

**SANTA BARBARA COUNTY
BOARD AGENDA LETTER**



Clerk of the Board of Supervisors
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Agenda Number:
Prepared on: 7/15/02
Department Name: Solid Waste/Public Works
Department No.: 054
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Continued Item: NO
If Yes, date from:

TO: Board of Supervisors

FROM: Phillip M. Demery, Director
Public Works Department

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SUBJECT: Tajiguas Landfill Expansion Project EIR
Third Supervisorial District

Recommendation(s):

That the Board of Supervisors:

- A. Certify that the Final Environmental Impact Report, 01-EIR-05, for the Tajiguas Landfill Expansion Project has been completed in compliance with the California Environmental Quality Act (CEQA);
- B. Certify that the Board has reviewed and considered the information contained in the Final EIR, 01-EIR-05, as well as information presented during the public hearing prior to approval of the project, and adopt the CEQA Findings and Statement of Overriding Considerations included as Attachment 1;
- C. Approve the Proposed Project (Front Canyon Expansion configuration and other project elements) which provides an additional capacity of 8.2 million cubic yards at the Tajiguas Landfill as the preferred project description;
- D. Adopt the mitigation measures, with their corresponding monitoring requirements, as the Mitigation Monitoring Program for this project (Attachment 2); and
- E. Direct the Public Works Department to apply for local, State and Federal permits to the extent required by law.

Alignment with Board Strategic Plan:

The recommendations are primarily aligned with Goal No. 1 An Efficient Government Able to Respond Effectively to the Needs of the Community and Goal No. 2. A Safe and Healthy Community in Which to Live, Work and Visit.

Executive Summary and Discussion:

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

The Solid Waste and Utilities Division oversees many recycling programs including residential and apartment curbside recycling, greenwaste collection and recycling, Christmas tree recycling, construction and demolition recycling, household hazardous waste collection, used oil recycling, and backyard composting among others. For the year 2001, the County of Santa Barbara was awarded the Household Hazardous Waste (HHW)/Used Oil Program, Program Excellence Award by the California Environmental Protection Agency (Cal/EPA). In addition, the Solid Waste and Utilities Division sponsors Coastal Cleanup Day to raise awareness about the issue of ocean and coastal conservation, to fight litter, to encourage recycling, and to promote community pride. The Solid Waste and Utilities Division is also a member of the County's "Green Team" that awards a yearly "Green Award". The Green Award recognizes voluntary activities by companies and organizations, big or small, private or non-profit, in Santa Barbara County, that result in cleaner air or water, less waste, less traffic, conservation of energy and natural resources, or reduced use of hazardous materials.

In the County's solid waste disposal system, residual waste is collected from the south coast (excluding the City of Carpinteria), the Santa Ynez and Cuyama Valleys and is disposed of at the Tajiguas Landfill. The Solid Waste Association of North America has recognized the Tajiguas Landfill by honoring it with the Silver Award of the Excellence in Solid Waste Management Awards Program, Landfill Management category in 2001. The award is based on several criteria that evaluate a commitment to environmentally and economically sound solid waste management. Among these criteria are environmental compliance, program efficiency and effectiveness, safety, and innovation.

The Division has prepared an Environmental Impact Report (EIR) 01-EIR-05 to evaluate the impacts of extending the life of the Tajiguas Landfill as directed by the Board of Supervisors in January 1998 and revised in August 1999.

Background

The Tajiguas Landfill has been in operation since 1967 for the disposal of municipal solid waste prior to the enactment of the California Environmental Quality Act (CEQA) and the California Coastal Act. The initial design of the Tajiguas Landfill was accomplished in compliance with regulations in effect during the 1960s. Based on those regulations, the majority of the area that has been used for waste disposal is unlined and rests on low permeability marine shale/claystone (the Rincon Formation). A chronology of the permitting history and site improvements accomplished over the life of the Tajiguas Landfill previous to 1998 is provided as Attachment 3 – Tajiguas Landfill History and Milestones.

Solid waste currently delivered to the Tajiguas Landfill is generated by the Cities of Santa Barbara and Goleta, the unincorporated areas of southern Santa Barbara County, the Santa Ynez Valley, including the Cities of Buellton and Solvang and the Cuyama Valley. The Tajiguas Landfill currently accepts an average 738 tons per day (tpd) of solid waste for disposal and green waste for processing.

Public Process

The environmental review process for the County's long-term disposal of refuse began on April 1, 1998 with a release of a Notice of Preparation (NOP) for the proposed Tajiguas Landfill Expansion Project. The project description for the NOP was for a 25-year expansion of the existing Tajiguas Landfill in the southern portion of the landfill site (known as the "Front Canyon").

On August 18, 1998, a Community Advisory Committee (CAC) was formed and began meeting to develop an alternative to be evaluated at project level in the EIR. The CAC consisted of 15 members, including two County Supervisors, and two City of Santa Barbara Council members. The CAC met weekly for approximately four months culminating with the recommendation that a Materials Recovery Facility¹ (MRF)/Transfer Station/Compost/and future Technology Facility be sited at a single campus. The Committee did not have a specific recommendation for the location of the residual refuse disposal. After the work of a subcommittee and approval by the CAC, the Board on May 25, 1999 directed staff to include the CAC alternative (a single campus facility) at the Tajiguas Landfill site in the EIR for project level review.

On July 20, 1999, Public Works staff returned to the Board with a contract amendment for preparation of Tajiguas Landfill Expansion Project EIR. The amendment was necessary to revise the project description to include a single campus facility at the Tajiguas Landfill site as a project option, as well as to provide an expanded alternatives analysis and prepare a separate technical financial analysis document that would provide cost information for the project-level options and landfilling alternatives. Although your Board approved the contract amendment, your Board expressed concerns that Tajiguas Landfill should not be considered as a long-term disposal option. The Board also questioned the rationale of siting a MRF/Transfer Station at the Tajiguas Landfill.

On August 3, 1999, the Santa Barbara County Board of Supervisors considered the following recommendations regarding Refuse Disposal Strategies for the South Coast:

¹ Waste brought to a Materials Recovery Facility is separated, diverting recyclable items from landfills and directing such materials to economical reuse purposes.

- a) Consider the long-term, intermediate and short-term disposal strategies;
- b) Consider a 15-year Tajiguas Landfill expansion for purposes of environmental review;
- c) Direct staff to develop another County Landfill site as a long-term disposal solution;
- d) Remove the CAC alternative (Compost, MRF, and transfer station) from CEQA project level consideration;
- e) Direct staff to initiate independent process for development of a MRF/Transfer Station as well as a Compost Facility; and
- f) Direct staff to proceed with all short-term options including a benchfill project and a minor fill project in the Coastal Zone at the Tajiguas Landfill site.

Following discussion, your Board approved the recommendations listed above and provided staff with the following direction:

- a) Conduct public hearings and consider the long-term, intermediate and short-term refuse disposal strategies.
- b) Modify the project description of the Tajiguas Landfill Expansion EIR project to reflect the goal that the Tajiguas Landfill be closed within 15 years or sooner.

The Santa Barbara County Public Works Department, Solid Waste and Utilities Division, at your Board's direction has proceeded with the environmental analysis and preliminary design of an expansion of the Tajiguas Landfill for 8.2 million cubic yards (15 years) of disposal capacity to allow adequate lead time to site and develop a new in-County regional landfill or other waste processing technologies. In addition, based on input received from citizens and regulatory agencies during the NOP process (April 1998), the County revised the original Front Canyon expansion design and also added a Back Canyon expansion configuration to the project description. The EIR (01-EIR-05) that was prepared to analyze the Tajiguas Landfill Expansion Project considers 8.2 million cubic yards of additional permitted capacity at the Tajiguas Landfill and analyzes two expansion configurations (the Front Canyon and the Back Canyon configurations) at project level. Both configurations would be lined and developed in compliance with current regulations. This analysis provides your Board with the ability to consider a number of factors in your decision-making process. The objectives of the Tajiguas Landfill Expansion Project are to:

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

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

On October 8, 1999, a Revised Notice of Preparation (RNOP) for the proposed 15-year Tajiguas Landfill Expansion Project EIR was released for public comment. The RNOP included the revised Front Canyon configuration and the new Back Canyon configuration of the Tajiguas Landfill Expansion as two project descriptions analyzed at project-level. The Draft Tajiguas Landfill Expansion Project Draft EIR (01-EIR-05) was released for public review from October 12, 2001 to December 14, 2001. The County responded to public comments and released the proposed Final EIR on July 9, 2002.

Proposed Project

The proposed project consists of horizontal and vertical expansion of the existing Tajiguas Landfill, utilizing one of two potential configurations contiguous to and north of the existing Tajiguas Landfill. Two configurations are analyzed at project level and are referred to in the EIR as the "Front Canyon" configuration and the "Back Canyon" configuration, shown in Figures 1-3 and 1-4, respectively of Attachment 4. Each configuration provides an additional 8.2-million cubic yards of additional capacity at the Tajiguas Landfill, and each meets the project objectives. Should your Board approve the project, either the Front Canyon or the Back Canyon expansion configuration may be selected, but not both.

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

Other project elements include modification or relocation of the greenwaste pad, scale, scalehouse and maintenance shop and modification of the southeast corner of the Tajiguas Landfill. The greenwaste pad, scale, scalehouse and maintenance shop would be modified or relocated within the existing Tajiguas Landfill disturbed area if required for operational efficiency. The Southeast Corner Modification is required to bring the facility into compliance with both the Coastal Zoning Ordinance (Article II), the Coastal Land Use Plan and the Coastal Act.

Four issue areas were found to have significant unavoidable impacts: Biological Resources, Cultural Resources, Visual Resources and Air Quality. Mitigation measures have been required through the EIR to reduce these and other potential significant impacts in the areas of Geology, Water Resources, Biological Resources, Cultural Resources, Nuisance, Land Use, Visual Resources, Traffic, and Health and Safety.

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

Should the Board approve the Project, new permits or modifications to the following existing permits are required prior to implementation of the Project:

- Waste Discharge Requirements (WDRs) No. 93-69 from the California Regional Water Quality Control Board, Central Coast Region.
- Solid Waste Facility Permit No. 42-AA-0015 from the Local Enforcement Agency of the California Integrated Waste Management Board.
- Final Combined Modified ATC/PTO 9788, for the Tajiguas Landfill Gas to Energy Project from the Santa Barbara County Air Pollution Control District.

Alternatives

Pursuant to Section 15126.6 of the CEQA Guidelines, the following range of alternatives was evaluated in the EIR to determine the potential to eliminate or reduce potentially significant environmental impacts, while still meeting basic project objectives. Possible alternatives to the proposed project are as follows:

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

reduced from 8.2-million cubic yards to 5.0-million cubic yards, and would provide approximately 10 years of disposal capacity.

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

None of the alternatives, including the No Project Alternative were determined to be both feasible and environmentally superior to the proposed project.

EIR Issues from Public Comments

The Tajiguas Landfill Expansion Project has been the subject of many public hearings and workshops since the planning process began in 1998. As previously described, your Board held several hearings to determine the

level of project review for the expansion. In addition, the CAC explored other options to landfilling at the Tajiguas Landfill. The Solid Waste and Utilities Division has also provided presentation on the Tajiguas Landfill Expansion Project to community groups such as Chamber of Commerce (Santa Barbara Solvang, Goleta), the Santa Barbara County Taxpayers Association, the Santa Barbara Building and Industry Council, City Councils (Buellton, Santa Barbara, Goleta), and the Surfrider Foundation. In addition, the Solid Waste and Utilities Division produced two informational videos about the Tajiguas Landfill that aired on Government Access television.

The Draft EIR for the Tajiguas Landfill Expansion Project was released for public review from October 12, 2001 to December 14, 2001. Environmental Hearings were held on November 7, 2001 in Santa Barbara, November 8, 2001 in Santa Maria, November 13, 2001 in Buellton, November 19, 2001 in Goleta, and November 28, 2001 in Lompoc.

Comments were received from various groups (Heal the Ocean, Environmental Defense Center, Gaviota Coast Conservancy, Surfrider Foundation, Community Environmental Council, Citizens' Planning Association, etc), Cities (Cities of Santa Barbara and Lompoc), Regulatory Agencies (Local Enforcement Agency, Regional Water Quality Control Board, California Integrated Waste Management Board, Santa Barbara Air Pollution Control District, etc.), attorneys and private individuals. All comments received on the Draft EIR have been responded to in the Response to Comments sections of the proposed Final EIR. Where appropriate, changes have been made to the Draft EIR text in response to comments received, and have been incorporated into the proposed Final EIR.

Issue areas raised through public comment on the EIR are:

▪ **Water Quality/Slope Stability/Geology**

Many comments were focused on the existing Tajiguas Landfill rather than the Tajiguas Landfill Expansion Project. The Water Quality/Slope Stability/Geology issues raised include concerns that bacteria may be present in groundwater and that migration routes may lead offsite, that environmental controls are adequate and effective, that water in the Tajiguas Landfill waste mass may affect landfill stability, and if the Tajiguas Landfill is in compliance with its permits. The Solid Waste and Utilities Division (SWUD) and the Regional Water Quality Control Board – Central Coast Region (RWQCB) have been in contact with respect to maintaining water quality in the Canada de la Pila watershed since the Waste Discharge Requirements were first issued in 1978. The RWQCB is aware of these concerns and has responded to all issues by intensifying the monitoring and reporting program designed to protect water quality in the Canada de la Pila watershed over the years.

A report critiquing the hydrogeologic studies completed for the Draft EIR and hydrogeologic studies prepared in the past was submitted as a comment to the EIR. This report has been referred to as the GeoSolv Report. The GeoSolv report is submitted under the seal of a California Registered Geologist and Certified Hydrogeologist. The vast majority of the GeoSolv comments relate to the existing Tajiguas Landfill and not to the proposed project. Detailed point-by-point responses to the GeoSolv report are included in the Final EIR, at Ch. 2.0, Document 2, GeoSolv, LLC, Comment Responses. In addition, The GeoSolv Report was reviewed by Engineering Geologist Brian Baca (RG, CEG, CHG) of the Santa Barbara County Planning and Development Department. Mr. Baca summarized his findings in

a June 30, 2002 memo to Mr. Roger Briggs, Executive Offices of the RWQCB (Attachment 5). Mr. Baca's comments on the GeolSolv Report are consistent with the evaluation and findings of the Draft EIR (Section 3.2).

The existing Tajiguas Landfill is constructed over the Rincon shale, a massive clay-rich formation that is known in Santa Barbara County for shrinking in the absence of moisture and swelling when moisture is present. Migration routes for liquids through this formation are therefore unlikely due to these characteristics. As water enters the formation, the clay-rich shale would swell, thus cutting off any contiguous migration routes for contaminants. Groundwater monitoring was initiated at the Tajiguas Landfill in 1988. Fourteen year's of data show that indicator bacteria are not present in groundwater at the landfill, but indicator bacteria in surface water is high following storm events. This rainfall-surface runoff response is typical of all watersheds along the south coast.

Another concern was high indicator bacteria levels in the ocean at Arroyo Quemado Beach. Arroyo Quemado been posted with beach warnings over the course of the past year. All postings are associated with living animal waste. In response to the assumption that the Tajiguas Landfill may be the source of indicator bacteria, a DNA study to determine the source of the bacteria was conducted by the County and environmental groups and a report released in December 2001. The DNA test results showed that the largest contributor to the bacteria at Arroyo Quemado Beach is seabirds (79%), with the greatest contributor being seagulls (59%). Seagulls are attracted to the Tajiguas Landfill as a food source and the Landfill likely supported the seagull population in the Arroyo Quemado area. In April 2002, a pilot project using falcons as bird deterrents was initiated at the Tajiguas Landfill. Arroyo Quemado Beach has been open with no beach warnings since the first week in April 2002 when the falcons began working at the Landfill. These results indicate that the Landfill was attracting a high number of birds, which, after feeding, congregated at Arroyo Quemado Beach and elevated the indicator bacteria levels in the ocean water. The falcons appear to have had a dramatic effect in deterring the seagulls from feeding at the Tajiguas Landfill and has resulted in Arroyo Quemado Beach water quality improvement.

Adequate environmental controls are in place at the Tajiguas Landfill to ensure that potentially impacted groundwater does not migrate off site. In 1992, 10 years ago, a groundwater collection trench (trench) was constructed approximately 200 feet wide and 47 feet below the ground surface and collects subsurface flow in Canada de la Pila. The RWQCB considers the trench to be adequate to control potentially impacted groundwater from leaving the site.

Several comments were received on the Draft EIR based upon the assertion that water in the *existing* Tajiguas Landfill is in violation of the site's Waste Discharge Requirements for the Tajiguas Landfill, RWQCB Order No. 93-69, or State law (CCR Title 23, Article 3, Chapter 15, Sec. 2530[c]); and CCR Title 27, Article 3, Sec. 20260[c]) because waste is within 5 feet of the underlying groundwater. This regulation is known as the "5-foot separation rule." The proposed Tajiguas Landfill Expansion Project will be lined and designed to comply with the requirement to provide 5 feet of separation between the bottom of the waste and the groundwater in compliance with current regulation.

The *existing Tajiguas Landfill* was designed and permitted before the promulgation of this requirement. Engineered alternatives are in place to protect groundwater quality. Monitoring programs are in place that

demonstrates the effectiveness of groundwater quality protection. The RWQCB is responsible for regulatory compliance (Final EIR, Ch. 2, Document 1 Heal the Ocean, Response 1-6).

Water does occur in discontinuous zones of saturated waste materials that are separated by low-permeability or unsaturated materials within the existing Tajiguas Landfill footprint, however, these zones are not connected and do not compromise the stability of the *existing* Landfill waste mass. The slope stability analysis prepared as supporting information for the Draft EIR, evaluated the slope stability of the *proposed* Tajiguas Landfill Expansion Project, assuming a groundwater profile 15 to 20 feet higher than what was measured in wells that were drilled into the waste mass in 2001. The report concluded that a potential maximum configuration of soil or waste fill stockpile on the top deck north of the Coastal Zone boundary (i.e., from elevation of about 400 above mean sea level (amsl) to elevation 700 amsl with an overall slope gradient of 2.5:1 (H:V) has adequate stability under both static and seismic conditions. The maximum elevation of the Proposed Project is 660 feet amsl.

- **Biology**

Comments on the Draft EIR focused on the removal of habitat at the Tajiguas Landfill site and impacts on sensitive species such as the California red-legged frog. The Tajiguas Landfill Expansion Project has been designed to avoid the coastal zone and Pila Creek and to protect the resources in these areas.

The expansion area would be located within the soil borrow area north of the existing waste footprint. Areas of chaparral, coastal sage scrub, coast live oak woodland, and non-native grassland would be removed and ruderal areas would also be disturbed. Discontinuous patches of chaparral and coastal sage scrub are located within the Tajiguas Landfill Expansion Project area and borrow areas but the expansion area avoids the coastal zone. The Environmentally Sensitive Habitat Area (ESHA) as defined by the California Coastal Act would not apply to habitats that occur on the inland portions of the Tajiguas Landfill site.

An ESHA is defined by the Coastal Act as “any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem which could easily be disturbed by human activities and developments” (Coastal Act Section 30107.5). The non-native grassland and coastal sage scrub habitats within the current Tajiguas Landfill and soil borrow areas occur in both the Coastal Zone and inland portions of the existing Tajiguas Landfill site. These areas are disturbed by landfill and soil excavation activities. The only excavation work associated with the Tajiguas Landfill Expansion Project within the Coastal Zone is the modification of the southeast corner of the Tajiguas Landfill. The southeast corner modification would occur over the existing Tajiguas Landfill footprint (an artificial fill slope) and would not disturb native plant habitats, as it is located on the artificially created waste fill slope that is the Tajiguas Landfill.

Evaluations to use the Rincon Formation for final cover during closure of the existing Tajiguas Landfill are included in two documents: The Preliminary Closure Plan and Preliminary Post-Closure Maintenance Plan that identified a line item in the preliminary costs estimate as “On-site clay acquisition and processing cost” (item 7c—(Santa Barbara County, 1994), and the Final Closure and Post-Closure Maintenance Plan (Santa Barbara County, 1999) that included soils reports identifying the Rincon and Sespe-Alegria Formations as potential soil cover materials. In addition, the cost estimated for excavation and placement of low-permeability clay soil layer are fairly low, indicating that costs to import appropriate soils from off-site were

not considered. The Rincon Formation was identified as the potential cover source for low-permeable material. The Rincon Formation provides a clay-rich cover layer that would prevent infiltration of precipitation. Hauling similar cover material from off-site would not prove to be cost-effective and would result in significant air quality impacts off site associated with vehicles hauling the material. A portion of the Rincon Formation along the west slope is located in the coastal zone; however, the material was identified as final cover for the existing landfill and would be “grandfathered in” under existing landfill operations (Final EIR, Ch.2.0, Response 3-82).

The west slope of Cañada de la Pila adjacent to the existing Tajiguas Landfill footprint has been disturbed in the past by grading activities associated with the landfill (water line placement, access road construction, etc.) and natural disturbance (i.e. landslide, dry ravel). These areas do not represent rare or especially valuable habitats due to past and ongoing disturbances, and similar habitats are common throughout the Gaviota Coast (Final EIR, Document 3, Response 3-49). The area of the Tajiguas Landfill Expansion Project would remove discontinuous vegetation within the soil borrow area and the periphery of contiguous habitat surrounding the Tajiguas Landfill.

California red-legged frogs have been observed in the sedimentation basins north of the existing Tajiguas Landfill. The capacity of the basins has been maintained by periodically removing sediment from the basins and water from the basins has been used for dust control at the existing Tajiguas Landfill. These practices would continue under the proposed project, however, the sedimentation basins would be operated in compliance with a California red-legged frog Management Plan (Management Plan). The Management Plan considers the life-history requirements of the California red-legged frog and also allows for landfill operations by timing water use and maintenance activities around the critical periods essential for survival of the red-legged frogs (Draft EIR, Page 3.4-44 — 3.4-45).

- **Traffic**

Comments were received with concerns over traffic safety associated with trucks entering and exiting the Tajiguas Landfill site at U.S. Highway 101. A traffic study completed in support of the Draft EIR found that there currently are and there would continue to be sufficient gaps in the traffic stream to accommodate project traffic with future increased volumes on U.S. Highway 101 (Draft EIR, Section 3.10).

- **Air Quality**

The Santa Barbara County Air Pollution Control District commented on the methodology used to evaluate impacts and alternatives and mitigation measures to reduce emissions. Mitigation Measures were revised in the Final EIR based on comments. All feasible air quality mitigation measures have been incorporated into the Final EIR (Draft EIR, Section 3.11 and FEIR, Ch. 4.0).

- **Waste Processing Technologies**

Alternative waste processing technologies, their current feasibility under the scope of this EIR, and an overview of current waste diversion/reduction programs in place in the Tajiguas Landfill watershed were provided in Section 4.0 of the Draft EIR and Section 3.0 of the Final EIR. These programs include an existing variable rate system, routing portions of the waste stream through existing materials recovery

facilities (MRFs), and green waste grinding. The County continues to evaluate other opportunities for increasing waste diversion/reduction, including green waste and food waste composting technologies, “waste-to-energy” technologies and conversion technologies, such as gasification. Currently these technologies are infeasible under the time constraints associated with the Tajiguas Landfill Expansion Project. Such technologies may however, become feasible when adequate time is available to plan and develop such waste processing technologies (FEIR, p. 3-18).

▪ **Southeast Corner Modification**

The southeast corner modification is located in the coastal zone portion of the existing landfill. The southeast corner modification component of the project involves excavation and relocation of waste and cover soil that are within and adjacent to the Coastal Zone above an elevation of 400 feet above msl. The Coastal Zone boundary on the landfill site was confirmed in recent years. With confirmation of this boundary, it was discovered that approximately 720,000 cubic yards of waste was inadvertently landfilled above the 400-foot elevation in the Coastal Zone.

Suggestions were made through the comments on the Draft EIR to delete the southeast corner modification from the project description (Final EIR, Ch.2, Responses 3-123 and 19-1). The alternative to leave the waste associated with the southeast corner modification in place is not considered feasible under current zoning requirements, Coastal Plan policies and the Coastal Act. However, leaving the waste in place would be environmentally superior because all potentially significant impacts associated with moving the waste would not occur. The waste removal is required to bring the facility into compliance with the zoning and Coastal Plan. A landfill is not an allowed use under the AG-II zoning designation in the Coastal Zone. Coastal Policies apply to activities, including waste placement, above the 400-foot elevation of the existing Tajiguas Landfill in the Coastal Zone. Below the 400-foot elevation, landfill activities are considered “grandfathered in” because this elevation was defined by the first Solid Waste Facilities Permit issued in 1978 (see Attachment 3). Therefore, it is not feasible under current regulations to leave the waste in place. Findings for consistency cannot be made with either the coastal zoning ordinance or the Local Coastal Plan policies.

Mitigation Measures

Mitigation measures have been developed to address significant impacts (Class I impacts) in the issue areas of Biological Resources, Cultural Resources, Visual Resources and Air Quality. These measures would potentially lessen impacts, but not to a level of insignificance.

Biological Resources:

1. A survey shall be conducted to identify sensitive plant species identified in Table 3.4-2 in areas to be cleared of native vegetation. The survey for the Gaviota tarplant (*Hemizonia increscens ssp. villosa*) shall be conducted during the months of May through late summer. In the event sensitive plant species (i.e., Santa Barbara honeysuckle, Gaviota tarplant, etc.) are identified, the following measures shall be implemented:
 - Plants shall be salvaged and/or propagules shall be relocated to an appropriate location in the Pila Creek watershed or the Baron Ranch, as identified by the biologist.

- Transplanted or propagated plants shall be maintained for a minimum of 5 years, or until the biologist determines that the plants have been successfully established (plants are vigorous, they flower and produce seed).
2. An oak tree replacement plan shall be prepared to replace oak trees identified for removal. Any oak trees that are removed and/or damaged (more than 25% of root zone disturbed) shall be replaced on a 10:1 basis with 1-gallon size saplings grown from locally obtained acorns. Trees shall be planted prior to winter rains, irrigated and maintained until established (5 years). The plantings shall be protected from predation by wild and domestic animals, and from human interference by the use of staked fencing and gopher fencing during the maintenance period. In the event that an oak tree(s) does not survive for 5 years, it shall be replaced.
 3. An oak tree protection program, prepared by a County-approved biologist, shall be implemented. The program shall include, but not be limited to, the following components:
 - No grading or development shall occur within the drip lines of oak trees.
 - All oak trees within 25 feet of proposed ground disturbances shall be temporarily fenced with chain-link or other satisfactory material throughout all grading and construction activities. The fencing shall be installed 6 feet outside the drip line of each oak tree, and shall be staked every 6 feet.
 - Within 6 feet of any oak tree drip line, the following shall be prohibited:
 - Parking, storage or operation of construction equipment;
 - Stockpiling of fill soil, rocks or construction materials;
 - Placement of artificial surface, pervious or impervious.
 - If any roots encountered are 1 inch in diameter or greater, they shall be cleanly cut under the direction of a County-approved arborist/biologist.
 - Any trenching required within the drip line or sensitive root zone of any specimen tree shall be done by hand.
 4. A survey for desert woodrat shall be conducted in mature chaparral prior to vegetation removal. In the event desert woodrat is found on the project site, a capture and relocation effort shall be conducted to move woodrats to suitable adjacent habitat.
 5. To compensate for native habitats disturbed by the expansion, a County-approved biologist shall prepare and implement a revegetation plan (e.g., a ratio of not less than 1:1 for each disturbed acre). The plan shall utilize native plants and seed stock from locally obtained sources to the maximum extent feasible and also shall take into account requirements for maintaining the integrity of the landfill and cover system. Species selection shall be dependent upon the nature of the habitat.
 6. To reduce impacts to California red-legged frogs (CRLF) that reside in the in-channel sedimentation basins, an extensive CRLF Management Plan shall be implemented and shall include the following:
 - a) The basin scheduled for maintenance shall be drained between mid-August and late-September. Maintenance activities for either basin shall occur October through November after draining the

basin or following a survey by a qualified biologist that confirms tadpoles have left the basin. Should SWUD demonstrate a need to conduct activities outside this period, the activities shall be subject to review and approval by the USFWS.

- b) At least 15 days prior to the onset of draining or maintenance activities, the SWUD shall submit the name(s) and credentials of biologists who conduct activities specified in the following measures to the USFWS. No project activities shall begin until SWUD receives verbal/written approval from the USFWS that the biologist(s) is qualified to conduct the work.
- c) Before any draining or maintenance activities begin on the sediment basin, a USFWS-approved biologist shall conduct a training session for all landfill personnel involved with these activities. At a minimum, the training shall include a description of the California red-legged frog and its habitat, and the general measures that are being implemented to conserve the California red-legged frog as they relate to the project. Brochures, books, and briefings may be used in the training session, provided that a qualified person is present to answer any questions.
- d) A USFWS-approved biologist shall survey the sediment basin at least 2 weeks before draining the basin. If California red-legged frogs, tadpoles, or eggs are found, the approved biologist shall contact the USFWS to determine the appropriate level of consultation.
- e) To obtain water for dust control (and prior to sediment removal), water shall be pumped on alternate days. Water shall be pumped only from July through November or as directed by a qualified biologist. The intake shall be placed within a floating, screened cage (3 feet by 3 feet by 3 feet) constructed of 0.25-inch mesh wire. To prevent adult frogs from climbing into the cage from below, the upper 12 inches of the cage may be covered with sheet metal flashing that extends above and below the water line and is bent at 90 degrees to form a 6-inch lip around the top of the cage.
- f) Maintenance activities (sediment removal) in the basins shall be conducted when the basins are as dry as possible. A temporary barrier (silt fencing or other appropriate material) shall be placed between the two in-channel sedimentation basins to exclude red-legged frog from the work area. A qualified biologist, approved by USFWS, shall perform a survey of soil cracks immediately prior to initiation of sediment removal. Any California red-legged frogs found should be captured and relocated to the other basin. Each night following sediment removal, the remaining soil cracks shall be searched in preparation for the next day's work. Sediment removal, once initiated, shall proceed as quickly as possible.
- g) A USFWS-approved biologist shall be present prior to and during draining and maintenance until such a time as all removal of California red-legged frogs, instruction of workers, and habitat disturbance has been completed. After this time, the SWUD shall designate a person to monitor onsite compliance with all impact minimization measures. The USFWS-approved biologist shall ensure that this individual receives training outlined above (in measure c) and is trained in the identification of California red-legged frogs. The monitor and the USFWS-approved biologist shall have the authority to halt any action that might result in impacts that exceed the levels anticipated by the USFWS during review of the proposed action. If work is stopped, the USFWS shall be notified immediately by approved biologist or onsite biological monitor.
- h) All fueling and maintenance of vehicles and other equipment shall occur at least 20 meters from any riparian habitat or water body. SWUD shall ensure that contamination of habitat does not

occur during such operations. Prior to the onset of work, the USFWS shall ensure that SWUD has prepared a plan to allow a prompt and effective response to any accidental spills. All workers shall be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.

- i) Native riparian and upland vegetation on the upper banks of the basins shall remain in place to provide cover for red-legged frogs except where the equipment will access the basins during sediment removal activities (e.g., a ratio of not less than 1:1 for each disturbed acre of existing habitat). To the extent feasible, sediment removal shall occur in the bottom of the basins, below the high water mark. A revegetation plan to enhance riparian wetland and upland vegetation in Pila Creek upstream of the sediment basins shall be prepared. A species list and restoration-monitoring plan shall be included with the project proposal for review and approval by the USFWS. Such a plan must include, but not be limited to, location of the restoration, species to be used, restoration techniques, time of year the work will be done, identifiable success criteria for completion, and remedial actions if the success criteria are not achieved.
 - j) Stream contours shall be returned to their original condition at landfill closure, unless consultation with the USFWS has determined that it is not beneficial to the species or is not feasible.
 - k) Access to the southern sediment basin shall be from the north. The size of staging areas, and the total area of the activity shall be limited to the minimum necessary to achieve the project goal. Routes and boundaries shall be clearly marked. Where impacts occur in these staging areas and access routes, restoration shall occur as identified in measures (i) and (j).
 - l) To control erosion during and after project implementation, the applicant shall implement best management practices (BMPs) as identified by the RWQCB.
 - m) During pumping of water from the in-channel sediment basins, intakes shall be completely screened with wire size set by the size of the frog larvae to prevent California red-legged frogs from entering the pump system. The screen box on the intake pipe shall be kept clean to maintain low water velocities across all screens. The wetted surface area of the box shall be designed based on pump rates and targeted water velocities across the screens. Upon completion of pumping activities, any barriers to flow shall be removed in a manner that would allow flow to resume with the least disturbance to the substrate.
 - n) A USFWS-approved biologist shall permanently remove from within the project area any individuals of exotic species, such as bullfrogs, crayfish, and centrarchid fishes, to the maximum extent possible. SWUD shall have the responsibility to ensure that these activities are in compliance with the California Fish and Game code.
7. To minimize wildlife disturbance, night lighting used on the landfill site shall be of low-intensity, low-glare design, and shall be hooded to direct light downward onto the work area and prevent spill-over onto adjacent habitats. Except on an emergency basis, artificial lighting shall not be employed prior to 6:00 a.m. or after 8:00 p.m.
 8. To reduce hazards to wildlife that may ingest or become trapped by debris, portable fences shall continue to be used to limit the spread of litter on the working face of the landfill. Litter shall be collected on a regular basis.

Cultural Resources

1. All known or potential cultural sites that are subject to ground disturbances shall be subject to a Phase 1 archaeological survey pursuant to County Archaeological Guidelines. If required, a Phase 2 subsurface investigation and Phase 3 data recovery program shall be performed if significant resources will be encountered and potential impacts are unavoidable. Surveys will take place as far in advance of landfill expansion activities as feasible to avoid delaying landfill operations.
2. In the event cultural remains are encountered during grading, work shall be stopped immediately or redirected until a County-qualified archaeologist and Native American representative are retained by the applicant to evaluate the significance of the find pursuant to Phase 2 investigations of the County Archaeological Guidelines. If remains are found to be significant, they shall be subject to a Phase 3 mitigation program, consistent with County Archaeological Guidelines.
3. A training program shall be developed and conducted for all landfill personnel. Personnel shall be made aware of the sensitivity of cultural resources at the landfill. These resources will be designated as "off-limits," with instructions to avoid them.

Visual Resources

1. At final closure, the landfill shall be contoured to be consistent with the surrounding terrain. It shall be vegetated with species that include appropriate local native plant species.
2. Native sycamore trees from local seed or cutting stock shall be planted in Pila Creek downstream of the landfill, in sufficient quantity to vegetate the area.
3. An oak tree replacement plan shall be prepared to replace oak trees identified for removal. Any oak trees that are removed and/or damaged (more than 25% of root zone disturbed) shall be replaced on a 10:1 basis with 1-gallon size saplings grown from locally obtained acorns. Trees shall be planted prior to winter rains, irrigated and maintained until established (5 years). The plantings shall be protected from predation by wild and domestic animals, and from human interference by the use of staked fencing and gopher fencing during the maintenance period. In the event that an oak tree(s) does not survive for 5 years, it shall be replaced.

Air Quality

1. Mobile source emissions shall be reduced through implementation of the following:
 - a. Engines shall be turned off when the idling period will exceed 10 minutes.
 - b. All vehicles and equipment shall be regularly maintained.
 - c. Heavy-duty diesel-powered equipment purchased for the project shall comply with federal and California diesel standards that are in force at the time of purchase.
 - d. Scrapers and compactors shall be retrofitted with diesel particulate filters (DPFs).
 - e. The maximum number of pieces of scrapers operating simultaneously shall be limited to four.

- f. Transfer trucks shall be used to haul waste from the transfer stations to the Tajiguas Landfill, thereby reducing the number of truck trips to the landfill.
2. Operation of the tub grinder and scrapers shall be coordinated to reduce peak daily air emissions. The following measures shall be implemented to reduce emissions:
 - a. The tub grinder or other grinder shall be used a maximum of 4 hours per day when scrapers are in use.
 - b. When no scrapers are in use, the tub grinder may be used up to a maximum of 8 hours per day.
3. Dust generated by landfill activities shall be controlled through implementation of the following dust control measures:
 - a. During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site.
 - b. Traffic speed shall be limited to 15 mph on all roads.
 - c. Soil stockpiled for more than two days shall be covered, moistened, or treated with soil binders to prevent dust generation.
 - d. In areas not in active use, exposed soil shall be moistened or shall be revegetated by seeding and watering, or soil binders shall be applied.
 - e. All permanent access roads shall be paved. Temporary access roads shall be provided with a crushed rock base (or similar material) or treated with a soil binder.
 - f. Paved roads shall be vacuum swept as needed.
 - g. Monitoring wind speed.
 - h. Monitoring PM₁₀ at the landfill boundary.
4. The landfill cover material shall be routinely inspected for adequacy, and for cracks and fissures. The cover shall be repaired as necessary to control landfill gas.
5. A buffer, approximately 250 to 320 meters (approximately 800 to 1,050 feet) east-west by 800 meters north-south (approximately 2,600 feet, and a total of 50 acres) on the Baron Ranch, adjacent to the east boundary of Tajiguas Landfill, shall have public access restrictions. These restrictions would assure that the public could not access an area where 24-hour PM₁₀ or 1-hour NO₂ concentrations could potentially be greater than ambient air quality standards according to the results of air dispersion modeling.

Mitigation measures have been developed to reduce potentially significant impacts to a less than significant level (Class II impacts) in the issue areas of Air Quality, Biological Resources, Cultural Resources, Visual Resources, Geology, Nuisances, Land Use, Traffic, and Health and Safety. Mitigation measures to reduce Class I impacts for Biological Resources, Cultural Resources, Visual Resources, and Air Quality would be implemented to reduce Class II impacts as well.

Geology

1. The landfill design shall include the following:
 - a) A detailed slope-stability report shall be prepared by a geologist/soils engineer to determine maximum cut-slopes, based on in-field observations of bedrock conditions. Cut-slopes shall not exceed 2:1 unless the slope-stability report concludes that steeper slopes will be stable. In that case, slopes may exceed 2:1, provided the slopes adhere to the design standards identified in the report.
 - b) A detailed geological and/or soils engineering study shall be prepared to determine landfill structural design criteria, as required by CCR Title 27, when the final landfill excavation and fill plans are being developed.
2. Expansive soils shall be excavated prior to placement of waste fill. In the event expansive soils are used as fill under sensitive structures or pavements, geotechnical engineering practices (i.e., compaction, drainage and watering controls) shall be implemented.
3. Grading and drainage improvement of natural slopes adjacent to the landfill components shall include construction methods to control shallow landslides. The construction methods shall include limiting the size of the exposed cut area, diversion of storm water runoff away from potential landslides, and identification of area for drainage.

Biological Resources

1. To protect oak/riparian habitat in the northern portion of the project site, all ground disturbance upstream of the back canyon sediment basins shall be prohibited within a 50-foot setback from either side of the top-of-bank (e.g., excluding existing road crossings) or oak/riparian vegetation canopy, whichever is greater, along Pila Creek (a sensitive riparian habitat area).
2. Erosion control measures shall continue to be implemented. Erosion control methods could include silt fencing, straw bales, hydroseeding with appropriate native plant species from the project vicinity, or use of sandbags in conjunction with other methods. Hydroseeding, if used, shall be applied prior to the rainy season.
3. To reduce impacts to Monarch butterflies that may roost in nearby eucalyptus trees along Highway 101, revegetation plantings shall include adult nectar sources and larval food plants, such as milkweed.

The mitigation measure to reduce Class I impacts and under Nuisance that provides for development of a Bird Management Plan would also reduce Class II impacts to Biological Resources.

Cultural Resources

The mitigation measure to reduce Class I impacts would also reduce Class II impacts to Cultural Resources.

Nuisance

1. To reduce potential vector habitat or harborage, good housekeeping practices shall be implemented at the landfill. Good housekeeping practices shall include, but are not limited to, the following measures:
 - a) The working face shall be maintained as small as safely practicable, considering the types and numbers of landfill equipment operating.
 - b) Extremely odiferous waste shall be buried as soon as possible after unloading.
 - c) Waste at the active working face shall be compacted.
 - d) Disturbance at previously covered cells shall be avoided.
 - e) Application of a minimum of a 6-inch-thick layer of compacted soil or ADC shall be applied during the day and/or at the end of each working day.
 - f) Structures and areas of human activity shall be kept clean.
 - g) Trash shall be deposited in appropriate closed containers and removed for proper disposal.
 - h) Tools, miscellaneous equipment, and other items that could commonly attract vectors shall be stored in closed containers and/or within an enclosed structure.
 - i) Drainage control structures (sedimentation ponds, drainage ditches, etc.) shall be maintained to preclude mosquito breeding habitat, vectors or pests, consistent with the California Red-legged frog management plan.
 - j) The landfill shall be inspected monthly to identify areas of substandard soil cover. These areas shall be corrected as needed; including repair of cracks or holes in the cover caused by landfill operations or weather conditions.
 - k) The working face, buildings, and storage containers shall be inspected monthly for signs of vector activity. Repairs to the working face, buildings or storage containers shall be implemented as necessary, and buildings or storage containers, would require repair or rodent traps.
 - l) In the event that a vector problem should occur, appropriate measures, such as cleaning and securing a building or container, or the use of a professional or licensed exterminator, shall be used.
2. To reduce nuisance birds at the landfill, a Bird Management Plan shall be developed. The plan shall include, but not be limited to, the following measures:

- a) Landfill personnel shall be assigned to bird management from dawn until all refuse has been buried and the landfill closed for the day. Personnel shall be trained in bird identification and behavior.
 - b) The working face shall be maintained as small as safely practicable, considering the types and numbers of landfill equipment operating.
 - c) The landfill shall be inspected regularly for cracks or fissures which can attract birds. Repairs shall be implemented as necessary.
 - d) Extremely odiferous waste shall be buried as soon as possible after unloading.
 - e) Application of a minimum 6-inch-thick layer of compacted soil or approved ADC shall be applied during the day and/or at the end of each working day.
 - f) The following actions to deter birds at the landfill may include, any one or more of the following:
 - 1) Propane cannons and noisemakers
 - 2) Distress calls
 - 3) Gull "decoys" displayed in distressed positions
 - 4) Remote control airplanes
 - 5) Overhead lines or wires
 - 6) Kites
 - 7) Flash tape and streamers
 - 8) Balloons
 - 9) Bird trainers (e.g., *JUMPO*TM)
 - 10) Raptors
 - 11) Dogs
 - 12) Depredation
 - g) SWUD shall determine the feasibility of using a large cage or netting as a bird deterrent at the landfill working face.
3. To reduce nuisance litter at the landfill and surrounding areas, the following measures shall be required:
- a) Signs displaying antilittering laws and requirements shall be posted in both English and Spanish at the landfill entrance and scalehouse. The signs shall include requirements for covering loads and notification that an additional "untarped" fee shall be charged for uncovered loads.
 - b) All waste haul trucks shall be tarped from the point of origin to prevent littering and odor nuisance.
 - c) During periods of high winds (greater than 25 miles per hour [mph]), application of cover material shall occur more frequently.
 - d) As feasible, the working face shall be temporarily relocated to wind-protected areas during periods of high wind (greater than 25 mph).

- e) Litter fences shall be installed downwind of the working face of the landfill.
 - f) The landfill perimeter fence shall be maintained to provide litter control.
 - g) Litter crews shall be used to routinely check the various fences for litter control effectiveness and to remove litter.
 - h) Roads leading to the landfill shall be inspected daily for litter and illegally dumped waste by landfill managers and supervisors as they travel to and from the landfill site. Road inspections shall include the landfill access road and Highway 101 for a distance of 1/4 mile east and west of the landfill access road intersection. Litter crews will be dispatched on an as-needed basis.
 - i) Onsite drainage channels shall be cleaned prior to the start of the rainy season (November 1 of each year) and periodically, as needed, to prevent offsite migration of accumulated litter.
4. Odors generated by the landfill shall be kept to a minimum, with a goal of retaining odors on the site. The following odor control measures shall be implemented:
- a) Extremely odiferous waste shall be buried as soon as possible after unloading.
 - b) The landfill shall be inspected regularly for cracks or fissures. Repairs shall be implemented as necessary.

The mitigation measure under Air Quality that provides for dust control would also reduce Nuisance impacts.

Land Use

Mitigation Measures under Geology, Water Resources, Nuisances, Visual Resources, Noise, Air Quality and Health and Safety would be required and would reduce impacts to a less than significant level.

Visual Resources

The mitigation measures under Biological Resources that provide for hooded lighting and revegetation of the landfill would also reduce impacts to Visual Resources.

Traffic

1. A permanent stop sign and speed dots shall be installed and maintained at the landfill exit to Highway 101. All vehicles exiting the landfill site shall be required to make a complete stop prior to entering the Highway.
2. To caution motorists approaching the intersection at Highway 101 and the Tajiguas Landfill entrance road, two signs, one for the northbound lanes and one for the southbound lanes of Highway 101 shall be provided. The signage shall be as follows: *Caution - Trucks Entering the Highway*.

Health and Safety

1. To minimize fire hazards, the following measures shall be implemented:
 - a) Fire suppression equipment such as fire extinguishers, dedicated water storage, and fire hydrants shall be provided in compliance with County Fire Department and OSHA standards.
 - b) Landfill equipment shall be inspected and cleaned on a regular basis to reduce the potential for vehicle fires.
 - c) Water trucks shall be maintained full of water and available for fire suppression at all times.
 - d) Access roads shall be maintained to allow emergency vehicles access to the working face.
 - e) Stockpile areas shall be accessible for fire suppression.
 - f) A "No Smoking" policy shall be strictly enforced at the Landfill.
 - g) The landfill footprint, wood stockpiles, and a 15-foot area along all access roads shall be cleared of weeds and errant debris.
2. The security fence shall be inspected and repaired as necessary. The entrance gate shall remain locked when the landfill is closed.
3. The operator shall install monitoring systems and monitor LFG. If monitoring indicates that impacts are occurring, appropriate corrective actions shall be implemented. These actions include, but are not limited to, the following:
 - a) The LFG collection system shall be adjusted to increase LFG control.
 - b) One or more additional LFG collectors shall be installed to increase gas collection.
 - c) The operator shall place additional daily, intermediate and final cover to control fugitive gas emissions.
4. The operator shall routinely inspect landfill cover materials for cracks and/or fissures. Cracks and fissures shall be repaired.
5. There shall be one or more onsite personnel to direct vehicles and equipment on the landfill as they travel to and from the working face. SWUD shall develop procedures that include, but are not limited to, issues of timing and right-of-way. These shall be modified as necessary specific to actual conditions and incidents that may occur.
6. An Excavation Plan shall be prepared for the Southeast Corner Modification to address operations associated with the excavation and removal of in-place waste. It shall include procedures and sequencing to maintain stability of the excavation area. Further, a Health and Safety Plan shall be developed to address the specific worker-associated activities of waste removal and relocation.

The mitigation measures under Nuisance that provide for measures to reduce vector habitat or harborage would also reduce impacts to Health and Safety.

Mitigation Monitoring Program

CEQA Section 15091(d) requires “(d) When making the findings required in subsection (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.” CEQA Section 15097(a) ensures “... that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects.”

The impact description, mitigation measures and enforcement agency is designated in the attached Mitigation and Monitoring Reporting Program (Plan — Attachment 2). This Mitigation and Monitoring Reporting Program (Plan) would ensure compliance with the mitigation measures during project implementation.

Conclusions

Staff recommends that the Board approve the proposed Project (Front Canyon Expansion configuration and other project elements - the greenwaste pad, scale, scalehouse and maintenance shop and modification of the southeast corner of the Tajiguas Landfill) which provides an additional capacity of 8.2 million cubic yards at the Tajiguas Landfill as the preferred project description (Proposed Project). While both the Front Canyon and Back Canyon configurations have similar environmental impacts, the Front Canyon is recommended because of the following non-environmental based considerations:

- 1) Construction of the Front Canyon configuration is significantly more cost effective (approximately \$17 million less than the Back Canyon configuration – see Attachment 6);
- 2) While the area of impact is similar, the waste footprint is approximately 25 acres smaller under the Front Canyon as compared to the Back Canyon configuration (Draft EIR, Table 2-6); and
- 3) While both the Front Canyon and Back Canyon configurations provide an adequate factor of safety for slope stability, even greater slope stability can be achieved under the Front Canyon configuration.

Staff also recommends that the Board approve the other project elements (the greenwaste pad, scale, scalehouse and maintenance shop and modification of the southeast corner of the Tajiguas Landfill) and direct staff to obtain permits to relocate the waste associated with the southeast corner modification to bring the Tajiguas Landfill into compliance with Article II of the Coastal Zoning Ordinance, the Coastal Plan and the California Coastal Act.

The alternative to leave the waste associated with the Southeast Corner Modification in place is not considered feasible under current zoning requirements, Coastal Plan policies and the Coastal Act. However, leaving the waste in place would be environmentally superior because all potentially significant impacts associated with moving the waste would not occur. The waste removal is required to bring the facility into compliance with the zoning and Coastal Plan. The coastal policies do apply to any activities, including

waste placement, above the 400-foot elevation in the Coastal Zone (Final EIR, Ch. 2, Response 3-5). The Southeast Corner Modification waste exceeds this elevation at the Tajiguas Landfill. A landfill is not an allowed use under the AG-II zoning designation in the Coastal Zone. Coastal policies apply to activities, including waste placement, above the 400-foot elevation of the existing Tajiguas Landfill in the coastal zone. Below the 400-foot elevation, landfill activities are considered “grandfathered in” because the maximum elevation of the Tajiguas landfill was defined by the first Solid Waste Facilities Permit issued in 1978 (see Attachment 3). Therefore, it is not feasible under regulations to leave the waste in place. Findings for consistency cannot be made with either the coastal zoning ordinance or the Coastal Plan policies. The southeast corner modification is required to bring the existing Tajiguas Landfill into conformance with the coastal zoning ordinance, Coastal Plan and the California Coastal Act (Draft EIR Section 3.7.3.4.1. and Final EIR Ch.2.0, Comment Response 3-123).

Further, staff recommends that your Board adopt the mitigation measures, with their corresponding monitoring requirements, as the Mitigation Monitoring Program (Plan) for this project (Attachment 2) to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented to mitigate or avoid significant environmental effects.

Mandates and Service Levels:

Certification of the EIR will allow staff to continue to provide reliable and cost-effective solid waste disposal capacity for the residents of southern Santa Barbara County and the Santa Ynez and Cuyama Valleys for the next 15 years.

Fiscal and Facilities Impacts:

Certification of the EIR will allow staff to develop, permit, and operate the Tajiguas Landfill Expansion Project in an efficient manner. The Tajiguas Landfill Expansion Project is identified in the Santa Barbara County 2002/2003 Capital Improvements Plan (CIP). A cost comparison of the Tajiguas Landfill Expansion Project and the alternatives analyzed in the DEIR are in Attachment 6. The cost of the Proposed Project (Front Canyon configuration) is approximately \$53 million, approximately \$17 million less than the Back Canyon configuration.

Special Instructions:

The Clerk of the Board to file the Notice of Determination and send a copy of the minute order to the Solid Waste and Utilities Division office, attn: Georgia Navarro.

Concurrence:

County Counsel

Attachments

Attachment 1: CEQA Findings and Statement of Overriding Considerations

Attachment 2: Mitigation Monitoring Program (Plan)

Attachment 3: Tajiguas Landfill History and Milestones

Attachment 4: Executive Summary (Section 1.0) of the Tajiguas Landfill Expansion Draft EIR

Attachment 5: Memo from Brian Baca to Roger Briggs, Executive Director, Regional Water Quality Control Board, June 30, 2002, RE: Tajiguas Landfill Expansion Project: Review of "Evaluation and Reporting on Contaminant Hydrogeological Conditions at the Tajiguas Landfill", report written by Franklin J. Goldman (RG #5557) and George Pavlov of *GeoSolv, LLC*, dated December 12, 2001.

Attachment 6: Comparative Financial Analysis of the Tajiguas Landfill Expansion and Landfilling Alternatives