To: **Decision-Makers**

From: Joddi Leipner, Senior Engineering Environmental Planner
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Resource Recovery and Waste Management Division (RRWMD)

Prepared with the assistance of Padre Associates, Inc.

DATE: August 15, 2023

RE: **CEQA 15164 Determination for Proposed Post-Fire and Odor Management Engineering Design/Project Description Changes (PD Change No. 5)**: Finding that Section 15164 of the State CEQA Guidelines applies to minor changes to the ReSource Center at the Tajiguas Landfill. CEQA Guidelines Section 15164 allows an Addendum to be prepared when only minor technical changes or changes that do not create new significant impacts would result. The Final Subsequent EIR (SEIR)(12EIR-00000-00002, SCH #2012041068) and the SEIR Revision Letter and Errata dated May 27, 2016 and SEIR Addendum dated August 11, 2017 (revised October 26, 2017), 15162 determinations dated January 15, 2020, May 18, 2020, and August 2, 2021 are hereby amended by this Addendum.

Location: The project is located at the Tajiguas Landfill on Assessor's Parcel Numbers (APN) 081-150-042, 081-150-019 and 081-150-026, located approximately 26 miles west of the City of Santa Barbara, along the Gaviota coast, Third Supervisorial District.

Background

A Final Subsequent EIR (SEIR)(12EIR-00000-00002, SCH #2012041068) and SEIR Revision Letter and Errata dated May 27, 2016 were certified by the Board of Supervisors for the Tajiguas Resource Recovery Project (currently named the ReSource Center) on July 12, 2016 and SEIR Addendum dated August 11, 2017 (revised October 26, 2017) was considered by the Board of Supervisors for the TRRP on November 14, 2017. The ReSource Center as revised by PD Change No. 5 (and previously approved PD changes) will be referred to as the "revised project" for the purposes of this CEQA 15162 Determination.

Four CEQA 15162 determinations have been prepared since the Final Subsequent EIR and Addendum were completed for project description changes including:

1. The change in the provision of natural gas to the ReSource Center (Project Description [PD] Change No. 1, pending implementation as a part of a separate project under review by Santa Barbara County Planning and Development Department).

2. The change in the location of the RRWMD maintenance shop, the construction of a new maintenance shop to service the ReSource Center Materials Recovery Facility (MRF) and the change in ground water supplies (increased extraction from Well No. 5 and new Wells No. 7 and No. 8) to serve the ReSource Center and the Tajiguas Landfill (PD Change No. 2, approved).

3. Engineering design changes to the MRF, Anaerobic Digestor Facility (ADF) and Compost Management Unit (CMU) that were made during final design and construction (PD Change No. 3, approved).

4. Changes in the MRF operating hours to include two operations shifts occurring between 5 a.m. to 9 p.m., with a maintenance shift between 9 p.m. and 5 am (PD Change No. 4, approved).

The potential environmental impacts of constructing and operating the ReSource Center were evaluated in the SEIR, a mitigation measure monitoring and reporting plan was adopted, and findings were made pursuant to CEQA Guidelines Sections 15091 and 15093. Primary facilities developed as a part of the ReSource Center are a MRF, ADF and CMU. The ReSource Center was constructed between 2018 – 2021 and commenced operations in 2021.

The Alisal Fire of October 11 – 17, 2021 impacted the Tajiguas Landfill and the ReSource Center, igniting the MRF biofilter woodchip media, causing heavy damage to the biofilter structures, air ducting, baghouse filters, support systems, scrubbers, sulfuric acid tanks (2) and ancillary systems (see photograph of the baghouse filter site taken October 19, 2021). These systems were installed as a part of the original project description to treat odors, particulate matter (PM) and Reactive Organic Compounds (ROC) generated within the MRF building by municipal solid waste sorting, handling and storage.

Following the Alisal Fire, MSB Investors, LLC (MSB, ReSource Center project vendor) applied for and obtained an Interim Variance (APCD, 2021-12-R Variance) from the Santa Barbara County Air Pollution Control District (APCD) allowing MRF operations to resume in late October 2021, without the biofilter system, baghouse filters, and scrubbers and subject to weekly monitoring of air quality (ammonia [NH_3], hydrogen sulfide [H_2S] and PM) in the MRF building at multiple locations at the Tip Floor and MRF Recycling Area. Based on the weekly monitoring, NH_3 and H_2S concentrations within each area of the MRF has been below the allowable permit limits, without the biofilter system. Therefore, MSB is requesting a revision to the ReSource Center project description and to its applicable regulatory permits to permanently remove this control system. In addition, following the Alisal Fire, the County Fire Department requested that MSB consider an alternative design and/or technology that does not utilize highly flammable woodchip media as a replacement to the previously permitted MRF biofilter.

On December 1, 2021, APCD granted a Regular Variance authorizing the continued operation of the MRF without the use of the Tip Floor and MRF Recycling Area baghouses, scrubbers, and biofilters, subject to regular monitoring of NH_3, H_2S and PM concentrations within the MRF, MRF indoor exhaust fans operating at the maximum rating, and expeditious processing of the municipal solid waste and immediate transport of the organics recovered to the ADF. The Regular Variance was valid until October 14, 2022 or such time that the biofilter system replacement is analyzed and the replacement system is permitted and installed, whichever first occurs. An extension of the Variance was approved to accommodate the completion of the quality impact analysis and the CEQA analysis, and a request for Board of Supervisors approval of a contract amendment incorporating the requested project description changes described herein (Project Description Change No. 5), including the associated financial costs for the MRF biofilter replacement and equipment damaged by the Alisal Fire.

The proposed MRF air quality treatment system to replace the biofilters and other changes to the ReSource Center to improve and support permitted operations are described below.

Proposed Changes to the Approved Project Description

Demolish the Remaining Components of the Alisal Fire Impacted MRF Biofilters and Replace with Direct Venting of CMAXX Baghouse Filters to Two (2) New 50-Foot-Tall Vent Stacks and Construct New Fenced Recyclable Storage Area. Installation of a MRF biofilter system was a part of the original ReSource Center project description to treat odors and reduce PM emissions along with a misting system within the MRF building (12EIR-00000-00002, Sections 3.5.1.1. and 3.5.9.3). As noted above the biofilter system was significantly damaged by the Alisal Fire and will not be replaced. The CMAXX baghouse PM filter and exhaust system will be replaced including new vent stacks.

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AECOM, the ReSource Center project air quality consultant, has re-evaluated the projected air quality emissions from the baghouses without the biofilters (refer to the Revised Air Quality Technical Memorandum for the ATC 14500 10 Application, Tajiguas ReSource Center, June 2023). The NH_3, H_2S and PM monitoring and air dispersion modeling shows that ambient air concentrations will remain within permit limits once the building air is again exhausted through the MRF baghouses. The baghouse filter support structures, which were damaged by the Alisal Fire, will be repaired and the two baghouses will exhaust the building air through two new separate vent stacks proposed to be constructed on the east side of the MRF in two locations adjacent to the biofilter site (see Exhibit 1 [keynote 21] and Exhibits 2 and 3).

The proposed vent stacks will disperse the MRF building air collected and treated by the baghouse filters. Both stacks will be approximately 50-feet in height above existing grade. One new 54-inch diameter stack will be erected at the north end of the existing biofilter area. One new 66-inch diameter stack will be erected at the south end of the biofilter area. The two proposed vent stacks are required to be 50-feet in height to allow them to be higher than the adjacent buildings in order to provide the air dispersion necessary to meet air quality standards. In addition, because the MRF building air will not need to be brought to ground level for treatment in the biofilters, the stacks minimize energy use required for the system. The existing exhaust conduits exit the MRF building at a height of 36 feet. Without the biofilters, there is no longer a need to bring the exhaust down to ground level for treatment and dispersal. The air exhausted from the MRF building is the highest temperature air from within the MRF building, near the ceiling level. Less energy is consumed by the fans if the air within the MRF is discharged above the point where the exhaust conduit leaves the building.

New duct work and fans will be installed connecting the two baghouses to their respective vent stacks. The footings for the two vent stacks will be located above the waste footprint constructed on the existing asphalt and concrete pad for the MRF. Pursuant to recommendations provided by consulting geotechnical engineers (Earth Systems, 2022), the footings will not be constructed near any slope that would warrant a slope stability analysis to be performed. The vent stack footings will be supported on a minimum of 3-feet of compacted engineered fill to ensure all seismic and structural requirements are met.

The existing biofilter structural concrete perimeter, partition walls, and steel support structure will be demolished, and the scrubber concrete pads will be removed. The existing acid tank concrete pads and containment system will be removed. The existing asphalt and concrete paving in the proposed location of the new stacks will be sawcut and removed in order to construct the proposed stacks. All demolition material will be disposed of off-site. The former biofilter area is proposed to be used for storing excess recyclable recovery bales and large wood recovered during the recycling process. Any storage of material would be required to be in compliance with the facility's industrial storm water permit. The storage area would be fenced with an 8-foot-tall chain link fence, including slats, to provide visual screening and security of the recyclables (see Exhibits 1 and 3).

The existing baghouse filter fans, motors, and controls will be removed and disposed, and the existing baghouse filter assemblies and any metal ductwork damaged by the fire will be taken apart and reassembled with new components. The original potable water piping system and supply to the emergency shower/eyewash, also damaged by the Alisal Fire, will be replaced and a new shower/eyewash will be installed. The existing modular control room structure at the southeast corner of the biofilter area, also damaged by the fire, will be repaired, including removal and replacement of the heat damaged roof and wall panels. Existing monitoring systems and damaged cabling, fiber, and tubing will also be removed and replaced.

Fire-related damage to a sulfuric acid tank that served the biofilter scrubbers resulted in a spill that was cleaned up in compliance with regulatory requirements. However, some sulfuric acid impacted water may have entered electrical conduits. Any impacted water removed during demolition activities will be placed in containers and properly disposed of pursuant to applicable waste disposal requirements. The estimated volume of impacted water to be removed is approximately 400 gallons based on two 3-inch conduits with an approximate length of 550 linear feet each. All new electrical wiring and conduits for controls, baghouse filter units and associated systems will be installed. The existing damaged lift station control panel located at the southwest biofilter wall will be removed and replaced with a new panel and wiring. Areas of damaged fencing and concrete paving will be properly prepared, patched and replaced. Several drains/piping/overflows that were required with the permitted project would not be needed with the proposed alternate emission control system and are proposed to be removed and capped below grade.

Demolition of the existing biofilter system is expected to generate approximately 300 cubic yards of debris. All demolition debris will be disposed or recycled off-site. This includes approximately 4,000 pounds of recyclable metal from the ductwork and support infrastructure to be removed. The existing baghouse blowers and motors will also be removed and recycled.

Demolition and construction activities will be supported by a temporary field office (small portable trailer) and storage container to be located in the MRF parking lot near the location of the biofilter. Demolition and construction activities are anticipated to take approximately four months to complete, not including mobilization, demobilization, or potential equipment procurement delays.

New Compost Irrigation and Dust Control Misting System. The ReSource Center CMU went into operation on September 27, 2021. As the autumn winds increased and ambient humidity decreased, it became apparent that supplemental water (in addition to that provided by stored stormwater) was required for the optimization of the compost process during the dryer months. Optimizing CMU operations means maintaining optimum moisture content in the compost for efficient aerobic digestion. As the compost approaches maturity, biologic activity slows down and moisture can be reduced to facilitate efficient (non-clumping) screening and export of drier compost.

The proposed compost irrigation system, which includes a new sprinkler system, is capable of providing up to 40 gallons/minute (gpm) to any location within the compost curing area (see Exhibit 4) at the CMU. The new compost irrigation system will have a control panel which is capable of setting customized flow durations for each sprinkler head so that the operator can apply more water to a particular windrow, as needed (see Exhibits 5 and 6). The existing windrow turner will turn each pile after the sprinkler for that row has stopped. A new 15,500-gallon water storage tank and electric booster pump is required for the new sprinkler system. No new water treatment facilities are required for the new sprinkler system.

In addition to the new compost irrigation system, a new dust control misting system is proposed to control dust generated during use of the permitted densimetric table at the finished compost bunker. This system will include a new electric water pump and 528 gallon pressure tank to be located near the existing stormwater storage tank (see Exhibit 7).

The water demand estimates provided for the proposed new irrigation and dust control systems are based on year-long average conditions. Ambient humidity and seasonal temperature variations are the primary factors in determining water demand. It should be noted that the CMU operations (compost screening and windrow turning) are curtailed when wind speeds exceed 15 mph; below this wind speed, the wind is not expected to appreciably affect dust control efficiency or water use. Water use/demand estimates for the proposed compost irrigation system and the dust control misting systems are included in projected water use provided in Table 1. When the Gore Membrane Cover System becomes operational (see description below), operation of the compost irrigation and dust control system would be terminated but would be used as a fire suppression and prevention system should a wildfire occur near or at the Landfill property, or if a compost fire occurs.

Gore Membrane Cover System. The proposed changes also include installation of a Gore Membrane Cover System at the CMU at the Tajiguas Landfill as an odor control best management practice. The Gore Membrane Cover System was selected after completion of a pilot test program that showed that the system provided a 97.5% reduction in odor compared to a non-covered windrow. This system is a cover and aeration system for the windrows at the CMU that will help reduce compost odor and more effectively compost digestate from the ADF (see Exhibit 11). The Gore Membrane Cover System includes a semi-permeable cover over each compost windrow at the CMU, which allows some moisture and gases to escape while trapping most volatile compounds such as ammonia to reduce odor. There will be 20 of these covers, one for each windrow at the CMU and two additional covers without an aeration system for the screened compost pile and the finished compost pile. A blower-driven aeration system (20, 3-HP blowers) will be used to inject ambient air under the cover of each windrow, to maintain oxygen levels and desired temperature during the aerobic composting and curing process. This system will limit the potential for the compost windrows to become anaerobic which produces odors and will provide compost temperatures necessary to kill pathogens. Implementation of the Gore Membrane Cover System includes:

- Set up aeration piping.
- Cover the piping with oversize material from the onsite ½" screen as a bulking agent to assist in aeration.
- Build the windrow with digestate from ADF.
- Deploy the cover using an electric cover winder.
- Seal the cover edges using weighted pipes.
- Connect the mobile blower unit, and oxygen and temperature monitors to each windrow.
- Monitor oxygen and temperature.
- Uncover the windrows using the electric cover winder after 28-38 days.

New Diesel-Powered CMU Organics Screen[1] and Increase in Composting Screening Hours (7 AM to 5 PM). The ADF went into operation on September 27, 2021. As operations were optimized, it became apparent that additional screening was required to remove plastics from the organic residue produced by the MRF. Additional screening will enable the ADF to process a much greater proportion of the organic residue. It will also increase methane production at the ADF, reduce compost volume at the CMU, and ultimately reduce the volume of residue sent to the Landfill. To achieve additional screening at the ADF, one of the two previously approved Doppstadt electric-powered screens from the CMU has been relocated to the ADF delivery hall to process the incoming organic fraction of mixed solid waste (provided by the MRF) to remove large plastic (greater than 3-inches) prior to the screened organics being loaded into the ADF digesters (see Exhibit 8).

The purpose of the installation of the diesel-powered compost screen and the change in screening hours is to reduce odor generation from the composting piles, or windrows, at the ADF by facilitating material movement and digestate processing. Screening promotes proper management of an aerobic environment in the compost windows. In addition, screening removes contaminants, such as plastics and glass that can impede the anaerobic digestion process. Therefore, the addition of the screen itself is unlikely to cause an odor nuisance issue and should help alleviate current odor issues occurring at the facility by improving feedstock management and movement. The peak day screening hours are proposed to be increased from 7 a.m. to 3:30 p.m. to 7 a.m. to 5 p.m. to allow a larger volume of compost to be screened, to make up for windy periods when screening is terminated to reduce the potential to generate wind-blown litter.

[1] Although included in this determination for cumulative impact assessment purposes, RRWMD determined that the diesel-powered screen did not require additional CEQA review as a measure required to address odors as documented in the Agreement between the County of Santa Barbara and MSB Investors, LLC (for Development and Operation of the Tajiguas Resource Recovery Project) and the Odor Impact Minimization Plan (OIMP) in the Joint Technical Document for the Anaerobic Digestion Facility and Composting Management Unit. ("Signed Interim Approval Process Agreement, Authority to Construct Application 15993, Facility ID 11480 Tajiguas Landfill ReSource Center" RRWMD, October 20, 2022). A Final Authority to Construct (ATC 15993) for the diesel-powered screen was issued by the APCD (APCD, April 12, 2023).

A new diesel-powered screen is proposed at the CMU to replace the relocated electric-powered screen. The new diesel-powered screen will be fueled by a diesel fuel supply truck that will periodically visit the CMU. The new diesel-powered screen at the CMU will include a 5/8-inch to 1-inch screen that will reduce the amount of plastics in the compost. The screening along with increased litter control effort by MSB are expected to help reduce plastics escaping as litter through the CMU perimeter fence and help address odors associated with materials management.

CMU and ADF Odor Misting System. An odor misting system was installed along the southern CMU perimeter fence[2]. This system is proposed to be upgraded and expanded to provide misting sprays along the entire perimeter of the compost curing area and digestate bunker at the CMU, along the digestate conveyor between the CMU and ADF, and above the ADF entrance door (see Exhibit 9). This odor misting system will help reduce odors from the composting process which, especially during startup of the ADF and CMU have been greater than anticipated. The proposed new misting system consists of a reservoir (a 55-gallon tank which is used to store the concentrated odor suppressing fluid prior to mixing with potable water while being pumped into the misting distribution system), a 5-hp electric pump, which receives power from the ADF building, a water distribution line, and mister heads. The misting system can be operated automatically or turned on/off by hand, and the zones can operate independently. The operator determines which zones to operate based on prevailing winds and site activities.

The water source for the new odor misting system is the ADF domestic water system hose bib located at the midpoint of the west wall of the ADF. Water demand estimates for the proposed odor misting system are included in projected water use provided in Table 1.

Modified Project Water Demand. The proposed project changes (Project Description Change No. 5) result in new water demand as a result of the proposed CMU irrigation system, new dust control misting system, and expanded odor control misting system. While water demand for the proposed compost irrigation, dust control, and odor control represents an increase in water demand, it will be offset by elimination of the MRF biofilters and scrubbers and associated water use. Table 1 shows that the overall projected water demand for proposed Project Description Change No. 5 is approximately 26 percent lower than the permitted use, as amended and approved under PD Change No. 2.

Since July 18, 2022, the ReSource Center Supervisory Control and Data Acquisition (SCADA) system has been reporting the geodetic groundwater elevations in all three Tajiguas wells (nos. 5, 6 and 7) on a continuous basis. This will enable MSB and the County to monitor the water table

[2] Although included in this determination for cumulative impact assessment purposes, installation of the misting system was approved by APCD pursuant to Authority to Construct 14500-09. APCD determined that the project was exempt from pursuant to Environmental Review Guidelines for the Santa Barbara County APCD (revised April 30, 2015). Appendix A (*APCD Projects Exempt from CEQA* and *Equipment or Operations Exempt from CEQA*) which provides an exemption specifically for projects to install air pollution control or abatement equipment.

in real-time to ensure that estimated safe yields are not exceeded and provide data to eventually be used to provide improved estimates of safe yield.

New Back-Up Diesel-Fueled Electrical Generator. A new stand-by, 350-kilowatt back-up generator with an integrated 710-gallon diesel fuel tank is proposed to be located adjacent to the MRF building on a trailer. The back-up electrical generator will be fueled by a fuel truck delivering fuel when needed. The existing, permitted standby 250-kilowatt back-up generator at the MRF does not provide sufficient power to restart the blower fans that send landfill gas from the collection system to the MRF engines. The landfill gas blower fans shut down when grid power is lost. If grid power will be unavailable for an extended period, the new back-up electrical generator will be moved over to the west side of the MRF building where it will be used for approximately 15 minutes to restart the fans and the flow of landfill gas to the MRF engines. Once the MRF engines are back online, they will provide power to the landfill gas blowers and the new back-up electrical generator will be shutdown.

Table 1. Comparison of Approved and Projected ReSource Center Water Use

ReSource Center Demand	Projected Water Use (acre-feet/year)	Source
MRF domestic use (includes misting system)	0.92	Well no. 7
ADF domestic use	0.02	Well no. 7
ADF biofilter	1.00	Well no. 7
ADF percolate supplement	5.89	Well no. 7
CMU compost conditioning	3.79	Well no. 6
CMU dust control (in excess of stored stormwater and including new dust control misting system)	0.18	Well no. 6
CMU odor control (including new odor misting system)	0.92	Well no. 6
Total	**12.72**	
Approved Water Use*	17.2	

*Approved water use from January 15, 2020 15162 CEQA Determination for PD Changes No. 2

Source: John Kular Consulting, April 3, 2023

Impact Analysis

The following resource/issue areas and impacts identified in the SEIR and Addendum were reviewed to determine if any changes to impacts or impact levels would result from the proposed PD Change No. 5.

1. Visual Resources/Aesthetics

Public Views (SEIR and Addendum - Impact TRRP VIS-1: Class III).

View 2: Landfill Access Road Entrance. None of the new facilities associated with PD Change No. 5 would be visible from View 2, due to intervening topography and waste fill slopes. The proposed Gore membrane covers over the compost piles at the CMU would be a green-brown color and not be visible from the Landfill access road entrance. Therefore, implementation of proposed PD Change No. 5 would not result in a change in ReSource Center aesthetics impacts at View 2.

View 7: Baron Ranch Trail. None of the new facilities associated with PD Change No. 5 would be visible from View 7 on the upper portion of this trail, or from the lower portion of this trail due to intervening topography. Therefore, implementation of proposed PD Change No. 5 would not result in a change in ReSource Center aesthetics impacts at View 7 and the lower trail.

View 8: Upper Outlaw Trail. None of the new facilities associated with PD Change No. 5 would be visible from View 8, due to intervening topography. Therefore, implementation of proposed PD Change No. 5 would not result in a change in ReSource Center aesthetics impacts at View 8.

Overall, Impact TRRP VIS-1 would remain less than significant (Class III).

View from U.S. Highway 101 (SEIR and Addendum – Impact TRRP VIS-2: Class II).

As shown in Exhibit 10, one of the two proposed vent stacks (MRF Recycling Area stack) would be visible from View 6, but would be a very small modification of the existing view of the MRF. No other facilities associated with PD Change No. 5 would be visible. The proposed Gore membrane covers over the compost piles at the CMU would be a green-brown color and not be visible from the U.S. Highway 101. Facilities proposed under PD Change No. 5 would not substantially change the visual impact as compared to the Revised TRRP addressed in the SEIR Addendum. Impact TRRP VIS-2 would remain significant but mitigable (Class II).

The following mitigation measures from the SEIR would continue to apply to the revised project:

MM TRRP VIS-1a: Building Exterior Color.

MM TRRP VIS-1b: Landscape Screening.

2. Air Quality/Greenhouse Gas Emissions

The Air Quality Technical Memorandum was updated in June 2023 to document emissions calculations and air dispersion modeling conducted for the ReSource Center as revised by the proposed PD Change No. 5 and to address other minor changes generated by further engineering design development and review by the Santa Barbara County Air Pollution Control District (SBCAPCD). Project changes addressed in the June 2023 Technical Memo include:

- Removal of the biofilter and scrubber systems previously serving the MRF Tipping Area and MRF Recycling Areas.
- Revised baghouse throughput for the MRF Tipping Area and MRF Recycling Areas.
- New MRF flare toxic emission factors based on the source test conducted in July 2021.
- New ADF flare toxic emission factors based on the source test conducted in March-April 2022.
- Proposed additional MRF diesel-powered back-up electrical generator.
- Mobile equipment changes at the MRF building and composting area.
- Proposed addition of a diesel-powered screen at the composting area.
- Increase in compost screening hours of operation to ten hours per day (7 a.m. to 5 p.m.) and an increase in peak day compost screening throughput to 650 tons (associated with longer compost screening hours).
- Change to the emission factor used for compost screening.
- Change in the supplemental fuel for the ADF flare from 100 percent propane to 50 percent propane and 50 percent landfill gas.

The Gore Membrane Cover System was not included in the Air Quality Technical Memorandum. Because the system will be operated with electric motors for the aeration system and for the portable winding machine, no additional criteria pollutant emissions would occur.

Operational Air Pollutant Emissions (SEIR and Addendum - Impact TRRP AQ-2: Class III).

Table 2 provides a comparison of total operational emissions of the Current ReSource Center (as revised by previously approved PD Change No. 4) with and without the proposed PD Change No. 5. Overall, air pollutant emissions would increase. However, emissions would remain below threshold levels and ReSource Center air pollutant emissions with the proposed PD Change No. 5 would remain less than significant (Class III).

Motor vehicle-related operational emissions with the proposed PD Change No. 5 would be the same as for the Current ReSource Center (as revised by previously approved project description changes) and remain less than significant (Class III).

Table 2. Summary of Operational Air Pollutant Emissions

Source		Maximum Daily Emissions (pounds/day)							
		ROC		NO_X		CO	SO_x	PM_{10}	$PM_{2.5}$
		All Equipment	Motor Vehicles Only	All Equipment	Motor Vehicles Only				
Baseline (Current Air Permit Mod. 5)	Permitted Equipment	57.35	--	169.86	--	304.07	33.77	70.13	70.13
	Exempt Equipment	3.51	0.06	13.85	0.14	71.95	0.41	2.13	0.54
	Offsite Vehicles	5.73	5.73	4.98	4.98	30.71	0.09	5.45	1.62
	Total	**66.59**	**5.79**	**188.69**	**5.12**	**406.73**	**34.27**	**77.71**	**72.29**
Proposed Project (Revised Air Permit Mod. 10)	Permitted Equipment	57.92	--	171.08	--	318.42	33.79	110.33	110.33
	Exempt Equipment	2.34	0.06	11.35	0.14	51.94	0.28	2.17	0.58
	Offsite Vehicles	5.73	5.73	4.98	4.98	30.71	0.09	2.28	0.84
	Total	**65.99**	**5.79**	**187.41**	**5.12**	**401.07**	**34.16**	**114.78**	**111.75**
Difference in Total Emissions (Proposed Project - Baseline)		***-0.60***	***0.00***	***-1.28***	***0.00***	***-5.66***	***-0.11***	***37.07***	***39.46***
Total Emissions CEQA Threshold [1]		240	25	240	25	--	--	80	--
Significant Impact		No	No	No	No	No	No	No	No

[1] Thresholds are from the *County's Environmental Thresholds and Guidelines Manual* (revised January 2021), taken from the SBCAPCD's 2022 update to *Scope and Content of Air Quality Sections in Environmental Documents*.

Normal Operations-Exceedances of Air Quality Standards (SEIR and Addendum - Impact TRRP AQ-3: Class III, Impact TRRP AQ-11: Class I).

Table 3 provides a comparison of the results of air dispersion modeling (comparison to the National Ambient Air Quality Standards [NAAQS]) conducted for the Current ReSource Center Project (as revised by previously approved project description changes) with and without the incorporation of proposed PD Change No. 5. Modeled ambient concentrations of air pollutants associated with the Current ReSource Center with proposed PD Change No. 5 would remain less than significant (no NAAQS would be exceeded).

The analysis of the Revised ReSource Center documented in the SEIR Addendum identified an exceedance of the PM_{10} 24-hour California Ambient Air Quality Standard (CAAQS) because the background concentration alone was the same as the CAAQS. Therefore, any project contribution would exceed the PM_{10} 24-hour CAAQS. This impact was determined to be less than significant because the project contribution would be less than 10 percent of the CAAQS. However, exceedances of the PM_{10} 24-hour CAAQS associated with the ReSource Center-related extension of Landfill life (Impact TRRP AQ-11) was found to be significant and unavoidable (Class I). Table 4 provides a comparison of results of air dispersion modeling (comparison to the CAAQS) conducted for the Current ReSource Center (as revised by previously approved project description changes) with and without the incorporation of proposed PD Change No. 5. Due to an increased PM_{10} 24-hour background concentration (associated with updated ambient air quality monitoring data) the modeled ambient concentration associated with proposed PD Change No. 5 would not increase but continue to exceed the CAAQS.

Similar to the Current ReSource Center, this impact was determined to be less than significant because the project contribution would be less than 10 percent of the CAAQS. However, exceedances of the PM_{10} 24-hour CAAQS associated with the ReSource Center-related extension of Landfill life (Impact TRRP AQ-11) was found to be significant and unavoidable (Class I).

Maintenance Scenarios-Exceedances of Air Quality Standards (SEIR and Addendum - Impact TRRP AQ-4: Class III).

Table 5 identifies six maintenance scenarios that may result in greater short-term emissions (and possibly greater ambient air pollutant concentrations) than during normal operations. These scenarios were modified as part of the assessment of approved PD Change No. 3 and cannot be directly compared to scenarios assessed in the SEIR Addendum prepared for the Revised ReSource Center. Table 6 provides the results of air dispersion modeling (percentage of the NAAQS) for these six maintenance scenarios. Note that the NAAQS would not be exceeded during any of the six maintenance scenarios.

Table 7 provides the results of air dispersion modeling (percentage of the CAAQS) for these six maintenance scenarios. Similar to the modeling results for normal operations (see Table 4), the

PM_{10} 24-hour CAAQS would be exceeded during short-term maintenance scenarios due to the ambient background concentration exceeding the CAAQS. However, the ReSource Center contribution with proposed PD Change No. 5 would be less than 10 percent of the CAAQS. Excluding PM_{10} 24-hour (discussed above) the NAAQS and CAAQS would not be exceeded, and Impact TRRP AQ-4 would remain less than significant (Class III).

Table 3. Normal Operations: Air Dispersion Modeling Results – NAAQS (µg/m3)

Pollutant	Averaging Period	Current ReSource Center					Current ReSource Center with PD Change No. 5				
		Project Contribution	Ambient Background	Total Concentration	Percent of NAAQS	Exceed the NAAQS?	Project Contribution	Ambient Background	Total Concentration	Percent of NAAQS	Exceed the NAAQS?
SO_2	1-hour[2]	5.3	4.4	9.7	4.9	**No**	5.3	4.4	9.7	4.9	**No**
	24-hour	1.3	1.8	3.1	0.9	**No**	1.3	1.8	3.1	0.9	**No**
	Annual	0.36	0.5	0.9	1.1	**No**	0.35	0.5	0.8	1.1	**No**
CO	1-hour	758.6	1954.0	2712.6	6.8	**No**	367.3	1954.0	2321.3	5.8	**No**
	8-hour	152.7	1494.3	1647.0	16.5	**No**	116.4	1494.3	1610.7	16.1	**No**
NO_2[1]	1-hour[3]	71.8	15.0	86.8	46.2	**No**	59.6	15.0	74.6	39.7	**No**
	Annual	1.6	3.3	4.8	4.8	**No**	1.4	3.3	4.6	4.6	**No**
PM_{10}	24-hour	3.7	68.0	71.7	47.8	**No**	4.4	68.0	72.4	48.3	**No**
$PM_{2.5}$	24-hour[3]	2.4	14.9	17.3	49.4	**No**	2.5	14.9	17.4	49.8	**No**
	Annual	0.9	7.9	8.8	73.6	**No**	1.0	7.9	8.9	74.1	**No**

[1] 1-hour NO_2 impacts modeled with ARM2 Tier 2 NO_x/NO_2 conversion.

[2] 99th percentile averaged over five years. Proper form of standard is 3-year average of the 99th percentile of the daily maxima.

[3] 98th percentile averaged over five years. Proper form of standard is 3-year average of the 98th percentile of the daily maxima.

Table 4. Normal Operations: Air Dispersion Modeling Results – CAAQS (µg/m3)

Pollutant	Averaging Period	Current ReSource Center					Current ReSource Center with PD Change No. 5				
		Project Contribution	Ambient Background	Total Concentration	Percent of CAAQS	Exceed the CAAQS?	Project Contribution	Ambient Background	Total Concentration	Percent of CAAQS	Exceed the CAAQS?
SO_2	1-hour	12.2	5.2	17.4	2.7	**No**	12.2	5.2	17.4	2.7	**No**
	24-hour	1.4	1.8	3.2	3.0	**No**	1.4	1.8	3.2	3.0	**No**
CO	1-hour	1119.0	1954.0	3073.0	13.4	**No**	417.5	1954.0	2371.5	10.3	**No**
	8-hour	161.7	1494.3	1656.0	16.6	**No**	170.4	1494.3	1664.7	16.6	**No**
NO_2	1-hour	134.0	28.2	162.2	47.8	**No**	115.6	28.2	143.8	42.4	**No**
	Annual	1.6	3.3	4.8	8.5	**No**	1.4	3.3	4.6	8.1	**No**
PM_{10}	24-hour	4.7	68.0	72.7	145.4	**Yes***	4.7	68.0	72.7	145.4	**Yes***
	Annual	1.0	17.0	18.0	89.8	**No**	1.04	17.0	18.0	90.2	**No**
$PM_{2.5}$	Annual	0.9	7.9	8.8	73.6	**No**	1.0	7.9	8.9	74.1	**No**

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

*The ambient background is greater than the 24-hour CAAQS (50.0 ug/m3). Because the project contribution would not exceed 10% of the CAAQS and a significant PM_{10} impact was identified for the Tajiguas Landfill, the contribution would be considered less than significant (see discussion under **Impact TRRP AQ-3**).

Table 5: Definitions of Maintenance Scenarios

Scenario	Description
AD1	ADF flare in operation with one of the two ADF engines off-line
AD2	One ADF engine in start-up, one ADF engine operating normally
AD3	One ADF engine in SCR burn-in, one ADF engine operating normally
MRF1	One MRF engine in start-up, one MRF engine operating normally
MRF2	One MRF engine in SCR burn-in, one MRF engine operating normally
FLARE	MRF Flare with MRF engine off-line

Table 6. Maintenance Scenarios (with PD Change No. 5)
Air Dispersion Modeling Results – NAAQS (µg/m3)

Pollutant: Averaging Period	Scenario AD1: Percent of NAAQS	Scenario AD2: Percent of NAAQS	Scenario AD3: Percent of NAAQS	Scenario MRF1: Percent of NAAQS	Scenario MRF2: Percent of NAAQS	Scenario FLARE: Percent of NAAQS
SO_2: 1-hour	5.9	4.9	4.9	7.3	4.8	4.6
SO_2: 3-hour	0.8	0.6	0.6	0.8	0.6	0.5
SO_2: 24-hour	1.0	0.9	0.9	1.1	0.9	0.9
CO: 1-hour	5.8	5.8	5.8	5.8	5.8	5.8
CO: 8-hour	16.1	16.1	16.1	16.1	16.1	16.1
NO_2: 1-hour	39.6	40.0	40.0	39.7	39.7	39.7
PM_{10}: 24-hour	48.3	48.3	48.3	48.3	48.3	48.2
$PM_{2.5}$: 24-hour	48.7	50.0	50.0	49.8	49.8	49.8

Table 7. Maintenance Scenarios (with PD Change No. 5)
Air Dispersion Modeling Results – CAAQS (µg/m3)

Pollutant: Averaging Period	Scenario AD1: Percent of CAAQS	Scenario AD2: Percent of CAAQS	Scenario AD3: Percent of CAAQS	Scenario MRF1: Percent of CAAQS	Scenario MRF2: Percent of CAAQS	Scenario FLARE: Percent of CAAQS
SO_2: 1-hour	2.6	2.7	2.7	3.6	2.7	1.9
SO_2: 24-hour	3.5	3.0	3.0	3.8	3.0	3.0
CO: 1-hour	10.3	10.3	10.3	10.3	10.3	10.3
CO: 8-hour	16.6	16.6	16.6	16.7	16.6	16.6
NO_2: 1-hour	42.4	42.4	42.4	42.4	42.4	42.4
PM_{10}: 24-hour	145.4	145.4	145.4	145.5	145.4	144.9

Human Health Risk (SEIR and Addendum - Impact TRRP AQ-5: Class III).

Revised air dispersion modeling and a refined multi-pathway cancer risk analysis (Tier 2) were conducted for the PD Change No. 5 consistent with past analysis for PD Change Nos. 3 and 4.

Table 8 provides a comparison of the modeled health risk associated with the Current ReSource Center (as revised by previously approved project description changes) with and without the incorporation of proposed PD Change No. 5. Consistent with past analysis, the Point of Off-site Maximum Contact (which exceeds the 10 per million maximum cancer risk) is a property line receptor location, which is uninhabited and inaccessible to the public; therefore, the public would not be exposed to this risk. In summary, health risk with proposed PD Change No. 5 would be reduced, remain less than the SBCAPCD thresholds and a less than significant impact (Class III).

Table 9 provides a comparison of the modeled facility-wide (all Landfill-related sources) health risk associated with the Current ReSource Center (as revised by previously approved project description changes) with and without the incorporation of proposed PD Change No. 5. Facility-wide health risk with proposed PD Change No. 5 would be reduced, remain less than the SBCAPCD thresholds and a less than significant impact (Class III).

Table 8. Summary of the Results of the Health Risk Assessment (Current ReSource Center/Current ReSource Center with PD Change No. 5)

Receptor Type	Maximum Cancer Risk (per million)	Maximum Acute Hazard Index	Maximum Chronic Hazard Index
Point of Off-site Maximum Contact	**175.6/26.34**	0.99/0.99	**5.59**/0.37
Maximum Exposed Individual (Residential)	6.73/1.82	0.27/0.17	0.22/0.02
Maximum Exposed Individual (Worker)	0.72/0.19	0.13/0.11	0.18/0.01
SBCAPCD Significance Threshold	**10**	**1.0**	**1.0**

Table 9. Summary of the Results of the Facility-Wide Health Risk Assessment (Current ReSource Center/Current ReSource Center with PD Change No. 5)

Receptor Type	Maximum Cancer Risk (per million)	Maximum Acute Hazard Index	Maximum Chronic Hazard Index
Point of Off-site Maximum Contact	**175.7/27.76**	0.99/0.99	**5.59**/0.39
Maximum Exposed Individual (Residential)	9.78/4.85	0.77/0.71	0.28/0.07
Maximum Exposed Individual (Worker)	1.02/1.27	0.48/0.45	0.18/0.05
SBCAPCD Significance Threshold	**10**	**1.0**	**1.0**

Greenhouse Gas Emissions (SEIR and Addendum - Impact TRRP AQ-7 and Impact TRRP AQ-8: Class IV).

The Current ReSource Center as modified by proposed PD Change No. 5 would have minimal changes in GHG emissions. The addition of the third back-up generator engine, a diesel-powered trommel screen, and increased mobile equipment at the composting area would increase GHG emissions, while the ADF flare change in supplemental fuel from 100 percent propane to 50 percent propane and 50 percent landfill gas, and decreased mobile equipment use at both the MRF and ADF areas would decrease GHG emissions. Overall, PD Change No. 5 would result in a net decrease in GHG emissions generated by ReSource Center operations by 665.9 metric tons CO_2E per year. These calculations do not include the beneficial reduction in future GHG emissions (reduced Landfill methane emissions from recovery of organic waste) associated with implementation of the ReSource Center. Impacts would remain beneficial (Class IV).

Odors (SEIR and Addendum - Impact TRRP AQ-9: Class III).

The primary purpose of the biofilters and scrubbers at the MRF was to treat odors generated inside the MRF building before they were exhausted to the atmosphere. Under proposed PD Change No. 5, the biofilters and scrubbers damaged by the Alisal Fire would not be replaced. Monitoring of ammonia and hydrogen sulfide (primary odor causing compounds) conducted inside the MRF building without operational biofilters and ammonia scrubber indicates concentrations of these compounds are a maximum of 1 ppmv ammonia and 0.1 ppmv hydrogen sulfide respectively (MSB, 2022). These values are below permit limits (5 ppmv for ammonia, 1 ppmv for hydrogen sulfide) imposed by the SBCAPCD.

When the fire-damaged baghouse filters and fans are replaced and vent stacks added, the MRF building air would be diluted by ambient air drawn into the building by the fans, such that concentrations of ammonia and hydrogen sulfide emitted by the vent stacks would be lower than measured inside the MRF building. The revised SBCAPCD permit for the MRF will contain a requirement to continue weekly H_2S and ammonia monitoring (email dated October 3, 2022 from Carly Barham, APCD Planning Division). Therefore, removal of the biofilters would not result in a substantial change to odor emissions associated with operation of the MRF.

As modeled in the SEIR and Addendum, odors from the ReSource Center were expected to be adverse but less than significant based on odor concentrations, frequency and number of people impacted (not considerable). However, odor complaints have been received from residents in the Arroyo Quemada community in association with the operation of the ADF/CMU and notices of violation have been issued by the Local Enforcement Agency triggering further implementation of odor best management practices as a part of the ADF/CMU's Odor Impact Management Plan (OIMP) included in the Landfill and ReSource Center Joint Technical Document. The Gore Membrane Cover System is proposed to manage the compost windrows, which can be a source of odors, especially if the compost is allowed to support anaerobic decomposition which may generate substantial odors. A pilot project was conducted at the CMU in March 2023 using digestate from the ADF, which included monitoring a test windrow over the entire 21-day composting cycle. The pilot project included sampling the surface of the membrane using

a surface isolation emission flux chamber and analysis of odors using olfactory dilution-to-threshold methods (ASTM E679). The Gore Membrane Cover System was determined to reduce compost windrow odors by 97.5 percent (Environmental Management Consulting, 2023).

The proposed diesel-powered screen at the CMU and the CMU/ADF odor misting system would address/help reduce odor generation/impact resulting from operation of the facilities. Other measures being implemented include operational modifications, installation of automatic closing door systems, reducing backlog of material, application of odor reducing chemicals to the compost as required by the OIMP.

Although odor management from the ADF/CMU is ongoing requirement, removal of the biofilters at the MRF, and addition of the Gore Cover System, screening equipment and odor misting system would not result change in the odor impact classification (Class III) analyzed in the SEIR and Addendum.

3. Geologic Processes

Differential Settlement Associated with Previously Buried Solid Waste (SEIR and Addendum - TRRP Impact G-7: Class II)

Landfill consolidation and decomposition of organic matter in the buried municipal solid waste can result in differential settlement of the landfill surface. Impacts associated with settlement to ReSource Center facilities (TRRP Impact G-7) including the MRF were mitigated through engineering design and implementation of engineered foundation systems to prevent settlement-related impacts to the buildings, operational pads, and related facilities. One of the proposed new vent stacks (replacing the biofilter serving the MRF Recycling Area) would be located above the closed waste disposal footprint (See Exhibits 1 and 3). The vent stack would be supported on a concrete footing and subject to settlement of buried solid waste under the footing. The estimated static and differential settlement for the 20 foot by 20 foot footing is 0.1 and 0.65 inches, respectively (Earth Systems, 2022). The ground surface east of the footing will undergo secondary compression settlement as the thickness of the buried solid waste increases over time and may cause additional movement of the footing associated with settlement within the waste footprint (Earth Systems, 2022). The settlement-related movement of the footing would be monitored and re-leveled if required and connected pipping would also be designed to be flexible withstand settlement and would not affect the MRF and related facilities. Impact TRRP G-7 would remain significant but mitigable (Class II).

4. Noise

Construction Noise Impacts on Noise-Sensitive Receptors: Impact TRRP N-1 (Class III).

Demolition of facilities damaged by the Alisal Fire and construction of new facilities would generate construction noise not anticipated in the SEIR and Addendum. These noise levels would be less than that associated with construction of the ReSource Center and would be located over 1,600 feet from the

nearest noise-sensitive land use. Therefore, TRRP Impact N-1 would remain less than significant (Class III).

Operational Noise Impacts on Noise-Sensitive Land Uses: Impact TRRP N-3 (Class III).

The approved ReSource Center includes two electric powered screens at the CMU to remove plastic and other residue from organic materials recovered at the MRF. PD Change No. 5 includes replacing a screen at the CMU that was moved to the ADF delivery hall (see Exhibit 8) with a new diesel-powered screen. Therefore, the total number of powered screens would be increased to three (two at the CMU and one at the ADF). Moving the CMU screen inside the ADF delivery hall has substantially reduced noise generated by screening operations due to attenuation associated with the delivery hall structure. The Gore Membrane Cover System would include electric motors for the aeration systems and for the portable winding machine and noise from this equipment would not increase noise levels above those associated with the existing and proposed CMU and ADF operations. Noise estimates provided for PD Changes No. 4 were updated to include a second screen (diesel-powered) at the CMU. Adding a third screen would increase ReSource Center noise levels; however, the increase would be minimal (0.1 dBA CNEL), undetectable at noise-sensitive land uses and less than the significance threshold (see Table 10).

Table 10. Changes to Estimated ReSource Center Operational Noise Levels (dBA CNEL)

Noise Receiver	ReSource Center Noise Level (SEIR Addendum)	ReSource Center Noise Level (PD Change No. 3 15162 Memo)	ReSource Center Noise Level (PD Change No. 4)	ReSource Center Noise Level (PD Change No. 5)	Significance Threshold
Arroyo Hondo residence	59.3	59.5	59.8	59.9	65
Arroyo Quemada community	59.5	59.7	59.9	60.0	65
Baron Ranch residence	58.6	58.7	58.9	59.0	65
Calle Real residences	54.2	54.4	54.6	54.7	65

The new back-up electrical generator would only operate for a short period during loss of grid power and 30 minutes for testing every two weeks. Based on the very limited and emergency-related use of back-up generators, they were not included in past noise analyses for the ReSource Center. In any case, 24-hour CNEL noise levels (basis of the significance threshold) associated with operation of the ReSource Center would be virtually the same on days when the back-up generator was operated.

Overall, TRRP Impact N-3 would remain less than significant (Class III).

5. Water Resources

Groundwater Supply (SEIR and Addendum - Impact TRRP WR-2, Class III).

The ReSource Center water supply requirements were originally estimated as 11.5 acre-feet per year and approved as part of the certified Final Subsequent EIR. The approved water demand was increased to 17.2 acre-feet per year as part of PD Changes No. 2 to accommodate the needs of the biofilter scrubbers at the MRF and ADF. A groundwater estimated safe yield analysis (Geosyntec Consultants, 2019) was completed as part of the 15162 CEQA Determination for PD Changes No. 2, which indicated there is sufficient annual recharge to the Vaqueros and Sespe-Alegria aquifers to support the ReSource Center water demand as modified by PD Changes No. 2 (17.2 acre-feet per year).

The current PD Change No. 5 includes not replacing the MRF biofilters and scrubbers damaged by the Alisal Fire. Therefore, the ReSource Center water supply demand would be reduced. However, PD Change No. 5 includes two new misting systems that would consume water. Note that when the Gore Membrane Cover System becomes operational, water use under PD Change No. 5 would decrease by 0.18 acre-feet per year (see Table 1) as operation of the compost irrigation and dust control system would be terminated.

As indicated in Table 1, the projected ReSource Center water use from Well no. 7 (Vaqueros Formation) is 7.83 acre-feet per year which exceeds the assumed production of 3.0 acre-feet per year identified in PD Change No. 2. However, this assumption was based on groundwater production from Well No. 5 (also completed in the Vaqueros Formation) of 12.6 acre-feet per year, to stay under the combined safe yield of the Vaqueros Formation (15.6 acre-feet per year, see Geosyntec Consultants, 2019). Current (2022) groundwater production for Well No. 5 is only 6.5 acre-feet per year (Landfill use). Note that the ReSource Center would not use any water from Well no. 5, which is reserved for Landfill use. In any case, these wells are continuously monitored to ensure safe yields are not exceeded.

Projected ReSource Center water use from Well no. 6 (Sespe-Alegria Formation) is 4.89 acre-feet per year (see Table 1), which is less than the assumed production of 9.4 acre-feet per year identified in PD Change No. 2. The estimated safe yield of the Sespe-Alegria Formation at the Landfill (including Well no. 6 and possible future Well no. 8) is 14.5 acre-feet per year (Geosyntec Consultants, 2019).

ReSource Center water use associated with implementation of PD Change No. 5 would be reduced overall, and the safe yields of affected wells would not be exceeded. In addition, the groundwater elevation in affected wells is currently and will continue to be monitored to ensure safe yields are not exceeded.

In summary, revised project impacts to groundwater supplies would be reduced and remain less than significant (Class III).

Groundwater Quality (SEIR and Addendum - Impact TRRP WR-3, Class III).

As discussed under Impact TRRP WR-2 above, the amount of groundwater to be pumped from the Vaqueros Formation (Well No. 7) to serve the ReSource Center would increase as compared to projections identified in PD Change No. 2. However, continuous monitoring of groundwater levels is conducted to prevent over pumping and ensure safe yields are not exceeded, such that substantial declines in groundwater levels are not expected. Consequently, the potential for project-generated groundwater pumping to impact groundwater quality would remain less than significant (Class III).

Groundwater Well Interference (SEIR and Addendum - Impact TRRP WR-4, Class III).

Increased groundwater pumping from the Vaqueros Formation associated with PD Change No. 5 may also increase the potential for well interference (groundwater elevation drawdown in Vaqueros Formation wells located in adjacent watersheds to the east and west). However, continuous monitoring of groundwater levels is conducted to prevent over pumping, such that substantial interference with off-site wells completed in the Vaqueros Formation (Shell Well) is not expected, and revised impacts would remain less than significant (Class III).

Surface Water, Streams and Springs Impacts (SEIR and Addendum - Impact TRRP WR-5, Class III).

Perennial streams and springs are not identified in the Vaqueros Formation or Sespe-Alegria Formation in the adjacent watersheds to the east (Arroyo Quemado) and west (Canada de la Huerta) of the Tajiguas Landfill, nor within the Tajiguas Landfill watershed limits. (Anikouchine, 1991 and Dibblee, 1988 as cited in Geosyntec, 2019). However, perennial springs are documented in the Gaviota Formation located in the headwaters of the Arroyo Quemado watershed, north of the Vaqueros Formation and Sespe-Alegria Formation (Anikouchine, 1991 and Stoecker, 2008 as cited in Geosyntec, 2019). The revised project would reduce water production from the Vaqueros Formation in the Tajiguas Landfill watershed and would not affect the perennial springs identified in the Gaviota Formation. Therefore, impacts to the documented upper canyon Gaviota Formation springs in the Arroyo Quemado watershed would remain less than significant (Class III).

Landfill Gas Migration Groundwater Quality Impacts (SEIR and Addendum - Impact TRRP WR-6, Class II).

The revised project would not include any new wells. Well no. 7 was installed in compliance with mitigation measure MM TRRP WR-1 from the Final Subsequent EIR. Future Well no. 8 (if needed) would also be installed in compliance with mitigation measure MM TRRP WR-1. Overall, the potential for landfill gas migration to affect groundwater quality would not be increased under the revised project and would remain a Class II impact.

Construction-related Impacts to Surface Water Quality (SEIR and Addendum - Impact TRRP WR-7, Class II).

Ground disturbance associated with demolition of facilities damaged by the Alisal Fire and construction of new facilities would be very limited. All construction activities would be subject to compliance with the Construction General Stormwater Permit and/or the Landfill's Industrial General Permit and Waste Discharge Requirements as required by mitigation measure MM TRRP WR-2 to prevent pollutant discharges to surface and groundwater. Sulfuric acid impacted water removed from electrical conduits during demolition activities would be placed in containers and transported off-site to an appropriate liquid waste disposal facility. Therefore, potential impacts of surface water contamination by sulfuric acid would be avoided. Overall, the potential for construction-related water quality degradation would not be substantially increased under the revised project and would remain a Class II impact.

Stormwater and Discharge Impacts to Surface Water Quality (SEIR and Addendum - Impact TRRP WR-8, Class II).

The revised project would not include any new facilities or processes that would increase the potential for stormwater contamination or discharges of percolate or wastewater. The proposed diesel-powered screen at the CMU would be fueled by a fuel truck and the potential for fuel spillage exists. However, implementation of the Spill Prevention and Countermeasure Plan required by mitigation measure MM TRRP WR-3 would prevent any surface water contamination associated with fueling.

The proposed recyclables storage area at the former site of the MRF biofilters would be included in the ReSource Center's Stormwater Pollution Prevention Plan as required by mitigation measure MM TRRP WR-3 and best management practices such as pavement sweeping and vacuum clean up, chain-link fence to contain windblown debris and hydrodynamic separator on the storm drain system would continue to be implemented to prevent contamination. Based on information from the manufacturer, the Gore Membrane Cover System uses PTFE. "PTFE, a member of the fluoropolymer class of PFAS, to make the moisture barrier of the GORE® Cover designated for the organic composting projects. PTFE is very different from the PFAS that have been a source of environmental concern. PTFE is a large, stable molecule that is too large to penetrate cell walls, therefore it cannot be absorbed" (Gore, Thomas Terpetschnig, April 13, 2023). The system may result in an increase in stormwater coming off of the CMU deck, but the covers would reduce the potential for leachate production in association with stormwater percolating through or running off the windrows. Runoff from the CMU, including the cover system would be collected, stored and reused in ADF/composting operations as was analyzed in 12EIR-00000-05 and Addendum certified by the Santa Barbara County Board of Supervisors on November 7, 2017. Overall, the potential for stormwater quality degradation would not be substantially increased under the revised project and would remain a Class II impact.

The following mitigation measures from the Subsequent EIR and Addendum would continue to apply to the revised project.

MM TRRP WR-1: Compliance with Well Construction Standards.

MM TRRP WR-2: Construction Storm Water Quality BMPs.

MM TRRP WR-3: Industrial Storm Water Permit Compliance and Spill Prevention

MM TRRP WR-4: Water Quality Monitoring and Corrective Action Plan

6. Other CEQA Issue Areas

Proposed PD Change No. 5 is not anticipated to significantly change the analysis of the following resource/issue areas: biological resources or cultural resources (all project components are in existing disturbed and/or developed areas), hazards and hazardous materials (no new hazardous materials would be brought onsite and potential acid impacted water would be collected and properly disposed during demolition of the MRF biofilter and associated conduits), land use (no new or substantial increase in impacts that would affect consistency with environmentally related comprehensive plan policies), transportation/circulation (some new construction related vehicle trips during the four month biofilter system demolition and construction of new stacks but no change in operational vehicle trips), public health (no new facilities that would introduce new vectors and inclusion of odor misting systems and screens to reduce odors) and environmental justice (the affected population is not considered minority or low income).

7. Cumulative Impacts

Proposed PD Change No. 5 is not expected to significantly change the analysis of cumulative impacts previously analyzed. However, since that analysis, a conditional use permit and coastal development permit application have been submitted for a new project at the Tajiguas Landfill which is considered a new pending cumulative project. This new project is the Tajiguas Landfill Gas to Renewable Natural Gas Conversion Project (LFG to RNG Project) and is composed of four primary components:

- RNG Upgrade System to process landfill gas to produce RNG that meets biomethane standards to allow injection into the regional natural gas pipeline and use as fuel for trucks.
- Compressed Natural Gas (CNG) Fueling Station to fuel heavy-duty trucks.
- Grid Gas Monitoring and Meter Station Assembly (MSA) to monitor RNG quality and transfer to the SoCalGas regional natural gas pipeline.
- Pipeline system to connect proposed facilities and ReSource Center facilities.

Currently, produced landfill gas is burned in engines at the MRF and ADF to produce electricity, with excess landfill gas combusted in the flares. The LFG to RNG Project would provide facilities to process the excess landfill gas to allow it to be used as truck fuel, with the remainder injected into a natural gas pipeline. The facilities associated with this pending project would be located south of the MRF and in the location of the former Energy Facility near the south sedimentation basin/lower Pila Creek (both locations in the Coastal Zone).

As discussed above, the proposed changes (demolition of the MRF biofilters and construction of new stacks, new compost irrigation and dust control misting system, Gore Membrane Cover System, CMU odor misting system, ADF odor misting system, new diesel-powered CMU organics screen, and new back-up diesel-fueled electrical generator) associated with PD Change No. 5 result in less than significant changes to the analysis of the following issue areas/resources: Visual Resources/Aesthetics, Air Quality, Geologic Processes, Noise and Water Resources. The CEQA analysis for the LFG to RNG project has not been completed. However, with respect to these five issue areas the LFG to RNG Project is estimated to result in the following potential impacts:

- Visual Resources/Aesthetics: a portion of the fueling station and exterior lighting from the facility may be visible from U.S. 101 and the MSA would be located within the Gaviota Coast Plan Critical Viewshed Corridor Overlay, but not visible from public viewing locations
- Air quality: construction emissions and operational emissions of criteria pollutants including NO_x and ROC, potential odors during upset conditions at the CNG odorant station.
- Geologic processes: increase in impervious surfaces and potential for differential settlement for areas over the waste footprint, construction of facility adjacent to the former west borrow area.
- Noise: construction noise and operational noise.
- Water resources: increase in runoff from new impervious surfaces and potential stormwater quality impacts from potential spills.

With respect to cumulative visual resources/aesthetics impacts of PD Change No. 5, when considered with the LFG to RNG Project, Impact TRRP VIS-CUM-1 would remain significant (Class II) and the LFG to RNG Project fueling facility may be visible from U.S. 101 and contribute to the industrial visual character of the landfill site as viewed from U.S. 101, but the contribution of change due to PD Change No. 5 would remain not considerable with mitigation as the visibility of the new stack would be limited and the height of the stack would be similar to the surrounding MRF building and associated facilities.

With respect to cumulative air quality impacts, when considered with the LFG to RNG Project, implementation of PD Change No. 5 would not result new or increased cumulative air quality impacts (Impacts TRRP AQ-CUM-1, -2 and -3) because:

- Construction emissions associated with the LFG to RNG Project would not be additive (construction of the ReSource Center is complete and demolition of MRF biofilters and construction of the new stacks is not expected to occur at the same time as the LFG to RNG Project).
- Impact TRRP AQ-CUM-2 would remain less than significant (Class III) because operational emissions when combined with the LFG to RNG Project would not exceed significance thresholds (AECOM, 2021).

- PD Change No. 5 includes project elements specifically proposed to address CMU/ADF odors, and odors associated with the LFG to RNG Project would only occur in the event of a rare upset condition and be limited to a very short period and would not be expected to affect a considerable number of persons.

With respect to cumulative noise impacts, when considered with the LFG to RNG Project, implementation of PD Change No. 5 would not result new or increased cumulative noise impacts (Impact TRRP N-CUM-1 and -2) because:

- PD Change No. 5 would not result in new vehicle trips and the LFG to RNG Project would require only two additional employees to operate the CNG Fueling Station and no new truck trips (MSBG Partners, 2021). The noise from the small number of additional vehicle trips would not be discernible when combined with cumulative traffic noise on U.S. 101 associated with forecasted growth.
- Estimated operation noise increases associated PD Change No. 5 (diesel-powered screen) would be approximately 0.1 dBA CNEL (see Table 10) and when combined with the LFG to RNG Project noise sources (blowers, compressors, pressure dryer, trucks) (estimated noise increase of less than one dBA CNEL [MSBG Partners, 2021]) would not exceed the 65 dBA CNEL significance threshold at affected sensitive receptors.

With respect to cumulative water resources impacts of PD Change No. 5 when considered with the LFG to RNG Project, would not result new or increased cumulative water resource impacts (Impact TRRP WR-CUM-2 and -3) because the LFG to RNG Project would not generate a water demand and both projects would be subject to compliance with the state industrial stormwater quality regulations.

CEQA Determination

It is the finding of the Planning and Development Department that the previous environmental documents Final SEIR (12EIR-00000-00002, SCH #2012041068), the SEIR Revision Letter and Errata dated May 27, 2016, SEIR Addendum dated August 11, 2017 (revised October 26, 2017), and 15162 determinations dated January 15, 2020, May 18, 2020, and August 2, 2021 amended by this CEQA Section 15164 Addendum, may be used to fulfill the environmental review requirements of the SYVRTS Project. No impacts previously found to be insignificant are now significant. Taken together, the original environmental document and this Addendum fulfill the environmental review requirements of the current project. As the current project meets the conditions for the application of the State CEQA Guidelines Section 15164, preparation of a new EIR or ND is not necessary.

Environmental Hearing Officer:

Alex Tuttle, Supervising Planner
Santa Barbara County Planning and Development

Signature: DocuSigned by: Alex Tuttle 1380B34A0ED5498... Date: 8/24/2023 | 8:54 AM PDT

References (all referenced documents are available for review at RRWMD)

Aesthetics/Visual Resources

John Kular Consulting. 2022. Photo-simulation of the View from U.S. Highway 101 (see Exhibit 10).

Air Quality/Greenhouse Gas Emissions

AECOM Environment. 2023. Revised Air Quality Technical Memorandum for ATC 14500 10 Application, Tajiguas ReSource Center, Santa Barbara County, California. Prepared for Mustang Energy Ventures.

Environmental Management Consulting. 2023. Technical Memorandum SG/GORE Composting System Pilot Study Program at the Tajiguas Landfill, Goleta, CA

MSB Investors. 2022. Spreadsheet summary of ammonia and hydrogen sulfide concentrations sampled within the MRF building from 11/19/21 through 5/6/22.

Santa Barbara County Air Pollution Control District (APCD). 2022. Email dated October 3, 2022 from Carly Barham, APCD Planning Division to Joddi Leipner, Senior Engineering Environmental Planner, Santa Barbara County Public Works Department, Resource Recovery and Waste Management.

Geologic Processes

Earth Systems. 2022. Letter report dated August 16, 2022 addressing settlement under the proposed 66-inch diameter vent stack, Tajiguas Resource Recovery Project. Prepared for Mustang Energy Ventures.

Noise

Aurora Industrial Hygiene, February 22, 2022. Santa Barbara County ReSource Center – Material Recovery Facility (MRF)/Anaerobic Digestion Facility (ADF)/Compost Management Unit (CMU) Noise Exposure Assessment Report. Prepared for Rincon Consultants, Inc.

Water Resources

Geosyntec Consultants. 2019. Technical Memorandum – Tajiguas Solid Waste Landfill ReSource Center Recovery Project Updated Water Supply Assessment & Hydrogeologic Impact Analysis. Prepared by Maygan Cline, PG, Senior Geologist, Kevin Coffman, PG, CHg, Senior Geologist, and Mark Grivetti, PG, CHg, Senior Principal.

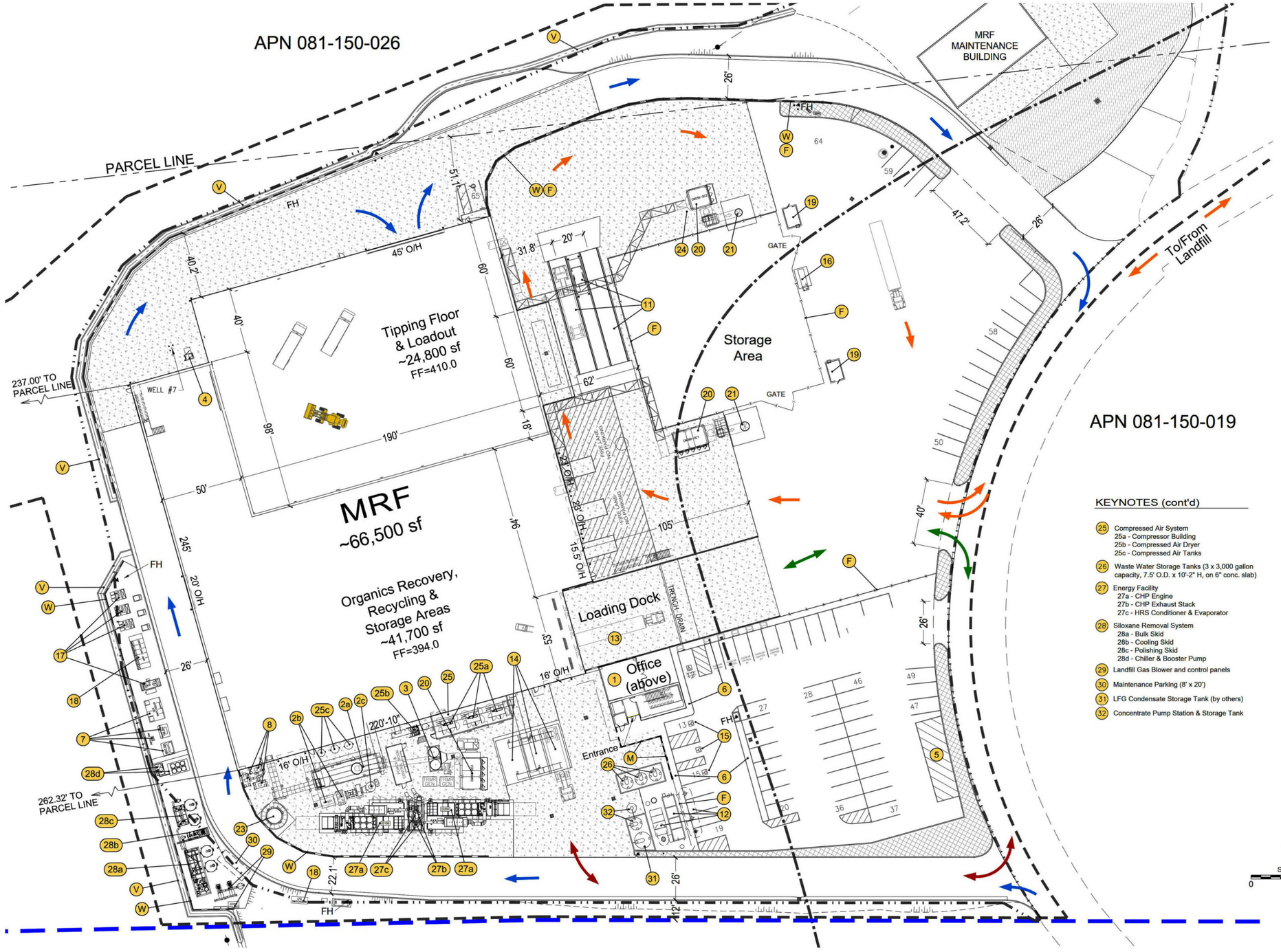
Gore, April 13, 2023. Letter from Thomas Terpetschnig to John Dewey. Tajiguas Landfill, Santa Barbara, County.

John Kular Consulting. April 3, 2023. Water Budget Summary for ReSource Center Use.

Cumulative Projects

AECOM Environment. 2021. Air Quality Technical Memorandum for ATC 14500 08 Application, Proposed RNG Project, ReSource Center (formerly the Tajiguas Resource Recovery Project), Santa Barbara County, California. Prepared for Mustang Energy Ventures.

MSBG Partners, LLC. 2021. Proposed Renewable Natural Gas Project, Tajiguas Landfill Gas to Renewable Natural Gas Conversion Project Description (submitted in association Conditional Use Permit and Coastal Development Permit Applications to the Santa Barbara County Planning and Development Department).



Elevations (0'-0" = 394.0)		
MRF - Tip Floor	FF: +16'-0" (el. 410.0)	Roof: +49'-9" (el. 443.75)
MRF - Recycling Area	FF: 0'-0"	Roof: +46'-2" (el. 440.17)
MRF - Office	FF: 0'-0"	Roof: +51'-3" (el. 445.25)
CHP Stacks (2) - 30'	Base: +14'-0"	Top: +54'-0" (el. 448.0)
Dust Collector Exhaust	Base: 0'-0"	Top: +54'-0" (el. 448.0)
Flare - 54'	Base: +0'-0"	Top: +54'-0" (el. 448.0)

KEYNOTES

1. 2 Story Annex above (offices, employee area, visitor center) - approx. 8,800 s.f. total
2. Paper Drying Facility (PDF)
   2a - Paper Dryer
   2b - Burner & Heat Exchanger
   2c - Blower Fan
3. Dual Cyclone Dust Collector
4. Water Treatment Facility
5. 10' x 50' Bus Parking Area
6. 4' Pedestrian Corridor
7. SCE Electrical Transformers, Switch & Switchgear
8. Air Filters
9. (not used)
10. (not used)
11. Weigh Scales (2) & 6'x12' scale house
12. AdvanTex Sewage Treatment System & 10,000 gal. Septic Tank
13. Weigh Scale
14. MSW Organics Bunkers and Glass Bunker
15. ADA Parking Stalls
16. Emergency Backup Generator
17. Electrical Transformers (4)
18. Electrical Switchgear
19. Biofilter Electrical Building - 8' W x 12' L x 8' H
20. Dust Collection Unit
21. Dust Collector Exhaust Stack & Concrete Pad
22. (not used)
23. Flare (50' tall, on 4' concrete pedestal) and Scrubber Unit
24. Emergency Safety Shower with Eye/Face Wash Station

V. Concrete V-Ditch
W. Reinforced Concrete Retaining Wall
F. Chainlink Fence
M. Concrete Masonry Wall

KEYNOTES (cont'd)

25. Compressed Air System
    25a - Compressor Building
    25b - Compressed Air Dryer
    25c - Compressed Air Tanks
26. Waste Water Storage Tanks (3 x 3,000 gallon capacity, 7.5' O.D. x 10'-2" H, on 6" conc. slab)
27. Energy Facility
    27a - CHP Engine
    27b - CHP Exhaust Stack
    27c - HRS Conditioner & Evaporator
28. Siloxane Removal System
    28a - Bulk Skid
    28b - Cooling Skid
    28c - Polishing Skid
    28d - Chiller & Booster Pump
29. Landfill Gas Blower and control panels
30. Maintenance Parking (8' x 20')
31. LFG Condensate Storage Tank (by others)
32. Concentrate Pump Station & Storage Tank

LEGEND

- MRF Delivery
- MRF Waste Loadout
- MRF Recycleable Loadout
- MSW Loadout
- Landfill Parcel Lines
- Permitted Waste Disposal Boundary
- Construction Disturbance Area Boundary
- Coastal Zone Boundary (County Planning & Development, 2017)
- Concrete paving
- Landscaping
- FH Fire hydrant

SCALE (FEET) 0 30' 60'

Abbreviations

SS = Source Separated
MO = Mixed Organics
SSOW = Source Separated Organic Waste
MSW = Mixed Solid Waste

MRF SITE PLAN

REV. 1 (8/16/2022)

Prepared by:
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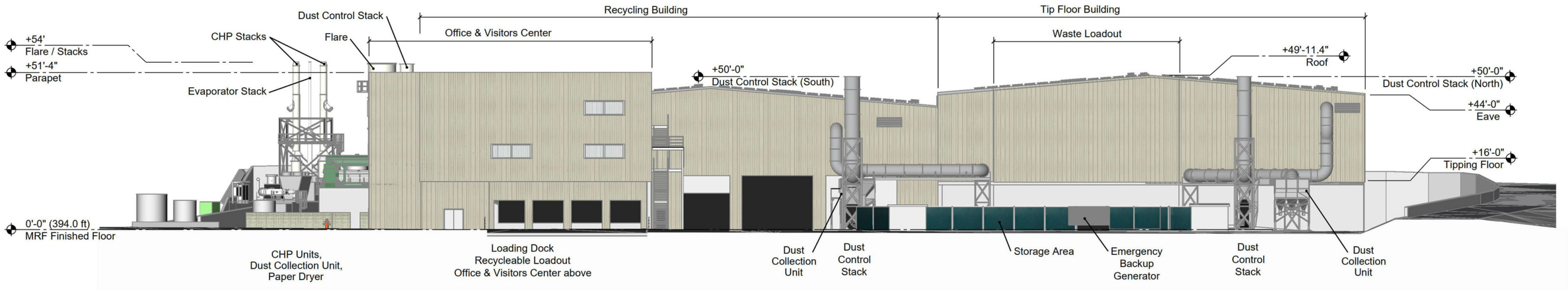
661-302-1292 kularconsult.com

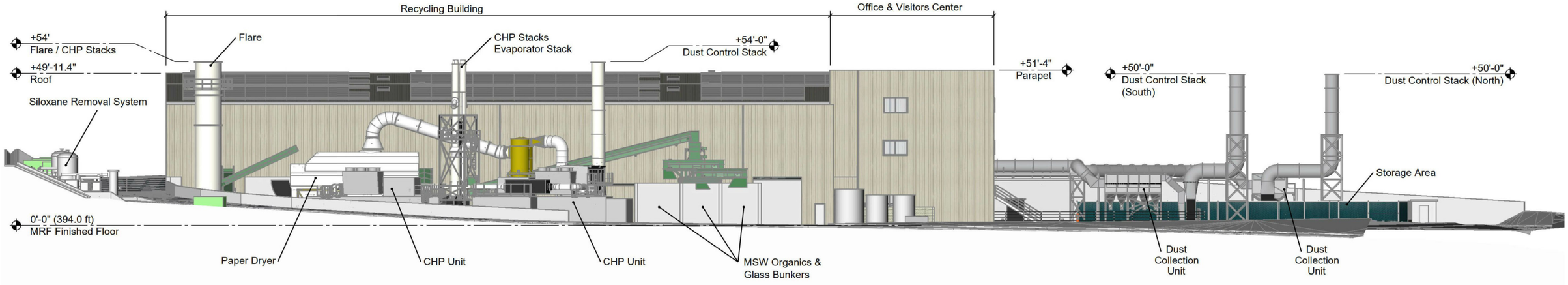
Tajiguas ReSource Center - 2022 Projects

Exhibit 1
MRF Site Plan

S:\Work\Projects\Tajiguas\Drawings\2022 New Projects\Exh1 - MRF Site Plan.dwg 11/8/2022 2:05 PM



East Elevation



South Elevation

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Tajiguas ReSource Center - 2022 Projects

Exhibit 2

MRF Elevation Drawings

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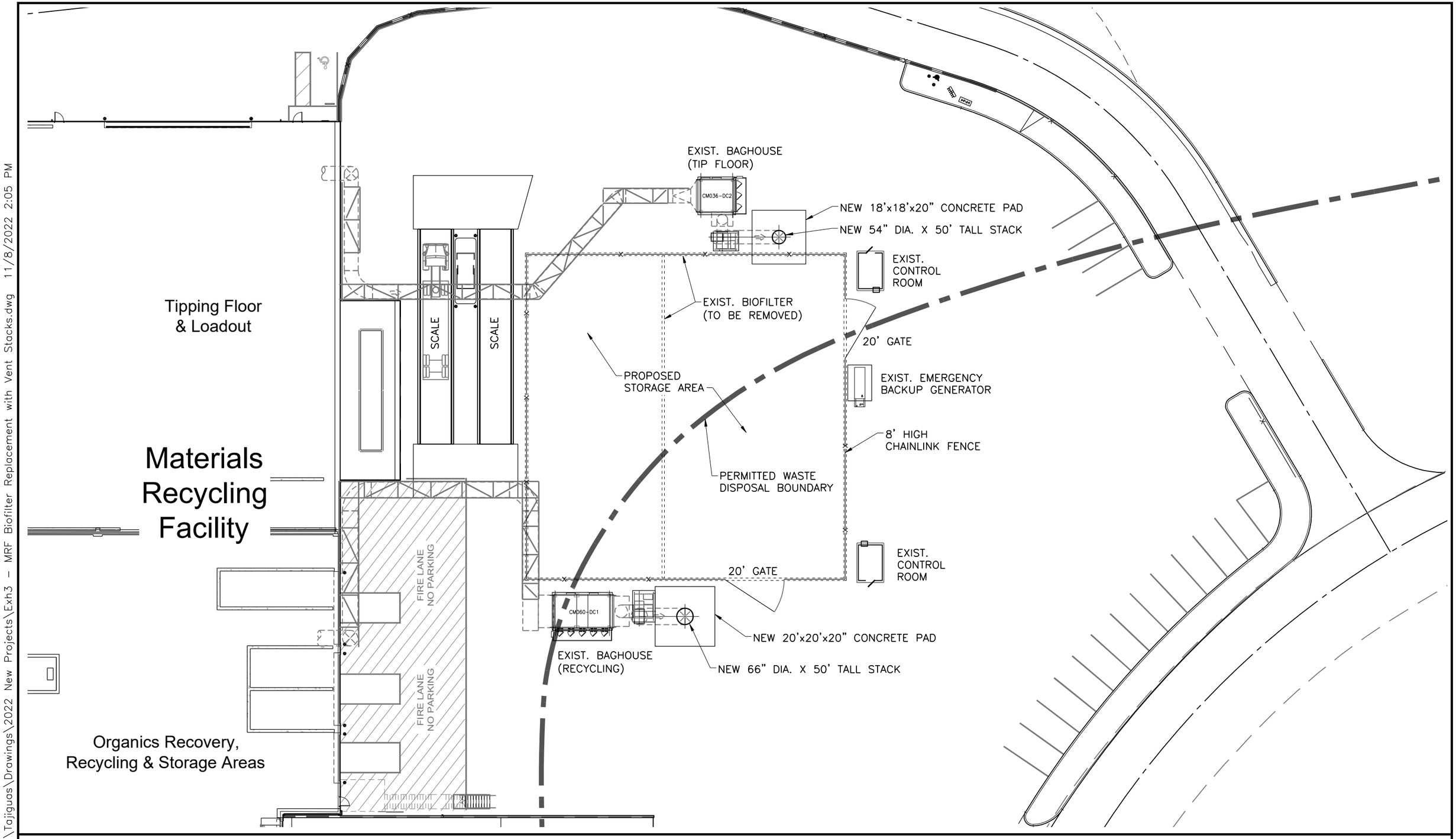

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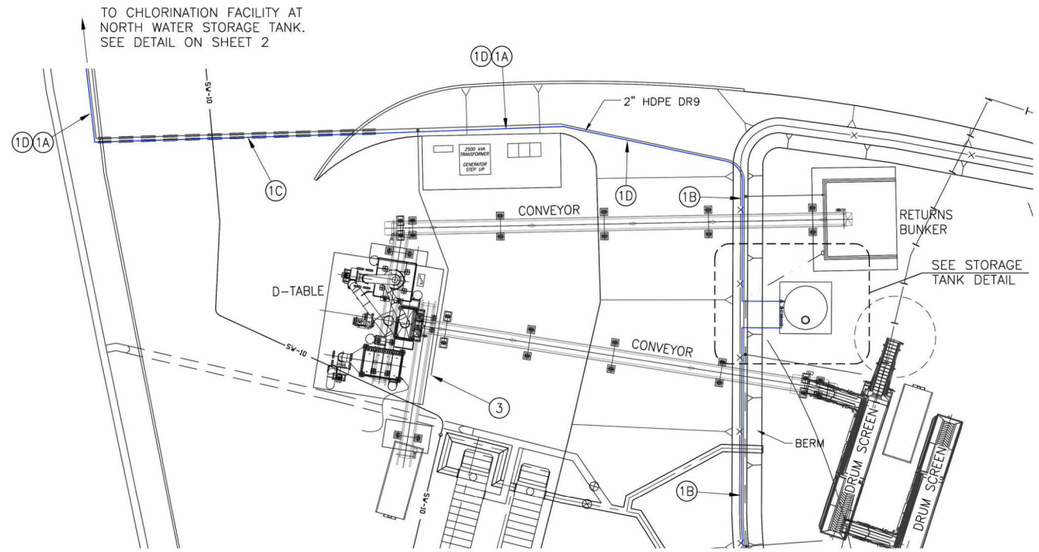
SCALE (FEET)
0 30' 60'

Tajiguas ReSource Center - 2022 Projects

Exhibit 3

MRF Biofilter Replacement with Vent Stacks

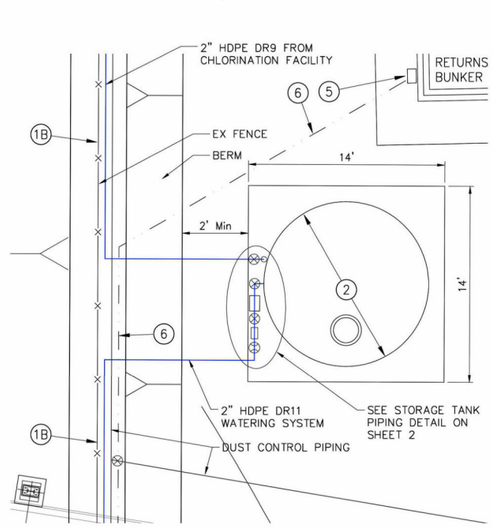


PIPING DETAIL

SCALE: 1" = 20'

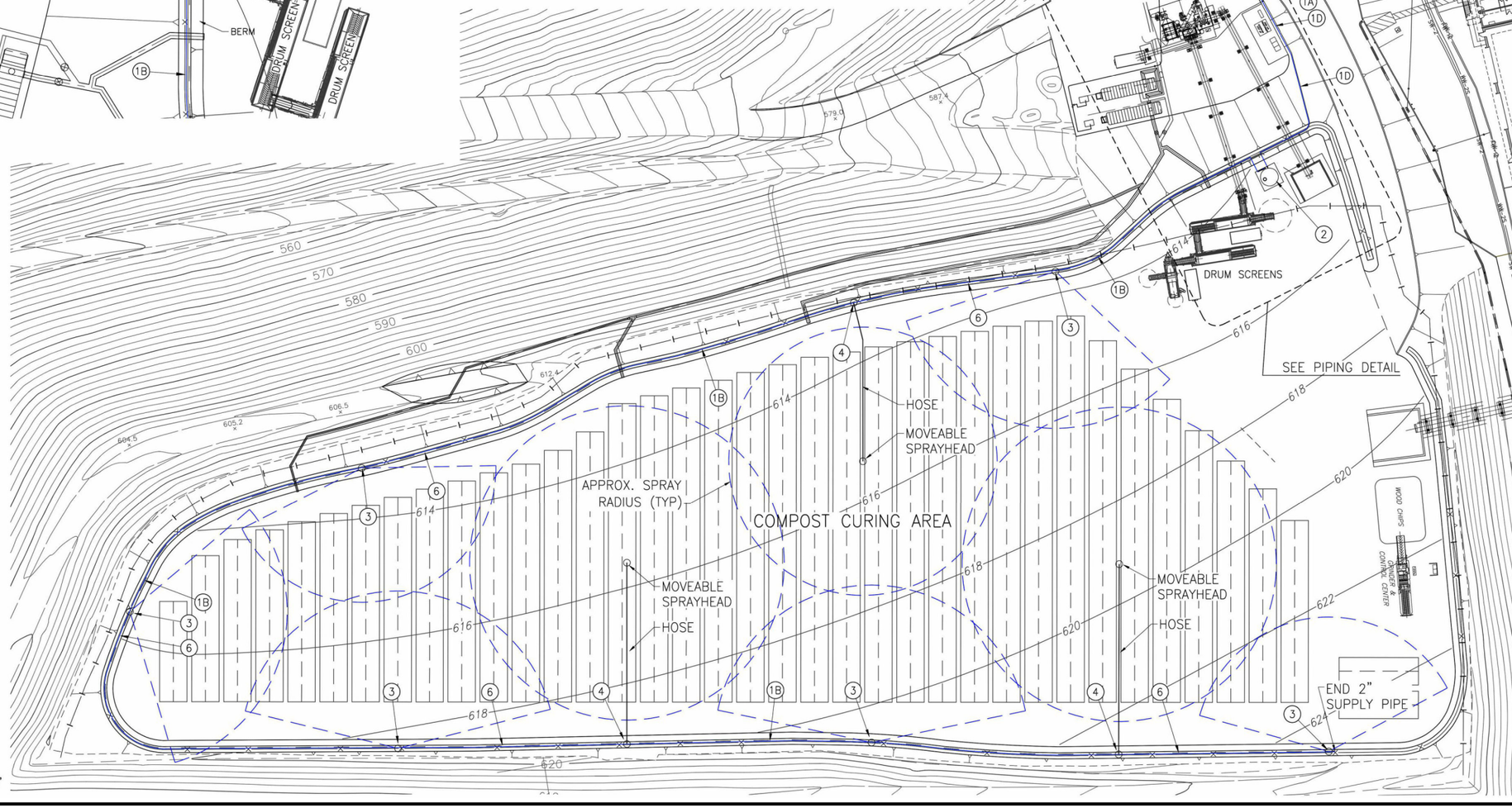
CONSTRUCTION NOTES:

1. INSTALL 2" HDPE WATER LINE (PRESSURE RATING PER PLAN)
   - 1A – LOCATE 12" BEHIND CURB/STRUCTURE
   - 1B – FASTEN TO EX. FENCE POSTS AT TOP OF BERM.
   - 1C – BURIED SECTION W/ 6" SCH 40 STEEL PIPE CASING. SEE DETAIL ON SHEET 2
   - 1D – INSTALL PIPE ANCHOR RESTRAINTS AT 25' SPACING.
2. 15,500 GALLON PLASTIC WATER TANK (11'-9"" DIA X 20'-3" HIGH) ON CONCRETE PAD (PER STRUCTURAL PLANS). ANCHOR TANK SECURELY TO PAD.
3. INSTALL TEE, BALL VALVE, CONTROL VALVE, RISER AND SUPPORT POST PER SPRAYHEAD CONNECTION DETAIL (FIXED OPTION) ON SHEET 2
4. INSTALL TEE, BALL VALVE, CONTROL VALVE AND HOSE REEL PER SPRAYHEAD CONNECTION DETAIL (MOVEABLE OPTION) ON SHEET 2
5. INSTALL IRRIGATION CONTROLLER ON COMPOST BUNKER WALL (HUNTER PHC-1200 WI-FI CONTROLLER). SEE DETAIL 'A' ON SHEET 2.
6. INSTALL 1" PVC CONDUIT W/ 2 16AWG CONTROLLER WIRES.



STORAGE TANK DETAIL

NO SCALE



PLAN

SCALE: 1" = 40'

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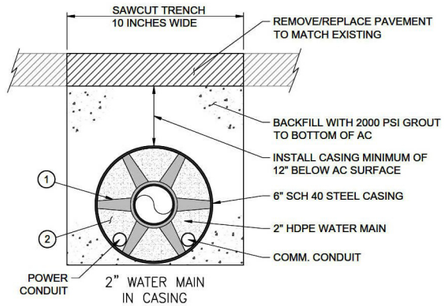
Tajiguas ReSource Center - 2022 Projects

Exhibit 4

CMU Irrigation and Dust Control Misting System

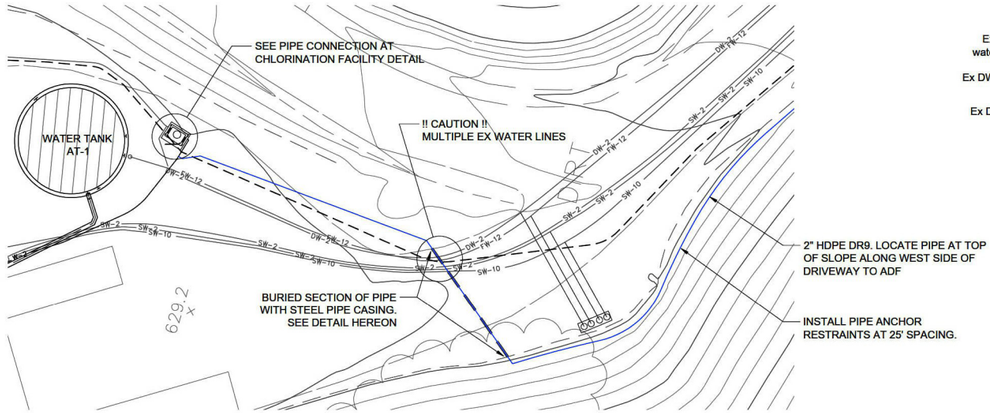


① TEFLON SPACERS @ 6' O.C., PLUS ADD'L @ 1' EITHER SIDE OF WATER MAIN PIPE JOINT. CASING END SEALS SHALL BE SYNTHETIC NEOPRENE RUBBER PULL-ON TYPE END SEALS WITH STEEL BANDS.

② FILL SPACE BETWEEN PIPES WITH BLOWN-IN SAND, CAP ENDS WITH MORTAR

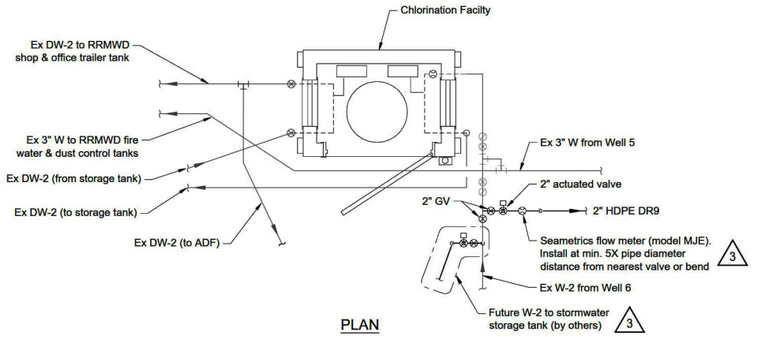
PIPE CASING

NO SCALE



PIPING AT NORTH WATER STORAGE TANK

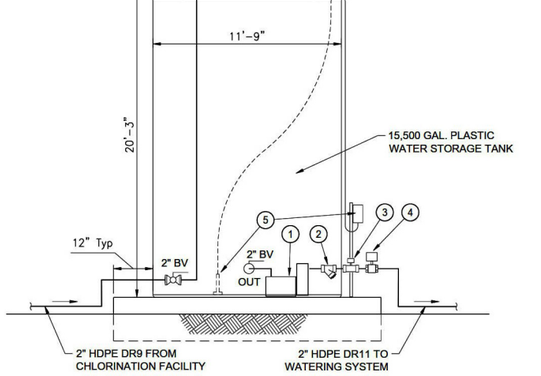
NO SCALE



PLAN

PIPE CONNECTION AT CHLORINATION FACILITY

NO SCALE



① BOOSTER PUMP: GRUNDFOS NBS 012-070-2P, 3450 RPM, 40 USGPM @ 175', 15HP MOTOR

② HAYWARD 2" PVC Y-STRAINER

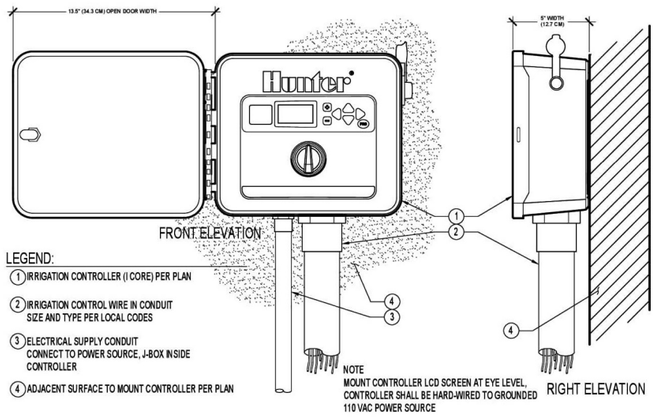
③ HUNTER HC-200-FLOW WIRELESS HC FLOW METER

④ HUNTER 2" REMOTE CONTROL MASTER VALVE (PGV-201)

⑤ PROSENSE SUBMERSIBLE LEVEL TRANSMITTER (MODEL SLT1-010-L40) AND JUNCTION BOX (MODEL SLT-JB1)

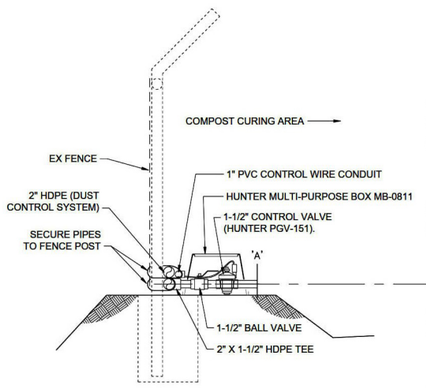
STORAGE TANK PIPING

NO SCALE



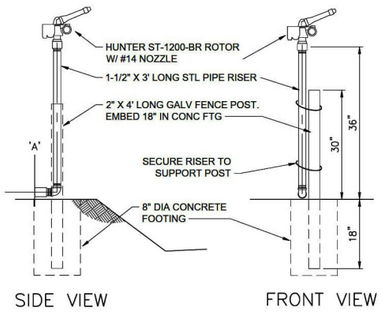
A CONTROLLER

N.T.S.

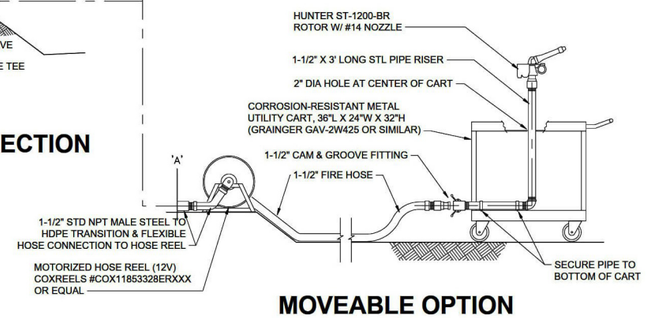


SPRAY HEAD CONNECTION

NO SCALE



FIXED OPTION



MOVEABLE OPTION

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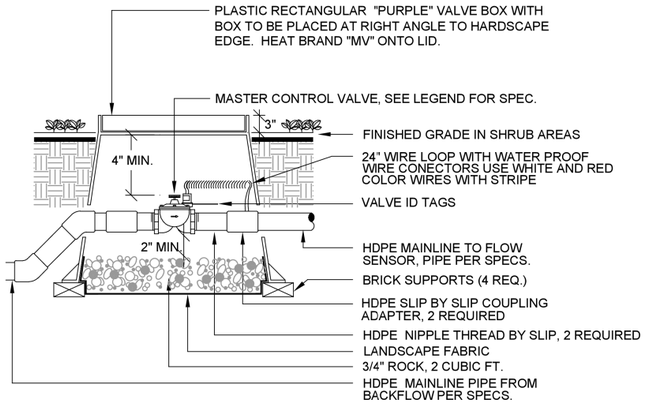
Tajiguas ReSource Center - 2022 Projects

Exhibit 5

CMU Irrigation System Controller and Spray Nozzle Details

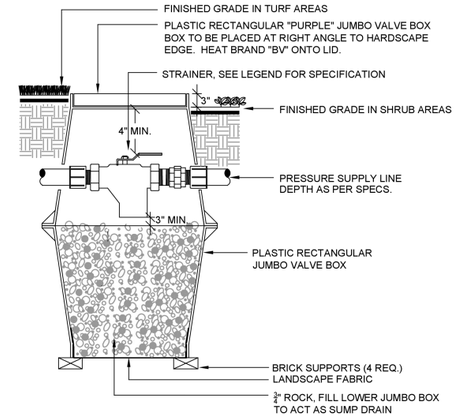


NOTE:

USE 45 DEGREE ELLS TO ACHIEVE MAINLINE DEPTH FROM UP-STREAM SIDE OF THE MASTER VALVE ASSEMBLY.

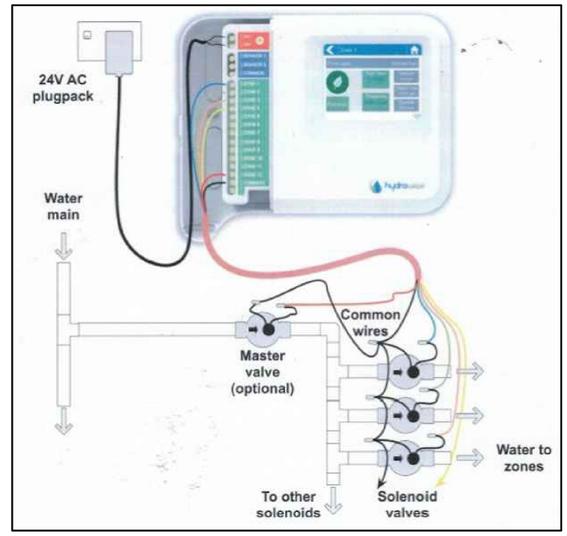
C MASTER VALVE

N.T.S.



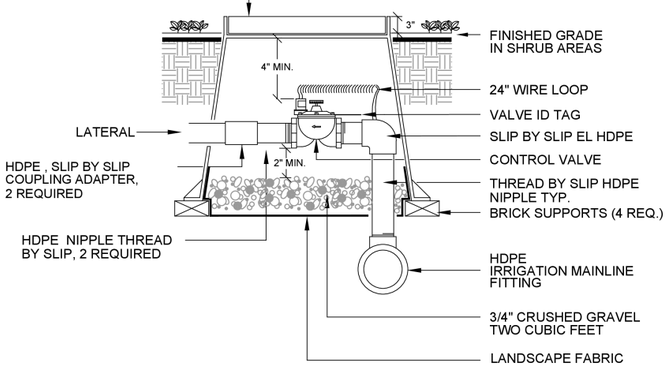
B HAYWARD STRAINER

N.T.S.



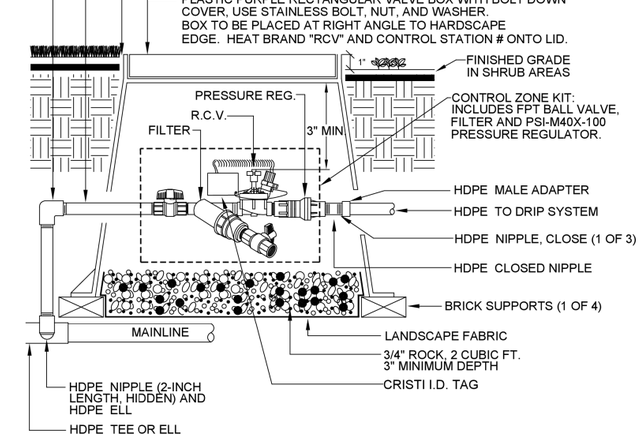
A HUNTER HC PRO CONTROLLER

N.T.S.



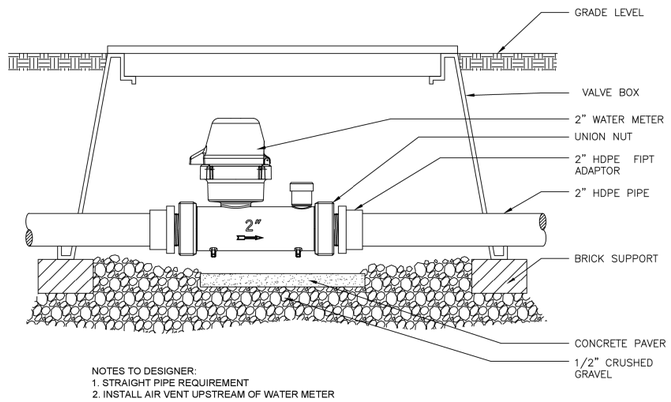
F REMOTE CONTROL VALVE

N.T.S.



E INLINE DRIP VALVE

N.T.S.



NOTES TO DESIGNER:
1. STRAIGHT PIPE REQUIREMENT
2. INSTALL AIR VENT UPSTREAM OF WATER METER

D NETAFIM FLOW METER

N.T.S.

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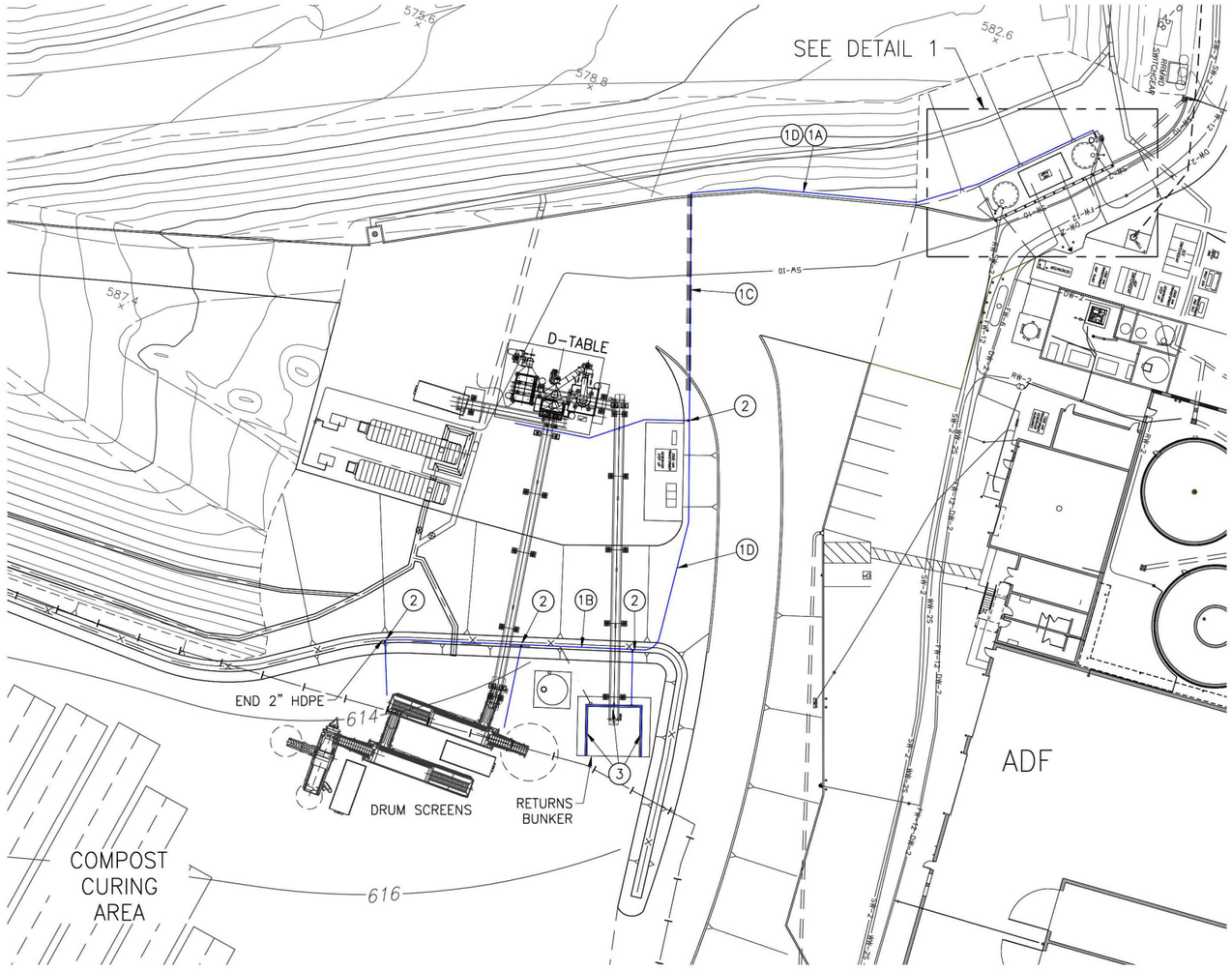
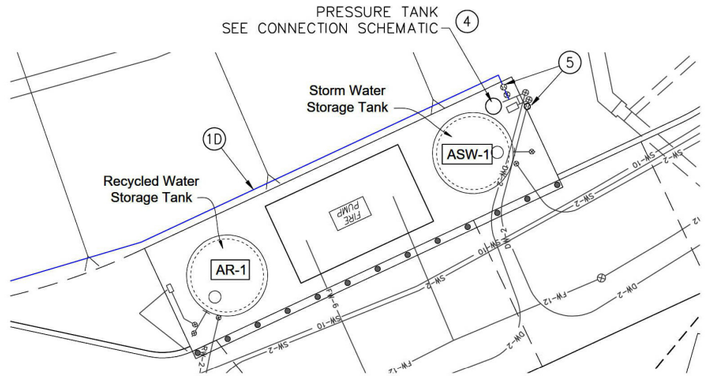
Tajiguas ReSource Center - 2022 Projects

Exhibit 6

CMU Irrigation System Piping Details



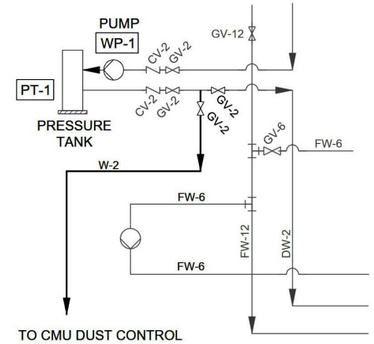
PLAN
SCALE: 1" = 30'



DETAIL 1
SCALE: 1" = 10'

CONSTRUCTION NOTES:

1. INSTALL 2" HDPE WATER LINE
   - 1A – LOCATE 12" BEHIND CURB
   - 1B – FASTEN TO EX. FENCE POSTS AT TOP OF BERM.
   - 1C – BURIED SECTION W/ 4" SCH 40 STEEL PIPE CASING. SAWCUT TRENCH 8 INCHES WIDE. INSTALL CASING MINIMUM OF 12" BELOW AC SURFACE. BACKFILL WITH 2000 PSI GROUT TO BOTTOM OF AC.
   - 1D – INSTALL PIPE ANCHOR RESTRAINTS AT 25' SPACING.
2. INSTALL 1" SERVICE CONNECTION W/ TEE AND SHUT-OFF VALVE.
3. INSTALL 1/2" WATER LINE W/ (9) 1/2" X 1/4" TEES AND 1/4N-SSN SPRAYHEADS AT TOP OF BUNKER WALL.
4. REPLACE EXISTING PRESSURE TANK WITH PT-1 PER EQUIPMENT SCHEDULE.
5. INSTALL SEAMETRICS MODEL MJE FLOW METER. INSTALL AT MIN. 5X PIPE DIAMETER DISTANCE FROM NEAREST VALVE OR BEND.



CONNECTION SCHEMATIC
NO SCALE

EQUIPMENT SCHEDULE						
ITEM	DESCRIPTION	SIZE	OPERATING CONDITIONS	BRAND	MODEL	QTY.
WP-1	Water pump		Automatic	Goulds	Aquaboost VS 2B50	1
PT-1	Pressure tank	528 gal	Automatic	WellXtrol	WX-457-C	1

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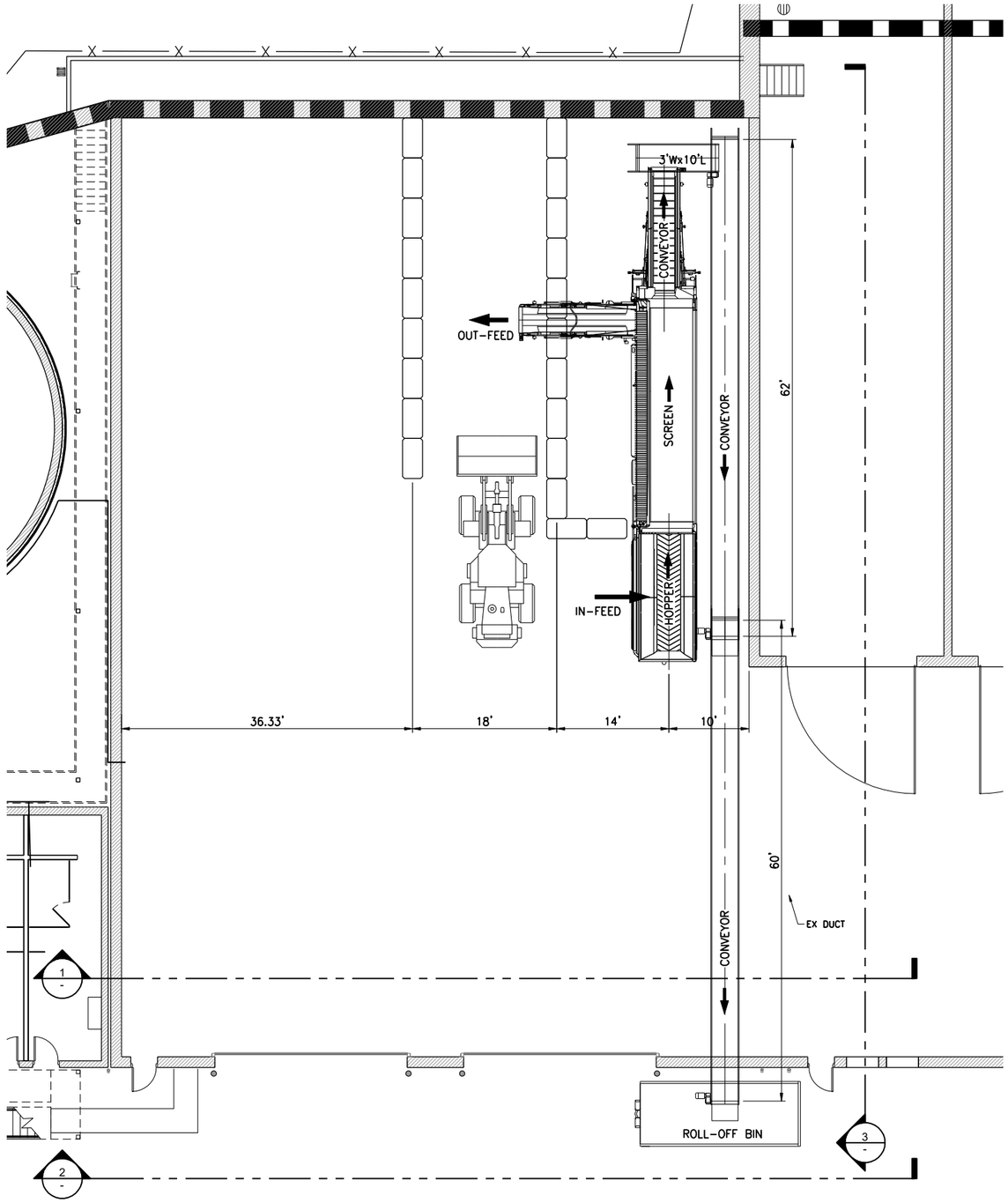
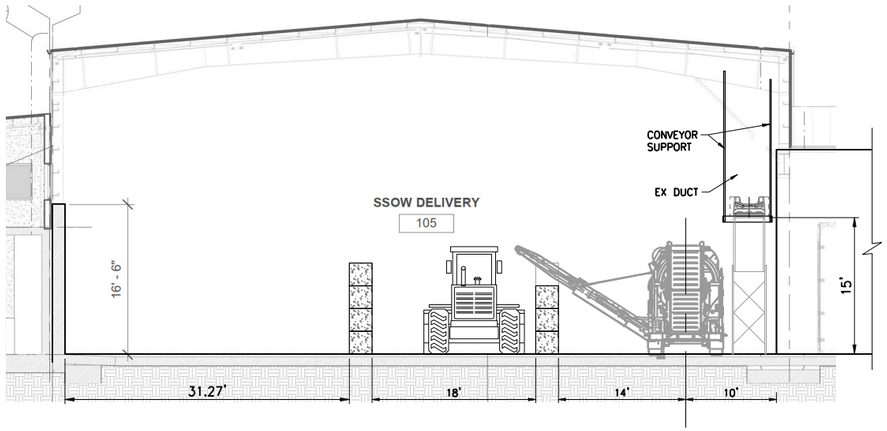
Tajiguas ReSource Center - 2022 Projects

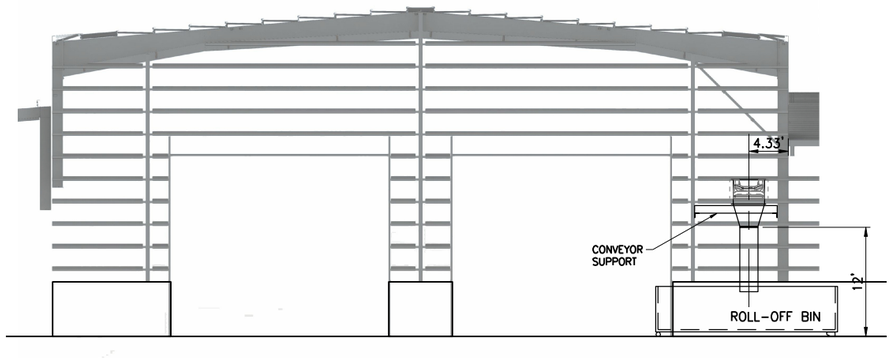
Exhibit 7

CMU Dust Control Misting System

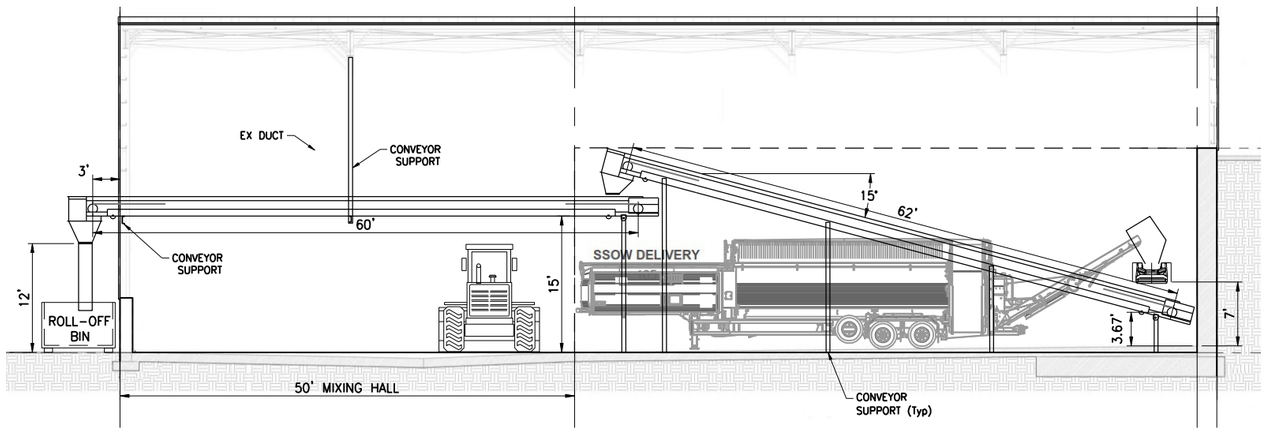




VIEW 1



VIEW 2



VIEW 3

Prepared by:
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PLAN
NO SCALE

Tajiguas ReSource Center - 2022 Projects

Exhibit 8

Powered Screen within the ADF Delivery Hall

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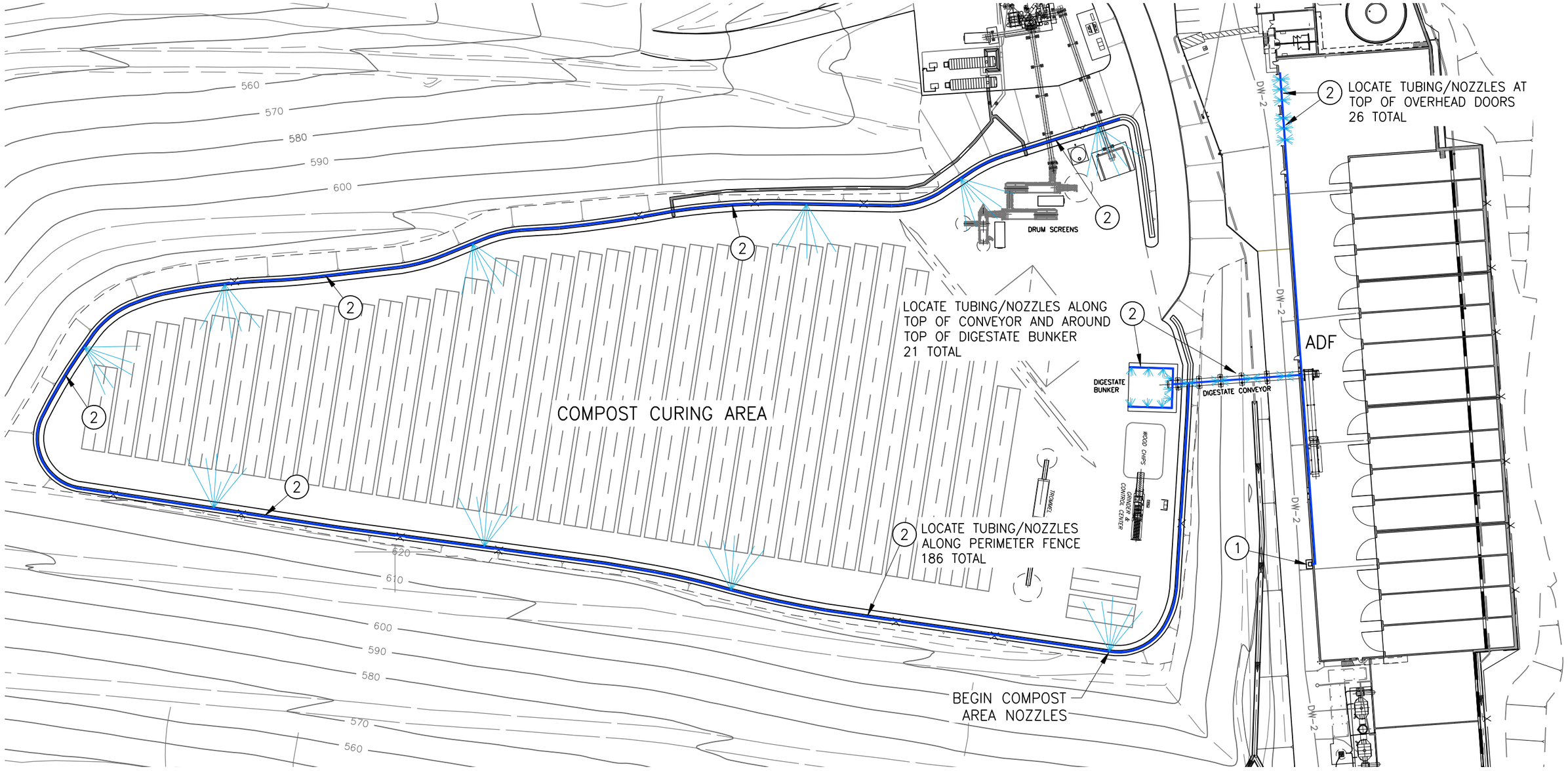

LEGEND:

1/2" HIGH-PRESSURE TUBING. ATTACH TO EXIST. FENCE AROUND PERIMETER OF COMPOST CURING AREA.

PLAN
NO SCALE

CONSTRUCTION NOTES:

1. INSTALL 1 HP, 5 GPM PUMP
2. INSTALL 1/2" NOZZLE UNIONS & 0.012 NOZZLES, EVENLY SPACED. SEE PLAN FOR LOCATION AND QUANTITY

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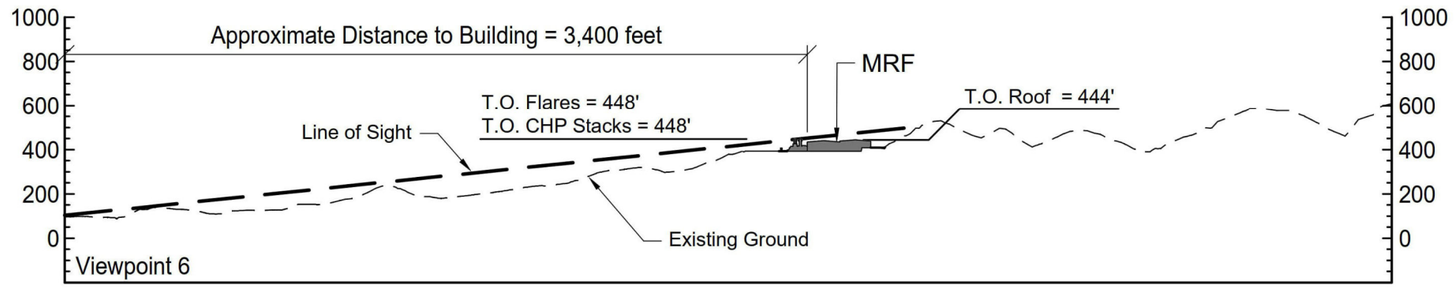
Exhibit 9

CMU Odor Control Misting System

SEIR ADDENDUM CONDITIONS

Date of photo: 12/17/2012

2020 REVISED PROJECT CONDITIONS



Line of Sight Profile

HORIZONTAL & VERTICAL SCALE

0' 800' 1600'

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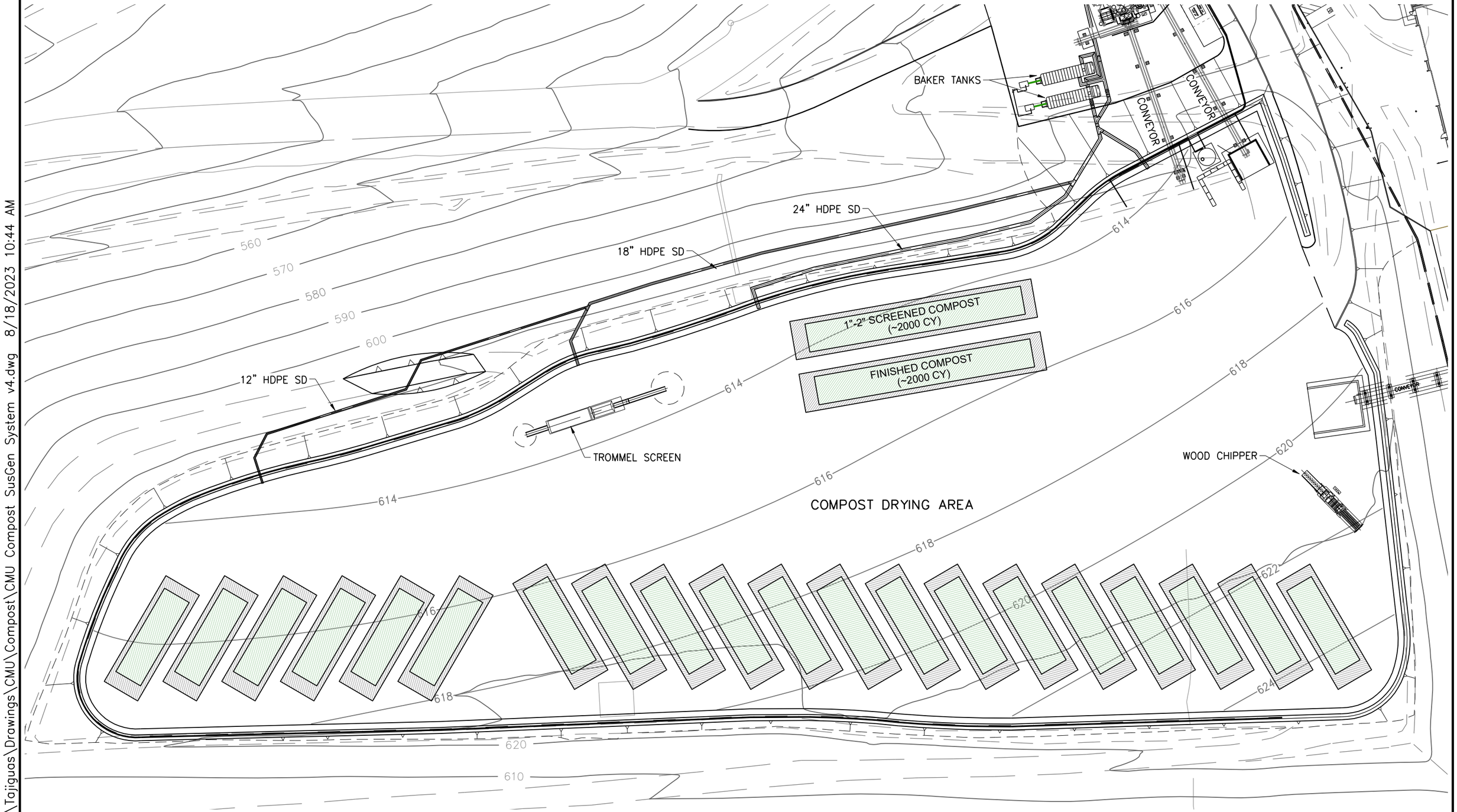
Exhibit 10

Photo-simulation of the View from U.S. Highway 101



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SCALE (FEET)
0 60' 120'

Exhibit 11

Tajiguas ReSource Center

CMU Compost Covers

Sustainable Generation Mobile System