

# **Attachment G**

ATTACHMENT 7  
 REVISED TAJIGUAS RESOURCE AND RECOVERY PROJECT  
 CASE NO. 17GPA-00000-00002 AND 17GOV-00000-00004

**COMPREHENSIVE PLAN POLICY CONSISTENCY ANALYSIS**

| REQUIREMENT  | DISCUSSION  |
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| <b>Comprehensive Plan Designation</b>  |   |
| <p><b>Agriculture II (A-II):</b> This designation applies to acreages of farm lands and agricultural uses located outside Urban, Inner Rural and Rural Neighborhood areas. General agriculture is permitted, including but not limited to livestock operations, grazing, and beef production as well as more intensive agriculture uses.</p>   | <p><b>Consistent:</b> The Tajiguas Landfill has been in operation since 1967, operates under a Solid Waste Facilities Permit, and is within the Waste Disposal Facility Overlay. The Overlay recognizes the operation of the Landfill facility as an allowable use within the Agricultural land use designation. The Comprehensive Plan Amendment would not change the underlying land use designation.</p> <p>In addition, as stated in the Planning Commission staff report, dated August 14, 2017 and incorporated herein by reference (Attachment 4 of the Board Letter), the inland Tajiguas Landfill property is exempt from zoning requirements, pursuant to the Land Use and Development Code (LUDC) Section 35.10.040.G.1.b.</p> |
| <b>Land Use Development</b>  |   |
| <p><b>Land Use Development Policy 4:</b> Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (i.e., water, sewer, roads, etc.) are available to serve the proposed development. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the proposed project. Lack of available public or private services or resources shall be grounds for denial of the project or reduction in the density otherwise indicated in the land use plan.</p> <p><b>Gaviota Coast Plan Policy LU-5:<br/>                 Development of Non-Agricultural Uses.</b><br/>                 Development of non-agricultural uses on land</p> | <p><b>Consistent:</b> Services currently exist at the Landfill and would continue to serve the Landfill, including the changes associated with the Revised TRRP.</p> <p><i>The Revised Hydrology Report and the Hydrogeologic and Water Supply Impact Analysis Report</i>, which are attached to the revised SEIR Addendum, dated October 10, 2017 (Attachment 3 of the Board Letter) as Appendices C and D, incorporated herein by reference, were updated to address the Revised TRRP.</p> <p>The AD Facility would be served by Well No. 5 which draws from the Vaqueros Formation. TRRP water use from Well No. 6 would decrease to 7.5 acre-feet/year as a result of this project. The use of Well No. 5 would not</p>               |

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| <p>designated for agriculture, including land divisions and changes to a non-agricultural land use/zoning designation, shall only be permitted subject to all of the following:</p> <ol style="list-style-type: none"><li>1. Non-agricultural uses shall be compatible with continued existing agricultural use on the premises and on adjacent lands;</li><li>2. Non-agricultural uses shall avoid prime agricultural land or locate development contiguous with or in close proximity to existing developed areas able to accommodate the use;</li><li>3. Non-agricultural uses shall not have a significant adverse impact on biological resources, visual resources, and coastal resources (including public access, recreation and coastal dependent uses); and,</li><li>4. For properties located in the Coastal Zone, the proposed non-agricultural use and proposed land divisions shall be consistent with Coastal Land Use Plan Policies 8-2, 8-3 and 8-4 and Coastal Act Sections 30241-30242.</li></ol> | <p>exceed 4.0 acre-feet/year, which is considered the safe yield for this well. In addition to Well Nos. 5 and 6, the Landfill water sources include Well No. 3 and the Groundwater Leachate Recovery and Collection System (GLCRS) interceptor trench. As a result, the groundwater resources present at the site are anticipated to be adequate to serve the project.</p> <p>The Revised TRRP includes the installation and operation of two advanced self-contained commercial wastewater treatment units. Permits will be necessary from County Environmental Health Services for the operation of the wells and for the commercial wastewater treatment units.</p> <p>Roads are presently developed on-site and would continue to serve the Landfill and associated facilities.</p> <p>Electrical service to the site is currently available. Service would continue to be provided by Southern California Edison (SCE) with power transmitted to each facility. Existing power lines run along the eastern and western boundary of the Landfill, and use of these existing poles to bring power to the new facilities is planned. However, SCE is responsible for construction of the power lines and for determining whether the existing poles will be maintained or replaced.</p> <p>In addition, the MRF would be equipped with solar panels, which are anticipated to generate approximately one megawatt of electricity.</p> <p>Adequate services would continue to be available to serve the reconfigured parcels. The project would not result in an increase in demand for libraries, police, fire or health services.</p> <p>Regarding the project's consistency with Gaviota Coast Plan Policy LU-5: Development of Non-Agricultural Uses, the Revised TRRP</p> |
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would not result in the loss of agricultural land and would not increase conflicts with adjacent agricultural activities because the additional area disturbed is not designated as having prime soils, has never been cultivated, and has been disturbed by prior Landfill operations, including the Tajiguas Landfill Expansion Project (01-EIR-05). Specifically, the area proposed for the AD Facility and associated facilities has been previously graded and is currently used for Landfill operations (perimeter road and drainage facilities).

Further, as previously indicated in the Planning Commission staff report, dated August 14, 2017 (Attachment 4 of the Board Letter), the Tajiguas Landfill is a non-agricultural use of the property; however the inland Tajiguas Landfill property is exempt from zoning requirements, pursuant to LUDC Section 35.10.040.G.1.b. The Waste Disposal Facility Overlay specifically allows for operation of the Landfill on agriculturally zoned land. The project does not involve land with a prime soils designation, and the additional 4.48 acres being added to the Waste Disposal Facility Overlay contain only non-prime soils and are classified as grazing land.

Lastly, as discussed in the revised Addendum dated October 10, 2017 (Attachment 3 of the Board Letter), incorporated herein by reference, the Revised TRRP is located outside of the Coastal Zone and will not have a new significant adverse impact on biological resources, visual resources, and coastal resources as compared to the project analyzed in the Final Subsequent EIR (12EIR-00000-00002) certified on July 12, 2016. As indicated throughout this policy consistency discussion, the Revised TRRP includes development that avoids Environmentally Sensitive Habitat to the maximum extent possible, avoids visually prominent areas to the maximum extent possible, minimizes infrastructure requirements, and maintains the landscape's

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|  | <p>prominent features. Therefore, the project is consistent with this policy.</p>   |
| <p><b>Aesthetics/Visual Resources</b></p>  |   |
| <p><b>Land Use Element, Visual Resource Policy 2:</b> In areas designated as rural on the land use plan maps, the height, scale, and design of structures shall be compatible with the character of the surrounding natural environment, except where technical requirements dictate otherwise. Structures shall be subordinate in appearance to natural landforms; shall be designed to follow the natural contours of the landscape; and shall be sited so as not to intrude into the skyline as seen from public viewing places.</p> <p><b>Gaviota Coast Plan Policy VIS-2:</b> Development shall be visually subordinate to the natural and agricultural environment as seen from public viewing places. Visual subordination shall be achieved through adherence to the Site Design Hierarchy and Design Guidelines. “Visually subordinate” is defined as development that is partially visible but not dominant or disruptive in relation to the surrounding landscape as viewed from a public viewing place.</p> <p><b>Gaviota Coast Plan Policy VIS-8:</b> Walls and Fencing. Walls and fencing shall not be visually dominant or disruptive in relation to their surroundings. Highly reflective or bright materials or colors shall not be permitted, and use of natural materials such as unfinished wood allowed to weather shall be encouraged.</p> <p><b>Gaviota Coast Plan Policy VIS-3: Skyline Intrusion.</b> Where feasible, development shall be sited so as not to intrude into the skyline as seen from public viewing places.</p> <p><b>Gaviota Coast Plan Policy VIS-4: Ridgeline Development.</b> Development shall be prohibited from locating on ridgelines to the maximum extent feasible, as implemented by the Ridgeline and Hillside Development</p> | <p><b>Consistent:</b> The project is located within the existing Tajiguas Landfill property. Permitted operation of the Landfill has substantially modified the natural landforms and contours in the area of the proposed project.</p> <p>The Revised TRRP facilities would be obscured from intervening topography and vegetation from U.S. Highway 101, 2.4 miles west of the approved MRF/AD Facility site (View 3), U.S. Highway 101, 1.4 miles southeast of the approved MRF/AD Facility site (View 4), and the Pacific Ocean offshore of the Landfill (View 5), as analyzed in the Final SEIR. Development from the Revised TRRP would not be visible from these locations.</p> <p>The Revised TRRP involves relocating the AD Facility from the southern portion of the operations deck to the eastern edge of the top deck. Terrain modeling and photo-simulation analysis were conducted to analyze visual resources and showed that the AD Facility would not be visible in the revised location from the Landfill access road entrance (View 2, as discussed in Attachment 3 of the Board Letter, incorporated herein by reference) due to intervening topography and vegetation. The AD Facility is not located on a ridgeline and would not intrude into the skyline as seen from public viewing places. Existing visual qualities of the AD Facility area have been significantly modified by Landfill grading associated with the Tajiguas Landfill Expansion project (01EIR-00000-00005). At the revised AD Facility site, the ridgeline elevation was lowered from a maximum elevation of 676 feet to 645 feet above mean sea level as part of the Expansion Project’s Phase 1B’s liner installation and was developed with perimeter road and drainage facilities.</p> |

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| <p>Guidelines.</p> | <p>The Composting Area on top of the top deck of the Landfill was added to the Landfill under the approved TRRP (approved by the Board of Supervisors on July 12, 2016) and was considered to be a small change in the visual condition of the Landfill as seen from the Landfill access road entrance. Under the Revised TRRP, the Composting Area would continue to be located on top of the top deck and would be visually subordinate in relation to the surrounding landscape, including the Landfill operations, as viewed from a public viewing place.</p> <p>The MRF, AD Facility and sub-facilities (e.g. percolate tanks, bio-gas engines) would not be visible from the Landfill access road entrance due to intervening topography and vegetation, and would be visually subordinate. Further, the AD Facility would be located east of the Composting Area to reduce changes in landform and not intrude into the skyline as seen from public viewing places.</p> <p>The Area Runoff Collection Tank would be constructed at a lower elevation than analyzed in the Final SEIR and not visible from the upper portion of the Baron Ranch Trail northeast of the Landfill property. It would not intrude into the skyline as seen from public viewing places and would not be located on a ridgeline.</p> <p>The certified SEIR identified no impacts from View 3 (U.S. Highway 101, 2.4 miles west), View 4 (U.S. Highway 101, 1.4 miles southeast), and View 5, (offshore in the Pacific Ocean) due to intervening topography and vegetation. View 7 includes the upper (northern) Baron Ranch Trail that will remain in the same location as studied in the certified SEIR (the lower section of the trail has been approved for realignment). The certified SEIR indicated that the Composting Area Collection Tank would be minimally visible from the upper portion of the Baron Ranch Trail</p> |
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northeast of the Landfill property (View 7, as discussed in Attachment 3 of the Board Letter, incorporated herein by reference). Under the Revised TRRP, while the Composting Area Collection Tank would be increased in volume, it would be constructed at a lower elevation and not visible from View 7. A small portion of the AD Facility would be visible through a small dip in the ridgeline from View 7. However, the AD Facility would be located approximately 1.5 miles from View 7, would be visually subordinate as compared to the overall viewshed, and would not obstruct public views. Development of the lower Baron Ranch trail has been approved and permitted for relocation from the east side of Arroyo Quemado to the west side. Development of this portion of the trail is in progress and the existing trail alignment in the southern portion of Baron Ranch will be abandoned. The relocation of the AD Facility and associated facilities would be a minimum of 1,400 feet from the approved, re-located lower Baron Ranch Trail. As identified in Figure 14 of the revised Addendum, dated October 10, 2017 (Attachment 3 of the Board Letter), an additional line of sight profile was generated to determine whether the AD Facility could be seen from the relocated trail. This location is the closest point to the revised AD Facility where topography allows for clear view from the relocated trail to the ridgeline; however, the AD Facility and associated facilities would not be visible from this location due to intervening topography.

Therefore, the AD Facility and associated structures in the Revised TRRP result in development that is visually subordinate to the natural landforms, is designed to follow natural contours, and does not intrude into the skyline.

The Revised TRRP contains changes in the view from the Upper Outlaw Trail on Arroyo Hondo Preserve, which is 0.6 miles north-northwest of the approved MRF/AD Facility

site (View 8, as discussed in Attachment 3 of the Board Letter, incorporated herein by reference). Specifically, changes in the view would be associated with the addition of the relocated AD Facility, fire-water tank and above-ground power line, deletion of the Landfill maintenance facility, relocation of the Composting Area Runoff Collection Tank, and increase in the tank size. Although these facilities would be added to the view-shed, the modifications associated with the Revised TRRP would be visually subordinate and an insubstantial element of the view relative to the landscape which has already been heavily modified by permitted Landfill operations. Existing views from this trail include the active Tajiguas Landfill.

Regarding View 6, the relocated AD Facility, Composting Area, relocated Landfill maintenance facility and the new above-ground power line would not be visible from U.S. Highway 101 due to the limited view corridor and intervening topography and vegetation. The MRF would remain on the operations deck and would continue to be visible from U.S. Highway 101, but would be located approximately 300 feet farther north of U.S. Highway 101 than the AD Facility location analyzed for the original TRRP in the Final SEIR (previously located south of and in front of the MRF from View 6). Therefore, the location of the structure would result in a reduction of the facility's visibility from U.S. Highway 101.

The only significant but mitigable visual impact (Impact TRRP VIS-2) identified in the certified Final SEIR involves altering the visual setting as seen from U.S. Highway 101. However, the visibility of the project would be reduced under the Revised TRRP as compared to the approved TRRP due to the relocation of the AD Facility.

Additionally, technical requirements, such as the need for large equipment to operate within



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|   | <p>the buildings, determine the height, size and form of the project facilities. The project is visually subordinate as it is mostly hidden from public view by intervening topography. As such, the height, scale and design of structures associated with the Landfill would be compatible with the character of the surrounding manmade and natural environments.</p>   |
| <p><b>Gaviota Coast Plan Policy VIS-5: Lighting.</b> The night sky and surrounding land uses shall be protected from excessive and unnecessary light associated with development.</p>   | <p><b>Consistent:</b> The approved TRRP included skylights in the MRF and AD Facility that would be fitted with blinds. These skylights have been deleted from the Revised TRRP which would reduce the potential for light to escape from the interior of the building and impact the night sky.</p> <p>Additionally, the relocated AD Facility flare and proposed LFG Control System flare would not produce external flames such as those typically associated with petroleum production facilities.</p> <p>Consistent with the approved TRRP, the Revised TRRP would include exterior lighting with dark sky compliant, full cut-off lighting fixtures, consistent with this policy.</p>  |
| <p><b>Gaviota Coast Plan Policy VIS-12: Critical Viewshed Corridor.</b> Protection of the ocean and mountain views of the Gaviota Coast from Highway 101 is critically important. Therefore, a Critical Viewshed Corridor Overlay, providing more protective viewshed policies for development permits within the overlay, is designated for the Gaviota Coast.</p> <p><b>Gaviota Coast Plan Policy VIS-13: Development Visibility.</b> Development within the Critical Viewshed Corridor shall be screened to the maximum extent feasible as seen from Highway 101. Screening shall be achieved through adherence to the Site Design Hierarchy and Design Guidelines.</p> <p><b>Gaviota Coast Plan Policy VIS-14: Landscaping.</b> Non-agricultural landscaping,</p> | <p><b>Consistent:</b> As identified in the Planning Commission staff report, dated August 14, 2017 (Attachment 4 of the Board Letter), the relocated AD Facility, Composting Area, relocated Landfill maintenance facility and the new above-ground power line would not be visible from U.S. Highway 101. The MRF would continue to be visible from U.S. Highway 101, but would be located approximately 300 feet farther north of U.S. Highway 101 than the AD Facility location analyzed for the original TRRP in the Final SEIR (Attachment 2 of the Board Letter). In addition, the Composting Area Runoff Collection Tank and the fire water tank would not be visible from U.S. Highway 101, and when looking towards Pila Creek, the tanks would not be seen. While the tanks have to be elevated above the MRF to provide gravity</p> |

when mature, shall not obstruct public mountain or ocean views.

**Gaviota Coast Plan Policy VIS-15: Ocean Views.** To the maximum extent feasible, development shall be sited and designed to preserve unobstructed broad views of the ocean from Highway 101, and shall be clustered to the maximum extent feasible.

**Gaviota Coast Plan Policy VIS-17: Unobstructed Broad Views of the Ocean.** For properties within unobstructed broad views of the ocean, development shall be designed so that exposed structural elevations are at an appropriately proportioned mass and scale to the unobstructed broad views of the ocean.

flow to the MRF, the tanks would be located on the side of a ridge. The ridgeline associated with the location of the tanks is lower than the mountain backdrop. Therefore, ocean and mountain views of the Gaviota Coast from Highway 101 would be maintained. Further, since development associated with the Revised TRRP would not be visible from U.S. Highway 101, Gaviota Coast Plan Policies VIS-13 and VIS-14 are not applicable.

The views of the Revised TRRP are entirely obscured by intervening topography and vegetation from U.S. Highway 101 and the Pacific Ocean offshore of the Landfill (Views 3, 4, and 5, as discussed in Attachment 3 of the Board Letter, incorporated herein by reference). Further, the project would continue to be subject to the mitigation measures provided in the certified Final SEIR (Attachment 2 of the Board Letter), including mitigation for landscape screening (MM TRRP VIS-1b).

The facilities associated with the Revised TRRP would not block ocean views, as they would be below the elevation of topographic features to the south. Views from the lower section of Baron Ranch Trail would be blocked by intervening topography, including the ridgeline that separates the Arroyo Quemado and Pila Creek watersheds. As discussed in the Planning Commission staff report, dated August 14, 2017 (Attachment 4 of the Board Letter), a small portion of the AD Facility would be visible through a small dip in the ridgeline from View 7, but would not obstruct public views or be incompatible with surrounding uses.

Further, the modifications to the Landfill associated with the project would be an insubstantial element of the view relative to the landscape which has already been, and will continue to be substantially modified by permitted Landfill operations. Therefore, the

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|   | Revised TRRP would be consistent with the Gaviota Coast Plan Critical Viewshed Corridor policies and the Critical Viewshed Corridor Overlay.  |
| <b>Dev Std VIS-1: Fuel Management Zone Buffers.</b> Structures shall be sited and designed to minimize the need for vegetation clearance for fuel management zone buffers.  | <b>Consistent:</b> Revised TRRP facilities have been sited in landfill operational areas that do not support vegetation or are currently managed to reduce fire hazards, including the relocated AD Facility. However, the relocated AD Facility would be within 100 feet of currently unmanaged vegetation, and would require an expansion (about 1.1 acres) into the fuel management area. The relocated AD Facility has been sited to minimize the additional vegetation clearance required to the maximum extent feasible.  |
| <b>Air Quality</b>  |   |
| <p><b>Air Quality Supplement Policy A:</b> Direct new urban development to areas within existing urbanized areas without endangering environmentally sensitive areas or open space resources.</p> <p><b>Air Quality Supplement Policy E:</b> Improve the integration of long-range planning and project approval procedures with air quality planning requirements.</p> | <p><b>Consistent:</b> Standard emission reduction measures recommended by the SBCAPCD, included in the approved TRRP and Revised TRRP analysis, would be implemented during project construction. The project would not exceed the 25 tons/year threshold for construction air pollutant emissions. Further, the NAAQS would not be exceeded for any of the criteria pollutant categories.</p> <p>In addition, minor changes in on-site mobile equipment would not exceed County operational or motor vehicle pollutant emissions thresholds.</p> <p>In the certified Final SEIR, truck trips associated with transporting digestate from the AD Facility to the Composting Area were addressed; however, under the Revised TRRP, these facilities would be adjacent to each other (digestate would be delivered to the Composting Area by a conveyor). The truck trips analyzed in the Final SEIR would be replaced with trips transporting organic waste from the MRF to the AD Facility. As such, the number of truck trips associated with transporting organic waste and digestate would not change as a result of the Revised TRRP.</p> |

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|  | <p>The Revised TRRP would also improve air quality over the approved TRRP in many regards. Replacement of the existing LFG Control System engine with modern engines equipped with a NO<sub>x</sub> Control System would result in a reduction in NO<sub>x</sub> emissions by up to 180.6 pounds per day and ROC emissions reduced by up to 71.5 pounds per day, which also represents a reduction in the County's stationary source emissions inventory.</p> <p>During the Revised TRRP review, an updated health risk assessment was completed based on changes in emissions source locations. While the acute hazard index threshold is exceeded at the Landfill property boundary for both the approved and Revised TRRP, the impact would be reduced under the Revised TRRP. The exceedance would occur in an uninhabited area of steep terrain and dense vegetation, not reasonably accessible to the public, such that individuals would not be exposed to the risk.</p> <p>The project was also reviewed for greenhouse gas emissions, and the Revised TRRP would have the same level of GHG emissions as the approved TRRP. Like the approved TRRP, the Revised TRRP is beneficial because it will reduce overall future GHG emissions from the site (reduced Landfill methane emissions) and would enhance the recovery of recyclable materials.</p> <p>The Revised TRRP would also maintain compliance with air quality requirements since it would be consistent with the 2013 Clean Air Plan and the 2016 Ozone Plan. Therefore, the project is in conformity with Air Quality Supplement Policy E.</p> |
| <b>Agriculture</b>   |  |
| <p><b>Agricultural Element Policy I.A:</b> The integrity of agricultural operations shall not be violated by recreational or other non-compatible uses.</p> <p><b>Agricultural Element, Policy II.D:</b></p> | <p><b>Consistent:</b> There is no agriculture on the property, as the Tajiguas Landfill site has been used for the disposal of municipal solid waste since 1967. Areas affected by the project are either already disturbed or in open space. The Landfill site has an agricultural land use</p>   |

Conversion of highly productive agricultural lands whether urban or rural, shall be discouraged. The County shall support programs which encourage the retention of highly productive agricultural lands.

**Gaviota Coast Plan Policy AG-I.A:** Protect and Support Agricultural Land Use. Land designated for agriculture shall be preserved and protected for agricultural use; the integrity of agricultural operations shall not be violated by non-compatible uses.

designation and is agriculturally zoned; however, acknowledgement of the site's use as a landfill is specified through the Waste Disposal Facility Overlay.

Implementation of the mitigation measures identified in the Tajiguas Landfill environmental documents for the operation of the Landfill with regard to land use, air quality and nuisances would continue to minimize conflicts with the ongoing agricultural operations in the area.

Furthermore, the 4.48 acres of land proposed to be added to the Waste Disposal Facility Overlay within the Baron Ranch parcel is previously disturbed land that is not used for agricultural purposes, and was reviewed under the Tajiguas Landfill Expansion Project EIR (01-EIR-05), which was certified by the Board of Supervisors on August 13, 2002. As indicated above under "Land Use", Baron Ranch has historically been used for agriculture but no active agricultural activities currently exist on the site. If agricultural activities resume on a portion of Baron Ranch in the future, activity would likely occur on the east side of creek.

The Gaviota Coast Plan was adopted on November 8, 2016 and took effect on December 9, 2016 in the inland area of the County. Chapter 7 of the Gaviota Coast Plan recognizes the Tajiguas Landfill as an existing facility and discusses the Tajiguas Resource and Recovery Project, including the construction of the AD Facility and MRF (Gaviota Coast Plan, page 7-14 and 7-15). Specifically, the Gaviota Coast Plan states that the TRRP would increase diversion rates to over 80%, generate additional electricity, and significantly reduce the region's greenhouse gas emissions. The Gaviota Coast Plan recognizes that the Tajiguas Landfill provides a necessary public service to the community, and is being closed in phases. The post-closure use

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|  | <p>of the Landfill is currently designated as open space.</p> <p>As indicated in this discussion above, the 4.48 acre addition to the Overlay consists of previously disturbed land that is not used for agricultural purposes, is located on a sloped area, and is considered non-prime agricultural land (classified as grazing land). Further, the Revised TRRP does not result in significant adverse impacts on biological resources, visual resources, and coastal resources, as discussed in the revised Addendum, dated October 10, 2017 (Attachment 3 to the Board Letter). The Revised TRRP is located entirely outside of the coastal zone.</p> <p>The addition of the land to the Waste Disposal Facility Overlay would not disturb the existing or potential future integrity of agricultural operations on Baron Ranch or other neighboring properties. The proposed project would not affect agricultural operations and is in conformity with policies I.A, II.D, and AG-I.A.</p> |
| <p><b>Archaeology</b></p>  |   |
| <p><b>Land Use Element, Historical and Archaeological Sites Policy 1.</b> All available measures, including purchase, tax relief, purchase of development rights, etc., shall be explored to avoid development on significant historic, prehistoric, archaeological, and other classes of cultural sites.</p> <p><b>Land Use Element, Historical and Archaeological Sites Policy 2.</b> When developments are proposed for parcels where archaeological or other cultural sites are located, project design shall be required which avoids impacts to such cultural sites if possible.</p> <p><b>Land Use Element, Historical and Archaeological Sites Policy 3.</b> When sufficient planning flexibility does not permit avoiding construction on archaeological or</p> | <p><b>Consistent:</b> There are no known historic sites within 0.5 mile radius of the project site, and there is no evidence of archaeological resources within the area of proposed ground disturbance.</p> <p>Excavation at the tank sites has the potential to encounter unknown buried cultural resources. Therefore, mitigation measure MM TRRP CR-1 from 12EIR-00000-00002, which requires stop work and evaluation of materials in the unlikely event of the discovery of resources during construction, is required. With implementation of this measure, the project is in conformity with policies relating to cultural resources.</p> <p>The 4.48 acres to be added to the Waste Disposal Facility Overlay has been analyzed for cultural resources in a supplemental Phase</p>  |

other types of cultural sites, adequate mitigation shall be required. Mitigation shall be designed in accord with guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission.

**Land Use Element, Historical and Archaeological Sites Policy 4.** Off-road vehicle use, unauthorized collection of artifacts, and other activities other than development which could destroy or damage archaeological or cultural sites shall be prohibited.

**Land Use Element, Historical and Archaeological Sites Policy 5.** Native Americans shall be consulted when development proposals are submitted which impact significant archaeological or cultural sites.

**Gaviota Coast Plan Policy CS-1:** Preserve and protect significant cultural, archaeological and historical resources to the maximum extent feasible.

**Gaviota Coast Plan Action CS-4:** Native American Consultation. The County shall continue its consultations with the tribes identified by the Native American Heritage Commission (NAHC) pursuant to Assembly Bill 52 and Senate Bill 18 to ensure that cultural resources of concern to Native Americans are identified and taken into account in future development planning.

**Gaviota Coast Plan Dev Std CS-1:** A Phase 1 archaeological survey shall be performed when identified as necessary by a County archaeologist or contract archaeologist. The survey shall include all areas of the project that would result in ground disturbance. The content, format, and length of the Phase 1 survey report shall be consistent with the nature and size of the project and findings of

1 Archaeological Survey, conducted by Padre Associates, Inc. and dated May 15, 2017. No evidence of cultural resources was found in the survey that analyzed the revised construction disturbance area.

In addition, the following surveys were conducted near the project area:

- A Phase 1 Survey was conducted on June 5, 2013 that indicated that no cultural resource impacts would occur at the proposed project site. The Phase 1 Survey investigation included a records search at the Central Coast Information Center, Native American notification, historic map and records review, and a field survey. This survey analyzed the project area associated with the original TRRP project, which was approved by the Board of Supervisors on July 12, 2016.
- A Phase 1 Archaeological Survey was conducted in October 1986. The record search and survey indicated no presence of on-site cultural resources. One location in the Phase 1 Survey was selected for subsurface testing due to a potential probability of prehistoric use, and no cultural resources were encountered during testing. This survey was conducted for an expansion of the Tajiguas Landfill near the current project site that was processed in 1987.

The results of the surveys indicate that no cultural resources are present, and as such, no impact to archaeological resources is anticipated. Also, the Certified SEIR and Approved TRRP included mitigation measures for evaluating and protecting discovered resources (MM TRRP CR-1).

Although no impacts would occur to significant archaeological or cultural sites, P&D staff complied with consultation requirements pursuant to AB 52 (not

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| <p>the survey.</p>  | <p>applicable for this project) and SB 18, and particularly initiated consultation efforts with local Native American Tribes pursuant to Government Code Section 65352.3 (Senate Bill 18), discussed in the Board Letter, dated October 26, 2017, and the Planning Commission staff report, dated August 14, 2017 (Attachment 4 to the Board Letter).</p>   |
| <p><b>Biological Resources</b></p>  |   |
| <p><b>Gaviota Coast Plan Policy NS-2:</b> Environmentally Sensitive Habitat (ESH) areas and important or sensitive biological and natural resources shall be protected to the maximum extent feasible. Where special-status plant and animal species are found pursuant to the review of a discretionary project, the habitat in which the sensitive species is located shall be preserved to the maximum extent feasible.</p> <p><b>Gaviota Coast Plan Dev Std NS-2: ESH Setbacks and Buffers.</b> Mapped inland riparian ESH-GAV overlay areas shall have a development area setback buffer of 100 feet from the edge of either side of the top-of-bank of creeks or existing edge of riparian vegetation.</p> <p><b>Gaviota Coast Plan Policy NS-7:</b> Riparian vegetation shall be protected to the maximum extent feasible. Riparian vegetation shall not be removed except where clearing is necessary for the maintenance of existing roads and/or free flowing channel conditions, the removal of invasive exotic species, stream/creek restoration, or the provision of essential public services. Any unavoidable riparian vegetation removal conducted in compliance with the activities identified by this policy shall be conducted in compliance with the Environmentally Sensitive Habitat and resource protection policies and provisions of the Gaviota Coast Plan and the Comprehensive Plan.</p> <p><b>Gaviota Coast Plan Policy NS-9:</b> With the</p> | <p><b>Consistent:</b> A biological field survey was conducted on May 11, 2017 to characterize vegetation and wildlife habitats in areas not previously surveyed for the certified Final SEIR that would be affected by the Revised TRRP.</p> <p>The locations where construction disturbance would be greater under the Revised TRRP are mostly part of active permitted Landfill operations previously analyzed in 01-EIR-05. The total construction disturbance area would be increased by 3.7 acres under the Revised TRRP. Earthwork for the revised AD Facility would extend beyond the existing cut slope east of the existing Landfill access road by up to 25 feet, in previously disturbed areas that have since been partially colonized by ruderal vegetation and generally serve as low quality wildlife habitat.</p> <p>Earthwork would not extend outside the Landfill operational boundary; however, it would result in a net increase of 0.5 acres of ruderal vegetation to be removed (0.2 acres of this disturbance will be temporary and re-colonized by vegetation and wildlife). Approximately 0.1 acres of hydro-seeded vegetation dominated by native species would be removed by power pole installation. Most of this disturbance would be temporary, and vegetation would be expected to re-colonize the construction area.</p> <p>The Revised TRRP involves separating the AD Facility from the MRF. However, the AD Facility and associated facilities would be</p> |



exception of local, state, or federal resource agency permitted activities, natural stream channels and conditions shall be maintained in an undisturbed state to the maximum extent feasible in order to protect banks from erosion, enhance wildlife passageways, and provide natural greenbelts.

**Gaviota Coast Plan Policy NS-11:** Biological impacts shall be avoided to the maximum extent feasible. In cases where adverse impacts to biological resources cannot be avoided after impacts have been minimized, restoration shall be required. A minimum replacement ratio shall be required to compensate for the destruction of native habitat areas or biological resources. The area or units to be restored, acquired, or dedicated for a permanent protective easement shall exceed the biological value of that which is destroyed. Where onsite restoration is infeasible or not beneficial with regard to long-term preservation of habitat, an offsite easement and/or alternative mitigation measures that provide adequate quality and quantity of habitat and will ensure long-term preservation shall be required.

**Gaviota Coast Plan Policy LU-10: Development Siting.** Development shall be sited to the maximum extent possible to: 1) avoid environmentally sensitive habitat, 2) avoid visually prominent areas, 3) minimize infrastructure requirements and/or redundancy, and 4) minimize fragmentation of the landscape.

**Gaviota Coast Plan Dev Std NS-2:** ESH Setbacks and Buffers. Mapped riparian ESH-GAV overlay areas shall have a development area setback buffer of 100 feet from the edge of either side of the top-of-bank of creeks or the existing edge of riparian vegetation, whichever is further. Development within other ESH areas shall be required to include setbacks or undeveloped buffer zones from these areas as part of the proposed

located adjacent to the Composting Area, which would eliminate truck trips transporting digestate to the composting area between the two facilities. The area associated with the revised AD Facility was previously graded as part of the Tajiguas Landfill Expansion Project (01-EIR-05). The relocation of the AD Facility would require expansion of the existing fuel management area beyond the existing cut slope, which would include mowing or disking about 1.3 acres of ruderal vegetation. Of that, approximately 0.9 acres extends into previously undisturbed areas; however, 0.8 acres is comprised of ruderal vegetation and 0.1 acres consists of native mixed scrub vegetation.

Overall, the incremental increase in vegetation loss would be 1.7 acres of ruderal vegetation (0.2 acres would be temporary) and 0.1 acres of native mixed scrub, and thus the total permanent increase in loss of vegetation would be 1.6 acres from Revised TRRP compared to the approved TRRP, 0.8 acres of which would be located in previously disturbed areas. The total amount of vegetation permanently removed under the Revised TRRP would be 4.93 acres as compared to 3.33 acres under the approved TRRP. Affected vegetation and wildlife habitat is primarily non-native grassland consisting of previously disturbed and fragmented patches with low habitat value.

The Revised TRRP would be located at least 1,400 feet from Arroyo Quemado, which has been designated ESH. With the implementation of the Revised TRRP, the area designated as ESH in the northeastern area of the Landfill parcel (APN 081-150-026) would no longer be included in the Overlay.

Work related to the project would not be performed in any ESH, riparian vegetation, or natural stream channel areas. All work would be performed within previously disturbed areas of the Landfill. The Revised TRRP would

development, except where setbacks or buffers would preclude reasonable use of the parcel. In determining the location, width and extent of setbacks and/or buffer areas, the County's biological resources and/or vegetation maps and other available data shall be used (e.g., maps, studies, or observations). Appropriate public recreational trails may be allowed within setbacks or buffer areas. Required buffers for ESH-GAV may be adjusted upward or downward on a case-by-case basis but shall not preclude reasonable use of a parcel. The buffer shall be established based on an investigation of the following factors and, when appropriate, after consultation with the Department of Fish and Wildlife and Regional Water Quality Control Board, if required, in order to protect the biological productivity and water quality of streams: demonstration of a net environmental benefit; existing vegetation, soil type and stability of stream corridors; how surface water filters into the ground; slope of the land on either side of the stream; location of the 100-year flood plain boundary; and consistency with adopted Gaviota Coast Plan and Comprehensive Plan policies.

meet all ESH setbacks and buffers since the ESH on the Landfill property is located on the northeast corner of APN 081-150-026 at Arroyo Quemado, which is at least 1,400 feet from the Revised TRRP. Therefore, the project meets the development area setback buffer of 100 feet from the edge of either side of the top-of-bank of creeks and from the existing edge of riparian vegetation.

In 2010, after grading occurred on the Tajiguas Landfill and the Baron Ranch parcel, the U.S. Fish and Wildlife Service (USFWS) designated 1,636,609 acres of critical habitat for the CRLF in 48 units. As described in the Federal Register by USFWS, the unit boundaries are meant to follow the watershed boundaries. The use of the watershed boundary as the unit boundary is further supported by the consultation history for the Biological Opinion for the Tajiguas Landfill Reconfiguration and Baron Ranch Restoration project. As indicated in the revised Addendum, dated October 10, 2017 (Attachment 3 of the Board Letter), USFWS and the Army Corps of Engineers clarified that the western boundary of the California Red Legged Frog (CRLF) proposed Critical Habitat Unit STB-6 is the ridgeline at the eastern border of the Tajiguas Landfill.

The disturbance area to construct the AD Facility would extend into a small section area that falls within CRLF Critical Habitat Unit STB-6; however, updated site-specific surveys for the Revised TRRP showed that all areas of earthwork were previously disturbed, and were comprised of sparsely vegetated, upland, low value habitat, such that disturbance by the project would not significantly impact the CRLF or its habitat. CRLF were only observed in water features at the southern end of the Landfill and in the back-canyon area of the Landfill, which are located at least 2,000 feet from the Revised TRRP's location. The AD Facility and associated facilities would be located outside of the Arroyo Quemado

watershed (approximately 1,400 feet north of Arroyo Quemado) and can be inferred to be located outside of an area designated as critical habitat, based on the Federal Register and Biological Opinion for the Tajiguas Landfill Reconfiguration Project.

The Revised TRRP would result in a net increase of 0.5 acres of ruderal vegetation removed by earthwork for construction (0.2 acres of this would be temporarily removed and re-vegetated after construction), plus 0.3 acres removed for wildfire fuel management, which would increase the area of exposed ground for CRLF to cross during overland movement. However, this earthwork and fuel management removal is not located in water features or areas where CRLF were observed, and the affected sparse, ruderal vegetation provides little cover for dispersing CRLF. The AD Facility construction disturbance area does not contain CRLF aquatic breeding habitat, aquatic non-breeding habitat, or upland habitat, and is a highly altered area with only marginal dispersal habitat.

CRLF may be present while making overland dispersal movements, which typically occur at night and/or during rain events. Since the AD Facility and Compositing Area would be adjacent to each other, night-time equipment and motor vehicle activity would not increase and dispersal of transient CRLF would not be adversely affected. The Revised TRRP has been designed to avoid and minimize disturbance of biological features. As such, the likelihood of CRLF occurring within affected upland areas is low, and biological impacts will be avoided to the maximum extent feasible. Critical habitat does not prevent development in a designated area. Although federal designation may signal the presence of potentially sensitive habitat, biological resources are not necessarily significantly affected. The addition of 4.48 acres in the Waste Disposal Facility Overlay is on land that

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|   | <p>has been previously analyzed in 01-EIR-05 and graded to support landfill activities. The Revised TRRP would not result in the disturbance of ESH or critical habitat that has not already been analyzed in 01-EIR-05, the certified Final SEIR for the TRRP (Case No. 12EIR-00000-00002), the Addendum, dated August 11, 2017, and the revised Addendum, dated October 10, 2017, (Attachment 3 to the Board Letter), all incorporated herein by reference. In addition, the Comprehensive Plan Amendment would adjust the Waste Disposal Facility Overlay boundary by removing approximately 50 acres of CRLF Critical Habitat Unit STB-6 from the Overlay. The Revised TRRP would not create new significant impacts that were not previously analyzed in the Final SEIR.</p> <p>Also, as discussed above, the Revised TRRP would be consistent with Policy LU-10(2), (3) and (4) by avoiding visually prominent areas, involving the minimal infrastructure needed for the Revised TRRP, and not resulting in fragmentation of the landscape since the project is located within the Landfill's permitted boundaries.</p> <p>The proposed project would not increase impacts to biological resources compared to the Certified SEIR and is in conformity with the Gaviota Coast Plan Policies NS-2, NS-7, NS-9, NS-11, and LU-10 and the Gaviota Coast Plan Development Standard NS-2.</p> |
| <p><b>Gaviota Coast Plan Policy NS-6: Wildlife Corridors.</b> Development shall avoid to the maximum extent feasible and otherwise minimize disruption of identified wildlife travel corridors.</p> | <p><b>Consistent:</b> Although not identified in the Gaviota Coast Plan or Gaviota Coast Resources Study, Arroyo Quemado may function as a wildlife movement corridor. The Revised TRRP would be located at least 1,400 feet from Arroyo Quemado, thus avoiding any disruption to wildlife travel corridors to the maximum extent feasible. As noted above, surveys for the Revised TRRP showed that areas of earthwork were often previously disturbed and comprised of sparsely vegetated, upland, low value wildlife habitat, such that</p>  |

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|   | disturbance resulting from the project would not significantly impact wildlife, including the CRLF.  |
| <b>Recreation</b>   |  |
| <p><b>Gaviota Coast Plan Policy REC-4: Protect and Preserve Trail Alignments.</b> All opportunities for public trails within the general alignments and locations identified on the Parks, Recreation and Trails (PRT) map shall be protected, preserved, provided for, and sited and designed using the considerations in Policy REC-5 and Policy REC-6 during review and approval of development and/or permits requiring discretionary approval.</p> | <p><b>Consistent:</b> The Landfill’s relocated bio-gas hazard area is limited to publicly inaccessible areas and would be approximately 1,200 feet west of the proposed relocation of the Baron Ranch Trail. The relocation of the AD Facility would be within 1,400 feet of the proposed relocated lower Baron Ranch Trail. However, the Baron Ranch Trail would not be affected by the Tajiguas Landfill or the facilities associated with the Revised TRRP.</p>   |
| <b>Noise</b>  |  |
| <p><b>Noise Element Policy 1:</b> In the planning of land use, 65 dB Day-Night Average Sound Level should be regarded as the maximum exterior noise exposure compatible with noise-sensitive uses unless noise mitigation features are included in project designs.</p>   | <p><b>Consistent:</b> Since the noise analysis for the certified Final SEIR Case No. 12EIR-00000-00002 was completed, the County purchased the two parcels immediately south of the Landfill (APNs 081-150-033 and 081-150-034). While the Hart residence was under construction during the original TRRP, construction was not completed before the County purchased the property. Therefore, the parcel is no longer considered a sensitive receptor because the residence was never fully built or used as a single family dwelling. As such, noise at the Hart residence parcel was not analyzed further.</p> <p>The project’s changes to the approved TRRP affecting noise include the relocation of the AD Facility east of the Composting Area and replacing the LFG Control System engines and flare adjacent to the MRF. On-site truck trips would not increase and mobile equipment changes would be minor such that mobile source noise would not affect the revised noise analysis. Based on information provided by the manufacturer, the proposed LFG Control System engine containers are equivalent to a masonry building with regard to noise attenuation.</p> <p>The overall Revised TRRP operational noise at the four noise-sensitive receptors would be the</p> |

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|  | <p>same as the approved TRRP, because the highest noise level components would not change (MRF and existing operations).</p> <p>Since the Revised TRRP does not change noise exposure, the conclusion from the Community Noise Technical Study (included as Appendix J to 12EIR-00000-00002), which states that the TRRP would not result in noise levels above the 65 dBA CNEL threshold at noise-sensitive land uses, remains accurate for the Revised TRRP. The proposed project is in conformity with Noise Element Policy 1.</p>  |
| <p><b>Hillside and Watershed Protection Policies</b></p>   |  |
| <p><b>Land Use Element, Hillside and Watershed Protection Policy 1:</b> Plans for development shall minimize cut and fill operations. Plans requiring excessive cutting and filling may be denied if it is determined that the development could be carried out with less alteration of the natural terrain.</p> | <p><b>Consistent:</b> The Revised TRRP includes modified earthwork volumes, mainly a reduction in the amount of cut. The Revised TRRP would result in 31,420 cubic yards of cut, which is a reduction of approximately 111,180 cubic yards of total cut volume analyzed in the Final SEIR for the TRRP. The decrease in total cut volume is associated with planned Landfill operations through 2017 since soil in this area will continue to be used for Landfill cover material. Ongoing Tajiguas Landfill operations have reduced the required amount of excavation needed in the West Borrow Area where the MRF would be located.</p> <p>The Revised TRRP would result in 103,100 cubic yards of fill, which is a minimal increase in the fill included under the approved TRRP (addition of 335 cubic yards of fill). This amount of grading is needed to create building pads large enough to accommodate the MRF and AD Facility. The new building pads would not overlie the waste footprint and could not be carried out with less alteration of the natural terrain.</p> <p>Cut and fill operations would primarily be within previously disturbed and/or graded areas of the permitted Landfill.</p> <p>The project is located on a developed site, and</p> |

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|   | <p>is designed to best integrate with the existing operations. As such, land disturbance (cut and fill) has been minimized to the extent practicable in the context of landfill disposal activities which cumulatively involve over three million cubic yards of earthmoving over the life of the project.</p>   |
| <p><b>Land Use Element, Hillside and Watershed Protection Policy 2.</b> All developments shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited to development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.</p> | <p><b>Consistent:</b> Suitable locations for development of the Revised TRRP's project components are limited due to the presence of the waste footprint, steep slopes, limited flat deck area, and space needs for Landfill equipment storage and operations. The proposed locations for the Revised TRRP include existing developed and/or disturbed areas of the Tajiguas Landfill property (operations deck, West Borrow area and top deck) with suitable area and slope to support the facilities. By constructing in these existing disturbed areas, grading and other site preparations are kept to an absolute minimum. Natural features, landforms and native vegetation, such as trees, have been preserved to the maximum extent feasible.</p> <p>Earthwork would be minimized as Revised TRRP facilities are located within areas that have been disturbed as part of permitted Landfill development. Natural landforms and native vegetation would be preserved by the proposed Comprehensive Plan Amendment to adjust the Waste Disposal Facility Overlay, whereby the Overlay would be amended to not include approximately 55.55 acres of dense native vegetation in the northern portion of Landfill parcel APN 081-150-026. As with the approved TRRP, construction outside previously disturbed areas would occur for water tanks and the utility line to Well No. 6. However, this area was analyzed during the Tajiguas Landfill Reconfiguration and Baron Ranch Restoration Project (08EIR-00000-00007) certified by the Board of Supervisors on May 5, 2009. In addition, existing mitigation from the original TRRP (12EIR-00000-00002) would ensure impacts to native</p> |

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|   | <p>vegetation are minimized.</p> <p>The original ridgeline at the revised AD Facility site was lowered from a maximum elevation of approximately 676 feet to approximately 645 feet above mean sea level as part of the installation of the Phase 1B Liner as part of the Tajiguas Landfill Expansion Project.</p> <p>The revised AD Facility would be located at a site underlain with approximately 50 feet of artificial fill, which includes 24 feet of stockpiled soil which is used as Landfill cover and will be completely used for ongoing Landfill operations prior to the construction of the revised AD Facility. Additionally, the Revised TRRP includes the Composting Area Runoff Collection Tank and fire water tank, which would be located on artificial fill (approximately 33.5 to 38 feet of artificial fill over Rincon formation bedrock). Because of existing conditions at the Landfill (e.g., need for soil cover for Landfill operations), the Revised TRRP includes development in areas where grading and site preparation are kept to an absolute minimum since structures would be placed in locations with artificial fill.</p> <p>Therefore, the proposed project and associated grading is in conformity with the Land Use Element, Hillside and Watershed Protection Policy 2.</p> |
| <p><b>Land Use Element, Hillside and Watershed Protection - Policy 3:</b> For necessary grading on hillsides, the smallest practical area of land shall be exposed at any one time during development, and the length of exposure shall be kept to the shortest practicable amount of time. The clearing of land should be avoided during the winter rainy season and all measures for removing sediments and stabilizing slopes should be in place before the beginning of the rainy season.</p> | <p><b>Consistent:</b> Following four months of grading and site preparation, construction of the approved MRF is estimated to take approximately twelve months. Construction of the approved AD Facility is projected to take approximately 12 months to complete and would be completed concurrently with the MRF.</p> <p>There is a decrease in the total cut volume of approximately 111,180 cubic yards as compared to the approved TRRP due to regular on-going use of borrow material from the</p>  |



project site for continuing landfill cover operations, and that removal will continue into the future.

The slope stability analysis indicates the proposed cut slope above the revised AD Facility site and the existing fill slope below the water tank site is consistent and complies with the minimum safety factors. In addition, documented fill soils upon which the AD Facility would be constructed are not sufficiently expansive to require specialized foundation materials or systems.

The project would exceed one acre of disturbance and would require coverage under the NPDES Construction General Storm Water Permit. Compliance with the Construction General Storm Water Permit requires preparation of a SWPPP that would include measures to reduce erosion and sedimentation during construction. Additionally, implementation of MM TRRP WR-2 from 12EIR-00000-00002, which includes numerous measures that would prevent erosion and protect soil stability (e.g. Erosion and Sediment Control Plan), would result in protection of slopes and the watershed from construction activities, even if construction were to occur during the rainy season.

Earthwork associated with project construction and Landfill operations may result in unstable slopes that may generate landslides. Although there is the potential for the project to result in unstable slopes, mitigation measures will ensure that it does not. Proposed MM TRRP G-1 from 12EIR-00000-00002 would ensure stability of cut slopes because the mitigation measure prohibits ponding on the slopes, diverts storm flows away from the slope faces, prevents concentrated over-slope drainage, and requires on site observation of the slopes during construction by an engineer or an engineering geologist. Further, compliance with the Construction General Storm Water

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|   | <p>Permit and mitigation measures provided in the certified Final SEIR (MM TRRP WR-2 and MM TRRP G-1) would ensure erosion is minimized. Therefore, the proposed project is in conformity with the Land Use Element, Hillside and Watershed Protection Policy 3.</p>   |
| <p><b>Land Use Element, Hillside and Watershed Protection - Policy 4:</b> Sediment basins (including debris basins, desilting basins, or silt traps) shall be installed on the project site in conjunction with the initial grading operations and maintained through the development process to remove sediment from runoff waters. All sediment shall be retained on-site unless removed to an appropriate dumping location.</p>                            | <p><b>Consistent:</b> Two sedimentation basins (north and south basins) currently capture sediment from the Landfill via a network of storm drains. These basins would continue to provide sediment control from the developed landfill area including areas that will be developed with TRRP facilities. In addition, construction-related storm water protection is addressed by mitigation measure MM TRRP WR-2 from 12EIR-00000-00002 which includes numerous water quality protection measures including the use of straw wattles or equivalent measures to trap suspended sediment around work areas containing disturbed soils. Best management practices contained in the SWPPP and ECSP are required to be in place prior to and throughout construction to ensure that sediment is retained on-site or removed to an appropriate dumping location. Therefore, the proposed project is consistent with this policy.</p> |
| <p><b>Land Use Element, Hillside and Watershed Protection - Policy 5:</b> Temporary vegetation, seeding, mulching, or other suitable stabilization method shall be used to protect soils subject to erosion that have been disturbed during grading or development. All cut and fill slopes shall be stabilized as rapidly as possible with planting of native grasses and shrubs, appropriate non-native plants, or with accepted landscaping practices.</p> | <p><b>Consistent:</b> The Revised TRRP involves an incremental increase in vegetation loss of 1.7 acres of ruderal vegetation (0.2 acres of this would be temporary) and 0.1 acres of native mixed scrub.</p> <p>The Revised TRRP requires a new power line between the MRF and the AD Facility, which would result in a less than 0.1 acre increase in earthwork in currently vegetated area as compared to the approved project.</p> <p>The Revised TRRP also involves a 2.9 acre increase in earthwork at the revised AD Facility site, which supports ruderal vegetation. The Revised TRRP would result in a 0.5 acre reduction in earthwork associated with locating the Composting Area Runoff Collection Tank and pipeline and a 3.2 acre reduction in</p>  |

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|  | <p>earthwork at the original MRF/AD Facility site, 2.4 acres of which supports ruderal vegetation.</p> <p>The project would require coverage under the NPDES Construction General Storm Water Permit which requires that a Storm Water Pollution Prevention Plan be prepared and implemented. Additionally, mitigation measure MM TRRP WR-2 from 12EIR-00000-00002 includes a requirement for an Erosion Control Plan that will be implemented until re-graded areas have been stabilized by structures, long-term erosion control measures or permanent vegetation established. As such, the proposed project is in conformity with this policy.</p>   |
| <p><b>Land Use Element, Hillside and Watershed Protection - Policy 6:</b> Provisions shall be made to conduct surface water to storm drains or suitable watercourses to prevent erosion. Drainage devices shall be designed to accommodate increased runoff resulting from modified soil and surface conditions as a result of development. Water runoff shall be retained onsite whenever possible to facilitate groundwater recharge.</p> <p><b>Land Use Element, Hillside and Watershed Protection - Policy 7:</b> Degradation of the water quality of groundwater basins, nearby streams, or wetlands shall not result from development of the site. Pollutants, such as chemicals, fuels, lubricants, raw sewage, and other harmful waste, shall not be discharged into or alongside coastal streams or wetlands either during or after construction.</p> | <p><b>Consistent:</b> The Comprehensive Plan Amendment adjusts the Waste Disposal Facility Overlay to include 4.48 acres that will accommodate the relocated AD Facility (the 4.48 acres is currently used for perimeter access and drainage).</p> <p>The Revised TRRP would include a Composting Area Collection Tank that can hold 436,000 gallons (an increase in capacity of 111,000 gallons from the approved project). The increase in volume is required to address updated seismic standards. The Collection Tank would retain water onsite rather than creating additional runoff, consistent with these policies.</p> <p>In addition, based on HEC-HMS modeling conducted by HDR Engineering for the Revised TRRP, peak run-off generated by a 100-year storm would be slightly less than the approved TRRP, and less than existing conditions. Peak storm flow rates would be less than the approved TRRP.</p> <p>Best management practices contained in the Stormwater Pollution Prevention Plan (SWPPP) and Erosion Control and Sedimentation Plan (ECSP) are required to be</p> |

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|  | <p>in place prior to and throughout construction. As a result, the Revised TRRP will not discharge pollutants into coastal streams or wetlands during or after construction. Therefore, the proposed project is in conformity with these policies.</p>   |
| <p><b>Flood Hazard</b></p>   |  |
| <p><b>Land Use Element, Flood Hazard Area - Policy 1:</b> All development, including construction, excavation, and grading, except flood control projects and non-structural agricultural uses, shall be prohibited in the floodway unless off-setting improvements in accordance with HUD regulations are provided. If the proposed development falls within the floodway fringe, development may be permitted, provided creek setback requirements are met and finished floor elevations are two feet above the projected 100-year flood elevation, and the other requirements regarding materials and utilities as specified in the Flood Plain Management Ordinance are in compliance.</p> <p><b>Land Use Element, Flood Hazard Area - Policy 2:</b> Permitted development shall not cause or contribute to flood hazards or lead to expenditure of public funds for flood control works, i.e., dams, stream channelizations, etc.</p> | <p><b>Consistent:</b> Due to the lack of adjacent development, neither Cañada de la Pila nor Arroyo Quemado are regulated floodplains, and no floodways have been identified by the Federal Emergency Management Agency (FEMA). Drainage from the Resource Recovery Project site would be conveyed to existing storm drain inlets which drain into the existing Cañada de la Pila 48-inch storm drain south of the Landfill.</p> <p>Peak flows from the project would not impact facilities downstream of the Landfill. The existing storm drain system was evaluated in 12EIR-00000-00002 and subsequently in HEC-HMS modeling conducted by HDR Engineering for the Revised TRRP, and would adequately convey peak storm runoff from 100-year events. Consistent with the certified Final SEIR, impervious surfaces and drainage modifications associated with the Revised TRRP would not cause or contribute to flood hazards, and no new flood control works would be required.</p> |
| <p><b>Public Facilities</b></p>  |  |
| <p><b>Land Use Element, Public Facilities Policy 1.a.:</b> The development of public facilities necessary to provide public service is appropriate within the defined Rural and Inner-Rural Areas.</p> <p><b>Land Use Element, Public Facilities Policy 1.b.:</b> When a public agency proposes that a facility be located in a Rural or Inner-Rural Area, especially when it may create any parcel(s) smaller than the minimum parcel size for the Area and the applicable land use designation(s), conformity with the Comprehensive Plan shall be determined in</p>   | <p><b>Consistent:</b> The Revised TRRP would provide for the extension of landfill life by approximately 10 years. The project provides a necessary public service to the community which relies on the Tajiguas Landfill for solid waste disposal. The project would be located at an existing solid waste management facility that has been in continuous operation since 1967. The purpose of the project is to accommodate the relocated AD Facility at the existing Landfill site, which will be accomplished by revising the Waste Disposal Facility Overlay boundary.</p>   |

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| <p>consideration of the following factors:</p> <ul style="list-style-type: none"> <li>i. Whether the public interest and necessity require the project, balancing potential inconsistencies with other elements and policies of the Comprehensive Plan; and</li> <li>ii. Whether the project is planned and located in the manner that will be most compatible with the greatest public good and the least private injury; and</li> <li>iii. Whether the property sought to be acquired is necessary for the project.</li> </ul> <p>Regarding any development of public facilities which meets the preceding three criteria, the acquisition of real property for such public facilities is appropriate within the Rural and Inner-Rural Areas, and the acquisition of such real property shall be deemed to be in conformity with the Comprehensive Plan, regardless of the fact that parcels may result which are smaller than the minimum parcel size for the Area and the applicable land use designation(s).</p> <p><b>Land Use Element, Public Facilities Policy 2:</b> In cases where a specific Community Facility or Overlay Designation is applicable, a site providing regional public services within a Rural or Inner-Rural Area shall be given one of the following Designations: “Institution/Government Facility”; “Public Utility” (e.g., a wastewater treatment plant site); “Cemetery”; “Special Area” (e.g., for recognition and preservation of a historic or archaeological site); or, “Waste Disposal Facility.” Such designation shall be applied to a proposed site through amendment of the pertinent Land Use Element map, either concurrent with or following the acquisition of the site by the public agency and prior to any development pertaining to the facility.</p> <p><b>Land Use Element, Public Facilities Policy 3:</b> Except in case of an emergency which</p> | <p>The proposed project would be located on the existing Landfill in a rural area and would not create any new parcels or significantly affect the parcel size of the underlying lots. The revised AD Facility location would allow for proximity between the AD Facility and Composting Area, would be located on-site at an area that has been previously graded for Landfill activities, and the site is within the Solid Waste Facilities permit boundary.</p> <p>The project is necessary to meet state waste management legislation and requirements and to support greenhouse gas reduction legislation, and is consistent with all applicable policies. The project is in the public interest because it substantially extends the life of the Landfill without having to find a new site for landfill operations. The EIR for the TRRP (12EIR-00000-00002) analyzed the potential for moving the AD Facility and MRF to an urban location; however, an urban location was strongly opposed by the public and the existing Landfill location was determined to provide the most benefits (e.g., similar or lower cost and existing land owned and operated by Santa Barbara County).</p> <p>Properties surrounding the Landfill are zoned and used primarily for agriculture or open space, or were formerly oil and gas producing facilities. The project is planned and located in a manner that will be compatible with the public good since the proposed facilities are located in the central portion of the Landfill and are largely remote from any public area. Existing residential development surrounding the Landfill consists of the Arroyo Quemado community located south of U.S. Highway 101 and the Union Pacific Railroad, south and east of the Landfill. The Hart residence, located south of the Landfill property, was not fully constructed prior to the purchase of the property by the County of Santa Barbara and is not considered existing residential development.</p> |
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| <p>threatens lives or the immediate safety of persons or property, environmental review for projects allowed under these Policies shall be conducted at the earliest feasible time, and should be completed prior to acquisition of any site for a public facility. The site selection process shall include criteria to avoid areas having significant environmental constraints (for example, prime agricultural soils, areas of high aesthetic value such as Scenic Highway Corridors, public service/resource limitations, geologic or hydrologic hazards, important biological resources, cultural resources), unless the public agency determines that the location of the facility or use on a specific site having such constraints is necessary to satisfy the findings required in California Code of Civil Procedure Section 1245.230 (or successor statute), or is necessary for the protection of the public health, safety, or welfare.</p> | <p>The project is necessary in order to accommodate the relocated AD Facility outside of the Coastal Zone. Environmental impacts have been minimized through project design, and through mitigation measures identified as part of the Final SEIR. Therefore as proposed, the project is planned and located in a manner that will be most compatible with the greatest public good. In addition, the proposed property is already under County ownership and is used as a landfill. No additional property needs to be acquired for the project.</p> <p>The Waste Disposal Facility Overlay would be amended to exclude approximately 55.55 acres of dense native vegetation on APN 081-150-026 not needed for solid waste disposal operations. The addition of 4.48 acres to the Overlay encompasses area that is proposed to be developed with the AD Facility. The project does not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.</p> <p>The site selection for the Revised TRRP accommodates facilities that are intended to substantially extend the life of the Tajiguas Landfill, meet or exceed the requirements of Assembly Bill 341 to recycle 75% of waste by 2020, and provide a long-term solution to the region's solid waste management needs. Therefore, the proposed project is consistent with these policies.</p> |
| <p><b>Energy and Climate Action Plan</b></p>  |   |
| <p><b>Renewable Energy Goal:</b> To promote the use of alternative energy for economic and environmental benefits, and facilitate opportunities for businesses that develop or market alternative energy technologies.</p> <p><b>Action Item 5)</b> Encourage the use of anaerobic digesters in agriculture, wastewater treatment,</p>  | <p><b>Consistent:</b> The proposed project includes processing of organic waste separated from the waste stream in an Anaerobic Digestion Facility. Bio-gas produced from the Facility would generate approximately 1 net megawatt of renewable energy. The MRF would recover approximately 90,000 tons/year (290 tons/day) of recyclable material. The TRRP would include diverting over 98% of organics and</p>   |

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| <p>and solid waste management.</p> <p><b>Waste Reduction Goal: To exceed the state’s required diversion rate of 75% by 2020.</b></p> <p><b>Waste Reduction (WR 1) Measure –</b> Continue to support the programs associated with efficient waste collection and recycling, public school education, and composting.</p> <p><b>Action Item 3)</b> Continue to look for opportunities to remove food waste from landfills, such as curbside composting for restaurants.</p> <p><b>Increased Recycling Opportunities (WR 2) Measure –</b> Seek additional opportunities for county residents to recycle cardboard, glass, paper, and plastic products.</p> <p><b>Action Item 2)</b> Implement the Resource Recovery Project’s centralized processing facility for waste, or other mechanism for increasing the diversion rate.</p> <p><b>Landfill Disposal Reductions (WR 4) Measure –</b> Reduce or minimize GHG emissions from waste materials deposited into landfills.</p> <p><b>Action Item 2)</b> Continue to develop programs and facilities, such as the Resource Recovery Project, that target the diversion and recycling of organic waste, which is the primary cause of methane gas production at landfills.</p> | <p>over 90% of recyclables being buried at the Landfill. Currently, the diversion rate for the county (North and South County) is approximately 73%. This project would increase the region’s diversion rate to approximately 80% without any changes to current programs, which exceeds the requirements of Assembly Bill 341 to recycle 75% of waste by 2020. Recycling activities associated with the project are expected to remove greenhouse gas emissions equivalent to annual emissions of approximately 13,270 vehicles per year. Also, the reduction of organic materials at the Landfill would result in a decrease in nearly one million metric tons of carbon dioxide equivalent (CO<sub>2</sub>e) during the first 50 years following project implementation.</p> <p>The LFG Control System reduces emissions from buried waste, such as methane, and minimizes air quality and groundwater quality impacts. A portion of the equipment for the existing LFG Control System would be decommissioned and replacement LFG Control System equipment would be located adjacent to the MRF to avoid additional trips to and from the facility. The replacement engines and flare for the LFG Control System would provide up to 2.8 megawatts of electricity and would be provided with APCD-required control systems to reduce nitrogen emissions.</p> <p>To date, the proposed Revised TRRP provides the single greatest amount of greenhouse gas emission reductions than any other single project included in any of the South Coast jurisdictions’ Climate Action Plans.</p> <p>The Revised TRRP would remain in conformity with energy and climate goals and action items.</p> |
| <p><b>Gaviota Coast Plan Policy TEI-11: Renewable Energy Resource Priority.</b> Utilize local renewable energy resources and</p>  | <p><b>Consistent:</b> Under the approved TRRP, a combination of energy generated from combustion of bio-gas in the AD Facility, roof-</p>   |

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| <p>shift imported energy to renewable resources where technically and financially feasible at a scale that is consistent with the sensitivity of coastal resources. Encourage opportunities for development of renewable energy resources where impacts to people, natural resources and views can be avoided or minimized. Support appropriate renewable energy technologies, including solar and wind conversion, wave and tidal energy, and biogas production through thoughtfully streamlined planning and processing, rules and other incentives. New development should be encouraged to use small scale renewable energy facilities to offset energy requirements.</p> | <p>mounted solar panels and the regional power grid was proposed to power the MRF. The energy sources would remain the same with the Revised TRRP. The Revised TRRP would also include a new power line that would connect the two facilities so a portion of the AD Facility-generated power not delivered to the grid may reduce the MRF’s reliance on the grid during peak periods, and serve as a backup energy source if grid power is interrupted.</p> <p>The development of the MRF and AD Facility provides the South Coast and Santa Ynez Valley region with the necessary processing infrastructure to maximize the recovery of usable resources as well as reduce greenhouse gas emissions associated with solid waste management. Therefore, the proposed project is consistent with this policy.</p> |
| <p><b>Transportation</b></p>  |   |
| <p><b>Gaviota Coast Plan Policy TEI-7: U.S. Highway 101 Operational Conflicts.</b><br/>                 Proposed new or expanded public or private uses, commercial uses and visitor-serving uses may be required to submit an analysis that evaluates the anticipated operational conflicts impacts to U.S. Highway 101 operations and makes recommendations on how conflicts can be overcome or mitigated.</p>  | <p><b>Consistent:</b> Design changes associated with the Revised TRRP would reduce the number of parking spaces from 72 to 62. However, a reduction in Landfill staff as well as the implementation of a van pool program was analyzed in the SEIR and parking would remain adequate. The parking changes would not create operation conflicts to U.S. Highway 101 operations.</p> <p>Traffic generation and potential traffic impacts would be the same for the Revised TRRP as the approved TRRP. The certified Final SEIR analyzed TRRP impacts to U.S. Highway 101 operations and did not identify any significant impacts.</p>   |
| <p><b>Infrastructure</b></p>  |   |
| <p><b>Gaviota Coast Plan Policy TEI-16: Tajiguas Landfill.</b> Any changes to operations at the Tajiguas Landfill necessary for the management of our communities’ solid waste should strive to reduce environmental impacts to the Gaviota Coast Plan Area. To reduce impacts, waste delivered to the Tajiguas Landfill should be consolidated and the landfill</p>  | <p><b>Consistent:</b> The Revised TRRP has been designed to minimize environmental impacts through siting facilities within previously disturbed areas at the Landfill property, as well as siting facilities to minimize visual impacts and to prevent significant unavoidable impacts beyond those associated with continued use of the Landfill. Under the Revised TRRP, the</p>   |



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| <p>should only accept waste generated from communities within Santa Barbara County. The County should pursue additional resource recovery projects/programs prior to, or concurrent with, any plan to expand municipal solid waste disposal through landfilling.</p> | <p>Landfill would continue to receive consolidated waste from existing transfer stations in Santa Barbara County. The Revised TRRP provides the flexibility to augment and adapt resource recovery processes at the Landfill, and does not include expansion of the Landfill operational area or its capacity. Therefore, the proposed project is consistent with this policy.</p> |
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