5 and Policy REC-6 during review and approval of development and/or permits requiring discretionary approval.	**Potentially Consistent/In Conformity:** The Landfill's relocated bio-gas hazard area is limited to publicly inaccessible areas and would be approximately 1,200 feet west of the proposed relocation of the Baron Ranch Trail. The relocation of the AD Facility would be within 1,400 feet of the proposed relocated lower Baron Ranch Trail. However, the Baron Ranch Trail would not be affected by the facilities associated with the Revised TRRP.
Noise	
Noise Element Policy 1: In the planning of land use, 65 dB Day-Night Average Sound Level should be regarded as the maximum exterior noise exposure compatible with noise-sensitive uses unless noise mitigation features are included in project designs.	**Potentially Consistent/In Conformity:** Since the noise analysis for the certified Final SEIR was completed, the County purchased the two parcels immediately south of the Landfill (APNs 081-150-033 and 081-150-034). While the Hart residence was under construction during the original TRRP, construction was not completed before the County purchased the property. Therefore, the parcel is no longer considered a sensitive receptor because the residence was never fully built or used as a single-family dwelling. As such, noise at the parcel was not analyzed further. The project's changes to the approved TRRP affecting noise include the relocation of the AD Facility east of the Composting Area and replacing the LFG Control System engines and flare adjacent to the MRF. On-site truck trips would not increase and mobile equipment changes would be minor such that mobile source noise would not affect the revised noise analysis. Based on information provided by the manufactures, the proposed LFG Control System engine containers are equivalent to a masonry building with regard to noise attenuation. The overall Revised TRRP operational noise at the four noise-sensitive receptors would be the same (to the nearest decibel) as the approved TRRP, because the highest noise level components would not change (MRF and existing operations).

REQUIREMENT	DISCUSSION
	Since the Revised TRRP does not change noise exposure, the conclusion from the Community Noise Technical Study (included as Appendix J to the certified Final SEIR), which states that the TRRP would not result in noise levels above the 65 dBA CNEL threshold at noise-sensitive land uses, remains accurate for the Revised TRRP.
Hillside and Watershed Protection Policies	
Land Use Element, Hillside and Watershed Protection Policy 1: Plans for development shall minimize cut and fill operations. Plans requiring excessive cutting and filling may be denied if it is determined that the development could be carried out with less alteration of the natural terrain.	**Potentially Consistent/In Conformity:** The Revised TRRP includes modified earthwork volumes, mainly a reduction in the amount of cut. The Revised TRRP would result in 31,420 cubic yards of cut, which is a reduction of approximately 111,180 cubic yards of total cut volume analyzed in the Final SEIR for the TRRP. The decrease in total cut volume is associated with planned Landfill operations through 2017 since soil in this area will continue to be used for Landfill cover material. Ongoing Tajiguas Landfill operations have reduced the required amount of excavation needed in the West Borrow Area where the MRF would be located. The Revised TRRP would result in 103,100 cubic yards of fill, which is a minimal increase in the fill included under the approved TRRP (addition of 335 cubic yards of fill). This amount of grading is needed to create building pads large enough to accommodate the MRF and AD Facility. The new building pads would not overlie the waste footprint and could not be carried out with less alteration of the natural terrain. Cut and fill operations would primarily be within previously disturbed and/or graded areas of the permitted Landfill. The project is located on a developed site, and is designed to best integrate with the existing operations. As such, land disturbance (cut and fill) has been minimized to the extent practicable in the context of Landfill disposal activities which cumulatively involve over three million cubic yards of earthmoving over the life of the project.
Land Use Element, Hillside and Watershed Protection Policy 2. All developments shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited to development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.	**Potentially Consistent/In Conformity:** Suitable locations for development of the Revised TRRP's project components are limited due to the presence of the waste footprint, steep slopes, limited flat deck area, and space needs for Landfill equipment storage and operations. The proposed facility locations for the Revised TRRP include existing developed and/or disturbed areas of the Tajiguas Landfill property (operations deck, West Borrow area and top deck) with suitable area and slope to support the facilities. By constructing in these existing disturbed areas, grading and other site preparations are kept to an absolute minimum. Natural features, landforms and native vegetation, such as trees, have been preserved to the maximum extent feasible. Earthwork would be minimized as Revised TRRP facilities are located within areas that have been disturbed as part of permitted Landfill development. Natural landforms and native vegetation would be preserved by the proposed Comprehensive Plan Amendment to adjust the Waste Disposal Facility Overlay, whereby the Overlay would be amended to not include approximately 55.55 acres of dense native vegetation in the northern portion of Landfill parcel APN 081-150-026.

REQUIREMENT	DISCUSSION
	As with the approved TRRP, construction outside previously disturbed areas would occur for water tanks and the utility line to Well No. 6. However, ~~the utility line is within an~~ this area was analyzed during the Tajiguas Landfill Reconfiguration and Baron Ranch Restoration Project (08EIR-00000-00007) certified by the Board of Supervisors on May 5, 2009. In addition, existing mitigation from the certified Final SEIR would ensure impacts to native vegetation are minimized. The original ridgeline at the revised AD Facility site was lowered from a maximum elevation of approximately 676 feet to approximately 645 feet above mean sea level as part of the installation of the Phase 1B Liner as part of the Tajiguas Landfill Expansion Project. The revised AD Facility would be located at a site underlain with approximately 50 feet of artificial fill, which includes 24 feet of stockpiled soil which is used as Landfill cover and will be completely used for ongoing Landfill operations prior to the construction of the revised AD Facility. Additionally, the Revised TRRP includes the Composting Area Runoff Collection Tank and fire water tank, which would be located on artificial fill (approximately 33.5 to 38 feet of artificial fill over Rincon formation bedrock). Because of existing conditions at the Landfill (e.g., need for soil cover for Landfill operations), the Revised TRRP includes development in areas where grading and site preparation are kept to an absolute minimum since structures would be placed in locations with artificial fill.
Land Use Element, Hillside and Watershed Protection - Policy 3: For necessary grading on hillsides, the smallest practical area of land shall be exposed at any one time during development, and the length of exposure shall be kept to the shortest practicable amount of time. The clearing of land should be avoided during the winter rainy season and all measures for removing sediments and stabilizing slopes should be in place before the beginning of the rainy season.	**Potentially Consistent/In Conformity:** Following four months of grading and site preparation, construction of the approved MRF is estimated to take approximately twelve months. Construction of the approved AD Facility is projected to take approximately 12 months to complete and would be completed concurrently with the MRF. There is a decrease in the total cut volume of approximately 111,180 cubic yards as compared to the approved TRRP due to regular on-going use of borrow material from the project site for continuing landfill cover operations, and that removal will continue into the future. The slope stability analysis indicates the proposed cut slope above the revised AD Facility site and the existing fill slope below the water tank site is consistent and complies with the minimum safety factors. In addition, documented fill soils upon which the AD Facility would be constructed are not sufficiently expansive to require specialized foundation materials or systems. The project would exceed one acre of disturbance and would require coverage under the NPDES Construction General Storm Water Permit. Compliance with the Construction General Storm Water Permit requires preparation of a SWPPP that would include measures to reduce erosion and sedimentation during construction. Additionally, implementation of ***MM TRRP WR-2*** from the certified Final SEIR, which includes numerous measures that would prevent erosion and protect soil stability (e.g. Erosion and Sediment Control Plan), would result in protection of slopes and the watershed from construction activities, even if construction were to occur during the rainy season.

REQUIREMENT	DISCUSSION
	Earthwork associated with project construction and landfill operations may result in unstable slopes that may generate landslides. Although there is the potential for the project to result in unstable slopes, mitigation measures will ensure that it does not. Proposed ***MM TRRP G-1*** from the certified Final SEIR would ensure stability of cut slopes because it prohibits ponding on the slopes, diverts storm flows away from the slope faces, prevents concentrated over-slope drainage, and requires on site observation of the slopes during construction by an engineer or an engineering geologist. Further, compliance with the Construction General Storm Water Permit and mitigation measures provided in the certified Final SEIR (***MM TRRP WR-2*** and ***MM TRRP G-1***) would ensure erosion is minimized.
Land Use Element, Hillside and Watershed Protection - Policy 4: Sediment basins (including debris basins, desilting basins, or silt traps) shall be installed on the project site in conjunction with the initial grading operations and maintained through the development process to remove sediment from runoff waters. All sediment shall be retained on-site unless removed to an appropriate dumping location.	**Potentially Consistent/In Conformity:** Two sedimentation basins (north and south basins) currently capture sediment from the Landfill via a network of storm drains. These basins would continue to provide sediment control from the developed landfill area including areas that will be developed with TRRP facilities. In addition, construction-related storm water protection is addressed by mitigation measure ***MM TRRP WR-2*** from the certified Final SEIR which includes numerous water quality protection measures including the use of straw wattles or equivalent measures to trap suspended sediment around work areas containing disturbed soils. Best management practices contained in the SWPPP and ECSP are required to be in place prior to and throughout construction to ensure that sediment is retained on-site or removed to an appropriate ~~dumping~~ disposal location.
Land Use Element, Hillside and Watershed Protection - Policy 5: Temporary vegetation, seeding, mulching, or other suitable stabilization method shall be used to protect soils subject to erosion that have been disturbed during grading or development. All cut and fill slopes shall be stabilized as rapidly as possible with planting of native grasses and shrubs, appropriate non-native plants, or with accepted landscaping practices.	**Potentially Consistent/In Conformity:** The Revised TRRP involves an incremental increase in vegetation loss of 1.7 acres of ruderal vegetation (0.2 acres of this would be temporary) and 0.1 acres of native mixed scrub. The Revised TRRP requires a new power line between the MRF and the AD Facility, which would result in a less than 0.1 acre increase in earthwork in areas hydroseeded with coastal sage scrub as compared to the approved project. The Revised TRRP also involves a 2.9 acre increase in earthwork at the revised AD Facility site, which supports ruderal vegetation. The Revised TRRP would result in a 0.5 acre reduction in earthwork associated with locating the Composting Area Runoff Collection Tank and pipeline and a 3.2 acre reduction in earthwork at the original MRF/AD Facility site, 2.4 acres of which supports ruderal vegetation. The TRRP would require coverage under the NPDES Construction General Storm Water Permit which requires that a Storm Water Pollution Prevention Plan be prepared and implemented. Additionally, mitigation measure ***MM TRRP WR-2*** from certified Final SEIR includes a requirement for an Erosion Control Plan that will be implemented until re-graded areas have been stabilized by structures, long-term erosion control measures or permanent vegetation established.

REQUIREMENT	DISCUSSION
Land Use Element, Hillside and Watershed Protection - Policy 6: Provisions shall be made to conduct surface water to storm drains or suitable watercourses to prevent erosion. Drainage devices shall be designed to accommodate increased runoff resulting from modified soil and surface conditions as a result of development. Water runoff shall be retained onsite whenever possible to facilitate groundwater recharge. **Land Use Element, Hillside and Watershed Protection - Policy 7:** Degradation of the water quality of groundwater basins, nearby streams, or wetlands shall not result from development of the site. Pollutants, such as chemicals, fuels, lubricants, raw sewage, and other harmful waste, shall not be discharged into or alongside coastal streams or wetlands either during or after construction.	**Potentially Consistent/In Conformity:** The Revised TRRP includes a Comprehensive Plan Amendment to adjust the Waste Disposal Facility Overlay to include 4.48 acres that encompass areas currently used for perimeter access and drainage that will accommodate the relocated AD Facility. The Revised TRRP would include a Composting Area Collection Tank that can hold 436,000 gallons (in increase in capacity of 111,000 gallons from the approved project). The increase in volume is required to address updated seismic standards. The Collection Tank would retain water onsite rather than creating additional runoff, consistent with these policies. In addition, based on HEC-HMS modeling conducted by HDR Engineering for the Revised TRRP, peak run-off generated by a 100-year storm would be slightly less than the approved TRRP, and less than existing conditions. Best management practices contained in the SWPPP and ECSP are required to be in place prior to and throughout construction. As a result, the Revised TRRP will not discharge pollutants into coastal streams or wetlands during or after construction.
Flood Hazard	
Land Use Element, Flood Hazard Area - Policy 1: All development, including construction, excavation, and grading, except flood control projects and non-structural agricultural uses, shall be prohibited in the floodway unless off-setting improvements in accordance with HUD regulations are provided. If the proposed development falls within the floodway fringe, development may be permitted, provided creek setback requirements are met and finished floor elevations are two feet above the projected 100-year flood elevation, and the other requirements regarding materials and utilities as specified in the Flood Plain Management Ordinance are in compliance. **Land Use Element, Flood Hazard Area - Policy 2:** Permitted development shall not cause or contribute to flood hazards or lead to expenditure of public funds for flood control works, i.e., dams, stream channelizations, etc.	**Potentially Consistent/In Conformity:** Due to the lack of adjacent development, neither Cañada de la Pila nor Arroyo Quemado are regulated floodplains, and no floodways have been identified by the Federal Emergency Management Agency (FEMA). Drainage from the Resource Recovery Project site would be conveyed to existing storm drain inlets which drain into the existing Cañada de la Pila 48-inch storm drain south of the Landfill. Peak flows from the project would not impact facilities downstream of the Landfill. The existing storm drain system was evaluated in the certified Final SEIR and subsequently in HEC-HMS modeling conducted by HDR Engineering for the Revised TRRP, and would adequately convey peak storm runoff from 100-year events. Consistent with the certified Final SEIR, impervious surfaces and drainage modifications associated with the Revised TRRP would not cause or contribute to flood hazards, and no new flood control works would be required.
Public Facilities	
Land Use Element, Public Facilities Policy 1.a.: The development of public facilities necessary to provide public service is appropriate within the defined Rural and Inner-Rural Areas. **Land Use Element, Public Facilities Policy 1.b.:** When a public agency proposes that a facility be located in a Rural or Inner-Rural Area, especially when it may create any parcel(s) smaller than the minimum parcel size for the Area and the applicable land use designation(s), conformity with the Comprehensive Plan shall be determined in consideration of the following factors: I. Whether the public interest and necessity require the project, balancing potential inconsistencies with other elements and policies of the Comprehensive Plan; and	**Potentially Consistent/In Conformity**: The Revised TRRP would provide for the extension of landfill life by approximately 10 years. The project provides a necessary public service to the community which relies on the Tajiguas Landfill for solid waste disposal. The project would be located at an existing solid waste management facility that has been in continuous operation since 1967. The relocated AD Facility would be accommodated at the existing Landfill site by revising the Waste Disposal Facility Overlay boundary.

REQUIREMENT	DISCUSSION
II. Whether the project is planned and located in the manner that will be most compatible with the greatest public good and the least private injury; and III. Whether the property sought to be acquired is necessary for the project. Regarding any development of public facilities which meets the preceding three criteria, the acquisition of real property for such public facilities is appropriate within the Rural and Inner-Rural Areas, and the acquisition of such real property shall be deemed to be in conformity with the Comprehensive Plan, regardless of the fact that parcels may result which are smaller than the minimum parcel size for the Area and the applicable land use designation(s). **Land Use Element, Public Facilities Policy 2:** In cases where a specific Community Facility or Overlay Designation is applicable, a site providing regional public services within a Rural or Inner-Rural Area shall be given one of the following Designations: "Institution/Government Facility"; "Public Utility" (e.g., a wastewater treatment plant site); "Cemetery"; "Special Area" (e.g., for recognition and preservation of a historic or archaeologic site); or, "Waste Disposal Facility," Such designation shall be applied to a proposed site through amendment of the pertinent Land Use Element map, either concurrent with or following the acquisition of the site by the public agency and prior to any development pertaining to the facility. **Land Use Element, Public Facilities Policy 3:** Except in case of an emergency which threatens lives or the immediate safety of persons or property, environmental review for projects allowed under these Policies shall be conducted at the earliest feasible time, and should be completed prior to acquisition of any site for a public facility. The site selection process shall include criteria to avoid areas having significant environmental constraints (for example, prime agricultural soils, areas of high aesthetic value such as Scenic Highway Corridors, public service/resource limitations, geologic or hydrologic hazards, important biological resources, cultural resources), unless the public agency determines that the location of the facility or use on a specific site having such constraints is necessary to satisfy the findings required in California Code of Civil Procedure Section 1245.230 (or successor statute), or is necessary for the protection of the public health, safety, or welfare.	The proposed project would be located on the existing Landfill in a rural area and would not create any new parcels or significantly affect the parcel size of the underlying lots. The revised AD Facility location would allow for proximity between the AD Facility and Composting Area, would be located on-site in an area that has been previously graded for Landfill activities, and the site is within the Solid Waste Facilities permit boundary. The project is necessary to meet State waste management legislation and requirements and to support greenhouse gas reduction legislation, and is consistent with all applicable policies. The project is in the public interest because it substantially extends the life of the Landfill without having to find a new site for landfill operations. The certified Final EIR for the TRRP analyzed the potential for moving the AD Facility and MRF to an urban location; however, an urban location was strongly opposed by the public and the existing Landfill location was determined to provide the most benefits (e.g., similar or lower cost and existing land owned and operated by Santa Barbara County). Properties surrounding the Landfill are zoned and used primarily for agriculture or open space, or were formerly oil and gas producing facilities. The project is planned and located in a manner that will be compatible with the public good since the proposed facilities are located in the central portion of the landfill and are largely remote from any public area. Existing residential development surrounding the Landfill consists of the Arroyo Quemado community located south of U.S. Highway 101 and the Union Pacific Railroad, south and east of the Landfill. The Hart residence, located south of the Landfill property, was not fully constructed prior to the purchase of the property by the County of Santa Barbara and is not considered existing residential development. The Revised TRRP is necessary in order to accommodate the relocated AD Facility outside of the Coastal Zone. Environmental impacts have been minimized through project design, and through mitigation measures identified as part of the Final SEIR. Therefore, as proposed, the project is planned and located in a manner that will be most compatible with the greatest public good. In addition, the proposed property is already under County ownership and is used as a landfill. Therefore, no additional property needs to be acquired for the project. As a part of the Revised TRRP, the Waste Disposal Facility Overlay would be amended to exclude approximately 55.55 acres of dense native vegetation on APN 081-150-026 not needed for solid waste disposal operations. The purpose of the project is to accommodate the relocated AD Facility by revising the Waste Disposal Facility Overlay boundary. The addition of 4.48 acres to the Overlay encompasses area that is proposed to be developed with the AD Facility. The project does not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

REQUIREMENT	DISCUSSION
	The ~~site selection for the~~ Revised TRRP accommodates facilities that are intended to substantially extend the life of the Tajiguas Landfill, meet or exceed the requirements of Assembly Bill 341 to recycle 75% of waste by 2020, and provide a long-term solution to the region's solid waste management needs.
Energy and Climate Action Plan	
Renewable Energy Goal: To promote the use of alternative energy for economic and environmental benefits, and facilitate opportunities for businesses that develop or market alternative energy technologies. **Action Item 5)** Encourage the use of anaerobic digesters in agriculture, wastewater treatment, and solid waste management. **Waste Reduction Goal: To exceed the state's required diversion rate of 75% by 2020.** **Waste Reduction (WR 1) Measure –** Continue to support the programs associated with efficient waste collection and recycling, public school education, and composting. **Action Item 3)** Continue to look for opportunities to remove food waste from landfills, such as curbside composting for restaurants. **Increased Recycling Opportunities (WR 2) Measure –** Seek additional opportunities for County residents to recycle cardboard, glass, paper, and plastic products. **Action Item 2)** Implement the Resource Recovery Project's centralized processing facility for waste, or other mechanism for increasing the diversion rate. **Landfill Disposal Reductions (WR 4) Measure –** Reduce or minimize GHG emissions from waste materials deposited into landfills. **Action Item 2)** Continue to develop programs and facilities, such as the Resource Recovery Project, that target the diversion and recycling of organic waste, which is the primary cause of methane gas production at landfills.	**Potentially Consistent/In Conformity**: The proposed project includes processing of organic waste separated from the waste stream in an Anaerobic Digestion Facility. Bio-gas produced from the Facility would generate approximately 1 net megawatt of renewable energy. The MRF would recover approximately 90,000 tons/year (290 tons/day) of recyclable material. The TRRP would include diverting over 98% of organics and over 90% of recyclables being buried at the Landfill. Currently, the diversion rate for the county (North and South County) is approximately 72%. This project would increase the region's diversion rate to approximately 80% without any changes to current programs, which exceeds the requirements of Assembly Bill 341 to recycle 75% of waste by 2020. Recycling activities associated with the project are expected to remove greenhouse gas emissions equivalent to annual emissions of approximately 13,270 vehicles per year. Also, the reduction of organic materials at the Landfill would result in a decrease in nearly one million metric tons of carbon dioxide equivalent (CO2e) during the first 50 years following project implementation. The LFG Control System reduces emissions from buried waste, such as methane, and minimizes air quality and groundwater quality impacts. A portion of the equipment for the existing LFG Control System would be decommissioned and replacement LFG Control System equipment would be located adjacent to the MRF to avoid additional trips to and from the facility. The replacement engines and flare for the LFG Control System would provide up to 2.8 megawatts of electricity and would be provided with APCD-required control systems to reduce <u>oxides of</u> nitrogen emissions. <u>To date, the proposed Revised TRRP provides the single greatest amount of greenhouse gas emission reductions than any other single project included in any of the South Coast jurisdictions' Climate Action Plans.</u>
Gaviota Coast Plan Policy TEI-11: Renewable Energy Resource Priority. Utilize local renewable energy resources and shift imported energy to renewable resources where technically and financially feasible at a scale that is consistent with the sensitivity of coastal resources. Encourage opportunities for development of renewable energy resources where impacts to people, natural resources and views can be avoided or minimized. Support appropriate renewable energy technologies, including solar and wind conversion, wave and tidal energy, and biogas production through thoughtfully streamlined planning and processing, rules and other incentives. New development should be encouraged to use small scale renewable energy facilities to offset energy requirements.	**Potentially Consistent/In Conformity**: Under the approved TRRP, a combination of energy generated from combustion of bio-gas in the AD Facility, roof-mounted solar panels and the regional power grid was proposed to power the MRF. The energy sources would remain the same with the Revised TRRP. The Revised TRRP would also include a new power line that would connect the two facilities so a portion of the AD Facility-generated power not delivered to the grid may reduce the MRF's reliance on the grid during peak periods, and serve as a backup energy source if grid power is interrupted. <u>The development of the MRF and AD Facility provides the South Coast and Santa Ynez Valley region with the necessary processing infrastructure to maximize the recovery of usable resources as well as reduce greenhouse gas emissions associated with solid waste management.</u>

REQUIREMENT	DISCUSSION
Transportation	
Gaviota Coast Plan Policy TEI-7: U.S. Highway 101 Operational Conflicts. Proposed new or expanded public or private uses, commercial uses and visitor-serving uses may be required to submit an analysis that evaluates the anticipated operational conflicts impacts to U.S. Highway 101 operations and makes recommendations on how conflicts can be overcome or mitigated.	**Potentially Consistent/In Conformity:** Design changes associated with the Revised TRRP would reduce the number of parking spaces from 72 to 62. However, a reduction in Landfill staff as well as the implementation of a van pool program was analyzed in the certified Final SEIR and parking would remain adequate. The parking changes would not create operation conflicts to U.S. Highway 101 operations. Traffic generation and potential traffic impacts would be the same for the Revised TRRP as the approved TRRP. The certified Final SEIR analyzed TRRP impacts to U.S. Highway 101 operations and did not identify any significant impacts.
Infrastructure	
Gaviota Coast Plan Policy TEI-16: Tajiguas Landfill. Any changes to operations at the Tajiguas Landfill necessary for the management of our communities' solid waste should strive to reduce environmental impacts to the Gaviota Coast Plan Area. To reduce impacts, waste delivered to the Tajiguas Landfill should be consolidated and the landfill should only accept waste generated from communities within Santa Barbara County. The County should pursue additional resource recovery projects/programs prior to, or concurrent with, any plan to expand municipal solid waste disposal though landfilling.	**Potentially Consistent/In Conformity:** The Revised TRRP has been designed to minimize environmental impacts through siting facilities within previously disturbed areas at the Landfill property, as well as siting facilities to minimize visual impacts and to prevent significant unavoidable impacts beyond those associated with continued use of the Landfill. Under the Revised TRRP, the Landfill would continue to receive consolidated waste from existing transfer stations in Santa Barbara County. The Revised TRRP provides the flexibility to augment and adapt resource recovery processes at the Landfill, and does not include expansion of the Landfill operational area or its capacity.