ATTACHMENT 1
(Revised Findings August 13, 2002)

1.0 CEQA FINDINGS

1.1 CEQA FINDINGS AND STATEMENT OF OVERRIDING CONSIDERATIONS

FINDINGS PURSUANT TO PUBLIC RESOURCES CODE SECTION 21081 AND THE CEQA GUIDELINES SECTIONS 15090 AND 15091:

A. CONSIDERATION OF THE EIR

The Tajiguas Landfill Expansion Final Environmental Impact Report ("FEIR"), 01-EIR-05, was presented to the Board of Supervisors and all voting members of the Board have reviewed and considered the EIR, 01-EIR-05, and its appendices prior to approving this proposal. In addition, the Board has reviewed and considered testimony and additional information presented at or prior to the public hearing on August 6, 2002.

B. FULL DISCLOSURE

The Board of Supervisors finds and certifies that the FEIR constitutes a complete, accurate, adequate and good faith effort at full disclosure under CEQA, and represents the independent judgment of the Board of Supervisors. The Board further finds and certifies the FEIR has been completed in compliance with the California Environmental Quality Act (CEQA) and is adequate for this project.

C. LOCATION OF DOCUMENTS

The documents and other materials, which constitute the record of proceedings upon which this decision is based, are in the custody of the Deputy Director of the Solid Waste and Utilities Division (SWUD), Santa Barbara County Public Works Department, located at 109 East Victoria Street, Santa Barbara, CA 93101.

D. ENVIRONMENTAL REPORTING AND MONITORING PROGRAM

Pursuant to Public Resources Code Section 21081.6, the Board hereby adopts the approved project description and mitigation measures, with their corresponding mitigation monitoring requirements, as the monitoring program for this project. The monitoring program is designed to ensure compliance during project implementation and mitigation or avoidance of significant effects on the environment. The agency responsible for carrying out and enforcing each mitigation measure is identified in the mitigation monitoring program as the Enforcement Agency.

E. RECIRCULATION NOT REQUIRED

Certain mitigation measures have been added to those considered in the Final EIR and some mitigation measures have been revised to require an additional margin of protection for habitat replacement. (See, e.g., Mitigation Measure BIO-7.) The changes to the mitigation measures do not differ considerably from those previously analyzed in the EIR for the expansion project. Therefore, pursuant to CEQA Guidelines section 15088.5, such changes do not qualify as "significant new information" triggering recirculation. Furthermore, no new information regarding changes to the project or circumstances surrounding the project have been added.

F. FINDINGS THAT CERTAIN UNAVOIDABLE IMPACTS ARE MITIGATED TO THE MAXIMUM EXTENT FEASIBLE

The FEIR for the Tajiguas Landfill Expansion Project identifies four environmental impacts that cannot be fully mitigated and therefore considered unavoidable. Those impact areas are: Biological Resources, Cultural Resources, Visual Resources, and Air Quality. To the extent the impacts remain unavoidable, such impacts are acceptable when weighed against the overriding social, economic, and other considerations, set forth in the Statement of Overriding Considerations included herein. Each of these significant and unavoidable ("Class I") impacts identified by the FEIR are discussed below, along with the appropriate findings as per CEQA Section 15091:

1. **Biological Resources:**

Impact: Seeps and rock outcrops, habitat for sensitive plant species, and chaparral and oak woodland, habitat for Plummer's baccharis, Hoffmann's nightshade and Santa Barbara honeysuckle, would be eliminated.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: Removal of vegetation from the Tajiguas Landfill site to accommodate the Tajiguas Landfill Expansion Project would eliminate sensitive habitats and potentially sensitive species that are found within these habitats. The Draft Environmental Impact Report ("DEIR") originally proposed to mitigate this impact by requiring surveys for sensitive species to be conducted prior to removal of vegetation. (DEIR, p. 3.4-50.) In response to comments by the California Department of Fish and Game (CDFG), Mitigation Measure BIO-1 was revised to include a requirement to survey for the presence of the Gaviota tarplant. (FEIR, Ch. 2, Doc. 13-1.) Additionally, if sensitive species are found, the species or propogules shall be collected and transplanted to similar habitat. (Mitigation Measure BIO-7, below.)

In response to commenters' suggestions, the County has increased the habitat compensation ratios for coastal sage, chaparral and oak woodlands. Although the County continues to believe that the 1:1 ratio called for in these finding is adequate, in the interest of providing an extra margin of safety, the County has amended its revegetation/restoration plan to increase the compensation ratios for coastal sage habitat, oak woodland and chaparral from 1:1 to 3:1. (See Mitigation Measure BIO-7.) Commenters also suggested establishing an on-site nursery to propagate native plants from on-site seed sources. However, the Board believes that this measure is not necessary to avoid the impact on habitat. Moreover, developing an on-site nursery could result in additional disturbance to the landfill parcels or the Baron Ranch. The County wants to minimize disturbance to the greatest extent possible. Therefore, the Board declines to adopt the suggested measure.

The commenter also suggested that the County include incremental construction of the third phase of expansion into the backcanyon area north of the existing landfill. The County will, as a general matter and to the extent feasible, limit the disturbance of habitat to areas for which cover is needed. In this way, if the landfill is closed earlier than expected, the disturbance to habitat will be kept to the minimum amount possible.

Although moving the sensitive species from one area to another would protect the individuals, the overall project would result in decreased habitat area available to the species. Therefore, the impact remains significant. (DEIR, p. 3.4-42; FEIR, Table 1-2.)

Mitigation Measures:

BIO-1 A survey shall be conducted to identify sensitive plant species identified in Table 3.4-2 in areas to be cleared of native vegetation. The survey for the Gaviota tarplant (*Hemizonia increscens ssp. villosa*) shall be conducted during the months of May through late summer. In the event sensitive plant species (i.e., Santa Barbara honeysuckle, Gaviota tarplant, etc.) are identified, the following measures shall be implemented:

- Plants shall be salvaged and/or propagules shall be relocated to an appropriate location in the Pila Creek watershed or the Baron Ranch, as identified by the biologist.
- Transplanted or propagated plants shall be maintained for a minimum of 5 years, or until the biologist determines that the plants have been successfully established (plants are vigorous, they flower and produce seed) (FEIR, p. 4-7).

BIO-7 To compensate for native habitats disturbed by the expansion, a County-approved biologist shall prepare and implement a revegetation/restoration plan (e.g., a ratio of not less than 3:1 for each disturbed acre). The plan

shall utilize native plants and seed stock from locally obtained sources to the maximum extent feasible and also shall take into account requirements for maintaining the integrity of the landfill and cover system. Species selection shall be dependent upon the nature of the habitat (FEIR, p. 4-9).

Impact: Loss of an estimated 100 to 150 mature coast live oak trees.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: The Tajiguas Landfill Expansion Project will eliminate a significant number of oak trees and will eliminate scattered areas of oak woodland on the Tajiguas Landfill site (DEIR, pp. 3.4-10 – 3.4-12). An oak tree replacement and revegetation plan shall be prepared to replace oak trees identified for removal and any oak trees that are removed and/or damaged (more than 25% of root zone disturbed), and oak trees shall be replaced on a 10:1 basis. (See Mitigation Measures BIO-3, BIO-4 and BIO-7, below.) One commenter recommended increasing the compensation ratio for oak trees with oak saplings from 10:1 to 20:1. Based on County policy, 10:1 is considered adequate to mitigate in the opinion of the County Planning Department and biologists. Therefore, this suggestion was not adopted.

In spite of these measures, replacing mature oak trees with immature oak trees will not replace the habitat lost for many years. Therefore, the impact remains significant. (DEIR, p. 3.4-42.).

Mitigation Measures:

BIO-3. An oak tree replacement plan shall be prepared to replace oak trees identified for removal. Any oak trees that are removed and/or damaged (more than 25 percent of root zone disturbed) shall be replaced on a 10:1 basis with 1-gallon size saplings grown from locally obtained acorns. Trees shall be planted prior to winter rains, irrigated and maintained until established (5 years). The plantings shall be protected from predation by wild and domestic animals, and from human interference by the use of staked fencing and gopher fencing during the maintenance period. In the event that an oak tree(s) does not survive for 5 years, it shall be replaced (FEIR, p. 4-8).

BIO-4. An oak tree protection program, prepared by a County-approved biologist, shall be implemented. The program shall include, but not be limited to, the following components:

- No grading or development shall occur within the drip lines of oak trees.

- All oak trees within 25 feet of proposed ground disturbances shall be temporarily fenced with chain-link or other satisfactory material throughout all grading and construction activities. The fencing shall be installed 6 feet outside the drip line of each oak tree, and shall be staked every 6 feet.
- Within 6 feet of any oak tree drip line, the following shall be prohibited:
  - Parking, storage or operation of construction equipment;
  - Stockpiling of fill soil, rocks or construction materials;
  - Placement of artificial surface, pervious or impervious.
- If any roots encountered are 1 inch in diameter or greater, they shall be cleanly cut under the direction of a County-approved aborist/biologist.
- Any trenching required within the drip line or sensitive root zone of any specimen tree shall be done by hand (DEIR, pp. 3.4-51 — 3.4-52).

BIO-7. To compensate for native habitats disturbed by the expansion, a County-approved biologist shall prepare and implement a revegetation/restoration plan (e.g., a ratio of not less than 3:1 for each disturbed acre). The plan shall utilize native plants and seed stock from locally obtained sources to the maximum extent feasible and also shall take into account requirements for maintaining the integrity of the landfill and cover system. Species selection shall be dependent upon the nature of the habitat (FEIR, p. 4-9).

Impact: The San Diego woodrat would be affected by the loss of mature chaparral, which provides nesting and foraging habitat for this species.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: An estimated 38 acres of mature chaparral would be removed by the proposed project. (DEIR, p. 3.4-9.) This plant community provides nesting and foraging habitat for the San Diego woodrat, a federal and California Species of Concern. (DEIR, pp. 3.4-6, 3.4-10, 3.4-42.) In the event desert woodrat is found on the project site, a capture and relocation effort shall be conducted to move woodrats to suitable adjacent habitat. (See Mitigation Measure BIO-5, below.) Furthermore, revegetation will be required to replace chaparral habitat removed by the Tajiguas Landfill Expansion Project at a ratio of 3:1. (Mitigation Measure BIO-7, below.) Although moving the sensitive species from one area to another would protect the individuals, the overall project would result in decreased habitat area available to sensitive species. Chaparral habitat would not be mature for many years to provide replacement habitat for the woodrat.

Therefore, the impact remains significant. (DEIR, pp. 3.4-36, 3.4-41, 3.4-42, 3.4-46.)

One commenter suggested that the impacts to woodrats should have been classified as significant because the reduction in their habitat amounts to a restriction in the range of rare species. As noted in this section, the County has already classified the impacts to this species as significant, but unavoidable. The issue of impacts to coastal sage scrub, oak woodland and chaparral habitat was addressed in the section above. Moreover, the County has already adopted the commenter's suggested mitigation of increasing the compensation ratios for these types of habitat, from 1:1 to 3:1. The County will not formally adopt the commenter's other suggested mitigation, incremental construction of the third phase of expansion into the backcanyon area north of the existing landfill, but the County will, as a general matter and to the extent feasible, limit the disturbance of habitat to areas for which cover is needed. In this way, if the landfill is closed earlier than expected, the disturbance to habitat will be minimalized.

Mitigation Measures:

BIO-5 A survey for desert woodrat shall be conducted in mature chaparral prior to vegetation removal. In the event desert woodrat is found on the project site, a capture and relocation effort shall be conducted to move woodrats to suitable adjacent habitat (DEIR, p. 3.4-52).

BIO-7 To compensate for native habitats disturbed by the expansion, a County-approved biologist shall prepare and implement a revegetation/restoration plan (e.g., a ratio of not less than 3:1 for each disturbed acre). The plan shall utilize native plants and seed stock from locally obtained sources to the maximum extent feasible and also shall take into account requirements for maintaining the integrity of the landfill and cover system. Species selection shall be dependent upon the nature of the habitat (FEIR, p. 4-9).

Impact: Approximately 71 acres of habitat, including 38 acres of mature chaparral and 5 acres of degraded coastal sage scrub, would be removed.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: The proposed project would result in the loss of an estimated 71 acres of habitat, including mature chaparral, and degraded coastal sage scrub. (DEIR, pp. 3.4-36, 3.4-41.) At final closure of the Tajiguas Landfill, a revegetation/restoration plan will be implemented that will partially offset vegetation impacts. (See Mitigation Measure BIO-7, below.) Although revegetation would occur at landfill closure, loss of the habitat itself and the loss

of the habitat over time are considered a significant and unavoidable impact. (DEIR, p. 3.4-41.)

Mitigation Measures:

BIO-7 To compensate for native habitats disturbed by the expansion, a County-approved biologist shall prepare and implement a revegetation plan/restoration (e.g., a ratio of not less than 3:1 for each disturbed acre). The plan shall utilize native plants and seed stock from locally obtained sources to the maximum extent feasible and also shall take into account requirements for maintaining the integrity of the landfill and cover system. Species selection shall be dependent upon the nature of the habitat (FEIR, p. 4-9).

Impact: Landfill operations in the northern portion of project site would encroach on the buffer area between the landfill and undisturbed native habitats along north site boundary.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: The existing, relatively low-intensity use of the northern portion of the site currently provides a buffer between intensive human activities at the existing landfill and undisturbed native habitats along the northern edge of the project site boundary. The Tajiguas Landfill Expansion Project will have the potential to introduce and expand the range of invasive, non-native plants on the site and degrade existing native habitats. (DEIR, p. 3.4-36.) Mitigation Measures BIO-7, BIO-9 and BIO-10, below, would lessen these impacts to a degree, but the effect would remain significant and unavoidable. (DEIR, pp. 3.4-41 – 3.4-42.)

Mitigation Measures:

BIO-7 To compensate for native habitats disturbed by the expansion, a County-approved biologist shall prepare and implement a revegetation/restoration plan (e.g., a ratio of not less than 3:1 for each disturbed acre). The plan shall utilize native plants and seed stock from locally obtained sources to the maximum extent feasible and also shall take into account requirements for maintaining the integrity of the landfill and cover system. Species selection shall be dependent upon the nature of the habitat (FEIR, p. 4-9).

BIO-9 To minimize wildlife disturbance, night lighting used on the landfill site shall be of low-intensity, low-glare design, and shall be hooded to direct light downward onto the work area and prevent spill-over onto adjacent habitats. Except on an emergency basis, artificial lighting shall not be employed prior to 6:00 a.m. or after 8:00 p.m. (FEIR, p. 4-13).

BIO-10 To reduce hazards to wildlife that may ingest or become trapped by debris, portable fences shall continue to be used to limit the spread of litter on the working face of the landfill. Litter shall be collected on a regular basis (DEIR, p 3.4-57).

Impact: Increased human presence and activity could lead sensitive bird and mammal species to avoid or abandon foraging/breeding habitat in adjacent foothill areas.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: The Tajiguas Landfill Expansion Project may affect habitat quality along the northerly reach of Pila Creek due to increased human presence. Implementation of the Tajiguas Landfill Expansion Project would introduce intensive human presence and alter the northern portion of the Tajiguas Landfill site in the intervening time between commencement of the Tajiguas Landfill Expansion Project and landfill closure. Implementation of Mitigation Measures BIO-7, BIO-9 and BIO-10 would reduce these impacts somewhat, but the overall effect would remain significant and unavoidable. (DEIR, pp. 3.4-42 – 3.4-43.)

Mitigation Measures:

BIO-7 To compensate for native habitats disturbed by the expansion, a County-approved biologist shall prepare and implement a revegetation/restoration plan (e.g., a ratio of not less than 3:1 for each disturbed acre). The plan shall utilize native plants and seed stock from locally obtained sources to the maximum extent feasible and also shall take into account requirements for maintaining the integrity of the landfill and cover system. Species selection shall be dependent upon the nature of the habitat (FEIR, p. 4-9).

BIO-9 To minimize wildlife disturbance, night lighting used on the landfill site shall be of low-intensity, low-glare design, and shall be hooded to direct light downward onto the work area and prevent spill-over onto adjacent habitats. Except on an emergency basis, artificial lighting shall not be employed prior to 6:00 a.m. or after 8:00 p.m. (FEIR, p. 4-13).

BIO-10 To reduce hazards to wildlife that may ingest or become trapped by debris, portable fences shall continue to be used to limit the spread of litter on the working face of the landfill. Litter shall be collected on a regular basis (DEIR, p. 3.4-57).

Impact: Management and maintenance of the in-channel sedimentation basins would disturb the California red-legged frog.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: The proposed project would involve active water use and maintenance of the sedimentation basins. The Tajiguas Landfill Expansion Project will include a long-term California red-legged frog Management Plan that will be developed by the County in consultation with, and approved by the U.S. Fish and Wildlife Service (USFWS) and CDFG. The plan will entail scheduled maintenance of the basins, limitations on use, preservation of native riparian and upland vegetation on the upper banks of the basins, access requirements and erosion-control measures. (See Mitigation Measure BIO-8, below.) Additionally, in response to CDFG's comments on the DEIR, the intake pumps within the sedimentation basins will be completely screened and kept clean to maximize protection of red-legged frogs. (FEIR, Ch.2, Response 13-1.) However, water use and maintenance activities would potentially disrupt the habitat and life cycle activities of the red-legged frog. (DEIR, p. 3.4-45.) Although implementation of Mitigation Measure BIO-8 would reduce the potential impacts, the effects of the proposed project to the California red-legged frog would remain unavoidable and significant. (DEIR, p. 3.4-45.)

Mitigation Measures:

BIO-8. To reduce impacts to California red-legged frogs (CRLF) that reside in the in-channel sedimentation basins, an extensive CRLF Management Plan shall be implemented and shall include the following:

a) The basin scheduled for maintenance shall be drained between mid-August and late-September. Maintenance activities for either basin shall occur October through November after draining the basin or following a survey by a qualified biologist that confirms tadpoles have left the basin. Should SWUD demonstrate a need to conduct activities outside this period, the activities shall be subject to review and approval by the USFWS.

b) At least 15 days prior to the onset of draining or maintenance activities, the SWUD shall submit the name(s) and credentials of biologists who conduct activities specified in the following measures to the USFWS. No project activities shall begin until SWUD receives verbal/written approval from the USFWS that the biologist(s) is qualified to conduct the work.

c) Before any draining or maintenance activities begin on the sediment basin, a USFWS-approved biologist shall conduct a training session for all landfill personnel involved with these activities. At a minimum, the training shall include a description of the California red-legged frog and its habitat, and the general measures that are being implemented to conserve the California

red-legged frog as they relate to the project. Brochures, books, and briefings may be used in the training session, provided that a qualified person is present to answer any questions.

d) A USFWS-approved biologist shall survey the sediment basin at least 2 weeks before draining the basin. If California red-legged frogs, tadpoles, or eggs are found, the approved biologist shall contact the USFWS to determine the appropriate level of consultation.

e) To obtain water for dust control (and prior to sediment removal), water shall be pumped on alternate days. Water shall be pumped only from July through November or as directed by a qualified biologist. The intake shall be placed within a floating, screened cage (3 feet by 3 feet by 3 feet) constructed of 0.25-inch mesh wire. To prevent adult frogs from climbing into the cage from below, the upper 12 inches of the cage may be covered with sheet metal flashing that extends above and below the water line and is bent at 90 degrees to form a 6-inch lip around the top of the cage.

f) Maintenance activities (sediment removal) in the basins shall be conducted when the basins are as dry as possible. A temporary barrier (silt fencing or other appropriate material) shall be placed between the two in-channel sedimentation basins to exclude red-legged frog from the work area. A qualified biologist, approved by USFWS, shall perform a survey of soil cracks immediately prior to initiation of sediment removal. Any California red-legged frogs found should be captured and relocated to the other basin. Each night following sediment removal, the remaining soil cracks shall be searched in preparation for the next day's work. Sediment removal, once initiated, shall proceed as quickly as possible.

g) A USFWS-approved biologist shall be present prior to and during draining and maintenance until such a time as all removal of California red-legged frogs, instruction of workers, and habitat disturbance has been completed. After this time, the SWUD shall designate a person to monitor onsite compliance with all impact minimization measures. The USFWS-approved biologist shall ensure that this individual receives training outlined above (in measure c) and is trained in the identification of California red-legged frogs. The monitor and the USFWS-approved biologist shall have the authority to halt any action that might result in impacts that exceed the levels anticipated by the USFWS during review of the proposed action. If work is stopped, the USFWS shall be notified immediately by approved biologist or onsite biological monitor.

h) All fueling and maintenance of vehicles and other equipment shall occur at least 20 meters from any riparian habitat or water body. SWUD shall ensure that contamination of habitat does not occur during such operations. Prior to the onset of work, the USFWS shall ensure that SWUD has prepared a plan to allow a prompt and effective response to any accidental spills. All workers shall be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.

i) Native riparian and upland vegetation on the upper banks of the basins shall remain in place to provide cover for red-legged frogs except where the equipment will access the basins during sediment removal activities (e.g., a ratio of not less than 1:1 for each disturbed acre of existing habitat). To the extent feasible, sediment removal shall occur in the bottom of the basins, below the high water mark. A revegetation plan to enhance riparian wetland and upland vegetation in Pila Creek upstream of the sediment basins shall be prepared. A species list and restoration-monitoring plan shall be included with the project proposal for review and approval by the USFWS. Such a plan must include, but not be limited to, location of the restoration, species to be used, restoration techniques, time of year the work will be done, identifiable success criteria for completion, and remedial actions if the success criteria are not achieved.

j) Stream contours shall be returned to their original condition at landfill closure, unless consultation with the USFWS has determined that it is not beneficial to the species or is not feasible.

k) Access to the southern sediment basin shall be from the north. The size of staging areas, and the total area of the activity shall be limited to the minimum necessary to achieve the project goal. Routes and boundaries shall be clearly marked. Where impacts occur in these staging areas and access routes, restoration shall occur as identified in measures (i) and (j).

l) To control erosion during and after project implementation, the applicant shall implement best management practices (BMPs) as identified by the RWQCB.

m) During pumping of water from the in-channel sediment basins, intakes shall be completely screened with wire mesh size set by the size of the frog larvae to prevent California red-legged frogs from entering the pump system. The screen box on the intake pipe shall be kept clean to maintain low water velocities across all screens. The wetted surface area of the box shall be designed based on pump rates and targeted water velocities across the screens. Upon completion of pumping activities, any barriers to

flow shall be removed in a manner that would allow flow to resume with the least disturbance to the substrate.

n) A USFWS-approved biologist shall permanently remove from within the project area any individuals of exotic species, such as bullfrogs, crayfish, and centrarchid fishes, to the maximum extent possible. SWUD shall have the responsibility to ensure that these activities are in compliance with the California Fish and Game code (FEIR, pp. 4-9 — 4-12).

2. Cultural Resources:

Impact: Site CA-SBA-3494 would be directly disturbed, as it is within the footprint of the proposed project.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: A cultural resource site (Site CA-SBA-3494) will be impacted by the Tajiguas Landfill Expansion Project. This site will be within the footprint of the proposed project. Avoidance of the site was considered in design. However, to obtain the necessary capacity, stability and other engineering requirements for construction, for closure, and in compliance with regulations applicable to landfills, avoidance of these resources is not feasible (DEIR, p 3.7-43). The impact can be reduced but not eliminated through implementation of mitigation measures that require archaeological testing of the site, site evaluation by a Native American, and cultural resource awareness training for landfill employees. Because the cultural resources impacts cannot be completely avoided, impacts would remain significant and unavoidable. (DEIR, p. 3.5-11)

Mitigation Measures:

CR-1. All known or potential cultural sites that are subject to ground disturbances shall be subject to a Phase 1 archaeological survey pursuant to County Archaeological Guidelines. If required, a Phase 2 subsurface investigation and Phase 3 data recovery program shall be performed if significant resources will be encountered and potential impacts are unavoidable. Surveys will take place as far in advance of landfill expansion activities as feasible to avoid delaying landfill operations (DEIR, p. 3.5-13).

CR-2. In the event cultural remains are encountered during grading, work shall be stopped immediately or redirected until a County-qualified archaeologist and Native American representative are retained by the

applicant to evaluate the significance of the find pursuant to Phase 2 investigations of the County Archaeological Guidelines. If remains are found to be significant, they shall be subject to a Phase 3 mitigation program, consistent with County Archaeological Guidelines (DEIR, p. 3.5-13).

CR-3. SWUD shall develop and conduct a training program for all landfill personnel. Personnel shall be made aware of the sensitivity of cultural resources at the landfill. These resources will be designated as "off-limits," with instructions to avoid them (DEIR, p. 3.5-13).

3. Visual Resources:

Impact: During the operations period of the proposed landfill expansion, the landfill would be visible from coastal areas of the Pacific Ocean.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effects.

Explanation: A portion of the North Borrow Area would be partially visible in the background from ocean viewpoints. (Viewpoint 5, DEIR, pp. 3.8-22 and 3.8-29.) Viewpoint 5 is approximately 1,100 feet offshore. (DEIR, p. 3.8-29.) At final closure, the Tajiguas Landfill will be contoured to be consistent with the surrounding terrain and revegetated. Over time, the color of the excavation surface will change due to natural processes of weathering, and some areas may naturally revegetate; however, the change in visual character will take many years to be indistinguishable from the surrounding terrain. Viewer sensitivity from U.S. Highway 101 and the Pacific Ocean location would be high, based on the duration of views and expectations of viewers. Therefore, the impact to visual resources is considered significant and unavoidable. (DEIR, p. 3.8-29.)

Mitigation Measures:

VIS-1 At final closure the landfill shall be contoured to be consistent with the surrounding terrain. It shall be vegetated with species that include appropriate local native plant species (FEIR, p 4-14).

VIS-2 Native sycamore trees from local seed or cutting stock shall be planted in Pila Creek downstream of the landfill, in sufficient quantity to vegetate the area FEIR, p 4-4).

BIO-3 An oak tree replacement plan shall be prepared to replace oak trees identified for removal. Any oak trees that are removed and/or damaged

(more than 25 percent of root zone disturbed) shall be replaced on a 10:1 basis with 1-gallon size saplings grown from locally obtained acorns. Trees shall be planted prior to winter rains, irrigated and maintained until established (5 years). The plantings shall be protected from predation by wild and domestic animals, and from human interference by the use of staked fencing and gopher fencing during the maintenance period. In the event that an oak tree(s) does not survive for 5 years, it shall be replaced (FEIR, p. 4-8).

Impacts: In the scenic and visually sensitive area of the project site, the visual characteristics of the completed project would result in significant visual effects.

At project completion, the landfill would be visible from the landfill access road north of U.S. Highway 101 and the Pacific Ocean. This is considered a significant and unavoidable impact.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: The Tajiguas Landfill Expansion Project would appear as a higher mound set behind the existing permitted waste prism from the landfill entrance road just north of U.S. Highway 101 and the Pacific Ocean, as vertical expansion would increase the height from the existing permitted limit of 500 feet mean sea level (msl) to the maximum elevation of the Tajiguas Landfill Expansion Project of 660 feet above msl. (Viewpoint 4, DEIR, pp. 3.8-21—22.) This configuration blocks all of the middle ground ridgelines and background ridgelines from view. From this viewpoint, the Tajiguas Landfill Expansion Project appears as a foreground vertical extension of the landform provided by the existing permitted landfill. With its revegetation, this configuration appears as a large hill, consistent with the existing setting. It is distinguishable from natural topography primarily because of its even sideslopes and flat top surface. (DEIR, p. 3.8-22.)

There is a view from U.S. Highway 101 from the Tajiguas Landfill access road. From a vehicle traveling on U.S. Highway 101 at a speed of 65 mph, the landfill is visible to the side (such as through a side window of a car) for a period of 8 seconds. At the Tajiguas Landfill access road viewer sensitivity is considered high, even though most persons would be using the access road specifically to get to the landfill. Although the Tajiguas Landfill would be revegetated at closure and the viewing time is limited from the landfill access road, the impact to visual resources from these viewpoints is considered significant and unavoidable. (DEIR, pp. 3.8-21—22.)

Mitigation Measures:

VIS-1 At final closure, the landfill shall be contoured to be consistent with the surrounding terrain. It shall be vegetated with species that include appropriate local native plant species (FEIR, p 4-14).

VIS-2 Native sycamore trees from local seed or cutting stock shall be planted in Pila Creek downstream of the landfill, in sufficient quantity to vegetate the area (FEIR, p. 4-4).

BIO-3 An oak tree replacement plan shall be prepared to replace oak trees identified for removal. Any oak trees that are removed and/or damaged (more than 25 percent of root zone disturbed) shall be replaced on a 10:1 basis with 1-gallon size saplings grown from locally obtained acorns. Trees shall be planted prior to winter rains, irrigated and maintained until established (5 years). The plantings shall be protected from predation by wild and domestic animals, and from human interference by the use of staked fencing and gopher fencing during the maintenance period. In the event that an oak tree(s) does not survive for 5 years, it shall be replaced (FEIR, p. 4-8).

4. Air Quality:

Impacts: The allowable NO_X and PM_{10} emission increase threshold will be exceeded onsite as a result of project operations.

Onsite mobile source exhaust and stationary source combustion of landfill gas will result in emissions of NO_X. These emissions are treated by the dispersion modeling as if the initially generated NO completely converts to NO_2. Based on modeling results, ambient air quality standards for NO_2 will be exceeded.

Onsite mobile source exhaust and stationary source combustion of landfill gas will result in emissions of PM_{10}. Based on modeling results, ambient air quality standards for premitigation 24-hour PM_{10} concentrations will be exceeded.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effects.

Explanation: The standards to protect human health under the 1-hour concentrations of NO_2 and 24-hour concentrations of PM_{10} (dust, particulate matter) associated with gasoline and diesel-powered heavy-duty landfill equipment, as well as employee vehicles and trucks transporting waste materials to and from the Tajiguas Landfill site will be exceeded. The potential health

effects from emission of criteria pollutants are above thresholds of significance. (DEIR, p. 3.11-27—28.) The NO_x impacts will be reduced through maintenance, scheduling and upgrading of equipment, and using transfer trucks to efficiently transport waste from transfer stations to the Tajiguas Landfill. (DEIR, pp. 3.11-29—30.) In addition, the tub grinder operation shall be coordinated and scheduled with other mobile equipment working at the Tajiguas Landfill. (DEIR, p. 3.11-30.) Furthermore, inspecting the landfill cover for cracks, and filling fissures and repairing the landfill cover material as needed shall control landfill gas emissions. (DEIR, p. 3.11-31.)

The PM_{10} impacts will be controlled through implementation of dust control measures. With implementation of these mitigation measures, exceedances of ambient air quality standards are expected to occur and impacts would be unavoidable and significant. (DEIR, p. 3.11-27—28.)

Mitigation Measures:

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

a. Engines shall be turned off when the idling period will exceed 10 minutes.
b. All vehicles and equipment shall be regularly maintained.
c. Heavy-duty diesel-powered equipment purchased for the project shall comply with federal and California diesel standards that are in force at the time of purchase.
d. Scrapers and compactors shall be retrofitted with diesel particulate filters (DPFs) where applicable.
e. The maximum number of scrapers operating simultaneously shall be limited to four.
f. Transfer trucks shall be used to haul waste from the transfer stations to the Tajiguas Landfill, thereby reducing the number of trips to the landfill (FEIR, p 4-17).

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

a. The tub grinder or other grinder shall be used a maximum of 4 hours per day when scrapers are in use.

b. When no scrapers are in use, the tub grinder may be used up to a maximum of 8 hours per day (DEIR, p 3.11-30).

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

a. During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site.
b. Traffic speed shall be limited to 15 mph on all roads.
c. Soil stockpiled for more than two days shall be covered, moistened, or treated with soil binders to prevent dust generation.
d. In areas not in active use, exposed soil shall be moistened or shall be revegetated by seeding and watering, or soil binders shall be applied.
e. All permanent access roads shall be paved. Temporary access roads shall be provided with a crushed rock base (or similar material) or treated with a soil binder.
f. Paved roads shall be vacuum swept as needed.
g. Monitoring wind speed.
h. Monitoring PM_{10} at the landfill boundary (FEIR, p 4-18).

AQ-4 A buffer, approximately 250 to 320 meters (approximately 800 to 1,050 feet) east-west by 800 meters north-south (approximately 2,600 feet) for a total of approximately 50 acres on the Baron Ranch, adjacent to the east boundary of Tajiguas Landfill, shall have public access restrictions. These restrictions would assure that the public could not access an area where 24-hour PM_{10} or 1-hour NO_2 concentrations could potentially be greater than ambient air quality standards according to the results of air dispersion modeling (DEIR, p. 3.11-31).

AQ-5 The landfill cover material shall be routinely inspected for adequacy, and for cracks and fissures. The cover shall be repaired as necessary to control landfill gas (DEIR, p. 3.11-31).

Impact: Based on modeling results, the potential carcinogenic risk on and near an 800-meter segment of the project site boundary would exceed the EPA and CAPCOA significance threshold of 10-in-1-million.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: The maximum potential carcinogenic risk on and near an 800-meter (2,600-foot) segment of project boundary exceeds the threshold for health risk (DEIR, p. 3.11-27). Thus, according to established regulatory guidelines, this impact would be considered significant and unavoidable. A buffer, approximately 250 to 320 meters (approximately 800 to 1,050 feet) east-west by 800 meters north-south (approximately 2,600 feet) for a total of 50 acres on the Baron Ranch, adjacent to the east boundary of Tajiguas Landfill, shall have public access restrictions. These restrictions would ensure that the public could not access an area where concentrations are exceeded.

However, because the threshold for carcinogenic risk would be exceeded, the impact is considered significant and unavoidable (DEIR, p. 3.11-27).

Mitigation Measures:

AQ-4 A buffer, approximately 250 to 320 meters (approximately 800 to 1,050 feet) east-west by 800 meters north-south (approximately 2,600 feet, and a total of 50 acres) on the Baron Ranch, adjacent to the east boundary of Tajiguas Landfill, shall have public access restrictions. These restrictions would assure that the public could not access an area where 24-hour PM_{10} or 1-hour NO_2 concentrations could potentially be greater than ambient air quality standards according to the results of air dispersion modeling (DEIR, p. 3.11-31).

G. FINDINGS THAT CERTAIN IMPACTS ARE MITIGATED TO A LEVEL OF INSIGNIFICANCE BY CONDITIONS OF APPROVAL

The FEIR (01-EIR-05) identified several subject areas for which the project is considered to cause or contribute to significant, but mitigable environmental impacts. Each of the these impacts is discussed below along with the appropriate findings as per CEQA Section 15091:

1. Geology

Impact: Slope failure could damage environmental control systems, disrupt operations and pose a threat to landfill workers and customers. (DEIR, p. 3.2-28.) Portions of cut slopes within moderately to extremely weathered materials may become unstable if inclined steeper than 2:1. However, studies conducted at the landfill site indicate that cut slopes in the Gaviota Formation bedrock have adequate stability under both static and seismic conditions.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: Portions of cut slopes that occur at the Tajiguas Landfill within any of the geologic formations containing moderately to extremely weathered materials could become unstable (i.e., not meet established stability criteria) if inclined steeper than 2:1. Slope stability analyses indicate that the cut slopes in the Gaviota Formation bedrock have adequate stability under both static and seismic conditions. (DEIR, p. 3.2-29.) Cut slopes would be limited to 2:1 gradient and/or cut slopes oriented to avoid adverse bedding planes unless a steeper slope is demonstrated to be stable by site-specific analysis, and the

structural design of the Tajiguas Landfill Expansion Project shall be in compliance with California Code of Regulations (CCR) Title 27. (DEIR, pp. 3.2-29, 3.2-33—34.) As a result, potential impacts would be reduced to a less than significant level. (DEIR, p. 3.2-34.)

Mitigation Measures:

GEO-1 The landfill design shall include the following:

a) A detailed slope-stability report shall be prepared by a geologist/soils engineer to determine maximum cut-slopes, based on in-field observations of bedrock conditions. Cut-slopes shall not exceed 2:1 unless the slope-stability report concludes that steeper slopes will be stable. In that case, slopes may exceed 2:1, provided the slopes adhere to the design standards identified in the report.

b) A detailed geological and/or soils engineering study shall be prepared to determine landfill structural design criteria, as required by CCR Title 27, when the final landfill excavation and fill plans are being developed (FEIR, p. 4-6).

Impact: There is the potential for the underlying expansive soils to damage the overlying facilities. However, expansive soils would be removed prior to placement of landfill liner, waste, roads or other facilities.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: Expansive soils have been identified overlying the Rincon Formation at the Tajiguas Landfill site (these soils having been formed through weathering of the Rincon mudstones). The Rincon Formation, however, provides a source of clay-rich impermeable soil that would be used for final cover. Expansive soils would be excavated (removed) prior to the placement of the landfill liner and used as final cover on the landfill. Excavated expansive soils will typically be used as daily cover within the landfill, for liner/final cover construction, or will be placed in engineered fills using standard geotechnical practices. Landfill support structures or other facilities (i.e., roads) would not be placed on expansive soil without implementing geotechnical engineering practices during design and construction of landfill facilities. Use of geotechnical engineering practices to design the Tajiguas Landfill Expansion Project and appurtenant structures would reduce potential impacts to a less than significant level. (DEIR, p. 3.2-30.)

Mitigation Measures:

GEO-2. Expansive soils shall be excavated prior to placement of waste fill. In the event expansive soils are used as fill under sensitive structures or pavements, geotechnical engineering practices (i.e., compaction, drainage and watering controls) shall be implemented (DEIR, p. 3.2-34).

2. Biology

Impact:

Habitat quality along the northerly reach of Pila Creek may be affected due to increased human presence and the potential for introduction and expansion of invasive, non-native plants.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effects.

Explanation: Implementation of the proposed project would introduce intensive human presence and alter the northern portion of the Tajiguas Landfill site in the intervening time between the implementation of the Tajiguas Landfill Expansion Project and landfill closure. This could lead to avoidance or abandonment of habitat areas. (DEIR, p. 3.4-42.) This could also degrade the wildlife corridor function along Pila Creek. All ground disturbances upstream of the back canyon sedimentation basins will be prohibited within a 50-foot setback from either side of the top-of-bank (e.g., excluding existing road crossings) or oak/riparian vegetation canopy, whichever is greater, along Pila Creek (a sensitive riparian habitat area). (FEIR, doc. 3-25—26.)

Mitigation Measures:

BIO-2. To protect oak/riparian habitat in the northern portion of the project site, all ground disturbance upstream of the back canyon sediment basins shall be prohibited within a 50-foot setback from either side of the top-of-bank (e.g., excluding existing road crossings) or oak/riparian vegetation canopy, whichever is greater, along Pila Creek (a sensitive riparian habitat area) (DEIR, p 3.4-51).

BIO-7. To compensate for native habitats disturbed by the expansion, a County-approved biologist shall prepare and implement a revegetation/restoration plan (e.g., a ratio of not less than 3:1 for each disturbed acre). The plan shall utilize native plants and seed stock from locally obtained sources to the maximum extent feasible and also shall take into account requirements for maintaining the integrity of the landfill and cover system. Species selection shall be dependent upon the nature of the habitat (FEIR, 4-9).

Impacts: California horned lark, loggerhead shrike, Cooper's hawk and white-tailed kite would be affected by disturbance to grassland, chaparral and coastal sage scrub habitats.

The American peregrine falcon would be affected by disturbance to grassland and scrub habitat, which is foraging habitat for this species.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effects.

Explanation: Implementation of the proposed project would introduce intensive human presence and alter the northern portion of the Tajiguas Landfill site in the intervening time between the implementation of the Tajiguas Landfill Expansion Project and landfill closure. This could lead to avoidance or abandonment of habitat areas. (DEIR, p. 3.4-42.)

California horned lark, loggerhead shrike, Cooper's hawk and white-tailed kite, (a local species of concern), are found in open grasslands with sparse vegetation. California horned lark, loggerhead shrike are regularly observed foraging and roosting on coastal terraces in the project area. The proposed expansion would result in phased disturbance of grassland habitat potentially used by these species for foraging and roosting. However, grasslands habitat is widely available throughout the project site and in adjoining areas, and disturbance would not occur at one time, but would be phased over the life of the landfill.

The white-tailed kite extensively utilizes grassland, coastal sage scrub and open chaparral as foraging habitats. Cooper's hawk is more confined to riparian woodland. Roosting and nesting habitat for Cooper's hawks and white tailed kite typically includes riparian woodlands and stands of mature eucalyptus. The white-tailed kite is known to breed along the South Coast. The proposed landfill has been designed to avoid Pila Creek by providing a 50-foot setback from the top-of-bank of the creek. The Tajiguas Landfill Expansion would not disturb existing riparian habitat north of the in-channel sediment basins. South of the in-channels sediment basin, Pila Creek discharges to a subterranean pipe. The landfill expansion would result in disturbance to grassland and scrub habitat, foraging habitat for these species. Revegetation associated with intermediate cover (soil that is retained for greater than 180 days, and phased closure of the landfill would restore grassland habitat for this species.

American peregrine falcons have been sighted in Cañada de la Pila, within and north of the existing landfill site. The rock outcrops in the northerly canyon, west and north of the existing landfill, provide good to excellent roosting and nesting habitat for this species, although no nests or roosts were observed during the surveys.

Habitat restoration would mitigate impacts to the California horned lark, loggerhead shrike, Cooper's hawk and white-tailed kite American Peregrine Falcon. As a result, impacts would be considered significant but mitigable (DEIR, p. 3.4-47).

Mitigation Measures:

BIO-7. To compensate for native habitats disturbed by the expansion, a County-approved biologist shall prepare and implement a revegetation/restoration plan (e.g., a ratio of not less than 3:1 for each disturbed acre). The plan shall utilize native plants and seed stock from locally obtained sources to the maximum extent feasible and also shall take into account requirements for maintaining the integrity of the landfill and cover system. Species selection shall be dependent upon the nature of the habitat (FEIR, 4-9).

Impacts: Mountain lions in the project area would be affected through the loss of foraging and denning habitat and increased human presence during landfill operations.

Ringtails could be affected through loss of foraging and breeding habitat and increased human presence.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effects.

Explanation: Implementation of the proposed project would introduce intensive human presence and alter the northern portion of the Tajiguas Landfill site in the intervening time between the implementation of the Tajiguas Landfill Expansion Project and landfill closure. This could lead to avoidance or abandonment of habitat areas. (DEIR, p. 3.4-42.) This could also degrade the wildlife corridor function along Pila Creek. All ground disturbances will be prohibited within a 50-foot setback from either side of the top-of-bank (e.g., excluding existing road crossings) or oak/riparian vegetation canopy, whichever is greater, along Pila Creek (a sensitive riparian habitat area) (FEIR, Response 3-50).

The baseline conditions described in the DEIR note that the expansion is proposed primarily in the area that currently is disturbed by the existing soil borrow area, an area that is subject to ongoing excavation and Landfill activities. Because existing habitat within the Tajiguas Landfill site is regularly disturbed by ongoing landfill activities, animals such as ringtails are expected to avoid such disturbed areas, and the habitat would not be critical to the maintenance of the species.

Noise and human activities currently occur with ongoing landfill operations. The analysis in DEIR Section 3.4.3.3.2 noted that ringtail would occur on the slopes and creek portions of the northern project site rather than in the active landfill and soil borrow area.

Ringtails are Fully Protected Species are not expected to be "taken" under the proposed Tajiguas Landfill Expansion Project (FEIR, Ch. 3.0, Response 3-48b). Loss of habitat for these species as a significant but mitigable impact. Wildlife are mobile, unlike plants, and in the short term, wildlife are expected to move away from landfill disturbance activities. In the long-term, the Landfill would be closed and revegetated. Once landfill activities cease, wildlife are expected to return and use the landfill for foraging. For this reason, the impact to ringtail habitat is considered significant but mitigable (FEIR, Ch. 2.0, Response 3-48b).

Habitat restoration would mitigate impacts to the Mountain lions as well. Mountain lions are also expected to move away from the project area, which represents only a small portion of their range. These mitigation measures would reduce these impacts to a less than significant level. (DEIR, pp. 3.4-53—55; FEIR, Ch. 2, Responses. 3-27, 3-29, and 3-30.)

One commenter suggested that the impacts to ringtails and mountain lions should have been classified as significant because the reduction in their habitat amounts to a restriction in the range of rare species. As noted in this section, the County has already classified the impacts to these species as significant, but mitigable through habitat protection, revegetation and restoration (see, e.g., Mitigation Measures BIO-2 and BIO-7.) The issue of impacts to coastal sage scrub, oak woodland and chaparral habitat was addressed in the section above discussing significant and unavoidable impacts. Moreover, the County has already adopted the commenter's suggested mitigation of increasing the compensation ratios for these types of habitat, from 1:1 to 3:1. The County will not formally adopt the commenter's other suggested mitigation, incremental construction of the third phase of expansion into the backcanyon area north of the existing landfill, but the County will, as a general matter and to the extent feasible, limit the disturbance of habitat to areas for which cover is needed. In this way, if the landfill is closed earlier than expected, the disturbance to habitat for ringtails and mountain lions will be minimized.

Mitigation Measures:

BIO-2. To protect oak/riparian habitat in the northern portion of the project site, all ground disturbance upstream of the back canyon sediment basins shall be prohibited within a 50-foot setback from either side of the top-of-bank (e.g., excluding existing road crossings) or oak/riparian vegetation canopy, whichever is greater, along Pila Creek (a sensitive riparian habitat area) (DEIR, p. 3.4-51).

BIO-7. To compensate for native habitats disturbed by the expansion, a County-approved biologist shall prepare and implement a revegetation/restoration plan (e.g., a ratio of not less than 3:1 for each disturbed acre). The plan shall utilize native plants and seed stock from locally obtained sources to the maximum extent feasible and also shall take into account requirements for maintaining the integrity of the landfill and cover system. Species selection shall be dependent upon the nature of the habitat (FEIR, p. 4-9).

BIO-9 To minimize wildlife disturbance, night lighting used on the landfill site shall be of low-intensity, low-glare design, and shall be hooded to direct light downward onto the work area and prevent spill-over onto adjacent habitats. Except on an emergency basis, artificial lighting shall not be employed prior to 6:00 a.m. or after 8:00 p.m. (FEIR, p. 4-13).

BIO-10.To reduce hazards to wildlife that may ingest or become trapped by debris, portable fences shall continue to be used to limit the spread of litter on the working face of the landfill. Litter shall be collected on a regular basis (DEIR, p. 3.4-57).

Impacts: During the landfill closure/postclosure period, subsequent to the period of operation, human use and disturbance in the area will gradually diminish. The area will be revegetated and established as open space.

Landfill expansion would result in intensive human use of the northern portion of the site, but such use will diminish at closure.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effects.

Explanation: Implementation of the proposed project would introduce intensive human presence and alter the northern portion of the Tajiguas Landfill site in the intervening time between the implementation of the Tajiguas Landfill Expansion Project and landfill closure. This could lead to avoidance or abandonment of habitat areas. (DEIR, p. 3.4-42.) This could also degrade the wildlife corridor function along Pila Creek. All ground disturbances will be prohibited within a 50-foot setback from either side of the top-of-bank (e.g., excluding existing road crossings) or oak/riparian vegetation canopy, whichever is greater, along Pila Creek (a sensitive riparian habitat area) (FEIR, Ch. 2, Response 3-50).

When the landfill reaches capacity, onsite activities will gradually diminish as final phases of the landfill are closed and revegetated and unneeded onsite structures are removed. During the postclosure maintenance and monitoring period, onsite activities will consist of a limited number of persons visiting the site for routine inspection and maintenance. Also, the landfill surface will be established as revegetated open space (DEIR, p. 3.5-41)

Mitigation Measures:

BIO-3 An oak tree replacement plan shall be prepared to replace oak trees identified for removal. Any oak trees that are removed and/or damaged (more than 25 percent of root zone disturbed) shall be replaced on a 10:1 basis with 1-gallon size saplings grown from locally obtained acorns. Trees shall be planted prior to winter rains, irrigated and maintained until established (5 years). The plantings shall be protected from predation by wild and domestic animals, and from human interference by the use of staked fencing and gopher fencing during the maintenance period. In the event that an oak tree(s) does not survive for 5 years, it shall be replaced (FEIR, p. 4-8).

BIO-4. An oak tree protection program, prepared by a County-approved biologist, shall be implemented. The program shall include, but not be limited to, the following components:

- No grading or development shall occur within the drip lines of oak trees.
- All oak trees within 25 feet of proposed ground disturbances shall be temporarily fenced with chain-link or other satisfactory material throughout all grading and construction activities. The fencing shall be installed 6 feet outside the drip line of each oak tree, and shall be staked every 6 feet.
- Within 6 feet of any oak tree drip line, the following shall be prohibited:
  - Parking, storage or operation of construction equipment;
  - Stockpiling of fill soil, rocks or construction materials;
  - Placement of artificial surface, pervious or impervious.
- If any roots encountered are 1 inch in diameter or greater, they shall be cleanly cut under the direction of a County-approved aborist/biologist.
- Any trenching required within the drip line or sensitive root zone of any specimen tree shall be done by hand (DEIR, pp. 3.4-51 — 3.4-52).

BIO-7. To compensate for native habitats disturbed by the expansion, a County-approved biologist shall prepare and implement a revegetation/restoration plan (e.g., a ratio of not less than 3:1 for each disturbed acre). The plan shall utilize native plants and seed stock from locally obtained sources to the maximum extent feasible and also shall take into account requirements for maintaining the integrity of the landfill and cover system. Species selection shall be dependent upon the nature of the habitat (FEIR, p. 4-9).

Impact: Tidewater gobies could be indirectly affected by increased sedimentation and adverse effects to water quality in near shore waters.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: Tidewater gobies have not been found and likely do not occur in Pila Creek due to the absence of a lagoon at the Creek's discharge point to the Pacific Ocean. The tidewater goby has been collected from lagoons at the mouths of Arroyo Quemado and Arroyo Hondo Creeks, immediately east and west, respectively, of the mouth of Pila Creek. However, the species could be affected by waters in the nearshore environment around the mouth of Pila Creek. Erosion control measures would be implemented to reduce the amount of sediment in Pila Creek and would reduce this impact to a less than significant level. (DEIR, p. 3.4-48—49.)

Mitigation Measures:

BIO-6 Erosion control measures shall continue to be implemented. Erosion control methods could include silt fencing, straw bales, hydroseeding with appropriate native plant species from the project vicinity, or use of sandbags in conjunction with other methods. Hydroseeding, if used, shall be applied prior to the rainy season.

Impact: The number of individuals and species may be reduced because of limited resources at the landfill and competition for limited habitat areas. Birds may exert predatory pressure on other species, such as the California red-legged frog.

The red-legged frog population in the in-channel sedimentation basins would experience predation by gulls and crows that are attracted to the landfill.

Tidewater gobies could be indirectly affected through predation by gulls that congregate around the terminal lagoons on surrounding drainages and at the landfill.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effects.

Explanation: Birds are attracted to the Tajiguas Landfill as a food source. A Bird Management Plan would be developed for the Tajiguas Landfill Expansion Project and will use a variety of methods to control birds at the landfill. Once the birds are deterred from the landfill, the bird population along the Gaviota coast will continue to be attracted to the area by the fresh water source at Arroyo

Quemado and/or Arroyo Hondo, the recreational areas frequented by humans in the area such as the Vista Point on U.S. Highway 101 west of the Tajiguas Landfill, Refugio State Beach and other campgrounds and picnic grounds in the area (where food from humans is easily available) and areas with low human disturbance, such as remote beaches along the Gaviota coast where the birds can roost undisturbed. The distinction is that with the bird management controls at the landfill, birds will no longer be attracted solely by the landfill. The birds will be attracted to the area because they naturally occur here and prefer other attributes offered by the Gaviota coast. (DEIR, pp. 3.4-43—44.)

Tidewater gobies have been found in Arroyo Quemado to the east and Arroyo Hondo to the west. The landfill expansion could indirectly affect gobies through predation by gulls that congregate around the terminal lagoons on these surrounding drainages and at the landfill. Bird management practices will mitigate predation of tidewater gobies by gulls. (DEIR, pp. 3.4-48—49.) Using bird deterrents in a varied manner would serve to reduce project impacts to a less than significant level. (DEIR, pp. 3.4-43—44; FEIR, Ch. 2, Responses 16-14 and 17-26 and Ch. 4.2.2)

Mitigation Measures:

NUI-2 To reduce nuisance birds at the landfill, a Bird Management Plan shall be developed. The plan shall include, but not be limited to, the following measures:

a) Landfill personnel shall be assigned to bird management from dawn until all refuse has been buried and the landfill closed for the day. Personnel shall be trained in bird identification and behavior.

b) The working face shall be maintained as small as safely practicable, considering the types and numbers of landfill equipment operating.

c) The landfill shall be inspected regularly for cracks or fissures which can attract birds. Repairs shall be implemented as necessary.

d) Extremely odiferous waste shall be buried as soon as possible after unloading.

e) Application of a minimum 6-inch-thick layer of compacted soil or approved ADC shall be applied during the day and/or at the end of each working day.

f) The following actions to deter birds at the landfill shall include one or more of the following:

1) Propane cannons and noisemakers.
2) Distress calls.
3) Gull "decoys" displayed in distressed positions.
4) Remote control airplanes.
5) Overhead lines or wires.
6) Kites.
7) Flash tape and streamers.
8) Balloons.
9) Bird trainers (e.g., *JUMPO*TM).
10) Raptors.
11) Dogs.
12) Depredation.

g) SWUD shall determine the feasibility of using a large cage or netting as a bird deterrent at the landfill working face (FEIR, p. 4-13).

Impact: Removal of nectar sources and larval food plants, such as milkweed, could affect the Monarch butterfly.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: The Tajiguas Landfill Expansion Project would not directly affect roosting habitat of the Monarch butterfly because of the absence of large eucalyptus trees at the Tajiguas landfill site. Therefore, no roost trees for Monarch butterflies would be removed by the Tajiguas Landfill Expansion Project. However, lateral expansion of the landfill into the ruderal and grassland areas east and west of the existing landfill and in the back canyon area of the project site may remove larval food plants such as milkweed, as well as nectar (food) sources for adult butterflies. Mitigation measures to revegetate the landfill will include nectar sources and larval food plants (such as milkweed) in the revegetation plan for the monarch butterfly. Impacts to the monarch butterfly would be reduced to a less than significant level. (DEIR, p. 3.4-49.)

Mitigation Measures:

BIO-11 To reduce impacts to Monarch butterflies that may roost in nearby eucalyptus trees along U.S. Highway 101, revegetation plantings shall include adult nectar sources and larval food plants, such as milkweed (DEIR 3.4-57).

3. Cultural Resources

Impact: Unknown surface and/or subsurface cultural resources could be discovered during ground disturbing activities.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effects.
Explanation: Cultural resource sites are located on the Tajiguas Landfill site and would potentially be disturbed directly or indirectly by landfill operations or landfill personnel. The impact can be reduced but not eliminated by requiring that in the event of unexpected cultural resource finds, grading operations shall be hauled and assessed by a qualified archaeologist and Native American prior to continuation of work. In addition, cultural resource awareness training shall be required for landfill employees. With implementation of these requirements impacts would be reduced to a less than significant impact. (DEIR, 3.5-11—14.)

Mitigation Measures:

CR-2. In the event cultural remains are encountered during grading, work shall be stopped immediately or redirected until a County-qualified archaeologist and Native American representative are retained by the applicant to evaluate the significance of the find pursuant to Phase 2 investigations of the County Archaeological Guidelines. If remains are found to be significant, they shall be subject to a Phase 3 mitigation program, consistent with County Archaeological Guidelines (DEIR, 3.5-13).

CR-3. SWUD shall develop and conduct a training program for all landfill personnel. Personnel shall be made aware of the sensitivity of cultural resources at the landfill. These resources will be designated as "off-limits," with instructions to avoid them (DEIR, 3.5-13).

Impact: Cultural resource sites SBA-iso-645, CA-SBA-92 and CA-SBA-1990 could be indirectly impacted by the continuation of human activities in the area related to operation of the landfill and closure and post-closure activities at the landfill.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effects.

Explanation: Cultural resource sites are located on the Tajiguas Landfill site and would potentially be disturbed indirectly by landfill operations or landfill personnel. Previously recorded sites CA-SBA-92 and CA-SBA-1990 are located on the terraces and knolls along U.S. Highway 101 in the vicinity of the existing landfill (DEIR, pp. 3.5-11 —3.5-12). SBA-iso-645 is located west of the landfill access road. Because of the locations of these cultural resources, the Proposed

Project would not disturb the areas where these cultural resources were found and the Project does not have the potential to directly impact these cultural resources sites. However, the sites could be indirectly impacted by the continuation of human activities in the area related to continued operation of the landfill. The impact can be reduced but not eliminated by requiring that in the event of unexpected cultural resource finds, grading operations shall be hauled and assessed by a qualified archaeologist and Native American prior to continuation of work. In addition, cultural resource awareness training shall be required for landfill employees. With implementation of these requirements impacts would be reduced to a less than significant impact. (DEIR, 3.5-11—14.)

Mitigation Measures:

CR-1. All known or potential cultural sites that are subject to ground disturbances shall be subject to a Phase 1 archaeological survey pursuant to County Archaeological Guidelines. If required, a Phase 2 subsurface investigation and Phase 3 data recovery program shall be performed if significant resources will be encountered and potential impacts are unavoidable. Surveys will take place as far in advance of landfill expansion activities as feasible to avoid delaying landfill operations (DEIR, p 3.5-13).

CR-2. In the event cultural remains are encountered during grading, work shall be stopped immediately or redirected until a County-qualified archaeologist and Native American representative are retained by the applicant to evaluate the significance of the find pursuant to Phase 2 investigations of the County Archaeological Guidelines. If remains are found to be significant, they shall be subject to a Phase 3 mitigation program, consistent with County Archaeological Guidelines (DEIR, 3.5-13).

CR-3. SWUD shall develop and conduct a training program for all landfill personnel. Personnel shall be made aware of the sensitivity of cultural resources at the landfill. These resources will be designated as "off-limits," with instructions to avoid them (DEIR, 3.5-13).

4. Nuisance

Standards for the control of nuisances at solid waste disposal sites and for the control of litter along roads and highways within the state are set forth in CCR Title 27, Consolidated Regulations for Treatment, Storage, Processing or Disposal of Solid Waste; regulations of the Santa Barbara County Air Pollution Control District (SBCAPCD); California Vehicle Code; and enforced the Local Enforcement Agency (LEA) of the California Integrated Waste Management Board (CIWMB). Implementation of the requirements of CCR

Title 27, in addition to the measures required under the following issue areas, would reduce impacts to a less than significant level. (DEIR, 3.6-1—4.)

Impacts: During landfill operations, resident and displaced rodents have the potential to inhabit or get lodged in landfill equipment and structures and could expose onsite personnel to disease.

Insects such as flies and mosquitoes could be attracted by ponded water or uncovered solid waste.

During closure activities, there is the potential for resident and displaced rodents to inhabit or get lodged in landfill equipment or structures.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effects.

Explanation: Landfill-related activities have the potential to disrupt onsite ground-burrowing rodents and, as a result, spread disease. However, development of the Tajiguas Landfill Expansion Project would more likely result in the direct mortality of these animals, as they generally are too small and/or too slow to abandon the area. Because rodent populations have small home ranges, they would be unable to establish and populate new territories in adjacent, undisturbed areas. In addition, there have been no reported cases of humans contracting any disease from rodents in the vicinity of the Tajiguas Landfill in the past. Proper housekeeping practices shall be implemented to reduce attractiveness of landfill equipment and structures to rodents. Insects may be attracted to the site due to availability of shelter, food, and water. Daily cover or approved alternative daily cover application will keep insect activity to a minimum. As a result, the potential nuisance impact related to rodents and insects is considered less than significant. (DEIR, pp. 3.6-5, 3.6-12.)

Mitigation Measures:

NUI-1 To reduce potential vector habitat or harborage, good housekeeping practices shall be implemented at the landfill. Good housekeeping practices shall include, but are not limited to, the following measures:

a) The working face shall be maintained as small as safely practicable, considering the types and numbers of landfill equipment operating.

b) Extremely odiferous waste shall be buried as soon as possible after unloading.

c) Waste at the active working face shall be compacted.

d) Disturbance at previously covered cells shall be avoided.

e) Application of a minimum of a 6-inch-thick layer of compacted soil or ADC shall be applied during the day and/or at the end of each working day.

f) Structures and areas of human activity shall be kept clean.

g) Trash shall be deposited in appropriate closed containers and removed for proper disposal.

h) Tools, miscellaneous equipment, and other items that could commonly attract vectors shall be stored in closed containers and/or within an enclosed structure.

i) Drainage control structures (sedimentation ponds, drainage ditches, etc.) shall be maintained to preclude mosquito breeding habitat, vectors or pests, consistent with the California Red-legged frog management plan.

j) The landfill shall be inspected monthly to identify areas of substandard soil cover. These areas shall be corrected as needed, including repair of cracks or holes in the cover caused by landfill operations or weather conditions.

k) The working face, buildings, and storage containers shall be inspected monthly for signs of vector activity. Repairs to the working face, buildings or storage containers shall be implemented as necessary, and buildings or storage containers, would require repair or rodent traps.

l) In the event that a vector problem should occur, appropriate measures, such as cleaning and securing a building or container, or the use of a professional or licensed exterminator, shall be used (DEIR, pp 3.6-20 — 3.6-21).

Impact: Birds are attracted to the solid waste at the landfill. When in large concentrations, they have the potential to affect the health and safety of humans and other animals.

Explanation: Birds are typically attracted to landfills as a food source. Birds can cause health problems for humans and can adversely affect wildlife in the project area. To reduce the food sources at the Tajiguas Landfill, good housekeeping practices shall be implemented and a Bird Management Plan shall be developed to deter birds from foraging at the landfill. Implementation of these requirements would reduce nuisance impacts due to birds to a less than significant level. (DEIR, pp. 3.6-12—14).

Mitigation Measures:

NUI-2 To reduce nuisance birds at the landfill, a Bird Management Plan shall be developed. The plan shall include, but not be limited to, the following measures:

a) Landfill personnel shall be assigned to bird management from dawn until all refuse has been buried and the landfill closed for the day. Personnel shall be trained in bird identification and behavior.

b) The working face shall be maintained as small as safely practicable, considering the types and numbers of landfill equipment operating.

c) The landfill shall be inspected regularly for cracks or fissures which can attract birds. Repairs shall be implemented as necessary.

d) Extremely odiferous waste shall be buried as soon as possible after unloading.

e) Application of a minimum 6-inch-thick layer of compacted soil or approved ADC shall be applied during the day and/or at the end of each working day.

f) The following actions to deter birds at the landfill shall include one or more of the following:

1) Propane cannons and noisemakers.
2) Distress calls.
3) Gull "decoys" displayed in distressed positions.
4) Remote control airplanes.
5) Overhead lines or wires.
6) Kites.
7) Flash tape and streamers.
8) Balloons.
9) Bird trainers (e.g., *JUMPO*TM).
10) Raptors.
11) Dogs.
12) Depredation.

g) SWUD shall determine the feasibility of using a large cage or netting as a bird deterrent at the landfill working face (FEIR, p 4-13).

Impacts: There is the potential for odors from the transport of waste to the landfill to be a nuisance along the roadways leading to the landfill (i.e., U.S. Highway 101).

Odors generated by the exposed waste at the landfill working face have the potential to be detected offsite.

Odors associated with landfill gas during landfill operations and closure/postclosure activities have the potential to be detected offsite.

Odors associated with landfill gas have the potential to be detected after the placement of final cover.

There is the potential for odors from landfill gas to occur during the closure/postclosure period. However, the generation of landfill gas would diminish over time, and the landfill gas collection system is expected to reach an efficiency of 95 percent.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effects.

Explanation: Odors generated by the exposed waste at the active Tajiguas Landfill working face shall be minimized by the daily application of cover material. The working face, where waste is buried, shall be kept as small as possible for optimum operations. These mitigation measures will minimize the amount of waste that is exposed and reduce the potential for associated odors. (DEIR, p. 3.6-15.) Odor control measures shall include burying odiferous material as soon as possible after unloading at the working face and inspecting the landfill cover regularly for cracks or fissures to reduce odor potential from landfill gas. Repairs to the landfill cover shall be implemented as necessary. (DEIR, p. 3.6-23.) In addition, waste haul trucks shall be required to be tarped from the point of origin and will reduce odors during waste transport. (DEIR, p. 3.6-24.) These mitigation measures would reduce nuisance impacts to a less than significant level. (DEIR, pp. 3.6-15—16, 3.6-23—24.)

Mitigation Measures:

NUI-3 To reduce nuisance litter at the landfill and surrounding areas, the following measures shall be required:

a) Signs displaying anti-littering laws and requirements shall be posted in both English and Spanish at the landfill entrance and scalehouse. The signs shall include requirements for covering loads and notification that an additional "untarped" fee shall be charged for uncovered loads.

b) All waste haul trucks shall be tarped from the point of origin to prevent littering and odor nuisance.

c) During periods of high winds (greater than 25 miles per hour [mph]), application of cover material shall occur more frequently.

d) As feasible, the working face shall be temporarily relocated to wind-protected areas during periods of high wind (greater than 25 mph).

e) Litter fences shall be installed downwind of the working face of the landfill.

f) The landfill perimeter fence shall be maintained to provide litter control.

g) Litter crews shall be used to routinely check the various fences for litter control effectiveness and to remove litter.

h) Roads leading to the landfill shall be inspected daily for litter and illegally dumped waste by landfill managers and supervisors as they travel to and from the landfill site. Road inspections shall include the landfill access road and U.S. Highway 101 for a distance of 1/4 mile east and west of the landfill access road intersection. Litter crews will be dispatched on an as-needed basis.

i) Onsite drainage channels shall be cleaned prior to the start of the rainy season (November 1 of each year) and periodically, as needed, to prevent offsite migration of accumulated litter (DEIR, p 3.6-23).

NUI-4 Odors generated by the landfill shall be kept to a minimum, with a goal of retaining odors on the site. The following odor control measures shall be implemented:

a) Extremely odiferous waste shall be buried as soon as possible after unloading.

b) The landfill shall be inspected regularly for cracks or fissures. Repairs shall be implemented as necessary (DEIR, pp 3.6-22 —3.6-23).

Impacts: Litter from uncovered waste loads, could become a nuisance along County roads and highways.

There is the potential for litter from illegal dumping in the vicinity of the landfill.

Litter from the landfill working face could blow offsite and become a nuisance.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effects.

Explanation: Litter may result from paper, plastic and other light materials blowing away from the working area before it can be compacted and covered. (DEIR, p. 3.6-6.) Several actions currently used at the Tajiguas Landfill will

continue with the Tajiguas Landfill Expansion Project to control litter. These measures include use of litter fences and litter crews. Downdrain inlets equipped with fencing collect runoff debris, including litter, preventing it from entering the drainage system and being discharged to Pila Creek. This prevents litter from reaching the ocean. In addition, trash racks downstream of the landfill in Pila Creek catch litter that may have bypassed other collection methods at the site DEIR, pp 3.6-6 — 3.6-7).

Signs shall also continue to be displayed with anti-littering laws, waste haul trucks shall be required to be tarped from the point of origin, the working face shall be relocated to protected areas and there shall be frequent application of cover during periods of high winds, to control litter. These requirements will reduce impacts due to litter to less than significant. (DEIR, pp. 3.6-22—23.)

Mitigation Measures:

NUI-3 To reduce nuisance litter at the landfill and surrounding areas, the following measures shall be required:

a) Signs displaying antilittering laws and requirements shall be posted in both English and Spanish at the landfill entrance and scalehouse. The signs shall include requirements for covering loads and notification that an additional "untarped" fee shall be charged for uncovered loads.

b) All waste haul trucks shall be tarped from the point of origin to prevent littering and odor nuisance.

c) During periods of high winds (greater than 25 miles per hour [mph]), application of cover material shall occur more frequently.

d) As feasible, the working face shall be temporarily relocated to wind-protected areas during periods of high wind (greater than 25 mph).

e) Litter fences shall be installed downwind of the working face of the landfill.

f) The landfill perimeter fence shall be maintained to provide litter control.

g) Litter crews shall be used to routinely check the various fences for litter control effectiveness and to remove litter.

h) Roads leading to the landfill shall be inspected daily for litter and illegally dumped waste by landfill managers and supervisors as they travel to and from the landfill site. Road inspections shall include the landfill access road and U.S. Highway 101 for a distance of 1/4 mile east and west of the landfill access road intersection. Litter crews will be dispatched on an as-needed basis.

i) Onsite drainage channels shall be cleaned prior to the start of the rainy season (November 1 of each year) and periodically, as needed, to prevent offsite migration of accumulated litter (DEIR, p 3.6-23).

Impacts: There is the potential for dust that is generated by landfill operations to result in offsite impacts.

Dust may occur during closure during transport and compaction of soil to construct the final cover and subsequent revegetation

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: Dust will be generated at the Tajiguas Landfill as a result of grading, soil excavation and hauling, and the movement of waste hauling vehicles involved in the transport and dumping of waste material. Dust would be controlled at the landfill through implementation of dust control measures. (DEIR, p. 3.6-17.) While dust would be generated throughout the duration of the Tajiguas Landfill Expansion Project, including closure, it is not expected to adversely affect nearby agricultural uses on the Baron Ranch due to the distance between the landfill and soil borrow areas and orchards on the Baron Ranch. Overall, dust from landfill operations is considered a less than significant impact with implementation of dust control measures. (DEIR, p. 3.6-18.)

Mitigation Measures:

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

a. During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site.
b. Traffic speed shall be limited to 15 mph on all roads.
c. Soil stockpiled for more than two days shall be covered, moistened, or treated with soil binders to prevent dust generation.
d. In areas not in active use, exposed soil shall be moistened or shall be revegetated by seeding and watering, or soil binders shall be applied.
e. All permanent access roads shall be paved. Temporary access roads shall be provided with a crushed rock base (or similar material) or treated with a soil binder.
f. Paved roads shall be vacuum swept as needed.
g. Monitoring wind speed.
h. Monitoring PM_{10} at the landfill boundary (FEIR, p. 4-18).

Impact: The Southeast Corner Modification could result in nuisance impacts, including odors, litter and dust, and attraction of vectors and birds.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: Modification of the southeast corner of the Tajiguas Landfill would have the potential for nuisance impacts for the duration of the activity. Excavation of the compacted waste and soil could be an attractant to vectors and birds and could result in the release of odors. The process of excavating, loading and transporting the waste for disposal at another location at the landfill could result in litter and odors from the waste. Also, dust will occur when waste is excavated and loaded for transport to the disposal site in the expansion area.

To reduce the potential for the excavation to attract vectors and birds, the excavation area and waste disposal site shall be maintained as small as safely practicable. Odors will be controlled by burial of any odiferous waste as soon as possible. To reduce litter, haul trucks will be covered, excavation will be curtailed during periods of high winds, and litter fences will be utilized. Dust will be controlled by periodic watering and other measures provided in DEIR, Section 3.11—Air Quality. Periodic watering and other dust control measures will control dust. As a result, impacts from modification of the southeast corner of the landfill are considered less than significant. (DEIR, p. 3.6-18.)

Mitigation Measures:

NUI-1 To reduce potential vector habitat or harborage, good housekeeping practices shall be implemented at the landfill. Good housekeeping practices shall include, but are not limited to, the following measures:

a) The working face shall be maintained as small as safely practicable, considering the types and numbers of landfill equipment operating.
b) Extremely odiferous waste shall be buried as soon as possible after unloading.
c) Waste at the active working face shall be compacted.
d) Disturbance at previously covered cells shall be avoided.
e) Application of a minimum of a 6-inch-thick layer of compacted soil or ADC shall be applied during the day and/or at the end of each working day.
f) Structures and areas of human activity shall be kept clean.
g) Trash shall be deposited in appropriate closed containers and removed for proper disposal.
h) Tools, miscellaneous equipment, and other items that could commonly attract vectors shall be stored in closed containers and/or within an enclosed structure.
i) Drainage control structures (sedimentation ponds, drainage ditches, etc.) shall be maintained to preclude mosquito breeding habitat, vectors or pests, consistent with the California Red-legged frog management plan.

j) The landfill shall be inspected monthly to identify areas of substandard soil cover. These areas shall be corrected as needed, including repair of cracks or holes in the cover caused by landfill operations or weather conditions.

k) The working face, buildings, and storage containers shall be inspected monthly for signs of vector activity. Repairs to the working face, buildings or storage containers shall be implemented as necessary, and buildings or storage containers, would require repair or rodent traps.

l) In the event that a vector problem should occur, appropriate measures, such as cleaning and securing a building or container, or the use of a professional or licensed exterminator, shall be used (DEIR, pp. 3.6-20 to 3.6-21).

NUI-2 To reduce nuisance birds at the landfill, a Bird Management Plan shall be developed. The plan shall include, but not be limited to, the following measures:

a) Landfill personnel shall be assigned to bird management from dawn until all refuse has been buried and the landfill closed for the day. Personnel shall be trained in bird identification and behavior.

b) The working face shall be maintained as small as safely practicable, considering the types and numbers of landfill equipment operating.

c) The landfill shall be inspected regularly for cracks or fissures which can attract birds. Repairs shall be implemented as necessary.

d) Extremely odiferous waste shall be buried as soon as possible after unloading.

e) Application of a minimum 6-inch-thick layer of compacted soil or approved ADC shall be applied during the day and/or at the end of each working day.

f) The following actions to deter birds at the landfill shall include one or more of the following:

1) Propane cannons and noisemakers.
2) Distress calls.
3) Gull "decoys" displayed in distressed positions.
4) Remote control airplanes.
5) Overhead lines or wires.
6) Kites.
7) Flash tape and streamers.
8) Balloons.
9) Bird trainers (e.g., *JUMPO*TM).

10) Raptors.
11) Dogs.
12) Depredation.

g) SWUD shall determine the feasibility of using a large cage or netting as a bird deterrent at the landfill working face (FEIR, p. 4-13).

NUI-3 To reduce nuisance litter at the landfill and surrounding areas, the following measures shall be required:

a) Signs displaying antilittering laws and requirements shall be posted in both English and Spanish at the landfill entrance and scalehouse. The signs shall include requirements for covering loads and notification that an additional "untarped" fee shall be charged for uncovered loads.

b) All waste haul trucks shall be tarped from the point of origin to prevent littering and odor nuisance.

c) During periods of high winds (greater than 25 miles per hour [mph]), application of cover material shall occur more frequently.

d) As feasible, the working face shall be temporarily relocated to wind-protected areas during periods of high wind (greater than 25 mph).

e) Litter fences shall be installed downwind of the working face of the landfill.

f) The landfill perimeter fence shall be maintained to provide litter control.

g) Litter crews shall be used to routinely check the various fences for litter control effectiveness and to remove litter.

h) Roads leading to the landfill shall be inspected daily for litter and illegally dumped waste by landfill managers and supervisors as they travel to and from the landfill site. Road inspections shall include the landfill access road and U.S. Highway 101 for a distance of 1/4 mile east and west of the landfill access road intersection. Litter crews will be dispatched on an as-needed basis.

i) Onsite drainage channels shall be cleaned prior to the start of the rainy season (November 1 of each year) and periodically, as needed, to prevent offsite migration of accumulated litter (DEIR, p. 3.6-23).

NUI-4 Odors generated by the landfill shall be kept to a minimum, with a goal of retaining odors on the site. The following odor control measures shall be implemented:

a) Extremely odiferous waste shall be buried as soon as possible after unloading.
b) The landfill shall be inspected regularly for cracks or fissures. Repairs shall be implemented as necessary (DEIR, pp. 3.6-22 — 3.6-23).

6. Land Use

Impacts: There is the potential for the proposed project to impact residential use in the vicinity, including the Arroyo Quemada community.

There is the potential for the proposed project to result in impacts to other land uses in the vicinity.

The Southeast Corner Modification has the potential to impact future use of the landfill site, after the completion of landfill operations.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effects.

Explanation: The Tajiguas Landfill Expansion Project is a continuation of the Tajiguas Landfill, an existing land use. CEQA identifies that a significant impact would occur under Land Use if the proposed project would physically divide an established community, conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (such as Comprehensive Plan, Coastal Plan, Coastal and/or Inland Zoning Ordinance), conflict with any applicable habitat conservation plan or natural community conservation plan, adversely affect any unique or other farmland of state or local importance, convert prime agricultural land to nonagricultural use or displace or divide grazing land capable of sustaining between 25 and 30 animal units per year. The potential for the proposed project to conflict with an applicable land use plan, policy or regulation and therefore result in a significant impact was evaluated based on the consistency of the proposed project with such plans, policies and regulations and was found to be consistent with applicable County policies (DEIR pp 3.7- 3.7-15 to 3.7-44. The Tajiguas Landfill Expansion Project was also found to be compatible with surrounding residential, recreational and agricultural uses (DEIR, pp3.7-44 — 3.7-47).

The mitigation measures required under each of the following issue areas in conjunction with requirements of CCR, Title 27 would serve to reduce land use impacts to a less than significant level. (DEIR, pp. 3.7-19 — 3.7-26.) Mitigation measures to reduce impacts under Geology, Water Resources, Nuisances, Visual

Resources, Noise, Air Quality and Health and Safety are required. Additionally, landfill closure requirements under CCR Title 27 General Closure and Post-Closure Maintenance Standards Applicable to Waste Management Units for Solid Waste would ensure that the Tajiguas Landfill will be closed according to a closure and post closure maintenance plan approved by the CIWMB and the RWQCB. These approvals provide for continued compliance with the applicable State Water Resources Control Board-promulgated standards for waste containment and precipitation and drainage controls.

In an August 16, 1999, memo to Phil Demery, Santa Barbara County Planning and Development reviewed the local permit requirements for the Tajiguas Landfill site. In the memo, P&D found that:

"The Tajiguas Landfill has been in operation since 1966 prior to the enactment of the Coastal Act, the passage of the California Environmental Quality Act, and the onset of State regulation of landfills through the Solid Waste Management Act. Therefore, the only potentially applicable regulation was the County of Santa Barbara Zoning Ordinance 661. The Tajiguas Landfill, a County owned Public Works Facility, was not subject to a County permit requirement because Ordinance 661 specifically states that it is not applicable to "the County of Santa Barbara or any district of which the Board of Supervisors is the governing body." Thus the landfill became a legal facility with no established limits of operation within the boundaries of the original landfill property (APN 081-150-019). In 1978, the landfill received a Solid Waste Facilities Permit (SWFP) from the State of California. The 1978 SWFP imposed a 400-foot elevation limit on the landfill but did not otherwise affect the permit status of the facility. Landfill activity within the parcel and below 400 feet in elevation was (and is) a continuation of the historic operation of the original landfill. This landfill activity is not subject to Coastal Zone requirements." Historically, landfill activity below 400 feet in elevation has been considered to be a continuation of the historic operations of the original Landfill. (FEIR, Ch. 2, Response 3-5).

In 1988, 87-EIR-8 was completed to allow a larger expansion at the Tajiguas Landfill north, east and west of the Landfill footprint, and to an elevation of 500 feet. This expansion project would have allowed the expansion to occur laterally and fill over portions of what is now the natural channel of Pila Creek north of the existing Landfill. This expansion project was not completed. In 1988, a new SWFP was issued to expand the height limit to 500 feet throughout the Landfill, including the coastal zone. However, no Coastal Development Permit to allow the increase in height within the coastal zone portion of the landfill has been issued (FEIR, Ch. 2, Response 3-5).

The alternative to leave the waste associated with the Southeast Corner Modification in place is not currently feasible under existing zoning and the existing Local Coastal Plan, even though it would be environmentally superior to leave the waste in place. The waste removal is required to bring the facility into

compliance with the coastal zoning ordinance (Article II), the Coastal Plan and the California Coastal Act. Leaving the waste in place is not feasible. Findings for consistency currently cannot be made with either the coastal zoning ordinance or the Coastal Plan policies. The Southeast Corner Modification would occur on the artificially created Tajiguas Landfill waste prism. Potentially significant impacts associated with the Southeast Corner Modification relocation to the Tajiguas Landfill Expansion project include Health and Safety and Fire (FEIR, Ch. 2, Response 3-123).

Mitigation Measures:

See mitigation measures for Geology, Water Resources, Nuisances, Visual Resources, Air Quality, Noise, and Health and Safety.

7. Visual Resources

Impact: Security lighting from the scale house would be visible from Viewpoint 4 and may be visible from Viewpoint 5.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: Security lighting will be associated with the scalehouse and the operations and maintenance center. In months when daylight savings time is not in effect (November through March), lighting in these areas would be required for operations 6 days a week during early morning hours (from 6:00 a.m.) and early evening hours (until 8:00 p.m.). Portable lighting may be used on an emergency basis. The screening effects of topography and vegetation prevent a direct view of lighting from the maintenance area. Lights from the scalehouse would be visible from the intersection of the Tajiguas Landfill access road and U.S. Highway 101 (Viewpoint 4) and may be visible from the Pacific Ocean (Viewpoint 5). If the scalehouse and maintenance center were relocated further north of their existing location, the operational lighting would be shielded from view by intervening topography of both the landfill and intervening natural slopes. Mitigation measures required under Biological Resources include that night lighting shall be of low-intensity, low-glare design, and shall be hooded to direct light downward onto the work area and prevent spill-over onto adjacent areas. Except on an emergency basis, artificial lighting shall not be employed prior to 6:00 a.m. or after 8:00 p.m. This measure would also serve to reduce visual resource impacts to a less than significant level. (DEIR, pp. 3.4-56—57; 3.8-17.)

Mitigation Measures:

BIO-9 To minimize wildlife disturbance, night lighting used on the landfill site shall be of low-intensity, low-glare design, and shall be hooded to direct

light downward onto the work area and prevent spill-over onto adjacent habitats. Except on an emergency basis, artificial lighting shall not be employed prior to 6:00 a.m. or after 8:00 p.m. (FEIR, p 4-13).

8. Traffic

Impact: Potential for project-related trucks and other vehicles to affect either truck traffic safety or total traffic safety (accidents) in the vicinity of the landfill. At the landfill access road intersection, trucks and other vehicles will turn across traffic on U.S. Highway 101, either as they enter or exit the landfill.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: Traffic accident data for the section of U.S. Highway 101 between the Refugio Interchange and the Mariposa Reina Interchange shows that the accident rate for this segment of roadway is less than the state-wide average for this type of roadway and the accident rate in the vicinity of the Tajiguas Landfill is well below the statewide average for this type of highway. Drivers of transfer and commercial trucks are familiar with the U.S. Highway 101/Tajiguas Landfill access road intersection and have experience in merging into traffic from the Tajiguas Landfill. (DEIR, pp. 3.10-12—13.)

Improvements to this intersection are identified in the County's Capital Improvement Projects (CIP) and identified in the DEIR as a County of Santa Barbara Public Works Department Project (Intersection Improvement - DEIR, p. 3.1-13.) Under the Tajiguas Landfill Expansion Project, a permanent stop sign and speed dots shall be installed and maintained at the landfill exit to U.S. Highway 101 to further control traffic. All vehicles exiting the landfill site shall be required to make a complete stop prior to entering the U.S. Highway. In addition on U.S. Highway 101, two signs shall be installed to warn motorists approaching the Tajiguas Landfill of trucks entering the highway (DEIR 3.10-13). These measures would reduce traffic impacts to a less than significant level. (DEIR, p. 3.10-15.)

Mitigation Measures:

TRAF-1. A permanent stop sign and speed dots shall be installed and maintained at the landfill exit to U.S. Highway 101. All vehicles exiting the landfill site shall be required to make a complete stop prior to entering the highway (FEIR, p 4-15).

TRAF-2. To caution motorists approaching the intersection at U.S. Highway 101 and the Tajiguas Landfill entrance road, two signs, one for the northbound lanes and one for the southbound lanes of U.S. Highway 101 shall be

provided. The signage shall be as follows: *Caution - Trucks Entering the Highway* (FEIR 4-16).

9. Health and Safety

Impacts: There is the potential for surface fire from adjacent wildland fire or onsite storage of petroleum products. However, the surface of the landfill is relatively barren, and there are established landfill safety procedures and provision of adequate water reserves for fire protection.

There is the potential for fire related to onsite storage of petroleum products.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: Landfill conditions, such as the lack of vegetation and dirt coverings of waste, limit the potential for fire to spread throughout the property. (DEIR, p. 3.12-9.) Various measures to reduce surface fire hazards such as proper storage of petroleum products and provisions for adequate fire access and fire equipment, brush clearing, enforcement of a "no smoking" policy and others would reduce the potential for surface of subsurface fires to a less than significant level. (DEIR, p. 3.12-15.)

Mitigation Measures:

HS-1 To minimize fire hazards, the following measures shall be implemented:

a. Fire suppression equipment such as fire extinguishers, dedicated water storage, and fire hydrants shall be provided in compliance with County Fire Department and OSHA standards.

b. Landfill equipment shall be inspected and cleaned on a regular basis to reduce the potential for vehicle fires.

c. Water trucks shall be maintained full of water and available for fire suppression at all times.

d. Access roads shall be maintained to allow emergency vehicles access to the working face.

e. Stockpile areas shall be accessible for fire suppression.

f. A "No Smoking" policy shall be strictly enforced at the Landfill.

g. The landfill footprint, wood stockpiles, and a 15-foot area along all access roads shall be cleared of weeds and errant debris (DEIR, p. 3.12-15).

Impacts: During landfill operations and closure/postclosure, the methane in landfill gas has the potential to ignite and/or explode if it is confined, with resulting personal injury and structural damage. Landfill gas also may escape through the landfill surface.

There is the potential for uncollected landfill gas to escape through the landfill surface. However, landfill gas collection efficiency is expected to reach approximately 95 percent.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: Subsurface fires may occur in the event of improper or incorrect design and/or operation of the landfill gas (LFG) collection system. CCR Title 27 and operational permits include various measures to prevent the above conditions. Systems to monitor landfill gas would also be installed during construction of the Tajiguas Landfill Expansion Project and would reduce impacts due to subsurface fires to a less than significant impact. (DEIR, pp. 3.12-11, 3.12-16.)

Mitigation Measures:

HS-3. The operator shall install monitoring systems and monitor LFG. If monitoring indicates that impacts are occurring, appropriate corrective actions shall be implemented. These actions include, but are not limited to, the following:
   a. The LFG collection system shall be adjusted to increase LFG control.
   b. One or more additional LFG collectors shall be installed to increase gas collection.
   c. The operator shall place additional daily, intermediate and final cover to control fugitive gas emissions (FEIR, p. 4-18 — 4-19).

HS-4. The operator shall routinely inspect landfill cover materials for cracks and/or fissures. Cracks and fissures shall be repaired (FEIR, p. 4-19).

Impact: There is the potential for subsurface fire from a landfill design flaw, lack of control of incoming waste, or faulty performance of the landfill gas collection system.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: Subsurface fires may occur in the event of improper design of a landfill, lack of controls of incoming waste, or incorrect design and/or operation of the LFG collection system. CCR Title 27 and operational permits include

various measures to prevent the above conditions. Due to the regulations for new and expanded landfills, and the requirements of various landfill permits, subsurface fires have become rare. Systems to monitor landfill gas would also be installed during construction of the Tajiguas Landfill Expansion Project and would reduce impacts due to subsurface fires to a less than significant impact. (DEIR, pp. 3.12-11, 3.12-16.)

Mitigation Measures:

HS-3. The operator shall install monitoring systems and monitor LFG. If monitoring indicates that impacts are occurring, appropriate corrective actions shall be implemented. These actions include, but are not limited to, the following:
   a. The LFG collection system shall be adjusted to increase LFG control.
   b. One or more additional LFG collectors shall be installed to increase gas collection.
   c. The operator shall place additional daily, intermediate and final cover to control fugitive gas emissions (FEIR, p 4-18).

Impact: During landfill operations and closure/postclosure, there is the potential for a breach of site security that results in unauthorized dumping and/or scavenging.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: Site security could be compromised at landfill closure and post-closure and result in unauthorized dumping and/or scavenging. Unauthorized dumping of unacceptable wastes, such as hazardous or infectious wastes, could create a safety threat to persons at the Tajiguas Landfill or in adjacent areas. To provide site security, the Tajiguas Landfill would continue to be gated and protected by a 5- to 6-foot-high fence on the southern boundary of the site and by steep topographic features that limit access to the landfill around the remainder of the site. To prevent unauthorized access, the gate at the Tajiguas Landfill entrance would be locked when the site is closed. The security fence and gate shall be inspected and repaired as necessary and the entrance gate shall remain locked. These mitigation measures would reduce impacts to less than significant. (DEIR, pp. 3.12-11, 3.12-16.)

Mitigation Measures:

HS-2. The security fence shall be inspected and repaired as necessary. The entrance gate shall remain locked when the landfill is closed (DEIR, p 3.12-16).

Impact: There is the potential for worker safety impacts due to the steeper sides of the waste prism and the requirement for narrow switchbacks.

During operations and closure/postclosure, health and safety impacts associated with use of heavy equipment, including bodily injury, noise and dust.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: The design of the Front Canyon will result in a waste prism with steeper sides than the Back Canyon to attain necessary slope stability. As a result, access roads will be steep and will require narrow switchbacks for equipment and waste hauling trucks to access the top of the landfill. The combination of steep roads and landfill traffic would potentially result safety impacts, However, potential impacts to worker safety are considered less than significant with the implementation of traffic control at the landfill. (DEIR, p. 3.12-14.)

Mitigation Measures:

HS-5. There shall be one or more onsite personnel to direct vehicles and equipment on the landfill as they travel to and from the working face. SWUD shall develop procedures that include, but are not limited to, issues of timing and right-of-way. These shall be modified as necessary specific to actual conditions and incidents that may occur (FEIR, p 4-19).

Impacts: There is the potential for resident and displaced rodents to inhabit or become lodged in landfill equipment and structures and, as a result, expose onsite personnel to disease.

There is the potential for rodent populations to increase during the postclosure period, with associated potential health impacts.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: There is the potential for resident and displaced rodents to expose onsite personnel to disease. This potential impact would be mitigated through proper housekeeping practices that would reduce the attractiveness of the landfill to harbor rodents. These mitigation measures are also required to reduce nuisance. As a result, the potential health and safety impact related to rodents is considered less than significant. (DEIR, 3.12-13; FEIR, pp. 4-18—19.)

Mitigation Measures:

NUI-1 To reduce potential vector habitat or harborage, good housekeeping practices shall be implemented at the landfill. Good housekeeping practices shall include, but are not limited to, the following measures:

a) The working face shall be maintained as small as safely practicable, considering the types and numbers of landfill equipment operating.

b) Extremely odiferous waste shall be buried as soon as possible after unloading.

c) Waste at the active working face shall be compacted.

d) Disturbance at previously covered cells shall be avoided.

e) Application of a minimum of a 6-inch-thick layer of compacted soil or ADC shall be applied during the day and/or at the end of each working day.

f) Structures and areas of human activity shall be kept clean.

g) Trash shall be deposited in appropriate closed containers and removed for proper disposal.

h) Tools, miscellaneous equipment, and other items that could commonly attract vectors shall be stored in closed containers and/or within an enclosed structure.

i) Drainage control structures (sedimentation ponds, drainage ditches, etc.) shall be maintained to preclude mosquito breeding habitat, vectors or pests, consistent with the California Red-legged frog management plan.

j) The landfill shall be inspected monthly to identify areas of substandard soil cover. These areas shall be corrected as needed, including repair of cracks or holes in the cover caused by landfill operations or weather conditions.

k) The working face, buildings, and storage containers shall be inspected monthly for signs of vector activity. Repairs to the working face, buildings or storage containers shall be implemented as necessary, and buildings or storage containers, would require repair or rodent traps.

l) In the event that a vector problem should occur, appropriate measures, such as cleaning and securing a building or container, or the use of a professional or licensed exterminator, shall be used (DEIR, pp. 3.6-20 to 3.6-21).

Impact: The Southeast Corner Modification would involve excavation and removal of compacted waste and soil from a portion of the existing landfill. The

material would be transported to another area of the landfill for disposal. Health and safety risks are related to the excavation of buried waste and potential for fire, worker exposure to infectious waste, and potential hazards associated with exposure of methane gas to atmospheric oxygen.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the effect.

Explanation: The excavation activities associated with the Southeast Corner Modification would involve removal of compacted waste and soil from a portion of the existing Tajiguas Landfill. The excavated waste then would be transported to another area of the landfill, in the Tajiguas Landfill Expansion area. Health and safety impacts for the Southeast Corner Modification would potentially be greater than for day-to-day landfilling operations. Modification of the southeast corner would require excavation of the intermediate cover and expose decomposing waste. Potential health impacts would result from exposure of the waste and associated methane gas to atmospheric oxygen, potentially resulting in a landfill fire. Workers could also be exposed to infectious wastes. Mitigation measures require that excavation of the southeast corner shall be carried out in compliance with an Excavation Plan and Health and Safety Plan. Compliance with these plans would reduce impacts to a level that is less than significant. (DEIR, pp. 3.12-14—15.)

Mitigation Measures:

HS-6. An Excavation Plan shall be prepared for the Southeast Corner Modification to address operations associated with the excavation and removal of in-place waste. It shall include procedures and sequencing to maintain stability of the excavation area. Further, a Health and Safety Plan shall be developed to address the specific worker-associated activities of waste removal and relocation (FEIR, p. 4-20).

G. FINDINGS THAT CERTAIN IMPACTS ARE POTENTIALLY ADVERSE BUT NOT SIGNIFICANT

The FEIR (01-EIR-05) identified several subject areas for which the project is considered to cause or contribute to potentially adverse impacts but which are not significant. For the purposes of responding to additional comments received in August 2002, the relevant impacts related to water resources are discussed below.

1. Water Resources

Impact: Surface water quality could be adversely affected. This would not be significant, as drainage control measures at the landfill reduce soil loss compared to natural conditions. Also, surface water would be directed away from the working face, and precipitation that infiltrates would be collected by the leachate

collection and recovery system and used for dust control. (DEIR, pp. 3.3-51 – 3.3-55.)

Finding: Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation: Commenters suggested that the County increase water sampling in Pila Creek to no less than four times per year and following significant storm events to determine the landfill's impact on surface waters in the Creek. The County already conducts surface water sampling and testing in the nearby creeks and nearshore ocean waters pursuant to the requirements of the landfill's permits from the Regional Water Quality Control Board (RWQCB). The landfill is currently in compliance with its existing permits for organic and inorganic parameters related to surface water quality. The landfill site monitoring program includes surface water monitoring for specified parameters both upstream and downstream of the landfill. Landfill operations incorporate Best Management Practices (BMPs) to minimize potential impacts to surface water quality in the site vicinity. (DEIR, pp. 3.3-24 -- 3.3-39.)

Bacteriological conditions are monitored for certain inland surface waters and nearshore ocean waters by the Santa Barbara Environmental Health Services and SWUD. Recent studies indicate that the historically high bacterial counts are not likely caused by the landfill operations. (DEIR, p. 3.3-42.)

The proposed expansion project would continue to implement BMPs and other key procedures such as bird control, limiting the size of the active working face, directing runoff into sedimentation basins, soil berms, and daily cover to prevent runoff from the landfill and minimize impacts to surface water quality. (DEIR, p. 3.3-54.) Therefore, the project is not expected to cause or contribute to any significant water resource impacts. (DEIR, p. 3.3-55.) Accordingly, the Board declines to adopt the specific measures proposed by commenters. The County will continue to perform all testing for water quality that the Regional Water Quality Control Board requires now and in the future.

Mitigation Measure:

None required.

Impact: Groundwater quality could be affected by abandonment of monitoring wells, seepage of leachate, landfill gas migration, or spillage of liquids and subsequent migration of surface fluids into groundwater. This impact will be minimized through continued implementation of ongoing procedures that include limiting the depth of excavation, maintenance and monitoring of the landfill gas and leachate collection and recovery systems, sealing of abandoned wells, and secondary containment of stored fuels and oils. (DEIR, pp. 3.3-55 – 3.3-59.)

Finding: Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation: One commenter suggested that the County add more monitoring wells to the east, west, southeast and southwest portions of the existing landfill to track contaminants in groundwater. It is not expected that large quantities of leachate would be generated, due to the semiarid conditions at the site, and the requirement for daily cover and periodic intermediate cover and the low moisture content of the disposed waste. Furthermore, the limited amount of leachate will be controlled by the leachate collection and removal system that will be installed in teh lateral landfill expansion area. The system would prevent migration of liquid through the landfill bottom. Performance of the leachate collection system will be monitored to provide early detection of potential leachate or migration toward groundwater. (DEIR, pp. 3.3-55 – 3.3-56.) Therefore, the expansion project is not expected to cause or contribute to any significant water resource impacts. (DEIR, p. 3.3-56.)

The RWQCB has recently determined that the existing monitoring system is adequate and there are no apparent un-monitored potential contaminant flow pathways at the landfill. The RWQCB found that the existing system is effective and in compliance with the applicable regulations. The RWQCB has not recommended that the landfill install any additional monitoring wells. (July 26, 2002, letter from Mr. Roger W. Briggs, Executive Officer, RWQCB, Central Coast Region, to Mr. Philip M. Demery, Director of County Public Works Dept.) Additionally, the County responded to all comments received regarding impacts to groundwater quality and proposed mitigation measures. (FEIR, Ch. 2.)

Therefore, the Board declines to adopt the measure proposed by the commenter. If, in the future, the RWQCB requires the County to install additional wells, the County will comply with all requirements.

Mitigation Measure:

None required.

H. CUMULATIVE EFFECTS

Cumulative project impacts were also analyzed. (DEIR, p. 3.1-10 et seq.) The DEIR analyzes cumulative impacts in each area of environmental concern and mitigates them accordingly. The cumulative impact area was chosen for its common attributes of being coastal, rural, in private or County ownership, and accessible via coastal U.S. Highway 101. Land east of the cumulative impacts area is of a different character. It is increasingly urban, with evidence of westward growth from the City of Santa Barbara. Land to the north of the

cumulative impacts area is the federally managed Los Padres National Forest. The westerly limit of the cumulative impacts area is Gaviota, where U.S. Highway 101 turns northward from the coast and goes inland. The coastal area further west is generally accessible only via dirt roads and the Union Pacific Railroad. Twelve projects were identified within the cumulative projects study area (DEIR, 3.1-10 —3.1-16).

Mitigation measures to reduce project specific and cumulative biological resources impacts include requirements for protection of sensitive resources (i.e. oak trees, California red-legged frog, San Diego woodrat, etc.) and revegetation of habitat areas would ensure that habitat for sensitive species on site will be restored in the long-term. Due to the intervening time between the start of the Tajiguas Landfill Expansion Project and landfill closure, and the intervening period of time between landfill activities and habitat restoration, residual impacts would remain significant and unavoidable. The Board of Supervisors finds that the identified impacts would be substantially reduced by the mitigation measures stated above, which are incorporated into the project Mitigation Monitoring Program (Plan). Pursuant to CEQA Guidelines Section 15091(a), the Board further finds that to the extent the impacts remain significant and unavoidable, such impacts are acceptable when weighed against the against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations in section I. of these findings.

Loss of a cultural resource site would contribute to cumulative loss in the cultural resources in the south coast area. Mitigations to reduce this impact include site testing, data recovery and curation of cultural resources, but would be inadequate to mitigate cumulative impacts. Due to the physical loss of the cultural resources site, residual impacts would remain significant and unavoidable. The Board of Supervisors finds that the identified impacts would be substantially reduced by the mitigation measures stated above, which are incorporated into the project conditions of approval. Pursuant to CEQA Guidelines Section 15091(a), the Board further finds that to the extent the impacts remain significant and unavoidable, such impacts are acceptable when weighed against the benefits the against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations in section I. of these findings.

The Tajiguas Landfill Expansion and associated north borrow site would be visible from the Pacific Ocean and the Tajiguas Landfill entrance road. Mitigation to reduce project specific and cumulative aesthetic impacts includes revegetation and re-contouring of the waste fill slope at closure to be similar in appearance with the surrounding terrain. Due to the change in the visual setting, however, residual impacts would remain significant and unavoidable. The Board of Supervisors finds that the identified impacts would be substantially reduced by the mitigation measures stated above, which are incorporated into the project conditions of approval. Pursuant to CEQA Guidelines Section 15091(a), the Board further finds that to the extent the impacts remain significant and

unavoidable, such impacts are acceptable when weighed against the benefits the against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations in section I. of these findings.

The Tajiguas Landfill Expansion Project would exceed Federal, State and local standards for air emissions. Mitigation to reduce project related emissions include dust control measures, requiring buffers on the adjacent Baron Ranch (County-owned) and upgrading equipment to meet current air emissions standards. With implementation of these mitigation measures, residual impacts would, remain significant and unavoidable as the project would still result in exceedance of the long-term threshold of total daily emissions of NOx. The Board of Supervisors finds that the identified impacts would be substantially reduced by the mitigation measures stated above, which are incorporated into the project conditions of approval. Pursuant to CEQA Guidelines Section 15091(a), the Board further finds that to the extent the impacts remain significant and unavoidable, such impacts are acceptable when weighed against the benefits the against the overriding social, economic, and other considerations set forth in the Statement of Overriding Considerations in section I. of these findings.

I. FINDINGS THAT IDENTIFIED PROJECT ALTERNATIVES ARE NOT FEASIBLE

The FEIR, 01-EIR-05, examined a reasonable range of alternatives to the Project to determine whether any of these alternatives could meet most or all of the project's objectives, while avoiding or substantially lessening its significant, unavoidable impacts. The following alternatives were evaluated in the EIR; 1) Diversion to Other In-County Landfills, 2) New In-County Landfill Sites, 3) Larger Project Alternative, 4) Reduced Project Alternative, 5) Diversion to Out-of-County Landfills, 6) Rail Haul, 7) New South Coast Transfer Station, , 8) Alternative Waste Management Technologies 9) Offsite Disposal for Southeast Corner Modification, 10) No Project.

The project alternatives have been screened based on the following criteria: 1) technical feasibility, 2) economic feasibility, 3) land and institutional considerations, 4) meeting the project objectives, and 5) environmental impacts.

1. Diversion to Other In-County Landfills.

Description
This alternative considers the potential for waste to be diverted to the Foxen Canyon, City of Lompoc, City of Santa Maria and/or Vandenberg Air Force Base

landfills. Distances to these Landfills from the South Coast Transfer Station range from 45 miles (to the City of Lompoc Landfill) to 70 miles (to the City of Santa Maria Landfill) (DEIR, p. 4-9, Table 4-2).

Foxen Canyon Landfill

On July 8, 1997, the Santa Barbara County Board of Supervisors (Board) authorized the County Public Works Department to implement the Santa Ynez Valley Waste Management Plan to: (1) modify the Foxen Canyon Landfill within the existing footprint to extend the life of the landfill, and (2) build a transfer station within the landfill site. Based on Board's approval of the Foxen Canyon Transfer Station, there are no plans for future expansion of the Foxen Canyon Landfill (DEIR, p 4-10).

The decision was based on a determination by the Board of Supervisors that, due to changes in landfill design regulations (Subtitle D of the federal Resource Conservation and Recovery Act and California Code of Regulations [CCR] Title 23 - now part of CCR Title 27), expansion of the Foxen Canyon Landfill would be so expensive as to be economically infeasible. In 1995, County staff estimated that, to meet the new Subtitle D requirements, a composite liner system would need to be installed as part of the expansion of the Foxen Canyon Landfill at a cost of approximately $250,000 per acre. A subsequent analysis determined it would be more economic to close the Foxen Canyon Landfill and convert it to a transfer station than to expand it. In addition, this action enabled the County to avoid an adverse impact to sensitive biological resources (i.e., loss of 46 mature oak trees) that would have occurred if the Foxen Canyon Landfill had been expanded.

Economic factors in addition to the cost of the liner system for expansion of the Foxen Canyon Landfill involve the County's lease agreement with the owner of the landfill property and make the expansion uneconomic. Under the current lease agreement, the County tipping fee at the Foxen Canyon landfill can be increased by only 50 cents per year for self-haul, which is not sufficient to defray the cost of the liner system that would be required for the expansion. In addition, under the current lease agreement, should the County decide to dispose of waste from outside the Santa Ynez Valley School District at the Foxen Canyon Landfill, the property owner would receive the entirety of the tipping fee for each ton of waste that originated outside this area. These two lease issues make it uneconomic to expand the Foxen Canyon Landfill and/or to divert waste from Tajiguas to Foxen Canyon.

Based on the above, it is speculative, if not unlikely, whether the County Board of Supervisors would change its decision regarding closure of the Foxen Canyon Landfill. Therefore, the alternative of keeping Foxen Canyon open to continue to accept waste from the Santa Ynez Valley (i.e., diverting it from Tajiguas as part of the proposed project) is not a feasible alternative (FEIR, Ch. 3, pp 3-25 —3-26).

City of Lompoc Landfill

Based on personal communication with Claudia Stein, Solid Waste Superintendent for the City of Lompoc, the Lompoc Landfill has the capacity to accept waste for another 47 years. Further, the City does not have plans to either increase the daily disposal rate or expand the disposal capacity of the landfill. The City Council wishes to protect the value of the landfill air space for the City and the Lompoc wasteshed and the City previously has made it known that it would not accept waste from the Tajiguas Landfill wasteshed. As a result, transport of any portion of Tajiguas waste to the Lompoc Landfill is not feasible and environmental impacts associated with this alternative were not evaluated (DEIR, p. 4-10).

City of Santa Maria Landfill

The Santa Maria Landfill currently accepts municipal solid waste from the unincorporated northern Santa Barbara County area, as well as the City of Santa Maria. It could take waste from other areas, as well (DEIR, p. 4-11). The Santa Maria Landfill was permitted on September 28, 2001 to expanded its capacity and additional approximately 14 million cubic yards. The permitted daily capacity is 740 tons per day (tpd), while the landfill receives an average 375 tpd. The expansion has an anticipated life until 2017 years, which is 3 years less than the proposed Tajiguas expansion. The Santa Maria Landfill currently accepts municipal solid waste from the unincorporated area of northern Santa Barbara County, southern San Luis Obispo County and the City of Santa Maria. (FEIR, Ch. 2, Response 3-4).

The County of Santa Barbara's 1997 Countywide Integrated Waste Management Plan (CIWMP) plans for regional solid waste management assumes the current wastesheds. In accordance with state regulations, the CIWMP was approved/adopted by the County, the cities within the County and the California Integrated Waste Management Board (CIWMB). The wastesheds identified in the CIWMP for the Lompoc and Santa Maria landfills do not include the Santa Ynez Valley (serviced by Foxen Canyon) or southern Santa Barbara County (serviced by Tajiguas). Therefore, not only would the policies of the cities of Lompoc and Santa Maria need to be changed to accept waste currently disposed at Foxen Canyon and/or Tajiguas, but the CIWMP would need to be revised to reflect changes in the wastesheds for the in-County landfills. The CIWMP revision would need to be approved/adopted by the County, the cities in the County, and the CIWMB.

In addition to changing the policies of the cities of Lompoc and Santa Maria, and to redefine the wastesheds and reapprove/adopt the CIWMP, the existing franchise agreements would require re-negotiation in order for waste currently disposed at Foxen Canyon and/or Tajiguas to be redirected to another in-County landfill (i.e., Lompoc and/or Santa Maria) or to an out-of-County landfill. It is speculative as to whether this combination of factors might be changed and

approved and is beyond the sole jurisdiction of the County Board of Supervisors. Therefore, the alternative of re-directing waste that currently is disposed at Foxen Canyon and/or Tajiguas to the Lompoc and/or Santa Maria landfills is not a feasible alternative to the proposed Tajiguas expansion project (FEIR, Ch.3, pp 3.27 —3.28).

Vandenberg Air Force Base Landfill

Based on personal communication with personnel at Vandenberg AFB, at its current disposal rate, the Vandenberg AFB Landfill has the capacity to accept waste until 2084. There are no plans to expand the facility. The Vandenberg AFB Landfill is limited to use by the United States Air Force, and it does not accept waste from other jurisdictions. Any decision for the County or other entity to use the Vandenberg AFB Landfill would not be made at the base level; it would be made at the Air Force level, in Washington, D.C. As a result of the above, disposal of all or part of Tajiguas Landfill waste at the Vandenberg AFB Landfill is not a feasible alternative to the proposed project (DEIR, p. 4-12) although environmental impacts associated with this alternative were evaluated.

Environmental Impacts

Foxen Canyon Landfill
Based on Board's approval of the Foxen Canyon Transfer Station, there are no plans for future expansion of the Foxen Canyon Landfill. However, further expansion of the Foxen Canyon Landfill would be expected to have similar impacts compared to the Tajiguas Landfill Expansion Project in all areas except traffic. The environmental documents prepared for the Santa Ynez Valley Waste Management Plan (90-EIR-14, 97-SD-02) identified main improvements to Foxen Canyon Road that would be necessary, if transfer trucks in a volume comparable to that going to Tajiguas were required. In this respect, impacts would be greater for traffic and other resource areas that would be affected by the road improvements (DEIR, p. 4-10).

City of Santa Maria
The Santa Maria Landfill is approximately 70 miles from the South Coast Transfer Station. Therefore, a significant increase in vehicle miles traveled would be required to dispose of municipal solid waste generated in southern Santa Barbara County at the Santa Maria Landfill rather than at the Tajiguas Landfill. This increase in vehicle miles would have the potential to result in increased waste disposal costs and other transportation-related impacts, primarily air quality. Based on the increased distance that waste would be transported prior to disposal, transportation-related emissions would be approximately three times

greater if waste generated in the South County were hauled to the Santa Maria Landfill rather than to the Tajiguas Landfill (DEIR, p. 4-12).

The Santa Maria Landfill is approximately 34 miles from the designated waste generation area of the Santa Ynez Valley and approximately 30 miles from the Foxen Canyon Transfer Station, which will be located on the site of the closed Foxen Canyon Landfill. This transportation distance compares to the Tajiguas Landfill, which is approximately 23 miles from the designated waste generation area of the Santa Ynez Valley and approximately 27 miles from the Foxen Canyon Transfer Station. Therefore, a moderate increase in vehicle miles traveled would be required to dispose of waste generated in the Santa Ynez Valley at the Santa Maria Landfill rather than at the Tajiguas Landfill. This increase in vehicle miles would have the potential to result in increased waste disposal costs, vehicular emissions and other transportation-related impacts as compared to the proposed project (DEIR, p. 4-12).

Vandenberg Air Force Base Landfill

The Vandenberg AFB Landfill is approximately 58 miles from the South Coast Transfer Station. Therefore, a significant increase in vehicle miles traveled would be required to dispose of waste generated in the South County at the Vandenberg AFB Landfill rather than at the Tajiguas Landfill. This increase in vehicle miles would have the potential to result in increased waste disposal costs, vehicular emissions and other transportation-related impacts. Other impacts associated with expanding this landfill would be similar to the proposed Tajiguas Landfill Expansion project (DEIR, p. 4-12)

Feasibility/Relationship of Alternative to Project Alternatives

The alternatives analysis in the DEIR (Section 4.0) was based on a stable set of assumptions that reflect what the County reasonably expects will occur to its solid waste system during the life of the Tajiguas Landfill Expansion Project. One of the assumptions for analysis was that the Foxen Canyon Landfill would be closed when it reaches its maximum disposal capacity (DEIR, pp. 4-2 and 4-3) and that the City of Santa Maria Landfill would continue to operate at its current permit limit and conditions (DEIR, pp. 4-2 — 4-3; FEIR, Ch. 2.0, Response 3-100).

The CEQA Guidelines (§15144) state that, in preparing an EIR, while foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can. This section of CEQA limits the requirement for forecasting to that which could be reasonably expected under the circumstances and is part of the effort to provide a general "rule of reason" for EIR contents. In regard to forecasting, the *Laurel Heights* Court commented that an agency is required to forecast only to the extent that an activity could be reasonably expected under the circumstances. An agency cannot be expected to predict the future course of governmental regulation or exactly what information scientific advances may ultimately reveal (see *Laurel Heights Improvement Association v. Regents of the University of California* [1988] 47 Cal. 3d 376).

Also, In accordance with the CEQA Guidelines (§15126.6[f][3]), "An EIR need not consider an alternative whose. . . implementation is remote and speculative." (FEIR, Ch. 2 Response 3-100 and Ch.3, p. 3-24)

It is speculative to assume that the County Board of Supervisors will change policy to re-open the Foxen Canyon Landfill. It is speculative to assume that the City of Lompoc and City of Santa Maria would change their policies and begin accepting waste that currently is disposed at the Foxen Canyon Landfill or to accept waste disposed at the Tajiguas Landfill. It also is speculative to assume that the United States Air Force will change its policy and accept waste from the Foxen Canyon and/or Tajiguas Landfills.

In addition to the policies of the cities of Lompoc and Santa Maria to refuse waste disposed at the Foxen Canyon and/or Tajiguas landfills, the County of Santa Barbara's 1997 Countywide Integrated Waste Management Plan (CIWMP) identifies the specific wasteshed for each of the existing in-County landfills. In accordance with state regulations, the CIWMP was approved/adopted by the County, the cities within the County and the CIWMB. The wastesheds identified in the CIWMP for the Lompoc and Santa Maria landfills do not include the Santa Ynez Valley (serviced by Foxen Canyon) or southern Santa Barbara County (serviced by the Tajiguas Landfill). Therefore, not only would the policies of the cities of Lompoc and Santa Maria need to be changed to accept waste currently disposed at Foxen Canyon and/or Tajiguas, but the CIWMP would need to be revised to reflect changes in the wastesheds for the in-County landfills. The CIWMP revision would need to be approved/adopted by the County, the cities in the County, and the CIWMB (FEIR, Ch. 2.0, Response 3-100).

<u>Foxen Canyon Landfill</u>
Based on Board's approval of the Foxen Canyon Transfer Station, there are no plans for future expansion of the Foxen Canyon Landfill (DEIR, p 4-10; FEIR, Ch. 2.0, Response 3-100). The landfill is expected to close and waste from the Foxen Canyon wasteshed is expected to be disposed of at the Tajiguas Landfill. (DEIR, p 4-10).

<u>City of Santa Maria Landfill</u>
For the County to dispose of all Tajiguas waste at this landfill, the County would need to reach an agreement with the City of Santa Maria. The agreement would need to address: (1) revising the landfill's permit to increase the daily capacity of the landfill; and (2) committing air space for the County's long-term disposal needs (DEIR, p 4-11).

The Santa Maria Landfill is approximately 49 miles from the Tajiguas landfill and 70 miles from the South Coast Transfer Station. Therefore, a significant increase in vehicle miles traveled would be required to dispose of municipal solid waste generated in southern Santa Barbara County at the Santa Maria Landfill rather than at the Tajiguas Landfill. This increase in vehicle miles would have the

potential to result in increased waste disposal costs and other transportation-related impacts, primarily air quality. Based on the increased distance that waste would be transported prior to disposal, transportation-related emissions would be approximately three times greater if waste generated in the South County were hauled to the Santa Maria Landfill rather than to the Tajiguas Landfill (DEIR, p 4-12). Therefore, this alternative would not reduce significant air quality impacts as compared to the Tajiguas Landfill Expansion Project.

2. New In-County Landfill Sites.

Description

Under this alternative, one or more new landfills would be sited and developed in the County. This alternative considered five potential sites located in throughout the County that were evaluated as part of the County's effort to site a new North County Class III sanitary landfill in 1992. These sites were Puente East, Laguna Seca, Cat Canyon West, Graciosa North, and Shuman. This alternative also considered four alternative sites identified in the Countywide Landfill Siting Study in 2001. These sites are Site No. 3-6, 6-8, 6-9, and 13-1, for a total of nine alternative sites considered as alternatives to the Tajiguas Landfill Expansion Project.

Environmental Impacts

The air quality impacts discussed below are associated with all in-County alternative sites. Other environmental impacts would be similar at all sites, depending on site-specific resources because a new landfill would be developed on previously undeveloped land.

Air Quality

Compared to the proposed project, there is only one alternative site (Site 13-1) that could reduce significant air emissions. However, development of an alternative site would result in moving onsite air quality impacts to another location. Because the levels of operational emissions would be similar for any site, an alternative site would not avoid or substantially lessen operational emissions compared to the proposed expansion of Tajiguas (DEIR, pp. 4-13 — 4-55).

Construction of a new landfill at an alternative site could reduce mobile emissions associated with waste transport if the alternative site was closer than the existing Tajiguas Landfill to the South Coast Transfer Station. The mobile air emissions associated with waste transport could not be substantially lessened unless the waste were transported to an alternative site that was less than 21 miles from the South Coast Transfer Station. Of the potential alternative sites described above, Site 13-1 is closest to the majority of waste and would reduce air pollutant

emissions due to waste hauling as compared to the Tajiguas Landfill Expansion Project (DEIR, pp. 4-52 — 4-55)

Other Environmental Impacts

Other environmental impacts associated with the alternative sites, including Site 13-1 would have issues and impacts similar to the Tajiguas Landfill Expansion Project. Site 13-1 is located in a coastal canyon, west of the City of Goleta. None of the alternative sites, including Site 13-1, offers apparent substantive advantages that would offset the larger amount of new land disturbance that would occur compared to the proposed project. Although the sensitivity of the potential new landfill sites has not been evaluated in detail at this time, considerably more new land disturbance would be required for construction of a new landfill with the same capacity as the proposed project. The land area required for a new, 8.2-million-cubic-yard landfill could range from 100 to 200 acres to accommodate the footprint of the new landfill, plus access roads and support facilities, and to provide appropriate buffer areas around the new development. Therefore, compared to the proposed project, construction of a new landfill at an in-County alternative site would result in greater land disturbance. Other factors being equal, disturbing more ground would result in greater related impacts, notably to biological and cultural resources (DEIR, pp 4-13 through 4-55).

Feasibility/Relationship of Alternative to Project Alternatives

The capacity at the Tajiguas Landfill is expected to be expended in 2005. This allows approximately three years to plan for the disposal of residual waste for the south coast of Santa Barbara County (excluding the City of Carpiteria) and the Santa Ynez and Cuyama Valleys. The time required to perform detailed site investigations, design work, permitting and construction of a new in-County landfill would require approximately 15 years. Therefore, alternative in-County sites for a new landfill may not feasibly met the County's objectives for the project (DEIR p.4-39).

3. Larger Project Alternative.

Description

This larger (25-year) project alternative was originally proposed by the County in a Notice of Preparation (NOP) dated April 1, 1998. Subsequent to distribution of the NOP, the Board appointed a Community Advisory Committee (CAC) to identify possible alternatives to the proposed 25-year project. After consideration of CAC and public input, the Board directed County staff to modify the proposed project to consist of a 15-year capacity expansion of the Tajiguas Landfill (DEIR, pp. 4-56 — 4-57).

Under this alternative, a 25-year expansion of the Tajiguas Landfill would be constructed and operated. This would be the 8.2-million-cy expansion disposal capacity, plus an additional 10 years of airspace. The disposal capacity of the larger landfill expansion would be 11.5-million cy. This larger project alternative

also would include removal and relocation of the existing drainage system to convey stormwater from the Tajiguas Landfill, plus installation of additional landfill gas collection system components. It also could require construction of a new scalehouse.

The larger project would provide for lateral expansion of the existing landfill to the north and east, with much of the expansion occurring in the Back Canyon area of the site. In addition, a portion of the back canyon area of the project site would be utilized for the excavation and stockpiling of soil material to be used for operations needs. Vertical expansion would raise the elevation limits of the landfill to a minimum of 700 feet north of the Coastal Zone (DEIR, pp. 4-55 — 4-56).

Environmental Impacts

The lateral expansion would result in greater surface disturbance than the proposed project and could result in indirect impacts to Pila Creek and/or to the California red-legged frogs resident in the southern in-channel sedimentation basin. The vertical expansion required for the larger project would result in greater visual impact than the proposed project (DEIR, p. 4-56) and existing operational impacts would continue at the site for a period of 25 years, rather than 15 years, resulting in greater environmental impacts due to longer duration of the landfill life.

Feasibility/Relationship of Alternative to Project Alternatives

The larger project would provide an operational landfill at Tajiguas for a period of 25 years, compared to the 15 years of the proposed project, and expand the existing operational impacts for a period of 25 years, rather than 15 years. Therefore, the larger project alternative would not result in the reduction or elimination of potentially significant impacts compared to the proposed project (DEIR pp. 4-56 — 4-57).

4. Reduced Project Alternative.

Description

Under this alternative, the proposed expansion of the Tajiguas Landfill would involve a smaller waste footprint and/or less vertical expansion than the proposed project. The capacity of the expansion would be reduced from 8.2-million cy to 5.0-million cy, and would provide approximately 10 years of disposal capacity.

The reduced project alternative would utilize a smaller version of either the Front Canyon configuration or the Back Canyon configuration, with a smaller waste footprint and/or less vertical expansion than the proposed project. The capacity of the expansion would be reduced from 8.2-million cubic yards to 5.0-million-cubic

yards. This alternative would include removal and relocation of the existing drainage system to convey stormwater from the site, and installation of additional landfill gas collection system components. The existing operational impacts of ongoing landfill activities would continue at the site for a 10-year period under the reduced project alternative (DEIR, p 4-57).

Environmental Impacts

The reduced project alternative would have a smaller waste prism than the proposed project and it could result in less visual impact than the proposed project. The visual impact of the proposed project is considered to be an unavoidable adverse impact (Class I) from Viewpoints 4 and 5 (view from U.S. Highway 101 and the Pacific Ocean, respectively), primarily due to the height of the final elevation of the landfill. With the reduced project alternative, the final elevation could be less, resulting in less visibility from Viewpoints 4 and 5 but not to a less than significant level (DEIR, p. 4-57).

The reduced project alternative also would result in less impact to biological resources. It would result in less surface disturbance to onsite habitat and fewer years of human interference with wildlife use of the northern portion of the project site. Depending on the configuration chosen, the reduced project alternative could eliminate removal of the onsite microhabitats of rock outcrops and seeps (DEIR, p. 4-57).

The reduced project alternative would result in fewer years of air quality impacts from onsite emissions and mobile emissions associated with waste transport to the Tajiguas Landfill.

Feasibility/Relationship of Alternative to Project Alternatives

Based on the environmental analysis, the reduced project could result in the reduction or elimination of potentially significant impacts of the proposed project. However, at the end of the life of the reduced project alternative, the County would be required to haul its municipal solid waste to another location. The resulting redirection of waste would generate its own impacts during what would have been years 10 to 15 of the proposed project. Also, as noted above, the reduced project alternative would fail to meet either the minimum 15-year County disposal capacity requirements of AB 939 or the goals of the CIWMP (DEIR, pp. 4-57 — 4-58).

One commenter suggested that the County should have evaluated a reduced project/11-year expansion alternative. This suggestion is virtually identical to the reduced project alternative that the County did evaluate. Although a slight lessening of project impacts would occur under commenter's suggested alternative, this option would not be consistent with project objectives. Thus, the Board rejects the suggestion on that basis.

5. Diversion to Out-of-County Landfills.

Description

Under this alternative, waste would be transported to the existing South Coast Transfer Station or a new in-County transfer station and/or to an existing out-of-County transfer station, then redirected to an out-of-County landfill via transfer truck and/or rail. The out-of County landfills considered as alternative sites for waste disposal are Toland Landfill in Ventura County and Chiquita Canyon and Calabasas Landfills in Los Angeles County.

Toland Landfill

The Toland Road Landfill is located approximately 52 miles southeast of the South Coast Transfer Station. The landfill is permitted to accept municipal solid waste only from jurisdictions in Ventura County and the City of Carpinteria in Santa Barbara County. Other waste from Santa Barbara County or other areas outside Ventura County cannot be disposed of at the Toland Road Landfill. In addition, this landfill is currently at its daily disposal capacity. As a result, this out-of-County facility does not represent a feasible alternative to the proposed project and was not considered further in the alternatives analysis (DEIR, p. 4-62).

Calabasas Landfill

The Calabasas Landfill is approximately 70 miles southeast of the South Coast Transfer Station. The landfill is permitted to accept municipal solid waste from Los Angeles County, plus waste from the Ventura County cities of Thousand Oaks and Westlake Village. Other waste from Ventura County or other areas outside Los Angeles County cannot be disposed of at the Calabasas Landfill. As a result, this out-of-County facility cannot accept waste from Santa Barbara County and, therefore, does not represent a feasible alternative to the proposed project. It is not considered further in this alternatives analysis (DEIR, p. 4-62).

Chiquita Canyon Landfill

The Chiquita Canyon Landfill is approximately 76 miles from the South Coast Transfer Station. Under its permit, this landfill may accept out-of-county waste from any jurisdiction up to its capacity of 6,000 tons per day (tpd). The Chiquita Canyon Landfill currently receives approximately 3,300 tpd of waste. The remaining daily capacity of 2,700 tpd is adequate to accommodate the maximum permitted disposal of waste that now goes to the Tajiguas Landfill (1500 tpd). Therefore, considering capacity alone, it may be feasible to utilize the excess capacity of the Chiquita Canyon Landfill for Tajiguas waste (DEIR, p. 4-62).

Environmental Impacts

The onsite environmental impacts of landfill disposal at the alternative Out-of-County site (Chiquita Canyon) would be similar as compared to the Tajiguas Landfill Expansion Project. The significance of other impacts depends in part on

the setting. The Chiquita Canyon Landfill alternative considered in 01-EIR-5 is an existing, operating landfill. Thus, disposing of waste at the out-of-County landfill would not result in impacts associated with disturbance of new ground. Rather, impacts would occur where there are access, established infrastructure and systems necessary to manage solid waste in place (DEIR, p. 4-58).

Under this alternative, emissions would occur in Santa Barbara, Ventura and Los Angeles counties. These three counties are nonattainment for PM_{10} and ozone. Therefore, vehicular emissions that are in excess of County or State thresholds would constitute a significant impact. Because vehicular emissions from this alternative would be additive to existing nonattainment conditions in Ventura and Los Angeles counties, they would constitute a significant air quality impact. Therefore, this alternative would not result in the reduction or elimination of a significant impact, but would result in an increase in offsite mobile air emissions. Operational impacts would be consistent with those of the proposed expansion (DEIR, p. 4-63).

Feasibility/Relationship of Alternative to Project Alternatives

Waste from the South Coast Transfer Station would be transported 76 miles to the Chiquita Canyon Landfill. Compared to the proposed project, waste would be hauled greater distances (both direct haulers to the South Coast Transfer Station and waste hauled to Chiquita Canyon Landfill). This increase in haul distances would result in greater offsite mobile-source emissions as compared to the proposed project (DEIR, pp. 4-62 — 4-63). Therefore, this alternative would not result in the reduction or elimination of significant air quality impacts, but would result in an increase in offsite mobile air emissions as compared to the proposed project.

Costs to the County of Santa Barbara associated with the Chiquita Canyon alternative would be significantly increased and The County's Integrated Waste Management Plan would be compromised. Costs associated with hauling and tip fees would be increased and would result in an excess of $130 million over the Proposed Project. Santa Barbara County would also be mandated under AB 939 to continue to meet or exceed 50% diversion. Many of the programs required through the County's comprehensive integrated waste management program would continue. However, without revenue generated by Landfill tip fees, it would be necessary to pass costs of these programs along to the public. The total costs of increased hauling, funding mandated the integrated waste management programs and lack of control over fees at the Chiquita Landfill in combination with the unavoidable, significant air quality impact make this alternative infeasible (Attachment 6).

The County of Santa Barbara's 1997 Countywide Integrated Waste Management Plan (CIWMP) plans for regional solid waste management. The CIWMP assumes the current wastesheds. In accordance with state regulations, the CIWMP was approved/adopted by the County, the cities within the County and the California

Integrated Waste Management Board (CIWMB). The CIWMP would be compromised if waste were sent to Chiquita Landfill. The CIWMP has been effective in systematically reducing the percentage of County-generated waste that ends up being landfilled, as the opportunity for separation of waste occurs within each element of the overall program. The Tajiguas Landfill Expansion Project was identified in the CIWMP as a component in the overall management program for Santa Barbara County (FEIR, Ch. 3, p. 3-24).

6. Rail Haul.

Description

Under this alternative, waste generated in southern Santa Barbara County and the Santa Ynez and Cuyama Valleys would be transported via rail to remote landfills. The evaluation considers rail haul to the permitted but not currently operational Mesquite Regional or Eagle Mountain landfill in the deserts of Southern California, or to the existing Carbon Canyon Landfill in Utah. Mesquite Regional or Eagle Mountain landfill are expected to be operational no earlier than 2006 and as late as 2013.

Waste would be transported from the point of generation to a transfer station and from there to a rail loading facility. There is no rail spur adjacent to the existing South Coast Transfer Station or the Gold Coast Transfer Station in Ventura. The Del Norte Transfer Station in Oxnard is on property adjacent to a rail spur and development of a rail haul capability for municipal solid waste is considered feasible (DEIR, p 4-68).

Environmental Impacts

To decrease in-County mobile emissions impacts would require development of a new in-County Transfer Station with rail haul capability. New transfer station development is evaluated under Alternative 7, below. Compared to the proposed project, rail haul would result in reduced in-County mobile emissions. The establishment of an appropriate loading facility, would be separate projects subject to environmental analysis in compliance with CEQA. However, such a facility is not yet available, and no potential site has been identified. For this reason, site-specific environmental impacts of constructing such a facility cannot be determined DEIR, p. 4-68).

Feasibility/Relationship of Alternative to Project Alternatives

It is recognized that hauling waste by rail requires less energy than hauling by truck. The mobile emissions would be approximately the same for the proposed project as transporting the same amount of waste 78 miles by rail. If a rail haul disposal destination required more than 78 miles of transport by train, then emissions would be greater than those associated with waste transport by truck for disposal at Tajiguas.

There would be additional emissions from rail transport to either Eagle Mountain (a distance of 345 miles) or Mesquite (a distance of 355 miles). Based on these distances, with rail haul to Eagle Mountain, emissions would be approximately 14 times those associated with the proposed project. Rail haul to Mesquite also would result in emissions approximately 14 times those associated with the proposed project. These emissions would occur in non-attainment air basins. Therefore, this alternative does not reduce or eliminate significant mobile emissions impacts compared to the proposed project (DEIR, pp. 4-67 — 4-69).

7. New South Coast Transfer Station.

Description

A "clean" MRF is a facility that receives recyclable materials that already have been separated from the waste stream. Examples include metal cans, glass, plastic, computer paper, cardboard boxes and newsprint. Issues of public perception and acceptability include noise, traffic, dust and odor. A "dirty" MRF is a facility that receives a stream of raw solid waste and sorts and processes recyclables directly from the waste stream. A "dirty" MRF typically is used in communities that have no curbside recycling programs (FEIR, Ch. 3, p. 3-5).

Under the out-of-County disposal alternative, the County could construct a new transfer station/materials recovery facility (MRF) in southern Santa Barbara County. Under this approach, waste received at the new transfer station would be transferred to an out-of-County disposal site. Potential locations for a new transfer station that were evaluated in the EIR include the Baron Ranch, the back canyon of the Tajiguas Landfill site, Cañada de la Huerta along the South Coast, or an undetermined location in the Goleta/Santa Barbara area. Waste that now goes to the Tajiguas Landfill would be collected at the new transfer station, then transported to an out-of-County disposal facility.

In 1999, the CAC subcommittee appointed by the Board completed a siting study for a combined transfer station/materials recovery facility/compost facility. The facility was to be located at a single campus. Siting criteria included requirements for a rural, site on the South Coast (excluding the Coastal Zone), with a suitable buffer area and proximity to waste generation, approximately 15 acres in size.

Based on these criteria, the CAC subcommittee looked at southern Santa Barbara County to identify locations of suitable size and zoning that could potentially be used for the combined transfer station/materials recovery facility/compost facility. A subsequent screening process eliminated all but three of the sites, primarily because of potential impacts associated with the proposed composting operation. These three sites are: Baron Ranch, the back canyon area of the Tajiguas Landfill site, and the old Shell Hercules site at Cañada de la Huerta (DEIR, p. 4-63 — 4-64).

Baron Ranch
The Baron Ranch is adjacent to the eastern boundary of the Tajiguas Landfill site. The County purchased the ranch in 1991, specifically as a buffer between landfill operations and private holdings to the east. The property is a 1,092-acre working ranch with orchards, a small reservoir and an abandoned gravel mine. Structures include a house, small cabin, barn/shed and bunkhouse. Topography ranges from a flat and rolling valley to steep, mountainous terrain.

Back Canyon - Tajiguas Landfill Site
This site is within the existing County-owned Tajiguas Landfill site. The site is a flat area of more than 30 acres that would be suitable for building a transfer station/MRF/compost facility. Development of such facility would potentially occur in the existing borrow area and green waste pad for current landfill operation. This site is within the existing County-owned Tajiguas Landfill site. The site is a flat area of more than 30 acres that would be suitable for building a transfer station/MRF/compost facility.

Cañada de la Huerta
This site is adjacent to the west of the County-owned Tajiguas Landfill site. It is the location of a former Shell Oil Company processing facility. Portions of the site are known to have soils that are contaminated with polychlorinated biphenyls (PCBs). The site has limited flat areas (2 to 3 acres).

Environmental Impacts
Baron Ranch
Various areas of this property provide sufficient space for a transfer station/MRF/compost facility. To accommodate such a facility, the access road and intersection with U.S. Highway 101 would require upgrading. Environmental issues include potential future recreational use of the property. Also, based on the rural location of this site, there is the potential for impacts to biological and cultural resources. Visibility and nuisance issues, such as litter, also would be considerations in this area of the South Coast (DEIR, p. 4-65).

Back Canyon - Tajiguas Landfill Site
Potential environmental concerns at the Back Canyon – Tajiguas Landfill Site would include biological and cultural resources. Potential visibility, as well as nuisance issues such as litter, also would be considerations. Nuisance birds would potentially be reduced if the facility were covered (DEIR, p. 4-64).

Cañada de la Huerta
Extensive grading would be required to provide sufficient space for a transfer station/MRF/compost facility at this site. Access to the site is provided via the existing Tajiguas Landfill access road. Removal of contaminated soils would be required. Also, some upgrading of the road and intersection with U.S. Highway 101 could be necessary. Potential environmental issues include geology, hydrology, hazards (related to the contaminated soils), and biological

and cultural resources. Visibility and nuisance issues, such as litter, also would be considerations (DEIR, p. 4-64).

The three of these South Coast locations are either within or adjacent to the existing Tajiguas Landfill site. Environmental impacts associated with a new transfer station along the South Coast at or near the existing landfill include land use compatibility, visibility, traffic, noise, odors, dust, biological and cultural resources, and/or other issues. Environmental impacts associated with waste hauling from the point of generation to the new transfer station would be the same as with the proposed project. Also, the transport of waste from the new transfer station to the Chiquita Canyon Landfill would be the same for the three locations, as addressed under the Out-of County alternative (Alternative 5) discussed above (DEIR, p. 4-66).

Goleta/Santa Barbara Locations
Additional locations in Goleta and the City of Santa Barbara were considered suitable sites for a new transfer station (DEIR, p 4-66). Such a facility would consist solely of a transfer station; it would not include a MRF or composting facility.

Environmental impacts associated with a new transfer station, include land use compatibility, visibility, traffic, noise, odors and dust. Depending on the site's existing conditions, there also could be concerns for biological and cultural resources and/or other issues. Because no site has been identified, it is not possible to analyze these potential impacts (DEIR, p 4-67).

Feasibility/Relationship of Alternative to Project Alternatives
The Santa Barbara County Board of Supervisors has made a policy decision that expansion of the existing South Coast Transfer Station would be "… a disfavored land use for the site and could not be constructed without inordinate delays and expense" (Santa Barbara County, 1998d). Therefore, to transfer all 1,500 tpd of waste that is permitted for Tajiguas, a new transfer station at a new location would be required, either to augment or replace the 550 tpd capacity at the existing South Coast Transfer Station (DEIR, p 4-63).

No specific site for a potential new transfer station has been identified and the direct impacts of constructing such a transfer station cannot be determined unless a specific site has been identified. Should the County want to consider a new transfer station, it would become a separate project that would undergo its own CEQA process (DEIR, p. 4-67).

Operation of a MRF involves contracts with recyclers that purchase and transport the bundled separated materials for re-manufacture and reuse. The market price for recyclables is volatile and, since there are no long-term markets for

recyclables, operators of MRFs must research markets frequently. The volatility of the market place requires MRF operators to avoid long-term contracts to stay on top of changing commodity prices and not get locked into a contract that ultimately will not be profitable. The County continues to evaluate the Tajiguas waste stream to implement programs to divert additional recyclables. This includes evaluation of a program to separate out commercial loads that contain a high content of dry cardboard and paper suitable for recycling (FEIR, Ch. 3, p. 3-5).

A decision to site a new clean MRF in the Tajiguas Landfill wasteshed would not necessarily result in an increase in the diversion rate. However, a new "dirty" MRF could facilitate an increase in the diversion rate. Implementation of a "clean" or "dirty" MRF involves a site of several acres in an area of appropriate land use. MRFs frequently generate significant opposition from residents and businesses located nearby. Such a facility would require CEQA documentation and evidence of compliance with both state and local environmental regulations. Siting, permitting and construction of such a facility could take several years (FEIR, p. 3-6).

8 Alternative Waste Management Technologies.

Description

Alternative waste management strategies to reduce the amount of municipal solid waste requiring disposal at the Tajiguas Landfill were analyzed. Waste diversion and resource recovery technologies present an opportunity to reduce the waste stream, thereby reducing the volume of waste for landfilling. This alternative considers the potential for solid waste management technologies to further reduce the volume of waste requiring landfill disposal. These include: increased source reduction, recycling, composting, waste-to-energy and other waste conversion technologies. Under these alternatives, unprocessed residual waste or by-products of processing would still require landfill disposal.

The Tajiguas Landfill Expansion Project is just one aspect of the County's comprehensive integrated waste management program that consists of the collecting municipal solid waste, commingled recyclables and green waste, separating recyclables and green waste for processing, collecting household hazardous waste and disposing of residual waste at the Tajiguas Landfill. The County also spearheads public education regarding recycling and beneficial reuse of municipal solid waste (DEIR, pp. 4-70 — 4-71 and FEIR, pp. 3-2 — 3-3).

Recycling

Within the Tajiguas Landfill wasteshed, through the development and implementation of recycling/waste reduction programs, the waste diversion rate in the Tajiguas Landfill wasteshed increased from 30 percent in 1995 to 57 percent in 2000 (FEIR, Ch. 3.0, p. 3-4).

Composting
Composting is a feasible technology that involves the processing of wood/yard waste (green waste) and also may include other organics, such as food waste and other organic components of the solid waste stream. The product from composting can be used as soil amendment for a variety of agricultural purposes. However, long-term end-users and/or end-markets for the compost must be identified and the specific product component needs established (FEIR, p. 3-7).

Composting is the biological decomposition of the organic portion of municipal solid waste under controlled conditions. The decomposition is carried out long enough so that the end-product is a stable, nuisance-free material that can be stored and used for land applications, such as fertilizer or soil amendment. Materials that are capable of being composted include yard trimmings, leaves, food products, biosolids and certain paper products (DEIR, p. 4-72).

Waste to Energy
Conversion technologies for municipal solid waste residuals may at some point in the future provide a way for local jurisdictions to attain or exceed the 50 percent state-mandated diversion level. The process of converting waste to energy utilizes waste as fuel to produce power or other usable energy by-products. With these technologies, a MRF separates recyclables from the incoming waste stream. The remaining organic material (paper products and other cellulose-based materials) are sent to the second part of the facility where the process converts over 90 percent of the residual waste into fuel grade ethanol.

The process used to generate power from waste is similar to the process used for energy generation from other, more typical, fuels (oil, natural gas). The fuel is burned to provide heat that is used to generate steam, which then is used to turn a turbine and power a generator. Other applications include using the steam for direct uses, such as space heating (DEIR, p. 4-72).

Environmental Impacts

Recycling
Environmental impacts associated with recycling would be the result of on-going and expanded programs being implemented by the County of Santa Barbara (FEIR, p. 3-2 — 3-3). Recycling rates are anticipated to continue to increase, although the most easily obtained waste already is diverted from the waste stream (FEIR, p. 3-5).

Composting
Environmental considerations associated with composting include, but are not limited to, air emissions, odors, water pollution, noise, vectors, fire and litter. Concerns regarding air emissions are related primarily to vehicle traffic and dust.

Odor is a major related concern, as feedstock can contain odorous compounds. Odors can be produced during collection, transport and storage of feedstock or discards, or as a result of improper composting procedures. Noise is related to transport trucks entering and leaving the facility. Proximity to certain water sources, such as floodplains, wetlands, surface waters, groundwater also is a consideration, as these need to be protected from facility runoff or leachate. Further, the facility needs to be protected from run-on, which could interfere with processing of the compost material.

Other environmental considerations include vectors, which are small animals or insects that carry disease (mice, rats, flies, mosquitoes) and are attracted to the decaying organic materials. Fire also is a concern, as spontaneous combustion is possible if compost material becomes too dry. Litter also is a concern. Litter can occur from yard trimmings and municipal solid waste delivered to the compost facility in open loads. Plastic and paper can blow away from windrows, and reject materials can blow away during preliminary screening procedures. (FEIR, Ch. 3.0, pp 3-7 and 3-8).

Waste-To-Energy

The primary environmental impact from these waste-to-energy facilities is air emissions, which require sophisticated control technology. Further, there are ongoing concerns regarding the composition, concentrations and effects of potential pollutants from these facilities. Other environmental issues include those typically associated with landfills, such as odor, visibility (the buildings are typically large), traffic, noise and dust (DEIR, p. 4-73).

Feasibility/Relationship of Alternative to Project Alternatives

Source Reduction

In the Tajiguas Landfill wasteshed, existing recycling, source reduction, and green waste and construction and demolition (C&D) diversion programs accomplish an overall diversion rate of 57 percent. As a result, while the County continues to evaluate measures to increase the diversion rate, as the more easily diverted materials are already removed from the waste stream, waste reduction will continue to improve, but is expected to improve at a slower rate. Source reduction may be a primary mechanism for additional waste reduction (FEIR, Ch. 3.0, p 3-5)

Recycling

The Santa Barbara County Public Works Department, Solid Waste and Utilities Division, has an active and proactive program for implementing various waste reduction and recycling programs to divert waste from the Tajiguas Landfill wasteshed. In addition, the City of Santa Barbara and other cities within the Tajiguas Landfill wasteshed are very active in developing and implementing recycling/waste reduction programs (DEIR, p.4-71). Commenters have suggested that the County should increase the solid waste diversion rate by establishing

business recycling programs and apartment and mobile home park curbside recycling. As noted in the EIR, the County continues to work on improving its recycling/waste reduction programs and increasing the overall diversion rate. (FEIR, p. 3-6.) The County evaluated the economic and environmental issues involved with increasing diversion as part of its consideration of the alternative waste management technology alternative. The establishment of business recycling and curbside recycling programs for apartments and mobile homes is outside the scope of this particular project, the expansion of an existing landfill. Therefore, the Board declines to adopt the commenters' suggestions at this time.

Composting

To establish a composting facility for the green waste and/or organics from the waste stream would involve specific facility siting and design considerations. These include sufficient size to accommodate facility design, a convenient location to minimize haul distances, adequate buffer between the facility and nearby land uses, and suitable site topography and soil characteristics. Other considerations include existing infrastructure (utilities, storage space paved access roads), zoning, site ownership and nearby land uses (FEIR, Ch. 3.0, p 3-7).

To implement a greenwaste/food waste composting program, and facilities in the Tajiguas Landfill wasteshed would require multi-jurisdictional commitments to guarantee feedstock and provide the necessary long-term contract to assure a steady waste stream to the composting facility. Such a combined composting facility would eliminate the current green waste mulching program in the Tajiguas Landfill wasteshed that has been operating successfully for a number of years (FEIR, Ch. 3, p 3-7).

Waste-To-Energy

While these types of technologies may offer relief to disposal in the future, there are no such facilities operating in the United States at the present time. Some of the more significant issues facing the development of these technologies are:

- The cost of facilities is high relative to current processing (biorefineries may cost more than $100 million.
- Permitting these types of facilities may be an extremely difficult and exceedingly lengthy process.
- There is uncertainty regarding the exact specifications for processing waste into usable feedstock.
- Diversion credit should be increased beyond the current 10 percent.
- Markets are still untapped for this type of energy in California (DEIR, p 4-74).

There are numerous issues to be considered in the process of developing and implementing waste management/processing technologies. These include, but are not limited to siting, permitting, identification of end users, financing, economics, market acceptability, political leadership and support, statutory constraints, regulatory framework, public perception and understanding, available data,

feedstock access and flow control. To provide a feasible alternative to the proposed project, these issues must be resolved either individually or jointly by the various jurisdictions within the Tajiguas Landfill wasteshed and within the life of the proposed landfill expansion (FEIR, p. 3-30).

In addition, multi-jurisdictional decisions and agreements would be required among the various jurisdictions within the Tajiguas Landfill wasteshed. Although such actions have occurred previously (current franchise agreements are evidence of such cooperation), it is unknown and speculative as to whether these complex actions that involve multiple jurisdictions are feasible within the time frame of the proposed project. The waste stream must be available to provide sufficient feedstock for a feasible waste processing technology, the amount of feedstock would need to be sufficient on both a short-term (daily) and long-term (annual) basis. Therefore, for the County to provide the appropriate quantity of feedstock over a sufficient period of time, it would need to gain control of the municipal solid waste generated within the cities of Santa Barbara, Goleta, Solvang and Buellton. Due to the structure of existing franchise agreements, this goal could not be accomplished until the terms of the agreements expire or are renegotiated. For the County to gain control of sufficient feedstock, it would need to implement multi-jurisdictional agreements and, potentially, control of solid waste and green waste that currently is being diverted for recycling purposes. This would require multi-jurisdictional agreements and, potentially, control of solid waste and green waste that currently is being diverted for recycling purposes (FEIR, Ch. 3, p. 3-31).

An alternative would have to avoid or substantially lessen the significant impacts of the proposed project. Due to the extent and complexity of developing and implementing one or a combination of waste processing technologies to accomplish sufficient reduction in the amount of waste disposed at the Tajiguas Landfill, it is speculative to assume this reduction could be achieved within the time frame of the proposed expansion project. Although the current developing waste processing technologies hold promise for the future, the current project objective is to provide waste disposal capacity at the Tajiguas Landfill for 15 years. Many of the obstacles to developing and marketing waste processing technologies will likely be overcome in the future, enabling these technologies to be considered as part of long-term planning to meet the waste disposal needs of Santa Barbara County (FEIR, Ch.3, 3-31 — 3-32).

9. Offsite Disposal for Southeast Corner Modification.

Description

Under this alternative, the excavated waste material would be transported offsite for disposal. The waste would be diverted either to another in-County landfill or to an out-of-County landfill.

Environmental Impacts

Impacts of this alternative would include, but not be limited to, noise from excavation equipment and haul trucks, dust from excavation activities, litter from blowing waste, air quality impacts from onsite equipment emissions, and truck traffic, vehicular emissions and nuisance odors associated with waste transport to an offsite disposal location (DEIR, p. 4-81).

Feasibility/Relationship of Alternative to Project Alternatives

An alternative to dispose of excavated waste associated with the Southeast Corner Modification onsite is offsite disposal, at either an existing in-County landfill, a new in-County landfill or an existing out-of-County landfill. With this alternative, the approximately 720,000 cubic yards of waste and cover soil currently landfilled in the southeast corner of the Tajiguas would be excavated and transported offsite for disposal at one or more landfills. Up to 1,200 tons per day of this material would be excavated and transported offsite for disposal. Potential locations for in-County and out-of-County waste disposal would be the same as for the proposed project (DEIR, p. 4-81)

10. No Project.

Description

Under this alternative, the proposed expansion of the Tajiguas Landfill would not occur. Since waste would still be generated and require disposal, this alternative would require one or more of the in-County and out-of-County disposal alternatives listed above to be implemented. Waste generated in southern Santa Barbara County would be diverted to an out-of-County landfill, while waste from the Santa Ynez and Cuyama Valleys would be diverted to an existing in-County landfill.

The No Project alternative is not typical of no project alternatives considered for other development projects. The no project alternative typically means No Project or action would occur and the existing environmental would remain the same as baseline. Santa Barbara County would continue to generate waste, and this waste would continue to require disposal. Waste that is disposed of at the Tajiguas Landfill, including waste from the City of Santa Barbara, Cuyama Valley and Santa Ynez Valley (via Foxen Canyon Transfer Station), would need to be transported to another location for disposal. Under the No Project alternative, the Tajiguas Landfill would reach capacity and the waste would be diverted to another out-of-County landfill either by truck or by rail. Impacts of the No Project alternative would therefore, have similar impacts to the out-of-County landfill alternatives and require development of a transfer station with associated impacts. In addition, this alternative would not meet the basic project objectives to provide approximately 15 years of additional, reliable and cost-effective solid waste disposal service for the Santa Barbara County residents of south County and the Santa Ynez and Cuyama Valleys.

With the No Project alternative, the Southeast Corner Modification waste that is now located 400 feet above msl in the southeast corner of the landfill also would be transported offsite. Impacts would be substantially greater in all identified areas since the waste would be transported offsite along public highway systems potentially exposing the general public to the decomposing waste.

Section 15126.6 of the CEQA Guidelines requires the environmentally superior alterative to be identified even if it is the No Project alternative. If the environmentally superior alternative is the No project alternative, CEQA requires that the environmentally superior alternative be identified among the remaining alternatives. Based on the analysis in 01-EIR-05 and the above analyses, it has been determined that the "No Project" alternative is not the environmentally superior alternative. Further, none of the other alternatives evaluated resulted in reduction or elimination of all significant project-related environmental impacts. Therefore, none of the other project alternatives was determined to be environmentally superior to the proposed project (DEIR, p. 4-80 — 4-81).

Conclusions

The alternatives to the proposed Tajiguas Landfill Expansion Project would not avoid or reduce the significant and unavoidable impacts (Class I) associated with the proposed expansion project, but would only transfer such impacts to another site (DEIR, Section 4.0 and FEIR, Ch. 3.0). The Alternative Waste Technologies may reduce impacts, but are not feasible due to the time constraints and capital outlay associated with developing such technologies.

Alternatives to ongoing recycling and disposal programs for the Tajiguas Landfill wasteshed involve a host of issues to be resolved. These include, but are not limited to:

- Development and implementation considerations: As described in FEIR Sections 3.3.3.1 and 3.3.3.2, there are numerous issues to be considered in the process of developing and implementing waste processing technologies. These include, but are not limited to siting, permitting, identification of end users, financing, economics, market acceptability, political leadership and support, statutory constraints, regulatory framework, public perception and understanding, available data, feedstock access and flow control. To provide a feasible alternative to the proposed project, these issues must be resolved either individually or jointly by the various jurisdictions within the Tajiguas Landfill wasteshed and within the 15 years of the proposed landfill expansion.
- Multi-jurisdictions: To agree upon a specific strategy regarding waste processing technologies and to implement such a strategy, decisions and agreements would be required among the various jurisdictions within the Tajiguas Landfill wasteshed. Although such actions have occurred previously (current franchise agreements are evidence of such cooperation), it is unknown and speculative as to whether these complex actions that

involve multiple jurisdictions are feasible within the time frame of the proposed project.

- Flow control: The County controls 24.5 percent (approximately 190 tons per day [tpd]) of the waste disposed at the Tajiguas landfill, based on landfill data for 2000. The remainder of the Tajiguas Landfill wasteshed waste stream is controlled by the cities of Santa Barbara, Goleta, Solvang and Buellton. Therefore, the County has long-term control over approximately 190 tpd of waste without affecting ongoing recycling and diversion programs. To provide sufficient feedstock for a feasible alternative to the proposed Tajiguas Landfill Expansion Project, the amount of feedstock would need to be sufficient on both a short-term (daily) and long-term (annual) basis. Therefore, for the County to provide the appropriate quantity of feedstock over a sufficient period of time, flow control of the municipal solid waste generated within the cities of Santa Barbara, Goleta, Solvang and Buellton would be needed. This would require multi-jurisdictional agreements and, potentially, control of solid waste and green waste that currently is being diverted for recycling purposes.
- Project Time Frame: The Tajiguas Landfill Expansion Project is proposed to provide 8.2 million cubic yards of disposal capacity (15 years) for jurisdictions within the Tajiguas Landfill wasteshed, the time needed to perform detailed site investigations, design work, permitting and construction of a new in-County landfill. To be a feasible alternative to the proposed project, that alternative would have to avoid or substantially lessen the significant impacts of the proposed project. As described in the FEIR, to meet these requirements would require a landfill that is 32 percent smaller than the proposed project. Due to the extent and complexity of developing and implementing one or a combination of waste processing technologies to accomplish a 32 percent reduction in the amount of waste disposed at the Tajiguas Landfill, it is speculative to assume this reduction could be achieved within the 15-year time frame of the proposed expansion project.

The DEIR evaluates alternative disposal technologies in Section 4.4 and in Chapter 3.0 of the FEIR. The DEIR considers recycling, composting, waste-to-energy, conversion technologies and other developmental technologies. As discussed in Draft EIR Section 4.4.4 – Other Developmental Technologies, although the current developing waste processing technologies hold promise for the future, the current project objective is to provide waste disposal capacity at the Tajiguas Landfill for 15 years. Many of the obstacles to developing and marketing waste processing technologies will likely be overcome in the future, enabling these technologies to be considered as part of long-term planning to meet the waste disposal needs of Santa Barbara County.

Based on the discussions provided in this chapter, the conclusions remain the same as stated in the Draft EIR Section 4.4.4. Although some of the waste processing technologies addressed are being implemented in other countries or

other locations within the United States, based on the development and implementation considerations discussed in this chapter, they are not feasible within the Tajiguas Landfill wasteshed within the time frame of the proposed project. Therefore, in accordance with the CEQA Guidelines (§15126.6), waste processing technologies do not represent a feasible alternative to the proposed Tajiguas expansion project (FEIR, Ch.3, 0 3-30 — 3-32).

Impacts associated with both the Front Canyon and Back Canyon configuration are similar. Only one potentially significant but mitigable impact (Class II) was identified with the Front Canyon configuration but was not identified under the Back Canyon configuration. This impact, identified under Health and Safety, is associated with worker safety due to engineering requirements to construct the Front Canyon configuration. The Front Canyon design, as compared to the Back Canyon configuration, dictates that a steeper waste prism with narrow switchbacks on roads is necessary to access the top of the landfill. These impacts can, however, be mitigated to a less than significant level with traffic control for vehicles and equipment as they travel to and from the working face (DEIR, p. 3.12-13 — 3.12-14).

Based on the above analyses, the environmentally superior alternative is the proposed Tajiguas Landfill Expansion Project, Front Canyon configuration (Proposed Project).

The Front Canyon configuration is recommended as the Proposed Project because of the following non-environmental based considerations:

1) Construction of the Front Canyon configuration is significantly more cost effective (approximately $17 million less than the Back Canyon configuration – see Attachment 6);

2) While the area of impact is similar, the waste footprint is approximately 25 acres smaller under the Front Canyon as compared to the Back Canyon configuration (Draft EIR, Table 2-6); and

3) While both the Front Canyon and Back Canyon configurations provide an adequate factor of safety for slope stability, even greater slope stability can be achieved under the Front Canyon configuration.

J. STATEMENT OF OVERRIDING CONSIDERATIONS

The FEIR, 01-EIR-05, identifies certain impacts to Biological Resources, Cultural Resources, Visual Resources, and Air Quality as significant and unavoidable environmental impacts. Having balanced the benefits of the project against its significant and unavoidable effects, the Board of Supervisors hereby determines that the project's unavoidable impacts are acceptable in light of the project's

benefits. Each benefit set forth below constitutes an overriding consideration warranting approval of the project, independent of the other benefits, despite each and every unavoidable impact. Pursuant to CEQA Sections 15043, 15092, and 15093, any remaining significant effects on the environment are acceptable due to these overriding considerations:

By approving the Proposed Project, the Board of Supervisors has adopted the Environmentally Superior Alternative. Certain significant and unavoidable Class I impacts have been identified for the areas of Biological Resources, Cultural Resources, Visual Resources, and Air Quality. These Class I impacts would be mitigated to the maximum extent feasible by the measures outlined in Sections 3.2 to 3.11 of the DEIR and Ch. 4.2 of the FEIR.

Various Southern California jurisdictions, including Santa Barbara County, are evaluating alternative methods of assuring long-term solid waste disposal capacity as their current landfills reach capacity. In recognition of the importance of long-term management of landfill capacity, and to reduce the volume of solid waste requiring disposal, the state legislature passed the California Integrated Solid Waste Management Act of 1989 (AB 939). This legislation requires counties to prepare Integrated Solid Waste Management Plans, establishes mandatory percentages of waste that must be diverted from landfill disposal, and requires counties to demonstrate 15 years of disposal capacity.

The Santa Barbara County Public Works Department, Solid Waste and Utilities Division is responsible for the cost-effective management of solid waste and utilities in the County. The Division's mission is to protect the public health and environment of our community by efficiently managing waste products and utilities with a focus on resource conservation. The comprehensive programs implemented by the Division for the management of solid waste include the collection, recycling, and disposal of solid waste, and also the abatement of illegal dumping of waste.

The proposed project represents one aspect of the County's comprehensive Countywide Integrated Waste Management Plan (CIWMP), which consists of the following elements:

- Collection of municipal solid waste, commingled recyclables and green waste from residences and businesses.
- Green waste processing.
- Separation of construction and demolition waste for recycling.
- Sorting and consolidation of waste and recyclables at transfer stations.
- Household and small-quantity business-generated hazardous waste collection.
- Public education regarding recycling and beneficial reuse.
- Disposal at Tajiguas Landfill.
- Disposal at Foxen Canyon Landfill.

The County's Integrated Waste Management Plan (CIWMP) has been effective in systematically reducing the percentage of County-generated waste that ends up being landfilled, as the opportunity for separation of waste occurs within each element of the overall program. The Tajiguas Landfill Expansion Project was identified in the CIWMP as a component in the overall management program for Santa Barbara County. Approval of the Tajiguas Landfill Expansion Project will bring the County into compliance with the CIWMP and is considered a benefit of the proposed project.

The Tajiguas Landfill Expansion Project provides:

a) 8.2 million cubic yards of additional reliable and cost-effective municipal solid waste disposal services for the residents of southern Santa Barbara County and the Santa Ynez and Cuyama Valleys.

b) A well-managed municipal solid waste disposal facility that maximizes local control of the waste stream to assure the safe, reliable and cost-effective solid waste disposal for southern Santa Barbara County, and the Santa Ynez and Cuyama Valleys.

c) Adequate time to consider and plan for alternative waste processing technologies in the future.

In addition, the Tajiguas Landfill Expansion Project promotes cost-effective, environmental responsible waste disposal for the County of Santa Barbara. Costs to the County of Santa Barbara associated with out-of-County waste disposal would be significantly increased. Costs associated with hauling and tip fees would be increased and would result in approximately $250 million over the Proposed Project. Santa Barbara County would also be mandated under AB 939 to continue to meet or exceed 50% diversion. Many of the programs required through the County's comprehensive integrated waste management program would continue. However, without revenue generated by Landfill tip fees, it would be necessary to pass costs of these programs along to the public. The Tajiguas Landfill Expansion Project allows the County to effectively manage its waste stream and promotes fiscal and environmental responsibility by controlling the waste management system within the County.

The Board recognizes the need to balance the obligation to provide reliable solid waste disposal for the citizens of Santa Barbara County, which is necessary for the protection of life and property against protection of environmental resources. The mitigation measures eliminate or significantly reduce a large number of environmental impacts associated with the Tajiguas Landfill Expansion Project. The Board finds that the project adopted (Proposed Project) mitigates

environmental effects to the maximum extent feasible when weighed against legal, technical, social, and economic mandates relative to solid waste disposal.

The proposed project, as mitigated, will serve an important role in helping the County fulfill its obligations under the CIWMP. The Board therefore finds that the remaining unavoidable significant environmental effects are acceptable.