9.0 RESPONSE TO COMMENTS

Section 15087 of the State CEQA Guidelines provides an opportunity for the public and agencies to review the Draft Subsequent EIR and submit comments regarding its adequacy. Section 15088, the California Environmental Quality Act (CEQA) Guidelines require that “[t]he lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” (italics added for emphasis.) Consistent with the Guidelines, the responses to comments focus on those comments that pertain to environmental issues. All comment letters and e-mails received during the extended public comment period (August 11, 2014 to October 9, 2014) are presented with written responses. In addition, responses to oral and written comments received at the September 4, 2014 public hearing are provided. The transcript from the public hearing is also attached.

9.1 RESPONSES TO WRITTEN COMMENTS

Written comments (letters, e-mails or comment forms from the public hearing) on the Draft Subsequent EIR were submitted by the agencies and persons listed below.

1. Governor’s Office of Planning and Research, State Clearinghouse (review period extension memo and October 10, 2014 letter);
2. Glenn Fredrickson, 4635 Sierra Madre Road, Santa Barbara;
3. Cynthia Oliver, 4699 Sierra Madre Road, Santa Barbara;
4. Dana Penoff;
5. Beatrice Ward Curatalo;
6. Stan & Peggy Archuleta, 450 Camino Del Remedio, Santa Barbara;
7. Patricia McCormack, 405 Grenoble Road, Santa Barbara;
8. Marc Chytilo, Law Office of Marc Chytilo, representing the Gaviota Coast Conservancy (request for comment period extension);
9. Joann Redding, 4647 Malaga Circle, Santa Barbara;
10. Brij & Sunanda Bhargava, 4596 Sierra Madre Road, Santa Barbara;
11. Justin & Jamie Anderson, 4590 Sierra Madre Road, Santa Barbara;
12. Oak Grove Homeowners Association, 401-409 Camino Del Remedio, Santa Barbara;
13. Valentin Shmidov, 353 Sherwood Drive, Santa Barbara;
14. Martha Hassen;
15. Beverly Herbert, 575 Lorraine Avenue, Santa Barbara;
16. League of Women Voters of Santa Barbara (8/31/14);
17. League of Women Voters of Santa Barbara (10/8/14);
18. Steve & Linda Petersen, 1084 Camino Del Rio, Santa Barbara;
19. Kas Terhorst, 4477 F. Shadow Hills Blvd., Santa Barbara (e-mail & comment form);
20. Pamela Poehler, 585 El Sueno Road, Santa Barbara (comment letter);
21. Pamela Poehler, 585 El Sueno Road, Santa Barbara (comment form);
22. Unknown (unsigned comment form from the public hearing);
23. Oretha Lambert, 340 Old Mill Road #182, Santa Barbara;
24. Judi Biegen, 315 Sherwood Drive, Santa Barbara;
25. Lynne Tahmisian, Sierra Madre Road, Santa Barbara;
26. Ginnie Grotenhuis, 4587 Sierra Madre Road, Santa Barbara;
27. Bill Edwards, 251 El Sueno Road, Santa Barbara;
28. Kelly Family, 1122 Via Regina, Santa Barbara;
29. James Marino, 1026 Camino Del Rio, Santa Barbara;
30. Cheri Spencer, La Ramada Drive, Santa Barbara;
31. Lorraine Morey, 1110 Camino Del Rio, Santa Barbara;
32. Peggy Kearns;
33. Jeff Hanson;
34. Dennis & Magdala LaLumandiere, 4600 Camino Del Mirasol, Santa Barbara;
35. Robert & Iris Cook, 669 Alto Drive, Santa Barbara;
36. Louis & Janet Tedeschi, 4655 Sierra Madre Road, Santa Barbara;
37. James & Patricia Shaw, 4650 Sierra Madre Road, Santa Barbara;
38. Jaan Karsh, 4541-B Oak Glen Drive, Santa Barbara;
39. Santa Barbara Air Pollution Control District;
40. Carol Weston, 4746 Sierra Madre Road, Santa Barbara;
41. Gerry Aspen, 4677 Sierra Madre Road, Santa Barbara;
42. Barbara Aspen, 4677 Sierra Madre Road, Santa Barbara;
43. Hochberg family, 4710 Sierra Madre Road, Santa Barbara;
44. James & Stella Woollum, 233 Sherwood Drive, Santa Barbara;
45. Bob & Debbie Hart, 494 N. La Cumbre Road, Santa Barbara;
46. Mary Wiemann, 991 Camino Del Rio, Santa Barbara;
47. David Hennerman, 730 El Rodeo Road, Santa Barbara;
48. Rancho San Antonio Homeowners Association;
49. John & Karen Long, 4707 Sierra Madre Road, Santa Barbara;
50. Ruth Von Eberstein, 133 Campo Vista Drive, Santa Barbara;
51. Nona Todd Andrews; 4541-F Oak Glen Drive, Santa Barbara;
52. Carol Ann Mineau, 4421 La Paloma Avenue, Santa Barbara;
53. William & Patricia McKinnon, 670 Alto Drive, Santa Barbara;
54. John Park, 4611 Sierra Madre Road, Santa Barbara;
55. Kenneth A. Cohen, 989 Camino Del Retiro, Santa Barbara;
56. Gage Ricard and George Azelickis, 4555-E Oak Glen Drive, Santa Barbara;
57. Amjadi family, 740 & 750 Alto Drive, Santa Barbara;
58. City of Santa Barbara Community Development Department;
59. Santa Barbara County Public Health Department, Environmental Health Services;
60. Laina Mayfield-Condron, 4490 La Paloma Avenue, Santa Barbara;
61. Lauren Hanson and Mary Jones, 288 Sherwood Drive, Santa Barbara;
62. Brian & Judy Gough, 4605 Sierra Madre Road, Santa Barbara;
63. California Department of Resources Recycling and Recovery (CalRecycle);
64. Sonja Cutner, 360 Sherwood Drive, Santa Barbara;
65. Community Environmental Council;
66. Alexandra Geremia, Arroyo Quemada Lane.
67. City of Goleta, Advanced Planning;
68. Susan E. Millhollan, 1091 Camino Del Rio, Santa Barbara;
69. Marc Chytilo, Law Office of Marc Chytilo, representing the Gaviota Coast Conservancy;
70. Ellison Folk, Shute, Mihaly & Weinberger LLP, representing the Santa Barbara Chapter of the Surfrider Foundation;
71. Cecilia Brown (Planning Commission member, 2nd District), 398 N. Kellogg Avenue, Santa Barbara;
72. Linda & Dan Smith, 5 Arroyo Quemada Lane, Goleta; and
73. Steven C. Johnson, property owner near the Tajiguas Landfill.

9.2 RESPONSES TO ORAL COMMENTS

Oral comments were provided by the following parties, primarily at the public hearing:

1. Andy Caldwell, Coalition of Labor, Agriculture and Business;
2. Connie Hannah, League of Women Voters of Santa Barbara;
3. Lorraine Morey;
4. Kas Terhorst;
5. Bob Hart;
6. Lauren Hanson;
7. Laina Mayfield-Condron, 4490 La Paloma Avenue, Santa Barbara;
8. Mary Jones;
9. Judith Roberson;
10. James Marino;
11. Cheri Bode;
12. Susan Riparetti;
13. Barbara Kloos;
14. Pamela Poehler;
15. Dave Court;
16. Sonja Cutner;
17. Bobbi McGinnis; and
18. Bruce McKaig.

In accordance with the requirements of Section 15088 of the CEQA Guidelines, responses are provided following each comment letter (beginning on page 9-325). Specific comments within each letter are numbered and responses are provided corresponding to each numbered comment. Oral comments are addressed by summarizing each comment using the transcript of the public hearing, and providing a written response following each comment.
Memorandum

Date: September 19, 2014
To: All Reviewing Agencies
From: Scott Morgan, Director
Re: SCH # 2012041068

Tajiguas Landfill Resource Recovery Project

Pursuant to the attached letter, the Lead Agency has extended the review period for the above referenced project to October 09, 2014 to accommodate the review process. All other project information remains the same.

cc: Joddi Leipner
Santa Barbara County Resource Recovery & Waste Mgt.
130 E. Victoria Avenue, Suite 100
Santa Barbara, CA 93101
REVISED NOTICE
NOTICE OF EXTENSION OF THE PUBLIC COMMENT PERIOD ON THE
DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED
TAJIGUAS RESOURCE RECOVERY PROJECT

PROJECT DESCRIPTION: Santa Barbara County Public Works Department, Resource Recovery and Waste Management Division (RRWMD) proposes to modify the operation of the Tajiguas Landfill Project to add a Resource Recovery Project that would process (recover recyclables and organics from) municipal solid waste (MSW) and process commingled source separated recyclables (CSSR, optional element) from the communities currently served by the Tajiguas Landfill.

PROJECT LOCATION: The project site is located at the Tajiguas Landfill, approximately 26 miles west of the City of Santa Barbara, commonly known as 14470 Calle Real, APNs 081-150-026, -019 and -042 in the Gaviota Coast area, 3rd Supervisorial District.

PUBLIC HEARING AND COMMENT: RRWMD is soliciting comments on the adequacy and completeness of the analysis and proposed mitigation measures described in 12EIR-00000-00002. In response to written requests, the public comment period on the Draft Subsequent EIR has been extended to Thursday, October 9th, 2014, 5:00 p.m. You may comment by submitting written or oral comments to the project planner identified below prior to the close of public comment on Thursday, October 9th, 2014, 5:00 p.m. Public testimony was also accepted at the public hearing held on Thursday, September 4th, 2014 5:00 p.m., at the Santa Barbara County Public Health Department Auditorium, 300 N. San Antonio Road, Santa Barbara, CA.

PROJECT DETAILS: The Resource Recovery Project would modify current waste management operations at the Tajiguas Landfill by the addition of a Materials Recovery Facility (MRF) and Dry Fermentation Anaerobic Digestion (AD) Facility. The MRF would be comprised of an approximate 60,000 square foot (sf) facility (70,000 sf if CSSR processing [optional element] is included) that would sort MSW into three streams:

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

The AD Facility would be housed within an approximate 63,000 sf building, along with an associated Energy Facility and percolate storage tanks that would convert all organics recovered from the MSW and SSOW into:

- Bio-gas (primarily composed of methane and CO₂) — that would be used to power two (2) 1,537 horsepower onsite combined heat and power (CHP)
areas: aesthetics, biological resources, hazards/hazardous materials, geologic processes, cultural resources, land use, and water resources. Beneficial impacts (Class IV) effects are anticipated in the following areas: greenhouse gas emissions and public health/nuisance. The project would extend the life of the Tajiguas Landfill and thereby extend previously disclosed Class I air quality and biological impacts, and Class II biological resources, hazardous materials, nuisance and cultural resource impacts. If the project description changes, RRWMD will require a reevaluation to consider the changes. If you challenge this environmental document in court, you may be limited to raising only those issues raised by you or others in written correspondence or in hearings on the proposed project.

**DOCUMENT AVAILABILITY:** If a copy of the Environmental Impact Report is not attached, the draft EIR may be obtained and all documents referenced in the EIR may be reviewed at RRWMD at 130 E. Victoria Street AND on our website at: [http://resourcerecoveryproject.com/pages/downloads.php/environmental-documents.php](http://resourcerecoveryproject.com/pages/downloads.php/environmental-documents.php)

Draft documents are also available for review at the Buellton Library 140 W Highway 246, Buellton CA 93427; Carpinteria Public Library, 5141 Carpinteria Ave Carpinteria CA 93013; Goleta Branch Library, 500 N Fairview Ave, Goleta CA 93117; Montecito Public Library, 1469 East Valley Road, Montecito CA 93108; Santa Barbara Public Library, 40 E Anapamu, Santa Barbara CA 93101; Solvang Public Library, 1745 Mission Drive, Solvang CA 93463; and UCSB Library Reference Department, University of California, Santa Barbara CA 93106.

**HOW TO COMMENT:** Please provide comments to the project environmental planner, Joddi Leipner at 130 E. Victoria Street, Suite 100, Santa Barbara, CA 93101, PHONE 805-882-3614, FAX 805-882-3601; email: jleipner@cosbpw.net prior to the close of public comment on October 9th, 2014 at 5 p.m. Testimony was also accepted at the public hearing held on September 4th, 2014. Please limit comments to environmental issues such as traffic, biology, noise, etc. You will receive notice of the dates of future public hearings before the Board of Supervisors to consider project approval or denial, which is estimated in fall 2014.

In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this hearing, please contact RRWMD (805) 882-3614. Notification at least 48 hours prior to the hearing will enable staff to make reasonable arrangements.
Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044, (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

Project Title: Tijuana Resource Recovery Project
Lead Agency: Santa Barbara County Resource Recovery & Waste Mgmt.
Mailing Address: 130 E. Victoria Avenue, Suite 100, Santa Barbara, CA 93101
City: Santa Barbara
County: Santa Barbara
Project Location: County: Santa Barbara
Census Tract: U.S. 101, Calle Real
Street: County: Santa Barbara
Project: Community
City/Nexus Community: Goleta
Zip Code: 93117

Project Presented: Jodi Leipner
Phone: 505482-3014

Assessor's Parcel No.: 081-150-019-006.42
Within 2 Miles: State Hwy #: U.S. 101
Airports:

Document Type:
- CEQA: NOP
- NEPA:
  - NOI: BA
  - EA: Final Document

Local Action Type:
- General Plan Update
- General Plan Amendment
- Specific Plan
- Master Plan
- Flannned Unit Development
- Site Plan

Development Type:
- Residential: Units
  - Office: Sq. ft.
  - Commercial: Sq. ft.
  - Industrial: Sq. ft.
  - Educational:
  - Recreational:
  - Water Facilities:

Project Issues Discussed in Document:
- Acute/Viscual
- Agricultural Land
- Air Quality
- Archeological/Historical
- Biological Resources
- Coastal Zone
- Drainage/Absoption
- Economic Jobs
- Flare
- Flood Plain/Flooding
- Forest Land/Fire Hazard
- Geologic/Seismic
- Minerals
- Noise
- Population/Housing Balance
- Public Services/Utilities
- Reclamation/Parks
- Schools/Universities
- Septic Systems
- Sewer Capacity
- Soil Erosion/Compaction/Grading
- Solid Waste
- Toxic/Hazardous
- Traffic/Circulation

Present Land Use/Zoning/General Plan Designation:
Zoning: Unlimited Agriculture (inland), AG-II-320 (coastal portion); land use: A-II-100, A-II-320, waste disposal overlay

Project Description: (please use a separate page if necessary)
The Resource Recovery Project would modify current waste management operations at the Tijuana Landfill by the addition of a Materials Recovery Facility (MRF) and Dry Fermentation Anaerobic Digestion (AD) Facility. The MRF would sort municipal solid waste into three streams: recyclables, organics and residue. The AD Facility would include an Energy Facility and percolate storage tanks that would convert all organics recovered from the municipal solid waste into bio-gas that would be used to power two on-site combined heat and power engines driving electric power generators and digestate that would then be cured into compost and/or soil amendments. Residual material would be disposed of in the Tijuana Landfill.

State Clearinghouse Contact:
(916) 445-0613

State Review Began: 08 - 11 - 2014
10 - 09

SCH COMPLIANCE 04 - 24 - 2014

Extended Review

Please note State Clearinghouse Number (SCH#) on all Comments
2012041068

Please forward late comments directly to the Lead Agency
AQMD/APCD 26
(Resourses: 98 / 14)

Project Sent to the following State Agencies

Resources
- Boating & Waterways
- Coastal Comm
- Colorado Rvr Bd
- Conservation
- CPFW # 43
- Delta Protection Comm
- Cal Fire
- Historic Preservation
- Parks & Rec
- Central Valley Flood Prot.
- Bay Cons & Dev Comm.
- DWR
- OES
- Resources, Recycling and Recovery

Bus Transp House
- Aeronautics
- CHP
- Caltrans # 25
- Trans Planning
- Housing & Comm Dev
- Food & Agriculture

State/Consumer Svs
- General Services
- Cal EPA

ARB: ALL Projects
- Transportation Projects
- Major Industrial Projects
- Div. of Draining Water
- Wt Quality
- SWRCB: Wt Rights
- Reg. WQCB # 12
- Toxic Sub Ctl-CTC
- Ydh/Adit Corrections

Independent Comm
- Energy Commission
- NAHC
- Public Utilities Comm
- State Lands Comm
- Tahoe Rgl Plan Agency

Conservancy
October 10, 2014

Joddi Leipner
Santa Barbara County, RRWMD
130 E. Victoria Street, Suite 100
Santa Barbara, CA 93101

Subject: Tajiguas Landfill Resource Recovery Project
SCH#: 2012041068

Dear Joddi Leipner:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 9, 2014, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project’s ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

[Signature]
Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency
The Resource Recovery Project would modify current waste management operations at the Tajiguas Landfill by the addition of a Materials Recovery Facility (MRF) and Dry Fermentation Anaerobic Digestion Facility. The MRF would sort municipal solid waste into three streams: recyclables, organics and residue. The AD Facility would include an Energy Facility and percolate storage tank that would convert all organics recovered from the municipal solid waste into bio-gas that would be used to power two on-site combined heat and power engines driving electric power generators and digestate that would then be cured into compost and/or soil amendments. Residual material would be disposed of in the Tajiguas Landfill.
October 7, 2014

Ms. Joddi Leipner, Senior Engineering Environmental Planner
County of Santa Barbara
Public Works Department
Resource Recovery and Waste Management Division
130 East Victoria Street, Ste. 100
Santa Barbara, CA 93101


Dear Ms. Leipner:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments for this proposed project and for your agency’s consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

Proposed Project Description

The proposed project is an expansion of operations at the existing Tajiguas Landfill to allow the implementation of the Resource Recovery Project. The proposed project would add the following facilities to the existing Tajiguas Landfill: Materials Recovery Facility (MRF), Dry Fermentation Anaerobic Digester (AD) Facility, with the Energy Facility. The following items will also be included: administration/visitor center, new groundwater well, self-contained wastewater treatment plant, parking lot, fire suppression water storage tanks and biofilters. The total acreage of the landfill property is 497 acres (APN 081-150-019, 026 and 042). The proposed Resource Recovery Project Facility would be located on approximately 6 acres on APN 081-150-019. The digestate curing site(s) would occupy approximately 4-6 acres on APN 081-150-019 and/or APN 051-150-026 and the water storage facilities would be on APN 081-150-019 and APN 081-150-042. The proposed Resource Recovery Project Facility would be located in the existing operation deck which houses the current landfill administration facilities.

The approximately 60,000 or 70,000 square foot Material Recovery Facility would process municipal solid waste (MSW) into three waste streams. In addition, source separated recyclable and organic wastes from the existing and future local recycling program may be processed at the MRF. The approximately 66,000 square foot Dry Fermentation Anaerobic Digestion Facility and associated 3,000 square foot Energy Facility would convert all organic waste recovered at the MRF into biogas and digestate. The biogas from the AD Facility would produce electricity. The digestate from the AD Facility would be
further cured in outdoor windrows at the landfill to create compost and/or soil amendments. Residual waste (residue) from the processing would be disposed of in the landfill if not prohibited. The design capacity of the MRF would be 800 tons/day of MSW or approximately 250,000 tons per year. Of the 250,000 tons per year processed through the MRF, approximately 60,000 tons/year of organic waste would be recovered and processed in the AD facility, approximately 90,000 tons per year of recyclable material would be recovered and sold for reuse, and the remainder 100,000 tons/year would be landfilled. No component of the currently proposed project would expand the permitted landfill capacity or increase the maximum permitted amount of waste that can be accepted on a daily basis.

The Lead Agency has identified several potentially significant project related impacts in the Draft SEIR. These potentially significant project related impacts were all reduced to less than significant levels by project or design features and/or mitigation measures. The only significant and unavoidable impacts were extension of significant operational air quality and biological resources impacts associated with extending the life of the Tajiguas Landfill. The Lead Agency indicated that the previous Findings and Statement of Overriding Considerations adopted for the Tajiguas Landfill project would remain applicable to the impacts associated with extending the landfill’s life.

Comments

Notice of Preparation (NOP)
CalRecycle provided comments on the NOP on May 18, 2012, and those comments have been addressed. CalRecycle staff has no further comments on the project as proposed at this time.

Solid Waste Facilities Permit (SWFP)
The Santa Barbara County Department of Public Health, Environmental Health Services (as the Local Enforcement Agency (LEA) for Santa Barbara County) and CalRecycle are responsible for providing regulatory oversight of solid waste handling activities, including permitting and inspections. The permitting and regulatory requirements for waste disposal, transfer/processing, and compostable material handling are contained in Title 14 or Title 27 of the California Code of Regulations (14 or 27 CCR). The LEA contact for this proposed project is Lisa Sloan and she can be reached at (805) 681-4942 or by e-mail at Lisa.Sloan@sbcphd.org. The proposed project may require a revision of the existing SWFP issued on February 10, 2014. Please contact the LEA to discuss the proposed permit revision for the proposed project.

Conclusion

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on this environmental document and hopes that this comment letter will be useful to the Lead Agency in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent environmental documents including, the Final Subsequent Environmental Impact Report, copies of public notices, and any Notices of Determination for this project. Please refer to 14 CCR, Section 15094 (d) that states:

"If the project requires discretionary approval from any state agency, the local lead agency shall also, within five working days of this approval, file a copy of the notice of determination with the Office of Planning and Research [State Clearinghouse]."
If the environmental document is adopted during a public hearing, CalRecycle staff requests ten days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests ten days advance notification of the date of the adoption and project approval by the decision-making body.

If you have any questions regarding these comments, please contact me at 951.782.4168 or by e-mail at Dianne.Ohiosumua@calrecycle.ca.gov.

Sincerely,

[Signature]
Dianne Ohiosumua, Environmental Scientist
Permitting and Assistance Branch – South Unit
Waste Permitting, Compliance and Mitigation Division
CalRecycle

cc: Virginia Rosales, Supervisor
Permitting and Assistance Branch – South Unit

David Brummond, Supervisor
County of Santa Barbara – LEA

Lisa Sloan, Senior Environmental Health Specialist
County of Santa Barbara - LEA
1 Letter no. 1a
2 Commenter: Governor’s Office of Planning and Research, State Clearinghouse
3 Date: September 19, 2014
4 1-1. This letter documents that the SEIR public comment period was extended to October 9, 2014.

6 Letter no. 1b
7 Commenter: Governor’s Office of Planning and Research, State Clearinghouse
8 Date: October 10, 2014
9 1-2. This letter documents that the Draft SEIR was forwarded to the State Clearinghouse and circulated to responsible State agencies and acknowledges that RRWMD has complied with State Clearinghouse review requirements for environmental documents. A response to the CalRecycle comment letter attached to the State Clearinghouse letter is provided separately (see Letter no. 63).
Dear Ms. Leipner and Supervisors Wolf, Carbajal, Farr, Adam, and Lavagnino,

We live at 4635 Sierra Madre Road in Santa Barbara – just above the proposed Alternative C site in the Draft SEIR for the Tajiguas Resource Recovery Project. We wish to register our strong objection to this location of the proposed Materials Recovery Facility (MRF), which in our opinion is entirely unsuitable for such an urban area. Specifically, the following impacts are evident:

1. **Enhanced fire danger.** A 1990 fire started at the existing transfer station and destroyed several homes on El Sueno and damaged homes on Sierra Madre Drive and Paderno Court. A dramatically larger facility at the same site would put all of us in the surrounding neighborhoods at great risk given the extensive fuel in the canyon above the facility. There is only a single entry and exit road into our neighborhood!

2. **Sound and odors.** The report downplays impacts on sound, odor, and air quality. We already suffer from hearing 101 traffic and San Marcos High School events. The notion of 24 hour operations with heavy equipment, heavy incoming and outgoing traffic, and foul odors emanating from the enormous site would surely ruin the quality of life for us, our immediate neighbors, and all those living in nearby communities.

3. **Water impacts.** Expanded operations and drilling of additional wells for the MRF will deplete water supply in existing wells in the surrounding area and increase the risk of water contamination. Today, several of these wells pump water into the Goleta Water District supply. An expanded facility would enhance both risks.

4. **Traffic impacts.** Traffic increases and the noise of trucks running all hours of the day and night would be very significant because trash all across the County would be brought here for sorting and then trucked back to the Tajiguas landfill. The Turnpike/Calle Real intersection, already severely impacted during morning and evening rush hours, would become unusable. Moreover, the already poor condition of our local roads would further deteriorate. That the SEIR considers this a class III impact is absurd; especially in view of traffic increases anticipated from the additional housing projects already planned and approved in the area.

5. **Property values – illegal taking.** The property values and quality of life of thousands of nearby residents will be highly impacted if the proposed 6-story, 88,600 square foot (2 acre!) heavily industrial facility with 24 hour operation is put in their midst.

6. **Impact on those with no voice.** There is no mention in the report of the impact on other occupants co-located on the County Campus such as Alpha, Veterans facility, Jail, and County Offices. This includes disabled and senior residents, as well as occupants with no recourse or control over the impacts that would be imposed on them.

7. **Visual impacts.** The visual impacts stated in the SEIR do not take into account views from above or across the giant new facility day after day - it only shows a perspective from 101, where drivers should be focused on the road! Other locations and perspectives need to be considered to assess the real visual impact of a six story, 2 acre mass that will be taller than everything else in the area.

8. **Impacts on Wildlife.** The canyon above the existing transfer station is teeming with wildlife including coyotes, bobcats, hawks, and owls, among others. Surely the noise and 24 hour lights and illumination would disrupt their habitat.

For all of these reasons, the Alternative C site makes absolutely no sense, nor does the other urban Alternative B site. The class II and III ratings of several of the impacts mentioned above for the Alternative C site are presented in the Draft SEIR with no explanation and appear the be the result of “subjective grading” with no rigorous, quantitative analysis performed.

In summary, we hope that you will support us and our neighbors in asking for removal of Alternative C from consideration in the Tajiguas Resource Recovery Project.
Sincerely,

Glenn and Lesley Fredrickson  
4635 Sierra Madre Road  
Santa Barbara, CA 93110  
(805) 893-8308  
ghf@mrl.ucsb.edu
Letter no. 2

Commenter: Glenn Fredrickson, 4635 Sierra Madre Road, Santa Barbara

Date: September 14, 2014

Response:

2-1. Fire Danger. Two fires occurred in the vicinity of the South Coast Recycling and Transfer Station (SCRTS) on June 27, 1990. RRWMD staff reports that a fire occurred at the SCRTS, destroyed the maintenance shop as well as 10 County Sheriff vehicles, and was brought under control by 6 p.m. The source of this fire is unclear. The Painted Cave Fire started at about 6:02 p.m. by a suspected arsonist in the Painted Cave area and resulted in the loss of 440 houses and 28 apartment complexes (www.santabarbaraview.com). Therefore, the fire at the SCRTS was not responsible for the loss of any homes. Impact ALT C HAZ-3 of the Draft SEIR (see page 5-190) identifies that very high fire hazard areas occur north of the Alternative C MRF site; however, existing fire protection services and proposed fire suppression systems would prevent a significant increase in fire hazard.

2-2. Sound, Odors and Air Quality. Under Alternative C, the MRF would have employees present 24 hours per day but waste receipt and processing would only occur from 7 a.m. to 11:30 pm. The MRF would accept waste only during the current permitted hours of Monday through Saturday from 7 a.m. to 5 p.m. Solid waste processing within the MRF building would occur from 7 a.m. to 11:30 p.m., with only cleaning and maintenance activity occurring during nighttime hours (11:30 p.m. to 7 a.m.). Therefore, noise associated with heavy equipment would not occur after 11:30 p.m. and noise associated with MSW and CSSR delivery would not occur after 5 p.m. Noise modeling was conducted for the MRF at the SCRTS site, and included stationary sorting equipment, mobile equipment and trucks (including back-up alarms).

The noise thresholds are based on noise averaged over a 24-hour period and noise occurring at night (after 7 p.m.) is weighted more heavily (penalized). As discussed under Impact ALT C N-2 (see page 5-202), noise generated at the SCRTS site would be attenuated due to the distance (at least 800 feet) from adjacent noise sensitive land uses and by surrounding topography, and noise levels associated with MRF operation would be less than the 65 dBA CNEL exterior threshold at the nearest residence. As noted above, intermittent noises (such as back up alarms) are included in the noise modeling. While these intermittent noises may be audible and represent a nuisance, they do not exceed the CNEL noise threshold, which takes into account noise occurring over a 24-hour period.
Under Alternative C, the MRF would include a negative pressure building with air filtration through two large bio-filters to reduce odors. Odor modeling (Impact ALT C AQ-6, see page 5-181) indicates odor-related nuisance would be less than significant. Criteria pollutant emissions, ambient pollutant concentrations and health risks were also estimated and as presented on pages 5-175 to 5-180 of the Draft SEIR, would not exceed the adopted criteria air pollutant or health risk thresholds. The commenter disagrees with the conclusion of the Draft SEIR regarding the significance of the project impacts on noise, odors and air quality, but offers no substantial evidence to support the assertion that impacts have been understated. These comments will be forwarded to the decision-makers for their consideration.

### 2-3 Water Impacts
Under Alternative C, a new well would be constructed at the Tajiguas Landfill to serve facilities to be located at the landfill and not at the SCRTS MRF site. Water for MRF operations at the SCRTS site would be obtained from the Goleta Water District, which has indicated sufficient potable water supplies are available to serve the MRF.

### 2-4 Traffic Impacts
As discussed above, under Alternative C, MSW and CSSR delivery would be limited to currently permitted hours (7 a.m. to 5 p.m.). As indicated in Table 5-30 of the Draft SEIR, only 27 additional trips would occur during a.m. peak hour, and 4 additional trips during p.m. peak hour. As discussed under Impact ALT C T-4 (see page 5-217), traffic associated with MRF operations at the SCRTS site would not result in traffic congestion exceeding County standards. The incremental increase in truck traffic is not anticipated to cause substantial deterioration or affect the life of affected roadways. Affected roadways would be maintained by the County according to existing standards. With regard to cumulative impacts associated with other development projects in the area, Impact ALT C T-CUM-1 (see page 5-223) indicates that MRF-related traffic when added to traffic volumes forecast in the Goleta Valley Community Plan update would also not result in traffic congestion exceeding County standards. The commenter disagrees with the conclusion of the Draft SEIR regarding the significance of the project impacts on traffic, but offers no substantial evidence to support the assertion that impacts have been understated.

### 2-5 Property Values
Economic or social impacts are not treated as significant effects on the environment under CEQA, unless these impacts result in physical changes or are used to determine the significance of physical changes (see State CEQA Guidelines Section 15064(e)). The Draft SEIR indicates that environmental impacts at the SCRTS site could be mitigated to a level of less than significant. No substantial evidence is provided to support the assertion that a reduction in property values would occur and would result in a significant physical change to the environment.
2-6 Impact on Those with No Voice. Notice of the availability of the Draft SEIR and the public hearing was posted at the Planning & Development Department public bulletin board, posted at the Clerk of the Board of Supervisors, posted on-line at the County Public Works Department RRWMD website, mailed to the properties within 1,000 feet of the outer boundary of the parcel that the SCRTS is located on, to other properties within 1,000 feet surrounding the Tajiguas Landfill property boundary, to property owners and interested parties adjacent to the Alternative B MRF site, to interested members of the public and community groups requesting to be noticed, regulatory agencies, and a display advertisement was published in the Santa Barbara News-Press and Santa Maria times to provide the opportunity for all potentially affected persons to submit comments on the Draft SEIR. Land uses surrounding the SCRTS site are described on pages 5-203 and 5-204 of the Draft SEIR, and impacts to surrounding land uses (including the County campus) were addressed in the Draft SEIR, including health risk (see page 5-180 and Figure 5-30), odors (see pages 5-181 to 5-183 and Figure 5-31) and noise (see pages 5-201 to 5-202 and Figure 5-32).

2-7 Visual Impacts. Numerous locations (not just U.S. 101) were investigated to identify potential public locations where the Alternative C MRF building might be visible. In addition, views from private roadways (such as La Paloma Avenue, see Figure 5-28) were considered although not required under CEQA. Four of the closest, most publically visible locations were modeled using 3-dimensional software. Due to intervening topography, the MRF building roofline would only be visible from relatively distant, (2,400 feet or greater), elevated locations. From these locations, other buildings located on the County Campus and in the surrounding urbanized areas are also visible. The MRF building would not obstruct public views, would not be incompatible with surrounding public facility uses/structures, would not significantly degrade the visual quality of the existing SCRTS site (which currently consists of an open air solid waste transfer station), would not result in the removal of significant amounts of vegetation or loss of important open space. Therefore, the Draft SEIR determined that visual impacts of constructing the MRF under Alternative C would be less than significant. No substantial evidence is provided to support the assertion that visual impacts would be significant.

As a courtesy to concerned residents near the SCRTS site and to provide full disclosure of potential impacts, an additional photo-simulation was prepared as part of responding to comments on the Draft SEIR (see Section 9.4 of the Final SEIR). The view selected for analysis is from 4444 Meadowlark Lane (a private residence located on a private street) because it is relatively close (~3,000 feet), and lies at a higher elevation overlooking the SCRTS site.
As indicated by the photo-simulation, only the roofline of the MRF (see center of the Project Conditions simulation) would be visible. The MRF would not obstruct views from this location, would not be incompatible with surrounding public facility uses/structures, would not significantly degrade the visual quality of the existing SCRTS site (which currently consists of an open air solid waste transfer station), would not result in the removal of significant amounts of vegetation or loss of important open space. Therefore, this photo-simulation supports the finding of Impact ALT C VIS-2 of the Draft SEIR (see page 5-171), that the MRF would not result in significant visual impacts to surrounding private properties.

2-8 Impacts on Wildlife. The SCRTS site is an urban area immediately surrounded by governmental/institutional uses (County Campus), with residential and commercial land uses bordering the County Campus; however, limited wildlife habitat does occur in the vicinity. MRF-related lighting would be controlled by external blinds and shielding of exterior lighting. Noise would be attenuated by the building and surrounding topography. Therefore, impacts to wildlife associated with MRF operation at the SCRTS site were considered less than significant. However, construction-related disturbance may significantly affect breeding birds, and mitigation has been identified to minimize this impact.

2-9 The analysis of the impacts of Alternative C contained in the Draft SEIR is based the technical analysis/studies included in Volume 2 of the Draft SEIR. Where applicable and required (e.g., noise, air quality, traffic) a quantitative analysis was conducted and the results of the analysis compared to federal, state or local adopted thresholds of significance to determine the significance of the impact. No substantial evidence is provided by the commenter to support the assertion that impacts levels would be different than disclosed in the Draft SEIR. The commenter’s opposition to the selection of Alternative B or C will be forwarded to the decision-makers for their consideration.
Leipner, Joddi

From: c oliver <cdoliver.cox@gmail.com>
Sent: Saturday, September 13, 2014 7:42 PM
To: Leipner, Joddi; Wolf, Janet; supervisorcarbajal@sbcbosb1.org; Farr, Doreen; Adam, Peter; Lavagnino, Steve
Cc: Cindy & Glenn Oliver
Subject: Resource recovery project

Ms. Leipner-

The Resource Recovery Project is a great plan to reduce our waste in SB County, especially as it is slated for Tajiguas, as planned.

Please do not consider alternate C as a viable solution for this project. The MRF is too massive of a facility in the middle of the residential community. The added truck congestion in the Tumpike, Calle Real corridor would be detrimental to the current level of traffic in the area. The noise, odor and other potential negative aspects of this project should not be in the residential area that is proposed in alternate C and would be a better fit for the out of the way Tajiguas Landfill.

Thank you,
Cynthia Oliver
4699 Sierra Madre Rd
Santa Barbara, CA  93110
(805) 683-8949
Letter no. 3

Commenter: Cynthia Oliver, 4699 Sierra Madre Road, Santa Barbara

Date: September 13, 2014

Response:

3-1. Please see responses to Letter no. 2. The SEIR fully addresses potential visual, traffic, noise, odor and other impacts at the SCRTS site associated with Alternative C, and no significant and unavoidable impacts were identified. However, as discussed in Section 5.5 of the Draft SEIR, the proposed project (at the Tajiguas Landfill) would have lesser impacts than Alternative C overall. The commenter’s support for the project at the Tajiguas Landfill but opposition to the selection of Alternative C will be forwarded to the decision-makers for their consideration.
From: Dana Penoff <dpenoff@gmail.com>  
Sent: Thursday, September 04, 2014 8:13 PM  
To: Leipner, Joddi; Farr, Doreen; Adam, Peter; Lavagnino, Steve; Wolf, Janet; SupervisorCarbajal

PLEASE DO NOT EVEN THINK about selecting the alternative location in the middle of the Eastern Goleta Valley, the existing "smaller" transfer station is bad enough!!!

WE DO NOT WANT THIS MASSIVE FACILITY IN THE MIDDLE OF OUR RESIDENTIAL NEIGHBORHOOD - PLEASE DO IT AT TAJIGUAS, AS PLANNED!

Sincerely,
Dana Penoff
Letter no. 4

Commenter: Dana Penoff

Date: September 4, 2014

Response:

4-1. This comment does not address the adequacy of the Draft SEIR, but states that local residents do not support Alternative C (MRF at the SCRTS site). The commenter’s support for the project at the Tajiguas Landfill but opposition to the selection of Alternative C will be forwarded to the decision-makers for their consideration.
4581 Camino Del Mirasol, Santa Barbara, CA 93110
September 9, 2014

Resource Recovery Project Public Comment

Joddi Leipner
Senior Engineering Environmental Planner
County of Santa Barbara Public Works
Resource Recovery & Waste Management Division
130 E. Victoria St., Ste. 100
Santa Barbara, CA 93101

Dear Ms. Leipner:

The consideration of placing a huge trash factory in the middle of a thriving and heavily populated suburban community is outrageous. Ever since the late 1700s in New England it has been the norm to place the trash pile away from the living areas of the village. Likewise, a hundred years ago the transfer station site was beyond the boundaries of the towns of Santa Barbara and Goleta. Once the towns grew to surround the dump it should have been completely decommissioned. Rather than deal with the problem, Santa Barbara city council members and Santa Barbara county supervisors have allowed for-profit trash contractors to continue operations at this residential location.

Hundreds of homes, many schools and other community facilities are located within a mile of South Coast Transfer Station.

La Paloma Ave./Meadowlark Ln./Shadow Hills Blvd.
El Sueno Rd./Sherwood Dr./Lorraine Ave.
Rancho Santa Barbara Homes
San Vicente Homes
Cieneguitas Rd./Via Andorra
Sansum Clinic Surgery Center
La Colina Gardens/Via Diego
Bishop Diego High School
Sansum Clinic Pesetas Ln.
El Patio Gardens/Wye Rd.
San Martin Way/Rosario Dr./Consuelo Dr.
Saint Vincent's Homes & Early Childhood Education Center
Hope Ranch Motel
Blue Skies Homes/Nomad Village Homes
Encore Dr./Modoc Rd./Vieja Dr.
Nogal Dr./Rancho Asoleado Dr.
Nueces Dr./N. Arboleda Rd.
Santa Barbara County Juvenile Hall
Goleta South Little League Fields/Page Youth Center Gym
Vieja Valley Elementary School
Carriage Hill Dr./Vieja Dr.
Auhay Dr./Arroyo Rd./Vista Buena Rd.
S. San Antonio Rd./Tajo Dr./Valdivia Dr.
San Marcos High School
Oak Glen Homes
Forte Ranch Homes/Granada Way
Ramada Hotel
Wake Center Adult Education Campus
Sierra Madre Heights/El Rodeo Rd.
Beit Ha Yeladim Preschool
San Antonio Canyon Park
Rancho San Antonio Homes
Alpha Resource Center
Santa Barbara County Health Clinics
Santa Barbara County Jail
Santa Barbara County Employee Offices
All of these neighborhoods would be adversely affected by any further expansion of industrial activity at the South Coast Transfer Station. The EIR failed to address at least four additional Class 1 impacts and a Class 2 impact of this proposed project.

1. Noise

Operations are projected to be going six days a week, 24 hours a day. The rumbling and droning noise of more than five times as many daily truck trips to and from the site in addition to the constant operation of mechanical equipment would cause unavoidable discomfort to people in all the surrounding homes and work places.

2. Air Pollution & Odor

There is potential for increased air pollution from added tire residue on roads and particulate matter from garbage becoming airborne. Composting organics will smell.

3. Litter & Water Pollution

The potential environmental hazards would be irremediable. Trash falling from trucks could be blown into surrounding areas by strong down-canyon winds. The 30-acre closed landfill is a fragile site, which could be disturbed by vibrations from construction activity or heavy trucks. There would be a potential for leakage of sludge from the anaerobic digestion factory. Any seepage from either source could cause contamination of ground water, which supplies household wells in the adjacent properties and Cieneguitas Creek and Atascadero Creek.

4. Traffic

The increased traffic of trucks and employee vehicles would cause unacceptable congestion on local roads and the 101 Freeway.

5. Visual Impact

The EIR addressed the visual appearance of the proposed 6-story high, 2-acre facility only from one vantage point (at the side of U.S. 101 Highway). The transfer station site is visible from many homes on adjacent properties as well as those on nearby hills. A fleeting glance from the freeway is much less of a concern than a continual view from one’s home.

My family and I strongly oppose any further construction of buildings or additional outdoor apparatuses at the South Coast Transfer Station, as well as any increase of trash moving activities or recycling at the site. Please remove “Alternative C” from consideration. It is definitely not an environmentally superior alternative to the Tajiguas Landfill for the proposed Materials Recovery Facility.

Sincerely,

Beatrice Ward Curatalo
Letter no. 5

Commenter: Beatrice Ward Curatalo

Date: September 9, 2014

Response:

5-1. The commenter identifies homes, schools and facilities within one mile of the proposed MRF site under Alternative C. The project’s effect on surrounding land uses are analyzed in the Draft SEIR.

5-2. Concerning noise, please see the response to Comment 2 in Letter no. 2.

5-3. Air Pollution & Odor. MRF operation at the SCRTS under Alternative C would increase vehicle trips and would increase tire wear particulate emissions. However, these emissions (when combined with other particulate emissions) would not exceed County thresholds (see Table 5-19 of the Draft SEIR). Under Alternative C, composting of organic matter recovered from the MRF would be conducted at the Tajiguas Landfill, not the SCRTS site. Therefore, the local community would not be exposed to these odors.

5-4. Litter & Water Pollution. Trucks transporting solid waste to the MRF or to the landfill from the MRF are required to be covered to minimize any litter. As solid waste would be processed inside a building, wind-blown litter would be reduced as compared to existing SCRTS operations which occur outdoors. Under Alternative C, the MRF building would not be constructed over the waste footprint associated with the closed Foothill Landfill, but a portion of the parking lot would be located over buried refuse (see Figure 5-19). The closed Foothill Landfill has a relatively thick cover system in place and due to the age of the waste, the landfill is not subject to significant settlement. Construction of the MRF would not involve any activities that could affect slope stability or settlement of the landfill. Water quality protection measures would be incorporated into the MRF design (see page 5-227 of the Draft SEIR), including trench drains at door thresholds, hydrodynamic separators at storm drains and sediment traps. However, water quality impacts may occur at the SCRTS site, and mitigation measures have been proposed to reduce these impacts to a level of less than significant. Note that, under Alternative C the AD Facility would be located at the Tajiguas Landfill, and not the SCRTS site and that the facility produces a digestate which would be cured into compost or a soil amendment, and does not produce sludge.

5-5. Traffic. Please see the response to Comment 4 in Letter no. 2.

5-6. Visual Impact. Please see the response to Comment 7 in Letter no. 2.

5-7. Section 5.5 of the Draft SEIR, identifies that the proposed project (at the Tajiguas Landfill) would have lesser impacts overall as compared to the alternatives. The commenter’s opposition to the selection of Alternative C will be forwarded to the decision-makers for their consideration.
Hi J oddi,

I was at the public hearing yesterday about the Tajiguas Landfill project. I live in the area of the "Alternative C" proposed project. My husband and I reside at 450 Camino Del Remedio. We are very concerned about the negative effects our neighborhood would experience with the proposed industrial expansion of the transfer station. Our biggest concerns are the odor and harmful air emissions, noise level, and greater congestion in this area. There are many residents who would be effected by this alternative choice. We feel the most logical choice would be the expansion at the current Tajiguas Landfill not in the middle of a residential community. There are also other facilities surrounding the transfer station like the Alpha Center, prison, Veterans Health Care, Casa Omega to name a few that are effected as well. We feel the "Alternative C" proposal is not a viable one.

Thank you,
Stan and Peggy Archuletta
Letter no. 6

Commenter: Stan & Peggy Archuletta, 450 Camino Del Remedio, Santa Barbara

Date: September 5, 2014

Response:

6-1. Please see responses to Letter no. 2 regarding potential odor, air quality, noise, and traffic impacts at the SCRTS site associated with Alternative C. The commenter's support for the project at the Tajiguas Landfill but opposition to the selection of Alternative C will be forwarded to the decision-makers for their consideration.
Having been present at the 9/4/2014 Hearing, my comments are as follows:

It seems the most sensible solution to this situation should be to continue using and expand the present Tajiguas Site. The other two suggested sites (Santa Barbara and Santa Maria) would create more problems and separation of functions, involving additional transportation by trucks to various locations, and creates even more problems.

We in Santa Barbara, vehemently oppose Alternative C - involving the Transfer Station, as stated by the several speakers at the Public Hearing Sept. 4, 2014, for mainly environmental concerns in a residential surrounding. Enlarging an industrial, processing facility in a populated and residential area is not an environmentally sound idea. Nearby are the County Jail, Alpha School, Oak Creek Condo Complex, Forte Ranch complex and numerous expensive residential properties. I agree with the concerns stated: Danger of fire, noise (operations and trucks), risks of toxic gases in residential areas, possible pollution of groundwater, unsuitably huge, ugly buildings in a lovely natural residential area, and great increase of traffic in already congested areas, streets and freeway ramps.

Patricia McCormack  
405 Grenoble Road  
Santa Barbara, CA 93110
Letter no. 7

Commenter: Patricia McCormack, 405 Grenoble Road, Santa Barbara

Date: September 5, 2014

Response:

7-1. The commenter states her concerns over fire, noise, risk of upset, water quality, visual and traffic impacts associated with construction of a MRF at the SCRTS site under Alternative C. These impacts are discussed in detail in the Draft Subsequent EIR (see Section 5.3.3.4). The commenter’s support for the project at the Tajiguas Landfill, but opposition to the selection of Alternative B, C or D will be forwarded to the decision-makers for their consideration.
Ms. Joddi Leipner  
Santa Barbara County  
Public Works Department  
Resource Recovery and Waste Management Division  
130 E. Victoria Street, Suite 100  
Santa Barbara, California 93101


Dear Ms. Leipner:

This office represents the Gaviota Coast Conservancy ("GCC") in this matter. GCC has been involved with the Resource Recovery and Waste Management Division (RRWMD)’s management and planning for the Tajiguas Landfill for decades, and with the Resource Recovery Project ("Project") specifically since its inception. GCC’s interest in the Project is in part due to its proposed location on the Gaviota Coast, but also because the Project involves a substantial investment of County time and resources, and will ultimately shape the County’s solid waste management for the foreseeable future. GCC submitted substantial and detailed comments on the scoping document (dated May 18, 2012), and intends to rigorously analyze and comment on the DSEIR. Unfortunately, the 45-day comment period allocated for this important Project has constrained GCC’s ability to provide meaningful comments. A longer comment period is both authorized and warranted pursuant to the CEQA Guidelines for various reasons, detailed below. The release of the document during the late summer/labor day vacation season and the County’s processing a number of other major and complicated environmental review documents and land use permitting actions on projects of concern to the Gaviota Coast Conservancy and other members of the community affected by this project’s impacts has further limited our ability to review this important document. Accordingly we respectfully request that you extend the comment period for an additional 60 days, to November 24, 2014.

1. CEQA Permits Longer Public Review Periods

The public review period currently established for this Project is 45 days, 15 days less than the 60-day period the CEQA Guidelines establish for projects under ordinary circumstances. (CEQA Guidelines § 15105(a)). The CEQA Guidelines further allow for public comment periods extending beyond 60 days where “unusual circumstances” are present. (Guidelines § 15105(a)). Public review and comment on environmental review documents is “an essential part of the CEQA process.” (Guidelines § 15201). CEQA imposes a “responsibility” upon every citizen “to contribute to the preservation and enhancement of the environment.” (Pub. Resources
Code § 21000(e)). RRWMD is clearly authorized to extend the comment period beyond the current 45-day period, and the unusual circumstances present in this case merit an extension of at least 30 days for reasons discussed below.

2. **Unusual Circumstances Warrant a 60 day Comment Period Extension**

a. **Complexity of Project Issues**

The Resource Recovery Project is an unusually complex project in various respects. First, it involves two distinct facilities - Materials Recovery Facility (MRF) and an Anaerobic Digestion (AD) Facility, with alternatives and alternative locations for each, as well as a third "optional project element" a "collected commingled source separated recyclables" (CSSR) facility. The Project Description also includes alternatives for management of the digestate. Second, each facility raises a technically complex set of issues, many of which are interrelated. Third, AD is an unfamiliar technology to many, has not yet been "road tested" by other California jurisdictions, and has given rise to operational failures where it has been implemented. Fourth, it affects various jurisdictions within the County – the waste-streams of each bearing on the physical and economic viability of each Project facility. Fifth, as discussed below, the DSEIR relies on a number of additional environmental review documents that are themselves complex and not well organized for integration into the review and comment on the subject SEIR by members of the public. It is imperative that the public and responsible agencies have sufficient time to understand, analyze and provide meaningful comment on the complex issues this Project raises, and accordingly the unusually complex nature of the proposed Project warrants a 60-day extension to the comment period. *(See Guidelines § 15105(a)).*

b. **Existing Public Controversy**

The Resource Recovery Project has been subject to intense public controversy since it was proposed, with numerous individuals, groups, private waste collection companies, and affected jurisdictions expressing strong opinions regarding the location, economic viability, and fundamental soundness of RRWMD’s approach to handling the future waste-stream of the Tajiguas Landfill waste-shed. The proposed location of both facilities at the existing Tajiguas Landfill is controversial due to the exceptional biological and aesthetic resources of the Gaviota Coast, and the overwhelming desire expressed both by the community and by the County Board of Supervisors to cease disposing of waste on the Gaviota Coast. The alternative sites are also controversial, as evidenced by opposition by neighbors of the proposed alternative sites. Moreover, the Project has ignited inter-jurisdictional political controversy within the County regarding the potential use of the Santa Maria Integrated Waste Management Facility at Los Flores Canyon. The Project proponents have elected to schedule presentations on various public agency agendas, conduct outreach to the media and to community groups touting the benefits of their approach, forcing interested members of the public to respond to media inquiries, monitor public presentations, and respond to the issue on multiple fronts, distracting from a reasoned
review of the environmental review document. The unusually complex, highly dynamic and controversial nature of the proposed Project warrants a 60-day extension to the comment period to enable meaningful public review and comment. (See Guidelines § 15105(a)).

c. Dynamic Project Description

Critical parts of the Project Description and/or alternatives have changed in the SDEIR, and the positions of supporting agencies and private participants in this Project have shifted in significant ways, affecting the feasibility of alternatives and affecting the final Project configuration and impacts. The SDEIR offers, for the first time, that some jurisdictions may opt-out from the joint powers agency, and thus may cause the project to be substantially smaller or utilize a different waste stream that as initially scoped. Initially the Project was expected to include Marborg operating the MRF at their facility in the City of Santa Barbara, but the SDEIR disclosed that Marborg has withdrawn its offer for this Project configuration and instead shifted dramatically to serving as the operator of the Mustang-owned MRF at Tajiguas Landfill. These changes complicate the task of careful public review and comment on the SDEIR.

d. Difficulty Accessing and Integrating Critical Documents

The DSEIR's analysis relies on a considerable number of overlapping and related environmental documents, including the Tajiguas Landfill Expansion Project EIR and Addendum, Tajiguas Landfill Reconfiguration and Baron Ranch Restoration Project Subsequent EIR, and CalRecycle's Statewide Anaerobic Digestion Initiative Final Program EIR. Although the DSEIR relies extensively on these documents and purports to simply incorporate them all by reference, DSEIR page 1-9, the DSEIR fails to specify page cites to analysis from prior documents, and only sometimes specifically identifies the previous/source document, making it virtually impossible for the public and responsible agencies to know with any precision or specificity what is being referenced. The older documents are not well segmented, resulting in documents of several hundred pages each, many of which are not rendered as optical characters and thus cannot be searched. The documents are not even well indexed, or at times, indexed at all – the failure to post an index delineating the environmental impact analysis in the 2002 EIR (an error we brought to RRWMD's attention and was corrected in early September) compounded the difficulty in correlating the new and old environmental review documents. Navigating, reviewing, and integrating these numerous additional documents relied on in the SEIR's analysis Project warrants a 30-day extension to the comment period. (See Guidelines § 15105(a)).

e. Competing Project Reviews and Processes

The Gaviota Coast Conservancy has, for over 20 years, raised serious concerns over the continued industrialization of the Gaviota Coast. GCC's mission involves all projects and processes affecting the Gaviota Coast, and is currently actively involved in the Las Varas Ranch subdivision, which is scheduled for its second hearing before the Planning Commission on
Ms. Joddi Leipner – Resource Recovery Project DSEIR Comment Period Extension Request
September 9, 2014
Page 4

September 23, one day before the deadline for the SEIR comments. The Long Range Planning Division’s DEIR for the Eastern Goleta Valley Community Plan (which affects the eastern Gaviota Coast and recreational demand on the Gaviota Coast) set a comment period to close on Friday September 26. GCC is party to litigation against the County and others over the Gaviota Coast Paradiso project approvals, a process that is consuming considerable effort on the part of GCC’s representatives. Finally, the Gaviota Coast Conservancy held their annual September First Thursday event (on the First Thursday of September, every year) regrettably, the day that the PWD set a public hearing to receive comments on the Tajiguas Landfill DSEIR.

3. The Public Requires Additional Time for Expert Analysis

CEQA’s public review and comment process has a number of functions detailed at Guidelines § 15200. One particular function relevant to this request is the exchange between professionals in specific fields and the lead agency, responsible and trustee agencies. Commenting on complex environmental review documents today involves the expertise of persons with specialized qualifications to analyze and address a project’s formulation, impacts and mitigation. In this case the Project has a number of elements potentially involving expert analysis, which is complicated by the unusual circumstances, discussed above, and adds to the reasons why an extended public review and comment period is appropriate in this case (see Guidelines § 15105(a)).

4. Conclusion

For all the above reasons, GCC believes that an extension of the public comment period on the DSEIR for the Resource Recovery Project is necessary and warranted. We request that RRWMD extend the public comment period on the DSEIR for at least 60 days until November 24.

Please contact this office if you have concerns or questions. We would appreciate a prompt response to our request. Thank you for your consideration and understanding.

Sincerely,

LAW OFFICE OF MARC CHYTILIO

Marc Chytilo
/For Gaviota Coast Conservancy

CC: Mark Schleich, PWD
Supervisor Doreen Farr
Letter no. 8

Commenter: Marc Chytilo, representing the Gaviota Coast Conservancy

Date: September 9, 2014

Response:

8-1. This comment letter requests extension of the public comment period and does not address the adequacy of the Draft SEIR. The RRWMD extended the end of the public comment period on the Draft SEIR from September 24 to October 9, 2014. Notice of the extension was mailed directly to individuals on the project’s noticing list and was published in the Santa Barbara News Press and Santa Maria Times on September 17, 2014.
Jodi Leipnzer  
Division Planner, Santa Barbara Public Works  
Resource Recovery & Waste Management Division:

Dear Ms. Leipnzer,

I wish to go on record as being very strongly opposed to any expansion of the transfer station which is located in my neighborhood. Alternative C is not viable due to the situation of the transfer station, the nearby homes, the resulting traffic, and many other factors.

Sincerely,

Joann Redding  
4647 Malaga Circle  
Santa Barbara, CA 93110

Sept. 6, 2014
Letter no. 9

Commenter: Joann Redding, 4647 Malaga Circle, Santa Barbara

Date: September 6, 2014

Response:

9-1. This comment does not address the adequacy of the Draft SEIR. The commenter's opposition to the selection of Alternative C will be forwarded to the decision-makers for their consideration.
TO: Joddi Leipner, County of Santa Barbara

We live at 4596 Sierra Madre Drive, on the hill west of the Transfer station directly overlooking the County property on which the Transfer station is located. My husband and I attended the public hearing for the Draft SEIR for the Tajiguas Resource Recovery Project on September 4 2014. We were never notified of the project or the various public meetings all these past years that the project has been under review and development and were surprised and shocked to hear that the County considers that only people living within 1000 feet of the transfer station are impacted by such a major industrial development and that there is no need to notify the rest of us who are impacted daily by the noise, air quality and odors of the existing operations.

I would therefore like to register our strong objection to Alternative C (to locate MRF at existing transfer station site) in the SEIR which downplays all the impacts of this project and which omits to mention several additional impacts as well. I have listed several points below in no particular order below for inclusion in the revised SEIR and I hope that this will be done before the report is presented to the Board of Supervisors for a decision. Collectively these impacts add up to Class 1 by your definition and I hope that you will see that this is not a viable Alternative at all. We also believe that each of the impacts labeled Class III are a very subjective conclusion based on very optimistic assumptions with insufficient detail and facts to back them up.

1. The degree of fire hazard will increase significantly with the location of such a large facility. In 1990 fire started at transfer station and destroyed several homes on El Sueno and also was driven up the hill behind Sierra Madre Drive/Paderno Court and destroyed several oak trees and damaged eh homes there.

2. The report downplays impacts on sound and odor and air quality - Sana Ana and high winds and heat carry sound and odors today to homes on Sierra Madre and Paderno. We shudder to imagine what these will be from an expanded operation.

3. Expanded operations and drilling of additional wells for the MRF will a) deplete water supply in existing wells in the surrounding area and increase the risk of water contamination. Today, several of these wells pump water into the Goleta Water district supply and the contamination will have a much wider impact if such contaminated water is pumped into the city’s systems.

4. Traffic increases and the noise of trucks running all hours of the day and night will be very significant because trash from North County and all other cities will now be brought here for sorting and then be trucked back to the Tajiguas landfill! That’s doubles the window of congestion and heavy trucking back and forth. This is not a class III by any means. Also the SEIR downplays the traffic increases already planned due to additional housing projects planned and approved in the area.

5. There was no mention in report of the 1995 EIR on same subject. The conclusion from that EIR resulted in a decision that deemed this site to be unsuitable for expansion - what makes it suitable now?

6. The property values and quality of life of the thousands of residents will be highly impacted if a facility of such a negative industrial use is put in their midst.

7. There is no mention in the report of the impact on other occupants co-located on the County Campus - Alpha, Veterans facility, Jail, County Offices - several are disabled, seniors or disenfranchised occupants with no recourse or control on impacts on them.
8. The visual impacts shown do not take into account those angles that will look down or across to the new 88600 sq ft (2 acres!) facility day after day - it only shows the angle from 101 where drivers focus on driving and are mostly transient - other locations and angles need to be considered to get the real visual impact of a six story, 2 acre mass that will the taller than everything else in the area and the city.

9. The report does not list the impacts that would result from a major earthquake - the area is riddled with faults. If no mention of impact if a major earthquake were to occur.

10. Construction will take a year or more - noise, dust, traffic, fire hazard etc will be increased significantly and impact all people living in the area.

In addition to the above observations we have other questions and comments that deserve a response and we hope that they will be addressed:

1. How will this project be funded and maintained - we heard that there will be an increase in trash fees - each year the County adds more and more fees and taxes on the property owners while reducing services and quality thereof but does nothing to manage its ballooning personnel costs.

2. The County has already broken their promises to limit development in this area - 5 telecom cell towers that hum loudly 24x7 have been located in this area - I hear them the minute we open our windows and they are particularly loud at night; a very large county fire and disaster operation center was built changing the character of this neighborhood, 5 acres of solar panels have been installed - they are very visible from the hill we live on. Each time a project is undertaken the residents are assured that there will be no development that adversely impacts the local residents - and in each of these instances that County has ignored their promises and our objections.

We recognize that the County has undertaken a worthy project and something needs to be done to reduce the trash that goes to the landfill. It would be a shame if it fails to realize the full potential and value of such an endeavor by damaging the values of properties in this neighborhood and severely impacting the quality of lives of the local residents. We strongly urge you to consider other solutions and to follow the first and foremost principle of "do no harm".

We would also request that we be notified of progress on this project and be included in any future public notifications. Thank you.

Thank you.

Brij and Sunanda Bhargava, 4596 Sierra Madre
Drive, Santa Barbara CA 93110, 805 280 1127
Letter no. 10

Commenter: Brij & Sunanda Bhargava, 4596 Sierra Madre Road, Santa Barbara

Date: September 6, 2014

Response:

10-1. Noticing. The CEQA statutes and guidelines (see Section 15087 of the State CEQA Guidelines) do not require lead agencies to provide notice of the availability of the Draft SEIR and public hearing to persons adjacent to alternative sites studied in an EIR. However, the RRWMD recognizes the concerns of neighborhoods near the Alternative C (SCRTS) MRF site and mailed notices to all properties within 1,000 feet of the outer boundary of the parcel on which the SCRTS is located. In addition, notice of the availability of the Draft SEIR and public hearing was published as a display ad in the Santa Barbra News Press and Santa Maria Times on August 11, 2014. Outside of the County’s noticing process, residents of the neighborhoods surrounding the Alternative C MRF site were very effective in sharing information regarding the proposed project as evidenced by the significant public turnout at the public hearing held on September 4, 2014.

10-2. Collective Impacts. Based on the CEQA statutes and guidelines (see Section 15130 of the State CEQA Guidelines), project impacts to one resource are not added to impacts to another resource, such as air quality and water quality. Cumulative impacts are identified in the Draft SEIR, but refer to the effect of adding impacts from other projects to that associated with the proposed project, for the same resource/issue area. However, the decision-making body (Board of Supervisors) may consider the number of significant impacts and adverse but less than significant impacts overall when considering approval of the project or an alternative. Please refer to the response to Comment 9 in Letter no. 2.

10-3. Please refer to the response to Comment 1 in Letter no. 2.

10-4. Please refer to the response to Comment 2 in Letter no. 2.

10-5. Please refer to the response to Comment 3 in Letter no. 2.

10-6. Please refer to the response to Comment 4 in Letter no. 2.

10-7. The referenced document is the Final Negative Declaration (95-ND-5) prepared in May 1995 for the Santa Barbara County Transfer Station, for a Revised Solid Waste Facility Permit and included the remodeled scale house building, recycling processing center, replacement shop building, household hazardous waste storage facility, second truck scale, tipping floor cover structure, and new restrooms/shower facilities. No significant unavoidable impacts were identified. The Negative Declaration (95-ND-5) and the Revised Solid Waste Facility Permit project analyzed in the document was approved by the Board of Supervisors. The Revised Solid Waste Facility Permit project has been implemented at the SCRTS except for construction of the tipping floor cover structure.
Although the tipping floor cover structure was approved to be built, the structure was never installed by RRWMD, because a substitute measure (storm water clarifier) was installed to address water quality concerns in the interim. More stringent storm water regulations adopted by the State Water Resources Control Board may necessitate future construction of the cover structure. The comment confuses the Revised Solid Waste Facility Permit project and its prior Negative Declaration with a separate policy statement issued by the Board of Supervisors as a part of the Tajiguas Landfill Expansion Project CEQA review. The Board of Supervisor issued a policy statement (dated September 15, 1998) stating that expansion of the SCRTS is an infeasible alternative as it relates to the Tajiguas Landfill Expansion Project (approved in 2002) and directed that it not be studied in the Tajiguas Landfill Expansion Project EIR. The footnote on page 5-132 of the Draft SEIR discussed this prior policy statement. Because this policy statement was by a prior Board and because it was in the context of the Tajiguas Landfill Expansion Project it is not directly applicable to the currently proposed Tajiguas Resource Recovery Project. However, the Board may consider this prior policy statement as well as the substantial number of public comments received regarding Alternative C, when considering whether to approve the proposed project at the Tajiguas Landfill or select one of the alternatives.

10-8. Please refer to the response to Comment 5 in Letter no. 2.

10-9. Impacts to surrounding land uses (including those on the County campus) were addressed in the Draft SEIR, including health risk (see pages 5-178 to 5-180, and Figure 5-30), odors (see pages 5-181 to 5-183, and Figure 5-31) and noise (see pages 5-199 to 5-202, and Figure 5-32). Please also refer to the response to Comment 6 in Letter no. 2.

10-10. Please refer to the response to Comment 7 in Letter no. 2.

10-11. The potential for seismic-related impacts (fault rupture, ground-shaking, liquefaction, settlement) to the MRF were addressed in the Draft SEIR and found to be less than significant (see page 5-193, Impacts ALT C G-1 and ALT C G-2).

10-12. Construction impacts are fully addressed in the Draft SEIR, including noise, biology, air quality and traffic. Significant construction-related impacts identified included disturbance of nesting birds, exposure of hazardous materials, disturbance of unreported cultural resources, storm run-off, and temporary re-direction of SCRTS traffic to the MarBorg MRF in downtown Santa Barbara. Mitigation has been provided in the Draft SEIR to reduce construction-related impacts to a level of less than significant.

10-13. This comment does not address the adequacy of the Draft SEIR; therefore, no response is required. The question will be forwarded to the decision-makers for their consideration.

10-14. This comment does not address the adequacy of the Draft SEIR; therefore, no response is required. The comment will be forwarded to the decision-makers for their consideration.
10-15. The commenter acknowledges that the Tajiguas Resource Recovery Project is a worthy project but opposes Alternative C. The comment will be forwarded to the decision-makers for their consideration.
Leipner, Joddii

From: Justin Anderson <justinranderson@gmail.com>
Sent: Thursday, September 11, 2014 9:01 PM
To: Leipner, Joddii
Cc: Jamie Anderson
Subject: Tajiguas Resource Project - Draft SEIR

To: Joddii Leipner, County of SB:
My pregnant wife, 18 month old daughter, and I live at 4590 Sierra Madre Drive, located on the hill west of the Transfer station that overlooks the County property on which the Transfer station is located. We just bought our home and moved here in May 2014, only 4 months ago. We just learned about the Draft SEIR for the Tajiguas Resource Recovery Project are very concerned about the impact that such a major industrial development will have on our community. In fact, we already are impacted daily by the noise, air quality and odors of the existing operations.
Please accept this email as our strong objection to Alternative C (to locate MRF at existing transfer station site) in the SEIR which downplays all the impacts of this project and which omits to mention several additional impacts as well.

I have listed 6 points below in no particular order below for inclusion in the revised SEIR and I hope that this will be done before the report is presented to the Board of Supervisors for a decision. It is my understanding that collectively these impacts add up to Class 1 by your definition and I hope that you will see that this is not a viable Alternative at all. We also believe that each of the impacts labeled Class III are a very subjective conclusion based on very optimistic assumptions with insufficient detail and facts to back them up.

The report downplays impacts on sound and odor and air quality - Sana Ana and high winds and heat carry sound and odors today to homes on Sierra Madre and Paderno. We shudder to imagine what these will be from an expanded operation.

- Traffic increases and the noise of trucks running all hours of the day and night will be very significant because trash from North County and all other cities will now be brought here for sorting and then be trucked back to the Tajiguas landfill! That's doubles the window of congestion and heavy trucking back and forth. This is not a class III by any means. Also the SEIR downplays the traffic increases already planned due to additional housing projects planned and approved in the area.

- There was no mention in report of the 1995 EIR on same subject. The conclusion from that EIR resulted in a decision that deemed this site to be unsuitable for expansion - what makes it suitable now?

- The property values and quality of life of the thousands of residents will be highly impacted if a facility of such a negative industrial use is put in their midst.

- The visual impacts shown do not take into account those angles that will look down or across to the new 88600 sq ft (2 acres!) facility day after day - it only shows the angle from 101 where drivers focus on driving and are mostly transient - other locations and angles need to be considered to get the real visual impact of a six story, 2 acre mass that will the taller than everything else in the area and the city.

- Construction will take a year or more - noise, dust, traffic, fire hazard etc will be increased significantly and impact all people living in the area.

We recognize that the County has undertaken a worthy project and something needs to be done to reduce the trash that goes to the landfill. It would be a shame if it fails to realize the full potential and value of such an endeavor by damaging the values of properties in this neighborhood and severely impacting the quality of lives
of the local residents. We strongly urge you to consider other solutions and to follow the first and foremost principle of "do no harm". We would also request that we be notified of progress on this project and be included in any future public notifications. Thank you.

Justin and Jamie Anderson
Justin R. Anderson
4590 Sierra Madre Dr.
Santa Barbara, CA 93110
805-698-2642
Letter no. 11

Commenter: Justin & Jamie Anderson, 4590 Sierra Madre Road, Santa Barbara

Date: September 11, 2014

Response:

11-1. Collective Impacts. See response to Comment 2 in Letter no. 10.

11-2. Sound, Odor and Air Quality. See the response to Comment 2 in Letter no. 2.

11-3. Traffic. See the response to Comment 4 in Letter no. 2.

11-4. 1995 EIR. See the response to Comment 7 in Letter no. 10.

11-5. Property Values & Quality of Life. See the response to Comment 5 in Letter no. 2.

11-6. Visual Resources. See the response to Comment 7 in Letter no. 2.

11-7. Construction. See the response to Comment 12 in Letter no. 10.
Oak Grove Homeowners Association
401-409 Camino Del Remedio
Santa Barbara Ca 93110

9-5-2014

In regard to: Alternative C

We do not want this massive facility in the middle of our residential community. If the project is to be done, please do it at Tajiguas as planned.

This proposed facility would be detrimental to our streets and neighborhood. It would also be an environmental disaster for our community.

Jane Taylor
405-F Camino Del Remedio
Santa Barbara, CA 93105

Matt Fortuna
405-F Camino Del Remedio
Santa Barbara Ca 93110
We do not want this massive facility in the middle of our residential community. If the project is to be done, please do it Taliguas, as planned.

<table>
<thead>
<tr>
<th>Owner</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Andrew Weed</td>
<td>405-Camino Del Remedio SB CA 93110</td>
</tr>
<tr>
<td>Lisa Russell</td>
<td>405 Camino Del Remedio # SB CA 93110</td>
</tr>
<tr>
<td>Jennifer Trace</td>
<td>409 Camino Del Remedio Unit H SB CA 93110</td>
</tr>
<tr>
<td>Sara Weisenburger</td>
<td>401-I Camino Del Remedio SB, CA 93110</td>
</tr>
<tr>
<td>Jodi Klein</td>
<td>401-H Camino Del Remedio SB, CA 93110</td>
</tr>
<tr>
<td>Tina</td>
<td>401-C Camino Del Remedio SB, CA 93110</td>
</tr>
<tr>
<td>John Urquidi</td>
<td>401 G Camino Del Remedio SB, CA 93110</td>
</tr>
<tr>
<td>Shawn Baughen</td>
<td>409-A Camino Del Remedio SB, CA 93110</td>
</tr>
</tbody>
</table>
Letter no. 12

Commenter: Oak Grove Homeowners Association, 401-409 Camino Del Remedio, Santa Barbara

Date: September 5, 2014

Response:

12-1. Environmental impacts of constructing and operating Alternative C are discussed in Section 5.3.3.4 of the Draft SEIR. The commenter does not provide substantial evidence to support a change in the Draft SEIR analysis or findings. The commenter notes the Oak Grove neighborhood’s opposition to Alternative C and support of the proposed project at the Tajiguas Landfill. These comments will be forwarded to the decision-makers for their consideration.
Leipner, Joddi

From: Valentin Shmidov <valentin.shmidov@gmail.com>
Sent: Friday, September 05, 2014 12:15 PM
To: Leipner, Joddi; Wolf, Janet; supervisorcarbajal@sbcos1.org; dfarr@cuyofsb.org; Adam, Peter; Lavagnino, Steve
Subject: Resource Recovery Project Alternative at the Transfer Station in between Turnpike and El Sueno

Dear Joddi and the Board of Supervisors,

Thank you for taking the time to explain the EIR and the potential consequences of locating the new material resource facility in our residential neighborhood. I live at 353 Sherwood Drive, which backs up to the open space next to the proposed alternative site. I am a father of 3 children, my daughter Sasha, who is 5 years old and attends Foothill Elementary, my son Fava, who is 2 and attends daycare at UCSB, and my son Adi, who is 8 months and attends daycare at UCSB as well. I usually take my children to school and daycare via bike. This involves traveling down El Sueno, across Calle Real (crossing the street that leads to the transfer facility), and crossing Turnpike to continue to Foothill School and the bike path that leads directly to UCSB.

The most dangerous and polluted stretch of bike lane is already the section between El Sueno and Foothill on Calle Real. There are many of the orange semi trucks that carry waste to Tajiguas as well as the large Marborg Garbage Trucks. All of my kids will attend Foothill School and I am worried about the consequences of increasing the traffic, and subsequently, the pollution along Calle Real. At least 3 days a week, we are passed by a semi truck, full of waste, accelerating down Calle Real to enter the 101 highway from the El Sueno or Turnpike exit. They come close to the bike lanes, but worse, as they accelerate with a full load, the diesel emissions are suffocating. These are large diesel trucks emitting fumes within 2 feet of us on the bike lane next to the street. I have talked to several of my neighbors and they have either stopped riding bikes on this stretch of street or time their bike trips to avoid times when trucks are present. The kids in my neighborhood attend Foothill School, which is on the other side of the proposed facility, so transportation to school will always, most likely, require the traversing of Calle Real.

I am concerned that the EIR pollution study takes into account ambient pollution thousands of feet away, where houses are present, but does not take into account the direct impact on bikers and their children, like me, that bike that stretch of street almost every day, and come within feet of the trucks regularly.

Please find attached a recent study done on Diesel truck emissions and the increase in lung cancer in individuals directly effected by the pollution. We moved to Santa Barbara, and this neighborhood, due to the proximity to open space and the healthy lifestyle that we can maintain. I sincerely hope that we can stay here for a long time and continue to provide a pollution free and safe life for our children. The last thing we would want is to experience increased cancer rates as individuals have around ports, highways, and other locations in close proximity to significant diesel exhaust.


On another note, I was also wondering if there are any plans to modify the bike lanes along this section of Calle Real to make them safer and protected from the emissions of the passing trucks and cars? I think that there would be a significant decline in car usage in our neighborhood if we could make the lanes a genuine alternative to car travel.

Thank you for your time.

Best regards,
Valentin
Letter no. 13

Commenter: Valentin Shmidov, 353 Sherwood Drive, Santa Barbara

Date: September 5, 2014

Response:

13-1. The air quality impact analysis for the Alternative C MRF presented in the Draft SEIR included both stationary and mobile sources at the MRF, as well as waste transportation trucks and employee vehicles. This analysis concluded that total air emissions (including sources at the landfill) would be less than County/APCD thresholds (see Table 5-19) and less than significant. In addition, a health risk assessment (including cancer risk) was conducted for the MRF at the SCRTS site under Alternative C, which focused on diesel particulate matter (a recognized carcinogen) from mobile equipment and trucks. The results of the health risk assessment indicate that the Santa Barbara County APCD thresholds for cancer risk and non-cancer health hazards would not be exceeded at the nearest occupied land use. Note that a portion of the collection truck fleet that would deliver solid waste to the MRF would be powered by natural gas and not diesel.

Please also note that since the publication of the Draft Subsequent EIR, a 2,600-foot pedestrian path was installed on the north side of Calle Real from El Sueno Road to the Honor Farm Road. This is the first phase of a plan to connect people between the populated areas on El Sueno Road to County facilities and ultimately to the Turnpike area.
Attached are my comments to the Draft Subsequent Environmental Impact hearing. I have also printed them in this e-mail in the event that your computer cannot read Word Docs.

Joddi Leipner
Tajiguas Resource Recovery Project/Draft Subsequent Environmental Impact Report

I attended the Public Hearing on Sept. 4, 2014 at the County Public Health Department Auditorium on N. San Antonio Rd. I would like the following comments responded to regarding the adequacy of the Draft Subsequent EIR.

1) The runoff tank is planned for a 25-year storm runoff. Given the known climate change we are experiencing this is not adequate for a MRF with a 20-year life, which will probably be extended. We are now entering into an El Nino weather pattern, the amount of rain cannot be estimated, but the past El Nino produced flooding and damage through out California.

2) Staff indicated that the Marborg site has an air risk of HR1 HO2 that cannot be mitigated for that site. Please respond on how this air risk can be mitigated for the transfer station, site C, located on El Sueno. I assume that the MRF will be constructed to the same specifications in both locations.

3) Category III indicates that the back-up beeps are insignificant. If you live within hearing range of back-up beeps it is a serious Category 1. For the MRF at the transfer station, site C, this should be a category 1. For the MRF at Tajiguas it might be a Category III, since that is a rural area.

4) Please explain the “private property improvement” which a staff member said is estimated to produce revenue of $800,000 a year. Who owns the Tajiguas Land fill property? Who owns the transfer station property? I understand that both sites are county owned property. If that comment was meant for the Marborg Property site, which has already been eliminated, the comment is out of context, and misleading. I didn’t know that County owned land could generate tax revenue.
5) The draft EIR makes little mention of Earth Quake Risk. If the facility is sited at the Transfer Station, (site C) in the event of an earth quake the possibility of extreme pollution within a family neighborhood should be addressed. This pollution might make it impossible to re-build or repair family homes that would be contaminated. Of course the damage to coastal beaches with an Earth Quake at Tajiguas would be extreme.

6) Normal storm run off might cause pollution to leak into the ocean off the Gaviota Coast. I did not hear how that is going to be managed; only that if it happens it will be mitigated. That is unacceptable. It must be prevented, not mitigated.

7) Staff is convinced that the compost created by the digesters will be saleable to farmers. This is misleading; no California Farmer would accept compost that contains, drugs, glass, pesticides and other residue from residential refuse. Over time this compost will end up stored at the MRF site.

Neither location is suitable for a Material Recovery Facility, (MRF). Staff has only done half their job in the seven years that they have been working on the project. The MRF as shown in the power-point presentation may be well suited to the type of garbage that is collected in Santa Barbara County, but the locations selected have many issues that cannot be mitigated.

I suggest that another site be selected in a rural area far removed from water sources and family neighborhoods. It is acknowledged that the cost of transfer will increase, but the safety and health of families, schools, and ocean are far more important. I would suggest that those who think otherwise open their neighborhood, their agricultural land, their residential community, and their conserved open space to the MRF. This issue is far beyond “not in my backyard” rhetoric. The potential, but very real damage that could be done needs to be calculated into the final decision.

CC: Janet Wolf, Salud Carbajal, Doreen Farr, Peter Adam, Steve Lavagnino
Letter no. 14

Commenter: Martha Hassen

Date: September 5, 2014

Response:

14-1. A composting area storm run-off collection tank would be located adjacent to the proposed composting area at the Tajiguas Landfill. The collection tank capacity has been designed based on climatic/hydrologic data obtained from County Flood Control to accommodate the run-off volume generated by a 25-year storm event. If the collection tank capacity is exceeded by a large storm event, run-off would be directed to the existing north sedimentation basin and slowly discharged to Pila Creek. Therefore, runoff from the site is not expected to result in a significant flooding impact (see Section 4.10.2.2 of the Draft SEIR).

14-2. The MRF designs under Alternatives B and Alternative C are not the same. The MRFs at each of the alternative locations are based on site specific design provided by the project vendors (Mustang in the case of Alternative C and MarBorg in the case of Alternative B). In addition, site-specific physical conditions affect the result of the modeling. Therefore, the health risk assessments at each location do not produce the same result. A health risk assessment was conducted for the MRF at the SCRTS site, which indicated that the Santa Barbara County APCD thresholds for cancer risk and non-cancer health hazards would not be exceeded at the nearest residence. The impact would not be significant and no mitigation is required. Health risk impacts at the Alternative B MRF site (MarBorg property) would be greater (Class I, significant and unavoidable) primarily due to the proposed MRF building exhaust stack design which does not provide adequate dispersion of contaminants.

14-3. Noise modeling was conducted for the MRF at the SCRTS site under Alternative C, and included stationary sorting equipment, mobile equipment and trucks (including back-up alarms). As discussed under Impact ALT C N-2 (see page 5-202), noise from the SCRTS site would be attenuated by surrounding topography, and noise levels associated with MRF operation would be less than the County’s 65 dBA CNEL exterior threshold at the nearest residence. It is important to note that the 65 dBA CNEL County threshold is a daily weighted average (adjusted to account for increased sensitivity in the evening and nighttime), and does not focus on short-term noise such as back-up alarms, which may create a nuisance but when averaged with other noise sources over the 24-hour period do not exceed the threshold.

14-4. This comment does not address the adequacy of the Draft SEIR; therefore, no response is required. This comment will be forwarded to the decision-makers for consideration.

14-5. The potential for seismic-related impacts (fault rupture, ground-shaking, liquefaction, settlement) to the MRF were addressed in the Draft SEIR and found to be less than significant (see Impacts ALT C G-1 and ALT C G-2, page 5-193). Since the MRF would not be significantly damaged by seismic events, no disaster-related off-site release of solid waste or pollution would occur.
The proposed project would include numerous measures to minimize the potential for discharges to storm drains that may ultimately reach the Pacific Ocean (see discussion in Section 4.10.2.4, Impacts TRRP WR-7, WR-8 and WR-9). In addition, storm water management and spill prevention plans would be place to address any inadvertent discharges. There is a potential for storm water to come in contact with digestate/compost in the composting area. Within this area, storm water generated by up to the 25-year event would be captured and reused on the compost piles. The Resource Recovery Project would be subject to compliance with the Industrial Storm Water Permit Program and best management practices would also be used in the composting area such as tarping, good housekeeping, etc.to limit the contact of storm water with the compost piles. Storm water in excess of the 25-year event that cannot be reused would be tested for compliance with the industrial storm water permit and composting area management/BMPs would be modified as needed to comply with the permit requirements and minimize water quality impacts.

Hazardous waste such as pesticides and drugs are not accepted at the landfill or the proposed MRF, and would not be present in finished compost produced by the project. Concerning the marketability of project compost, in California, there are currently two other permitted facilities that are creating marketable compost from municipal solid waste (MSW); the Zero Waste Energy Development anaerobic digestion (AD) facility located in the City of San Jose, CA (http://zwedc.com) and Zbest Composting located in Gilroy, CA (http://www.zankerrecycling.com/content/z-best-composting-services).

The proposed project would utilize pre- and post-AD processing of the MSW organic based compost to screen metals, glass, plastic, stones and other inert material from the organic waste to create a fair quality compost. Screening technology has advanced to remove an estimated 95-98% of the inert contamination material to make a marketable product. Additionally, similar to the two referenced projects in Northern California, the MSW based compost, after completion of all inert contaminant screening, is then blended with a high quality source separated organic waste based compost to add additional stability and maturity to the finished product producing a higher quality finished compost.

Importantly, as the organic material in MSW based compost is predominantly food waste (vs. the predominant green-waste based compost produced throughout the state), the finished compost often has a higher nitrogen content which is more attractive to the agricultural markets due its crop yield enhancing capabilities. Additionally, the MSW based compost has produced equal water retention in soil capacity (vs. green-waste based compost) which has become a primary driver for increasing agricultural market acceptance of the finished compost. Overall, the finished compost (following screening and blending) produced by the proposed project is a known product with increasing market acceptance, and is not anticipated to be stored in large quantities at the proposed composting area.
Two urban area alternatives were considered in the Draft SEIR, as suggested by the public, to determine if impacts would be reduced if the MRF is located near population centers that generate solid waste, such as Santa Barbara (Alternative B) and Goleta (Alternative C). These alternatives would reduce waste transportation-related impacts including air quality, noise and greenhouse gas emissions. This approach is consistent with Section 15126.6 of the State CEQA Guidelines which states “The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant impacts of the project.” Appendix Q of the Draft SEIR provides a matrix listing the many alternative locations considered.
From: CTS Mailer [mailto:bsherbert@msn.com]
Sent: Thursday, September 04, 2014 9:19 AM
To: comments@conversiontechnologystudy.com
Subject: Results from the comment form on the CTS website...

Name: Beverly Herbert

E-Mail: bsherbert@msn.com

Comments: I live at 575 Lorraine Ave, Santa Barbara, Ca. 93110. This is about 2 blocks from the proposed trash sorting area on the County property off Cathedral Oaks, across from the County Operations Center, Fire Dept. and Education Office.

This is one of the worst places that this project could go. There are schools in the area, La Colina, and Mt. View Schools, many churches, thousands of homes, traffic congestion leading up to Hwy 154, and several County offices, including Public health.

This property has also been subject to notices of leaking oil in the past, How will the leaking oil go with the separation of trash?

Please abandon this idea immediately,
Letter no. 15

Commenter: Beverly Herbert, 575 Lorraine Avenue, Santa Barbara

Date: September 4, 2014

Response:

15-1. See the response to Comment 1 in Letter no. 5.

15-2. Regarding “notices of leaking oil”, none have been issued for the SCRTS site proposed under Alternative C. The commenter may be referring to fuel leakage at the County campus associated with the Santa Barbara County Corporation Yard. A leaking underground fuel tank was discovered at the Santa Barbara County Corporation Yard, which resulted in groundwater contamination. This contamination was remediated using soil vapor extraction and the case was closed by the Regional Water Quality Control Board in 2011. A small fuel spill occurred at the “County Road Yard” in 2012, but was cleaned up and the case was closed by the Regional Water Quality Control Board in 2013. These spills did not occur at or impact the SCRTS site, and would not affect the construction and operation of a MRF at the site.
Letter no. 16

Tajguas 3-14

LEAGUE OF WOMEN VOTERS OF SANTA BARBARA

8-31-2014

Joddi Leipiner, Project Environmental Planner
Santa Barbara County Public Works Department
Resource Recovery and Waste Management Division
130 East Victoria Street
Santa Barbara, CA 93101

The Santa Barbara League of Women Voters has been supporting the County's plan to employ resource recovery since 2002. The League has a national policy calling for us to “reduce the generation of and promote the reuse and recycling of solid and hazardous waste” and so we welcome this program. However, even with the supplemental Environmental Impact Report (EIR), we have several of the same questions that we have raised earlier.

We should say that our questions arise because of the history of this landfill, and it's unsolved water problems. The threat of the landfill releasing leachate into the ocean does not seem to be covered in this EIR, and the Class I impacts noted earlier are not repeated here.

For that reason we had planned to support the environmentally superior choice among the alternatives, , the transfer station, for the siting of the new Materials Recovery Facility (MRF). The trucks already take waste there, and this would reduce the number of truck trips making the 25 mile haul to the Tajguas site. However, we have since learned that the trucks carrying unsorted trash already go out to Tajguas. If this is true, then there would not be much advantage to the transfer station. We do not think the MRF should be located at the landfill, but we do not hear other acceptable choices.

It appears that the Anaerobic Digestion (AD) facility may need to be sited at Tajguas location. If it is, we have a question about whether placing the digestate on top of the landfill will be a good thing to do. Will this put a harmful stress on the landfill itself by placing the additional material on it, and when the digestate is then removed to be sold?

It is hard for the League to support this proposed project if all of it is put at Tajguas, thereby increasing the industrialization of the Gaviota Coast and the stress on the poorly sited landfill.

Susan Shank, Co-President for Program and Action

Contact person: Connie Hannah, Vice President for Program and Advocacy
Email address: connieandbobhannah@gmail.com
Letter no. 16

Commenter: League of Women Voters of Santa Barbara

Date: August 31, 2014

Response:

16-1. Unsolved Water Problems. A discussion of landfill water quality is presented in Section 1.4.3 of the Draft SEIR and water quality monitoring results are presented in Figure 1-1. Historically, there has been a concern about leachate (groundwater or rainwater percolating through buried solid waste) from the landfill impacting surface waters. In 1991, the County installed a Groundwater Leachate Collection Recovery System (GLCRS), which is composed of a trench to collect shallow alluvial groundwater flow that could have been impacted by the landfill. The collected groundwater is used for dust control and construction projects at the landfill. The landfill also has a landfill gas collection and recovery system in place and composite liners and leachate collection systems have been constructed under portions of landfill disposal area. Data provided by groundwater monitoring wells indicate contamination (volatile organic compounds, VOCs) was greatly reduced by installation of these groundwater protection measures and analytical results of groundwater testing from monitoring well #15 (just upstream of U.S. 101) have been non-detect for VOCs since 1995. The proposed project would not affect the existing groundwater protection measures, such that no change to the less than significant groundwater quality impact identified in the Landfill Expansion EIR would occur.

16-2. Environmentally Superior Alternative. A discussion regarding MSW collection and recyclable materials management was presented in Section 1.3.1 of Draft SEIR. MSW currently collected by the County’s franchise waste haulers is transported to the Tajiguas Landfill for disposal. Some consolidation of the waste from smaller collection truck to transfer trucks occurs at MarBorg’s existing MRF. CSSR is currently transported to, and consolidated at the SCRTS. Self-haul MSW and green waste is collected at the SCRTS and consolidated for delivery to the Tajiguas Landfill. Therefore, some, but not all, of the waste stream that would be processed in the Tajiguas Resource Recovery Project is currently processed at the SCRTS. Alternative C would not result in any significant and unavoidable (Class I) impacts and was considered superior among the alternatives studied in the Draft SEIR. However, as discussed in Section 5.5 of the Draft SEIR, the proposed project (at the Tajiguas Landfill) would have lesser impacts overall.

16-3. Placing Digestate on the Landfill. Organic materials processed in the anaerobic digesters (digestate) would be transported to the composting area for curing. The proposed composting area would be located on the landfill top deck, in an area which is currently being filled with solid waste, and which will receive up to 80 additional feet of waste prior to reaching its final design elevation and capacity in approximately 2016. Prior to locating the composting facilities in this area, the top deck area would undergo final closure and an engineered landfill cover system would be installed.
The Draft SEIR includes an analysis of the potential for the placement of digestate above buried waste to adversely affect the stability of waste fill slopes (see page 4.5-14, Impact TRRP G-2). The analysis included both static slope stability as well as seismic-induced displacement, and determined that waste fill slope stability would meet current engineering standards and significant impacts would not occur.
LEAGUE OF WOMEN VOTERS OF SANTA BARBARA

10-8-14

Jodi Leipiner, Project Environmental Planner
Santa Barbara County Public Works Department
Resource Recovery and Waste Management Division
130 East Victoria Street
Santa Barbara, CA 93101

The League of Women Voters wants to thank Resource and Recovery for sending the team out to talk with us and answer questions on September 23rd. As you know, we have been anxious to see a Materials Recovery Facility (MRF) here for many years, and we have understood that finding a location for it was not going to be easy.

We think that it is absolutely essential for us to stop putting so much unsorted trash into a landfill that already has had problems. We believe that the EIR, and the staff, have studied the many site possibilities that were suggested, and it is not surprising that the heavily developed south coast does not seem to have any suitable site.

Your staff was good about answering our questions, and we have to agree that it appears that the only place to develop a MRF seems to be at the landfill site itself, since the unsorted trash already goes there. We were reassured that there is a solid area back away from the landfill that can be used for these new industrial buildings. We do not like to see further industrialization of the Gaviota coast, but we know that a MRF is badly needed here.

The League hopes that the Resource Recovery process can go forward rapidly, and we can begin to do a real sorting of recyclable material and processing of organic waste. We were interested to learn that there are good standards for compost that will be sold, and that while we cannot meet the “organic” standard, we can meet a less demanding one. In some other areas such compost is distributed free to residents to use on their gardens, and that could be done here as well.

The League of Women Voters supports the present plan and is anxious to see it implemented soon.

Susan Shank, Co-President for Program and Action

Contact person: Connie Hannah, Vice-President for Program and Advocacy
Phone: 967-4720 Email address: connieandbobhannah@gmail.com
Letter no. 17

Commenter: League of Women Voters of Santa Barbara

Date: October 8, 2014

Response:

17-1. The comments expresses support of the project but does not address the adequacy of the Draft SEIR. The comments will be forwarded to the decision-makers for their consideration.
Ms. Wolf,

I am emailing you to voice my objection to "alternate site C" for the above referenced project. Putting this facility in the middle of a densely populated area of our city is an absolute disaster waiting to happen. The possibility of a gas explosion, contaminated water runoff, and 24 hour operation are just the minimal hazards created by this option. Excess noise and traffic will effect the quality of life of the residences in the area adjacent to the transfer station which could adversely effect property values for those that live here. Any accidental pollution problems could present a class action law suit that the county certainly does not need.

There is a perfectly viable location, the Tajiguas transfer station, that is already operational, which effects very few residences. Please do not consider "alternate site C" for this operation.

Thank you for your time.

Steve & Linda Petersen
1084 Camino Del Rio
Santa Barbara, CA 93110
Letter no. 18

Commenter: Steve & Linda Petersen, 1084 Camino Del Rio, Santa Barbara

Date: September 3, 2014

Response:

18-1. Gas Explosion. Under Alternative C, only the MRF component of the project would be located at the SCRTS site. The MRF does not generate bio-gas.

Contaminated Run-off. See response to Comment 6 in Letter no. 14. Note that anaerobic digestion and digestate composting would occur at the Tajiguas Landfill, and not the SCRTS site, such that storm run-off from these activities would not affect the MRF site.

24 Hour Operation, Noise & Traffic. See responses to Comments 2 and 4 in Letter no. 2.

18-2. Property Values & Quality of Life. See response to Comment 5 in Letter no. 2.
Objection to alternate trash sorting facility.

Kas Terhorst <kasterhorst@gmail.com>  Thu, Sep 4, 2014 at 4:13 PM
To: "Wolf, Janet" <jwolf@co.santa-barbara.ca.us>
Cc: SupervisorCarbajal@sbcbos1.org, dfar@countyofsb.org, peter.adam@countyofsb.org,
    steve.lavagnini@countyofsb.org

I urge that you will use your influence to remove the proposed alternate trash sorting facility in the un-incorporated
Eastern Goleta Valley from consideration.

To burden those of us who live near the proposed site would face a nightmare of untold, huge garbage trucks
clogging our roads is grossly unfair.

Please stop this madness.

Kas Terhorst

4477 F. Shadow Hills Rd.
Santa Barbara, CA 93105

tel. (805) 692-9388

postmaster@co.santa-barbara.ca.us <postmaster@co.santa-barbara.ca.us>  Thu, Sep 4, 2014 at 4:13 PM
To: kasterhorst@gmail.com

Delivery has failed to these recipients or groups:

dfar@countyofsb.org
The e-mail address you entered couldn't be found. Please check the recipient's e-mail address and try to resend
the message. If the problem continues, please contact your helpdesk.

steve.lavagnini@countyofsb.org
The e-mail address you entered couldn't be found. Please check the recipient's e-mail address and try to resend
the message. If the problem continues, please contact your helpdesk.

Diagnostic information for administrators:

Generating server: co.santa-barbara.ca.us
dfar@countyofsb.org
#550 5.1.1 RESOLVER.ADR.RecipNotFound; not found ##
steve.lavagnini@countyofsb.org
TAJIGUAS RESOURCE RECOVERY PROJECT
DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

September 4, 2014 Public Hearing – Speaker Slip/Comment Form

The purpose of this hearing is to solicit public comments on the adequacy of the Draft Subsequent EIR in addressing the requirements of the California Environmental Quality Act. Please fill out this speaker slip and focus your comments on environmental issues. You may provide comments by speaking at the hearing, provide written comments using this form, or submit comments by letter or e-mail to Joddi Leipner (jleipner@cosb pw.net) 130 E. Victoria Street, Suite 100, Santa Barbara, CA 93101 by 5:00 pm, September 24, 2014.

I OBJECT TO LOCATING A REFUSE FACILITY IN THE UNINCORPORATED EASTERN GOLIATH VALLEY AREA.

THE BURDEN ON OUR AREA WILL BE ENORMOUS WITH UNTOLD, LARGE CANDY TRUCKS COMING THROUGH OUR AREA AT ALL TIMES OF THE DAY.

PLEASE REMOVE THIS OPTION FROM YOUR PLANS.

Name (print): KAS TELIROUS
Address: 4977 F. SHADOW HILLS BLVD

S.B. 93105

REPRESENTING THE 50 RESIDENTS OF THE SHADOW HILLS HOME OWNERS ASSOC.
Letter no. 19a and 19b

Commenter: Kas Terhorst, 4477 F. Shadow Hills Blvd., Santa Barbara

Date: September 4, 2014

Response:

19-1. These comments do not address the adequacy of the Draft SEIR. The commenter's opposition to the selection of Alternative C will be forwarded to the decision-makers for their consideration.
Comments on the Draft Subsequent EIR for the Proposed Taiiguas Resource Recovery Project

Pamela Mallen Poehler
585 El Sueno Rd
Santa Barbara, Ca. 93110

My family owns property and lives in the closest proximity to the the South Coast Recycling and Transfer Station, and we are very concerned about any increase in activity on the County Campus. The following are some comments on the Draft Subsequent EIR for proposed Taiiguas Resource Recovery Project, specifically the section regarding Alternative C as an option for building the MRF.

Public Health/Nuisance

The EIR Summary states “Considering the more densely populated area surrounding Alternative C MRF site, more people could be exposed to nuisance impacts, however, many waste management activities that currently occur outdoors at the SCRTS site would be moved indoors. Overall, public health/nuisance impacts would be similar under Alternative C.

The EIR minimizes the impacts by stating more people “could” be exposed to nuisance impacts when the word should be “would.” The large surrounding population would no doubt be affected by the increased truck traffic during construction (at least a year or more) and during operation of the MRF, 24 hours a day. Additionally, there would be an increase in dust and constant backup beeps from trucks during construction and operation of the MRF. All of these disturbance would have a negative affect on public health and would certainly create more of a nuisance than already exists. In particular, everyday I wake up to a cacophony of back up beepers that take a toll on my mental health. Back up beepers are designed to alarm people so they do not get run over. The unintended consequence is that back up beepers that are constantly alarming are exceedingly annoying.

Additionally, although the majority of the MRF operation would take place indoors there would be an increase in the number of trucks. All of the Marboung trucks that are currently hauling trash and recycling to Tajiguas would be going to the SCRTS instead, creating more noise, backup beeper annoyance, dust, air pollution and traffic clogging up the already narrow Calle Real Rd.

Visual Resources/Aesthetics

The EIR minimizes the visual impacts and does not take into consideration the visual impacts from the hills above the site where many people hike and enjoy the outdoors.
The MRF would undoubtedly create a visual blight. Additionally, our neighborhood would be negatively impacted by night time lighting that would not only affect our ability to enjoy the night sky but would negatively affect nocturnal wildlife.

Noise

In the EIR Summary it states “under Alternative C, more sensitive receptors would be exposed to adverse, but less than significant (Class III) noise impacts associated with construction and operation of the MRF.” Again I think the EIR language minimizes the affects of the noise on the surrounding neighborhood. Any increase in noise due to construction, more trucks, and back up beepers is not “less than significant.” For those of us who live nearby, any increase in noise is very significant.

The County personnel have mentioned at public meetings that the berm built between the SCRTS and El Sueno, directly behind my house, as one of the things they have done to mitigate noise. First, the berm building was not initiated by the County to mitigate noise, rather it was the result of many phone calls I made and letters I wrote in response to the constant noise from the Transfer Station. Although the berm helps reduce noise it by no means mitigates the problem. Being that the SCRTS is carved out of a hillside that faces the El Sueno neighborhood and my home, the bare rock and dirt surface acts as a sounding board and amplifies the noise in the direction of the neighborhood. With the building of a MRF and more hard surfaces in the form of concrete and buildings, the noise problem is sure to increase especially with the enormous increase in the truck traffic to and from the MRF.

Some of my other concerns that I did not see mentioned in the EIR include an increase in an urban heat island. The addition of an 88,600 square foot building surrounded be concrete will increase the heat created in the surrounding area in a time when we are already experiencing multiple consecutive heat waves. Additionally, a building of this enormity will put stress on the County for space and will undoubtedly result in the County using land that is closer to neighborhood homes, mine in particular. Specifically, Mark Schiech mentioned the possibility of moving Hearts Riding Academy directly behind my house. This would increase noise and dust and pollution from cars, and flies and odor from the horses.

Thanks for considering my input and comments on the MRF EIR.

Sincerely,

Pamela Mallen Poehler
Letter no. 20

Commenter: Pamela Mallen Poehler, 585 El Sueno Road, Santa Barbara

Date: October 9, 2014

Response:

20-1. Note that noise, dust, air pollution and traffic are addressed separately in the Draft SEIR and not under public health/nuisance. Concerning noise issues, noise modeling was conducted for the MRF at the SCRTS site, and included stationary sorting equipment, mobile equipment and trucks (including back-up alarms). As discussed under Impact ALT C N-2, due to the distance and surrounding topography noise originating at the SCRTS site is attenuated, and noise levels associated with MRF operation would be less than the 65 dBA CNEL exterior noise threshold at the nearest noise-sensitive land use. It is important to note that the 65 dBA CNEL County threshold is a daily weighted average (adjusted to account for increased sensitivity in the evening and nighttime), and does not focus on short-term noise such as back-up alarms. Sounds (including back-up alarms) originating from the MRF at the SCRTS under Alternative C may be audible but would not exceed the County’s noise thresholds. The commenters concerns over the nuisance noise impacts associated with intermittent noise sources associated with existing and future operations (if Alternative C is selected) will be forwarded to the decision-makers for their consideration.

Concerning dust, as opposed to existing conditions at the SCRTS, all solid waste would be unloaded and sorted in a building provided with a negative pressure environment, dust collectors and bio-filters. Therefore, a significant increase in dust associated with waste sorting is not anticipated.

Concerning air pollution, an air quality impact analysis was conducted for the Alternative C MRF and included both stationary and mobile sources at the MRF, as well as waste transportation trucks and employee vehicles. This analysis concluded that total air emissions (including sources at the landfill) would be less than County thresholds (see Table 5-19) and less than significant. In addition, a health risk assessment (including cancer risk) was conducted for the MRF at the SCRTS site, which focused on diesel particulate matter from mobile equipment and trucks. The results of the health risk assessment indicate that the Santa Barbara County APCD thresholds for cancer risk and non-cancer health hazards would not be exceeded.

Concerning truck traffic, an increase in truck trips to and from the SCRTS site would occur under Alternative C, including 27 additional vehicle trips (including 24 heavy-duty truck trips) would occur during a.m. peak hour, and 4 additional trips during p.m. peak hour. As discussed under Impact ALT C T-4, traffic associated with MRF operations at the SCRTS site would not result in traffic congestion exceeding County standards, including Calle Real and local intersections.
20-2. Please see Letter no. 2, response to Comments 7 and 8. The commenter disagrees with the conclusions of the Draft SEIR regarding the significance of the project impacts on visual resources, but does not provide substantial evidence to support a change in the conclusions. These comments will be forwarded to the decision-makers for their consideration.

20-3. See the response to Comment 1 regarding noise. The referenced berm provides noise attenuation to land uses east of the SCRTS site (including the El Sueno neighborhood), such that 65 dBA CNEL exterior noise standard would not be exceeded by MRF operations.

20-4. If Alternative C is selected, the building would be constructed in an area that is currently developed with a concrete pad. Heat generated by sorting equipment, mobile equipment and trucks would occur primarily within the MRF building and would not affect adjacent land uses, as building air would be cooled by evaporation of water in the bio-filters. Implementation of the project, as a whole would result in a beneficial impact to global warming/climate change. Under Alternative C, the MRF would be constructed entirely at the SCRTS site and would not use any space additional space at the County campus. The potential relocation of the Hearts facilities was proposed prior to this alternative being considered and is unrelated to the proposed project or Alternative C.
TAJIGUAS RESOURCE RECOVERY PROJECT

DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

September 4, 2014 Public Hearing – Speaker Slip/Comment Form

The purpose of this hearing is to solicit public comments on the adequacy of the Draft Subsequent EIR in addressing the requirements of the California Environmental Quality Act. Please fill out this speaker slip and focus your comments on environmental issues. You may provide comments by speaking at the hearing, provide written comments using this form, or submit comments by letter or e-mail to Joddi Leipner (jleipner@cosbpw.net) 130 E. Victoria Street, Suite 100, Santa Barbara, CA 93101 by 5:00 pm, September 24, 2014.

Pamela Poehler

Concern - Noise: "Less than significant (Class III)* noise impacts associated with construction and operation of the WRF"

Less than significant to who?

Construction noise - 1-2 years

Truck noise

Tractor/grading, noise + dust

Back up beepers - constant

Trash: Increased, trucks coming in and out

Name (print): Pamela Poehler

Address: 585 El Sueno
Letter no. 21

Commen ter: Pamela Poehler, 585 El Sueno Road, Santa Barbara

Date: September 4, 2014

Response:

21-1. Construction Noise. Noise generated by MRF construction (including tractors/grading) at the SCRTS site was modeled (see Impact ALT C N-1) and found to be less than the County 65 dBA CNEL standard at the nearest noise-sensitive land uses.

21-2. Truck Noise/Back-up Beepers. See the response to Comment 2 in Letter no. 2.

21-3. Truck Traffic. See the response to Comment 4 in Letter no. 2.
TAJIGUAS RESOURCE RECOVERY PROJECT
DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

September 4, 2014 Public Hearing – Speaker Slip/Comment Form

The purpose of this hearing is to solicit public comments on the adequacy of the Draft Subsequent EIR in addressing the requirements of the California Environmental Quality Act. Please fill out this speaker slip and focus your comments on environmental issues. You may provide comments by speaking at the hearing, provide written comments (using this form), or submit comments by letter or e-mail to Joddi Leipner (jleipner@cosbwp.net) 130 E. Victoria Street, Suite 100, Santa Barbara, CA 93101 by 5:00 pm, September 24, 2014.

22-1 Greatest worry is odor
22-2 Second greatest worry is Traffic problems (Traffic concern; weekend Traffic plus New Medical Center on Cathedral Oaks (Samosun Clinic Building))
22-3 So, "both" will be a lot more Traffic than currently - and "Noise" for these "quiet places" San Vicente and ranchos - both elderly places.
22-4 24 hr x 6 days will be almost "Total Traffic"
22-5 Tall building will probably cause more Traffic - not pretty - blocking view.
22-6 Santa Barbara is for elderly people and recreation - not a dump -

Thank you for asking!

Name (print): _____________________________
Address: _______________________________
Letter no. 22

Commenter: Unknown (unsigned comment form submitted at public hearing)

Date: September 4, 2014

Response:

22-1. **Odors.** Under Alternative C, the MRF would include a negative pressure building with air filtration through two large bio-filters to reduce odors. Odor modeling (see page 5-181, Impact ALT C AQ-6) conducted for Alternative C (MRF operation at the SCRTS site) indicates odor-related nuisance would not be significant.

22-2. **Truck Traffic.** See the response to Comment 4 in Letter no. 2.

22-3. **Cumulative Traffic and Noise.** We understand that a new Sansum Clinic recently opened at 4151 Foothill Road and may contribute traffic to some of the same roadways and intersections that could receive additional traffic under Alternative C. The cumulative traffic impact analysis of the Draft SEIR was based on full build-out of the 2012 Goleta Valley Community Plan update, which included the site of the Sansum Clinic. As discussed under Impact ALT C T-CUM-2 (see page 5-223), the project's contribution to cumulative traffic impacts were found to be less than significant based on the County's traffic thresholds. Concerning traffic noise, due to the small incremental increase in traffic volumes on nearby roadways from Alternative C, compared to the existing volumes, traffic noise increases associated with Alternative C at the SCRTS site are considered less than significant (see discussion under Impact ALT C N-3).

22-4. **24 Hour Operations.** See the response to Comment 2 in Letter no. 2.

22-5. **Visual Impacts.** The proposed project would be a public facility constructed for the general public benefit for the purpose of managing the communities and waste and reducing the need for landfilling. The need for a 60 foot-tall (maximum) building for the MRF is unique to the function of the MRF (solid waste processing) which requires a larger building height to accommodate multi-level processing/sorting equipment connected by conveyor belts and to accommodate large pieces of equipment (e.g., loaders) and large transfer trucks operating within the building. Because of the specific function of this building, it is not reasonably foreseeable that the MRF could be used as a precedent for proposing other tall public buildings on the County campus. All other non-County buildings on surrounding private properties would be subject to the height limits set forth in the County's Land Use Development Code for the specific zone district. As discussed under Impact ALT C VIS-1 and VIS-2 (pages 5-171 to 5-173 of the Draft SEIR), the MRF building would not block views and only a distant view (at least 2,400 feet away) of the roofline would be visible.

22-6. This comment does not address the adequacy of the Draft SEIR.
TAJIGUAS RESOURCE RECOVERY PROJECT
DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT
September 4, 2014 Public Hearing – Speaker Slip/Comment Form

The purpose of this hearing is to solicit public comments on the adequacy of the Draft Subsequent EIR in addressing the requirements of the California Environmental Quality Act. Please fill out this speaker slip and focus your comments on environmental issues. You may provide comments by speaking at the hearing, provide written comments using this form, or submit comments by letter or e-mail to Joddi Leipner (jleipner@cosbw.net) 130 E. Victoria Street, Suite 100, Santa Barbara, CA 93101 by 5:00 pm, September 24, 2014.

I am a 12 year resident of Santa Barbara, 10 years and 2 1/2 Vista de la Mesa Dr., Vista La Cumbre Community.

In order to draw near and live in the lovely San Vicente Mobile Community, I moved in January 2014. This community and the surrounding area is just perfect for me.

I am an 82 year old widow in good health, best with colleges (asthma) and a ready spirit. The project would shorten my life span.

Oreatha

Name (print): OREATHA LAMBERT

Address: 340 Old Mill Road # 182 - Santa Barbara 93110
reduce my home value and create a most unpleasant atmosphere for so many communities surrounding this area! Do not allow this to happen!! I was never informed of any of this project!
Letter no. 23

Commenter: Oretha Lambert, 340 Old Mill Road #182, Santa Barbara

Date: September 4, 2014

Response:

23-1. **Shorten Lifespan.** A health risk assessment (including cancer risk) was conducted for the MRF at the SCRTS site, which indicates that the Santa Barbara County APCD thresholds for cancer risk and non-cancer health hazards would not be exceeded. Therefore, the MRF is not expected to substantially affect human health or lifespan.

23-2. **Property Values.** See the response to Comment 5 in Letter no. 2.

23-3. **Noticing.** See the response to Comment 6 in Letter no. 2.
Dear Ms. Leipner,

I attended the recent meeting regarding the county’s plan for the trash sorting facility. I have objections to this being built on the transfer station property. First, a brief history:

My parents, George and Elinor Taylor, bought property on Sherwood Dr in 1946, building their first home. I was born 3 years later. I grew up on the property and I still live on Sherwood Dr, on the property next door to where my parents lived. My father died in 1989, my mother in 2003. I can vaguely remember the property prior to the dump being put in: there were beautiful rolling hills, a seasonal creek, and many large trees. I think the dump was put in about 1956, totally changing the entire area. My mother told me that there was a meeting prior to the dump being put in; all the neighbors protested, but in just a few days the work started on the dump.

Growing up, one of the most common things was hearing ‘Fire at the dump’, as in those days, people dumped things that did not belong in landfills. Decomposition of the dumped materials was a factor as well (methane is a VERY flammable gas!). The dump stunk, even when there was not a fire. At one point, it was so close to our home, that one could see the ‘tractor man’s’ face as he tried to cover up the garbage. My mother had a hard time drying our laundry on the backyard clothes-line, as the seagull population was huge. Many times, she had to wash the clothes more than once for them to be clean. People did not spay or neuter cats or dogs than and so they left them at the dump. At one time, there were 13 cats that came to our house to be fed.

Then, in June of 1990, the Painted Cave fire burned almost the entire Sherwood Dr neighborhood, both my mother and I lost our homes and because we didn’t have electricity that night, we had no warning and got out with only the clothes on our backs. It was a long, slow, expensive, heartbreaking process re-building. My mother was having trouble dealing with it all, so we just rebuilt one house and shared it for several years. We were promised by the county that they would plant trees after the fire, but they did not do so.

Several years ago, there was flooding and mud slides on Highway 154 and all the excess dirt was put on the transfer station property, very close to my property. Constant dumping 7 days a
week, 10-12 hours a day, began at that time. The trucks’ back-up beepers echoed throughout the canyon. Beepers are designed to be easily heard, and these were! But they also seriously disturb the peace.

24-1

Our neighborhood has put up with a lot on noise, smell and inconvenience for a long time. Putting the trash sorting facility on the transfer station property would add one more to the growing list of irritating, disruptive aspects of “life in our neighborhood.” Please reconsider using this property for that purpose and, for once, leave things alone!

I am including this document as an attachment for your convenience. Please feel free to contact me via email 'judib76@live.com' or by phone at (805) 964-8325.

Thank you,
Judi Biegen
Letter no. 24

Commenter: Judi Biegen, 315 Sherwood Drive, Santa Barbara

Date: September 18, 2014

Response:

24-1. This comment does not address the adequacy of the Draft SEIR, but addresses the commenter's concerns over past activities at the County Campus and the compatibility of these activities with the surrounding land uses. The commenter also expresses her opposition to Alternative C. These comments will be forwarded to the decision-makers for their consideration.
Dear Ms. Leipner,

I am writing in order to voice my opposition to the site chosen as alternative “C” to the Tajiguas landfill north of Santa Barbara. The alternative site I refer to is the facility near the current Alpha Recovery Center. I reside on Sierra Madre Road and cannot imagine this site as a location of a massive trash receiving and sorting center. I attended the most recent hearing in which citizens expressed their views and concur with the majority of opinions voiced against this considered project.

This facility, if approved, would cause heavy truck traffic and high levels of pollution and noise. It makes no sense to place this trash center in the middle of developed neighborhoods. Please register my strongest objection to the proposed project. Thank you for your concern.

Sincerely,

Lynne Tahmisian

Lynne M. Tahmisian, President
La Arcada Investment Corporation
1114 State Street, Suite 243
Santa Barbara, CA 93101
805-966-6634 Phone
805-564-1654 Fax
Letter no. 25

Commenter: Lynne Tahmisian, Sierra Madre Road, Santa Barbara

Date: September 18, 2014

Response:

25-1. The comments do not address the adequacy of the Draft SEIR, but presents the commenters opposition to Alternative C and concerns regarding traffic, pollution and noise. These impacts are discussed in Section 5.3.3.4 (starting on page 5-169) of the Draft SEIR. The comments will be forwarded to the decision-makers for their consideration.
Letter no. 26

Leipner, Joddi

From: Ginnie Grothenhuis <ggrothenhuis7@gmail.com>
Sent: Monday, September 22, 2014 1:12 PM
To: Leipner, Joddi
Subject: Tajiguas Resource Recovery Project

Hello, I was told that we should direct our comments to you about the proposed Tajiguas project, so that's why I'm communicating with you. I think that it's a great idea for Tajiguas, but a very poor idea for any urban area. I live in the neighborhood around the current transfer station and would certainly not like the imposition of a very large building and the additional traffic and pollution that would entail. Please don't put it in any urban area. It's most properly located at Tajiguas. Thank you, Ginnie Grothenhuis
Letter no. 26

Commenter: Ginnie Grotenhuis, 4587 Sierra Madre Road, Santa Barbara

Date: September 22, 2014

Response:

26-1. The comments do not address the adequacy of the Draft SEIR, but presents the commenters opposition to Alternative C and concerns regarding traffic, pollution and noise. These impacts are discussed in Section 5.3.3.4 (starting on page 5-169) of the Draft SEIR. The comments will be forwarded to the decision-makers for their consideration.
From: Bill Edwards [mailto:billedwards1@prodigy.net]
Sent: Monday, September 22, 2014 2:42 PM
To: Leipner, Joddi
Subject: Transfer stn. by El Sueno Rd, SB, alternative plan

"We do not want this sorting facility in our residential community. If the project is to be done, please do it at Tajiguas, as planned".

We just bought our house here this spring, that we had been renting for years. We actually live in it, not renting it out. In a dozen years or so it will be our retirement home. Every so often, when the weather conditions are right, you can smell that sickly sweet deodorizer that is used at the transfer station/ trash hauling trucks there. That is bad enough as it is! To sink everything you have into getting a place, in an extremely tight housing market, to be rewarded with "a change in plans". I'm not gonna bring up the cost to housing values, I'm talking about quality of life. So much for the "American Riviera" slogan. Just don't plan to live down-wind of it.

Bill Edwards
251 El Sueno Rd.
Santa Barbara, CA  93110-1020
Letter no. 27

Commenter: Bill Edwards, 251 El Sueno Road, Santa Barbara

Date: September 22, 2014

Response:

27-1. The comments do not address the adequacy of the Draft SEIR, but present the commenters opposition to Alternative C and concerns regarding traffic, pollution and noise. These impacts are discussed in Section 5.3.3.4 (starting on page 5-169) of the Draft SEIR. The comments will be forwarded to the decision-makers for their consideration.
To: Wolf, Janet; Leipner, Joddi
Subject: Material Resource Facility in Noleta

Dear Supervisor Wolf and Ms. Leipner,

I was unable to attend the public hearing held earlier this month on the topic of constructing a Material Resource Facility (MRF) in the unincorporated area of Santa Barbara. It's my understanding that it's slated to be a 60,000 sq.ft. facility which accepts trash and recyclables for sorting purposes with the goal of reducing the flow of trash to our local landfill. While I applaud the County for their commitment to our environment, I have some major concerns about building this huge, industrial complex at the Transfer Center off Calle Real near Turnpike, right smack in the middle of our neighborhood. This decision will have a negative impact on our residential community surrounding it. This is the community where our family moved to, only this past July.

As a new resident of this area, but a longtime resident of Santa Barbara, I am also rather concerned about the way this project has been handled with respect to keeping the community informed. Construction of a MRF in S.B. has been quietly investigated by County staff for years, partnerships have been forged, site locations discussed -- all without public knowledge, input, or involvement. The stealth way this has proceeded is of great concern and I urge you to rethink this and ask whether this expensive development is truly even needed.

Transfer Center is not a viable location due to the risks associated with a Material Resource Facility (MRF) including:

- Higher risk of fire is associated with the operation of a MRF itself — to be built in a high risk fire area.
- Serious or fatal accidents due to vehicular traffic associated with the day-to-day operations of a MRF. More transport trucks and vehicles will travel Calle Real and Turnpike Road daily and encounter pedestrians (residents of the area, students walking to/from schools, residents making their daily commute). This intersection is already overly busy and can’t handle traffic associated with an industrial facility that hauls waste and recyclables.
- Health risks due to by-products of a MRF, such as increased dust, airborne microorganisms, fungi, bacteria and endotoxins — all can cause health problems to those exposed. Not to mention the disease-bearing insects and vermin that will soon make their home near the MRF.
- Evacuation of such a large number of residents, county workers, students, etc. poses a very serious problem for this location in the event of a fire or breach, which will only be increased, and worsened should the MRF project move forward.
Quality of life must be considered — people must be adequately segregated from a MRF due to the associated risks. The Transfer Center location does not offer any segregation, the present facility is just yards from family homes and several schools. Imagine the endless noise of vehicles, machinery running, the act of tipping waste (trash trucks), blowers, glass crushers, conveyor belts running where sorting is done. Then there are the lights surrounding the gigantic facility. Heat generated by trucks and equipment, vibrations and so on. It’s an environmental nightmare in a residential area! Not one of these risk factors was mentioned at the public hearing (9/4/14) — individually significant enough to deny such a development at the Transfer Center, together they spell Disaster and LIABILITY for the county and it’s partners in this project.

My family of four - including 2nd grade twins - would greatly appreciate your reconsidering of this project moving forward; if you, in your wisdom and planning feel this is absolutely necessary, why not place the MRF in a location better suited for a project like this? All of those purposes can and should be accomplished at Tajiguas, as the project calls for. The EIR analyzes the project as being, in its entirety, at Tajiguas, and finds that Tajiguas is the best place for all of the components of the project. Sorry this email is so long, and I hate to be a "NIMBY"...but seriously, would you want to LIVE nearby a MRF?

Thank you for your time and attention.

Most sincerely,

The Kelly Family ~ Joni, Rod, Maddie & Ethan
1122 Via Regina, Santa Barbara, CA 93111
Letter no. 28

Commenter: Kelly Family, 1122 Via Regina, Santa Barbara

Date: September 22, 2014

Response:

28-1. Noticing. See the response to Comment 6 in Letter no. 2.

28-2. Fire Risk. Impact ALT C HAZ-3 of the Draft SEIR recognizes that very high fire hazard areas occur north of the Alternative C MRF site; however, existing fire protection services and proposed fire suppression systems to be provided at the MRF would prevent a significant increase in fire hazard.

28-3. Traffic Accidents and Congestion. MRF operation would involve 27 additional trips (including 24 heavy-duty truck trips) during a.m. peak hour, and 4 additional trips during p.m. peak hour. As discussed under Impact ALT C T-4, traffic associated with MRF operations at the SCRTS site would not result in traffic congestion exceeding County standards, including the Calle Real/Turnpike Road intersection and would not exceed the design capacities for roadways serving the Alternative C MRF site (Impact ALT C T-3). As no significant increase in traffic congestion would occur and no significant impact to roadway capacity would occur, no increases in accident rates are anticipated.

28-4. Health Risks. Under Alternative C, unloading and processing of the MSW and CSSR would be conducted with the MRF building which would be a negative pressure building provided with a dust collection system and bio-filters to capture and filter dust, microorganisms and odors generated during sorting and processing. Nuisance management at the MRF would include development and implementation of a Vector Management Plan (VMP) that would address disease vectors through good housekeeping, minimizing accessibility of organic waste to nuisance species so that these species are not attracted to the facility, and for insects and rodents, on minimizing features that would support breeding by and refugia for these species. Because completely eliminating access to food waste and refugia for nuisance species may not be feasible, the VMP would also include measures to capture and remove individual nuisance mammals and treat areas with nuisance insects. The VMP would be designed to be adaptive, and include some monitoring of the presence and/or abundance of individual nuisance animals and increasingly more stringent measures to limit accessibility of wastes to these animals. With respect to health risk associated with air emissions, a health risk assessment (including cancer risk) was conducted for the Alternative C MRF site, which focused on diesel particulate matter from mobile equipment and trucks. The results of the health risk assessment indicate that the Santa Barbara County APCD thresholds for cancer risk and non-cancer health hazards would not be exceeded. (see page 5-178, Impact ALT C AQ-4). Overall, significant increases in health risk associated with the MRF at the SCRTS site are not anticipated.
28-5. **Evacuation for Wildfire.** Construction and operation of a MRF at the SCRTS site under Alternative C would not exceed the capacities of the adjacent roadways, significantly increase traffic congestion at area intersections, or substantially affect traffic circulation or access to other adjacent land uses. During construction, a traffic control plan would be developed and implemented to maintain traffic circulation and emergency access in the project area. Therefore, impacts associated with emergency response and evacuation were considered less than significant (see Impact ALT C HAZ-4).

28-6. **Quality of Life/Segregation.** The analysis of construction and operation of a MRF at the existing SCRTS site under Alternative C considers the surrounding governmental/institutional, residential and commercial uses (see Impact ALT C LU-1). With respect to residential land uses, the proposed operation of a MRF at this location would result in adverse but less than significant visual, noise, air quality, odor, nuisance, hazards, and traffic impacts, and potentially significant but mitigable impacts associated with the possible discovery and exposure of hazardous materials during construction.

28-7. **Noise, Lighting, Heat and Vibration.** See the response to Comment 2 in Letter no. 2 regarding noise. MRF-related lighting would be controlled by blinds to reduce the escape of interior lighting and shielding of exterior lighting, such that light and glare impacts were found to be less than significant (see Impact ALT C VIS-4, page 5-172). Heat generated by sorting equipment, mobile equipment and trucks would occur primarily within the MRF building and would not affect adjacent land uses, as building air would be cooled by the bio-filters.

Because of the distance between the project site and the closest residential land use, a vibration impact analysis was not provided in the Draft SEIR for Alternative C. However, using Equation 12 from Caltrans' Transportation and Construction Vibration Guidance Manual, vibration at the nearest residence to the SCRTS (on El Sueno Road) based on use of a large bulldozer is estimated as a peak particle velocity (PPV) of 0.001 inch/seconds. Note that 0.01 PPV is considered barely perceptible, such that 0.001 PPV would not be perceptible.

28-8. The comment does not address the adequacy of the Draft SEIR, but presents the commenters support for the proposed project at the Tajiguas Landfill if the project needs to be built, and opposition to Alternative C. The comments will be forwarded to the decision-makers for their consideration.
TAJIGUAS RESOURCE RECOVERY PROJECT

DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

September 4, 2014 Public Hearing – Speaker Slip/Comment Form

The purpose of this hearing is to solicit public comments on the adequacy of the Draft Subsequent EIR in addressing the requirements of the California Environmental Quality Act. Please fill out this speaker slip and focus your comments on environmental issues. You may provide comments by speaking at the hearing, provide written comments using this form, or submit comments by letter or e-mail to Joddi Leipner (jleipner@cosbw.net) 130 E. Victoria Street, Suite 100, Santa Barbara, CA 93101 by 5:00 pm, September 24, 2014.

THE ENVIRONMENTAL ANALYSIS FOR ALTERNATIVE C IS COMPLETELY INADEQUATE AND THE NOTICE TO NEGATIVELY IMPACTED NEARBY PROPERTIES, NEIGHBORS AND BUSINESS WAS LEGALLY DEFECTIVE.

Name (print): JAMES E. MARINO
Address: 1026 CAMINO DEL RIO SB 93110
Jodi Leipner  
Division Planner  
Santa Barbara County  
Solid Waste Management Division  
130 East Victoria Street #100  
Santa Barbara, California 93101

20 September 2014

COMMENTS ON THE ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED TAJIGUAS RESOURCE RECOVERY PROJECT

Dear Ms. Leipner;

I have reviewed the lengthy and detailed EIR prepared for the Tajiguas reclamation project. Some of the comments made at the public hearing have expressed the concerns of the vast majority of the hundreds of home owners and residents including me that would be impacted if alternative C would somehow allow this project to be sited, in any part or component, at the current County
Transfer Station off of Calle Real and adjacent to the County Jail and Sheriffs’ Department. The analysis of this Alternative C site is grossly inadequate. Areas of inadequacy include the traffic and transportation analysis. The surface streets approaching this site particularly from the Southeast are narrow. I assume NO trucks coming from the North County would be allowed to use the already extremely dangerous and congested San Marcos Pass Road.

It is unlikely that trucks coming from the South would take the SR 154-State Street-Hollister Ave, turnoff and traverse that intersection which operates on a 5 cycle rotation and at times operates at an LOS D now depending on the day of week and the time and travelers and residents headed over San Marcos Pass Road to the Santa Ynez Valley or returning from there.

That route would take trucks along the narrow one lane Westbound Calle Real approach and they would then have to negotiate the signalized intersection at SR 154 which also operates at a level D at certain times of day and is also a 5 cycle rotation. The El Sueno exit from the 101 Northbound is too narrow and constricted to handle large waste hauling trucks, and the short sharply curved off ramp leads to traffic backing up onto the
freeway when it is even slightly congested by large numbers of vehicles using the 4 way stop sign controlled intersection at El Sueno and Calle Real.

As a result virtually all of the trucks traveling to and from the proposed alternative C site would be utilizing the Turnpike-Calle Real-101 interchange. This is another 5 cycle signalized intersection which operates at levels of D to F at certain times of day depending upon the rush hour, school hours at the nearby San Marcos High School, meal times at In and Out Burger and drive through, and any traffic congestion and back-up on the 101 freeway coupled with the regular surface traffic in that area.

In articulating the traffic and transportation analysis it completely fails to consider the number of denser and more urbanized uses already planned for that immediate vicinity, such as the now vacant MTD property scheduled for several hundred homes, many slated to be so called affordable units.

In addition to the inadequacy of the traffic analysis the noise, odor and light pollution from this 24 hours, 6 day a week operation using heavy equipment and in the heart of a large suburban to urban residential area is inadequately assessed.
By comparison using alternative B’s odor overlay map, used for the Marborg site, it demonstrates the considerable distances which noxious odors can travel, depending of course on the winds of which there are two or three prevailing patterns at the transfer station site. Those winds are winds from the Northwest, generally the prevailing winds, Santa Ana or off shore winds, from the North and northeast and winds out of the South depending upon weather and approaching frontal systems.

It is clear that noxious odors and possibly heavier than air gases will travel from the transfer site downward to the jail where hundreds of prisoners are incarcerated, to the condominiums there and on the other side of the ridgeline to residences and the homes in the mobile home park where large numbers of elderly people reside and also to the Alpha center which is situated in a hollow where sound reverberates and heavier than air gases and odors will naturally descend and likely be trapped.

The size bulk and scale of the proposed facility far exceed the residential profile surrounding most of the site and it will present negative visual impacts to those expensive homes on three sides of the site particularly from lighting and equipment operating at night. The acoustic characteristics of the canyons to the west and Northwest are such that they act
like a geological megaphone and sound boards transmitting noise to the North, Southeast and West and the outdoor shooting range the Sheriff Department occasionally used in the past, had to be shut down due to numerous noise complaints from the hundreds of homes nearby where that sound was directed or reflected.

Because the site is elevated, surface run-off of pollutants and contaminated rainwater is another problem not adequately mitigated, such as by subjecting trucks and their tires to be washed in a closed system internally containing the wash water and done prior to departure to insure area roadways are not contaminated or littered.

Perhaps most importantly of all, the subject of the expansion of the County Transfer Station was discussed at length over the years in conjunction with any needed expansion of the Tajiguas land fill. In 1998 the County and the Board of Supervisor concluded that any expansion of the County transfer station operations beyond it’s then scale and size WAS INFEASIBLE due to the residential character of the surrounding neighborhoods.

See the attached EXHIBIT A, the County Board of Supervisors’ minute order making that finding in connection with the EIR being proposed for the
Tajiguas land fill project then being discussed and considered. There has been no change in the surrounding neighborhoods since 1998 when the Board concluded that any expansion of the County transfer station beyond its then size and scale was disfavored and infeasible and further that it should not be considered at all as an alternative either standing alone or as a part of any other elements of the Tajiguas land fill expansion project.

In fact, if anything, the surrounding neighborhood has become more residential, denser and more populated since then with more homes, condominiums, motels, restaurants and other businesses including the County Social services campus, the County Hospital, the Air Pollution Control District, SBCAG offices, Jail, Sheriffs’ Department, County training facilities, County Road Department and many others. Also omitted from the EIR is the fact still many more residences and businesses are planned in the impacted surrounding neighborhoods for the immediate future.

The notice to the surrounding neighbors, home owners and businesses, including many county employees exposed to the negative impacts of this proposed alternative C was woefully inadequate and in most cases non-existent with many people
finding out about alternative C being chosen not just as a feasible alternative, but rather as the “environmentally preferred Alternative”, only a day or two before the public hearing. It is believed by many that the failure to adequately notify the many hundreds of surrounding neighbors and properties was a result of the experience in 1998, as documented in the attached Exhibit A, that the County was well aware the suggestion of any expansion, particularly one of the magnitude of this one, would meet with widespread opposition.

Consequently it is widely suspected that the failure to adequately notify those logically and negatively impacted in the surrounding neighborhoods was an attempt to head off an anticipated uproar.

Given the long standing and well stated County Policy opposing any expansion or proposed expansion of the County Transfer Facility as evidenced by the attached Exhibit A, it is respectfully suggested that the alternative C should not only, not be considered the “environmentally preferred alternative”, but rather determined to be infeasible as it has been for the past two decades and it should be removed as an alternative from the EIR. Numerous property owners and businesses have relied upon this long
standing policy and invested in their homes, expensive properties and businesses based upon it!

I hope that the current EIR in circulation for comments, will be amended to reflect and include this long standing County policy as it should have at the outset and that if need be the EIR should be re-circulated for comment in view of this County policy with regard to any expansion of the transfer station facility beyond it's current size, scale and scope of operations, a discussion which was completely omitted from the current EIR.

I remain;

Very Truly Yours;

James E. Marino

[One of the many concerned and potentially negatively impacted neighbors of the County Transfer Station].
Policy Established by the County of Santa Barbara and the County Board of Supervisors in 1998, that use of the County Transfer Facility in Connection With any Expansion Project For the Tajiguas Land Fill Was and Is Infeasible
BOARD OF SUPERVISORS OF THE COUNTY OF SANTA BARBARA
STATE OF CALIFORNIA
CLERK OF THE BOARD OF SUPERVISORS

*****

MINUTE ORDER

September 15, 1998, in the p. m.

Present: Supervisors Naomi Schwartz, Jeanne Graffy, Gail Marshall,
Joni Gray, and Thomas Urbanske
Michael F. Brown, Clerk (Fiorillo)

Supervisor Marshall in the Chair

RE: County Counsel - Approve recommendations regarding Policy Statement that
Transfer Station expansion is not a feasible alternative to Tajiguas Landfill
Expansion, as follows: (98-20,739 & 20,731) (FROM SEPTEMBER 1, 1998) (EST.
TIME: 20 MINS.)

a) Adopt the final language of the Policy Statement that Transfer Station
expansion is not a feasible alternative to the Tajiguas Landfill Expansion
Project;

b) Direct the environmental consultant responsible for the preparation of the
Tajiguas Landfill EIR to include the Policy Statement in the EIR analysis of
alternatives;

c) Direct the consultant that the scope of work on the EIR does not include
analysis of Transfer Station expansion as an alternative to the Tajiguas
Landfill Expansion Project.

COUNTY ADMINISTRATOR'S RECOMMENDATION: POLICY

Graffy/Urbanske a) Adopted as revised per “Proposed Revisions to
the Board of Supervisors Statement Regarding the
County Transfer Station Alternative to the Tajiguas
Landfill Expansion Project” dated September 15,
1998.

b) and c) Approved.

No: Marshall
Proposed Revisions to the Board of Supervisors Statement
Regarding the County Transfer Station Alternative to the
Tajiguas Landfill Expansion Project
9-15-98

4. In 1993, persons living in the neighborhoods surrounding the Transfer Station formed a “Coalition for Safe Neighborhoods” which participated in a Focus Group, which in turn participated in detailed technical discussions and meetings with County staff. The Goals of the Coalition, among others, are to eliminate the possibility that the Transfer Station will cause future industrialization of the area, reduce Transfer Station operations, and reduce or eliminate neighborhood hazards and impacts.

10. In April, 1998, the Public Works Department issued a Notice of Preparation (NOP) of an Environmental Impact Report for the proposed expansion of the Tajiguas Landfill. Included in the NOP was an initial listing of the potential range of alternatives to the proposed expansion of the Tajiguas Landfill that would be analyzed in the EIR (Case #98-CP-033). The NOP noted that several of these alternatives (e.g., redirection of waste to another existing or new in-County landfill, redirection of waste to out-of-County landfills by truck or rail) may require the expansion of the existing Transfer Station and/or construction of a new transfer station. Through the scoping process of the EIR, oral and written comments were received by the County from the public and the Coalition for Safe Neighborhoods expressing the opinion that such expansion would be contrary to statements and prior Board actions regarding the future land use of the site, and that the Transfer Station expansion alternative identified in the NOP should be determined to be infeasible by the County in accordance with the provisions of CEQA, because it would be inconsistent with the existing Five-Year Plans. The scoping comments indicated strong objection to any alternative to the proposed expansion of the Tajiguas Landfill that could result in the expansion of the existing Transfer Station.

11. The Board of Supervisors recognizes that an EIR must consider a reasonable range of feasible alternatives, and acknowledges its responsibility, as Lead Agency, to make the final determination of which alternatives are feasible and must be included in the EIR. CEQA Guidelines §15126 indicates that when addressing the feasibility of alternatives, the Lead Agency may take into account “site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations...” In light of (1) the Board of Supervisors’ prior policy direction that expansion of the Transfer Station is a disfavored land use for the site, (2) the continued community opposition to such an expansion, and (3) the community and Board acceptance of the Five-Year Plans for the continued limited operation of the Transfer Station, it is the Board of Supervisors’ determination that the expansion of the Transfer Station or its operations beyond conformance with its currently-permitted size, capacity, structures, and specific equipment and operations of 550 tons-per-day as further described by Santa Barbara-County Transfer Station project (Case #95-GC-002) and Negative Declaration 95-ND-5 is an infeasible alternative as it relates to the Tajiguas Landfill Expansion project. “Expansion” means any expansion of the Transfer Station, whether as a stand-alone alternative or as a component of another alternative. The
Transfer Station may be included as a fixed component in any analysis of alternatives as long as the current size, capacity, structures, and specific equipment and operations are not expanded or intensified.
To: Clerk of the Board

Subject: Final Approved Board of Supervisors Statement Regarding the County Transfer Station Alternative to the Tajiguas Landfill Expansion Project

September 22, 1998

Attached is the final Board of Supervisors Statement Regarding the County Transfer Station Alternative to the Tajiguas Landfill Expansion Project approved by the Board of Supervisors on September 15, 1998 (identified as County Counsel “dcm\waste\tajiguas\expansion\transfer6.mem”).

Pursuant to Board direction on September 15, 1998, this office will forward a copy of this Statement to the Consultant responsible for the preparation of the Tajiguas Landfill EIR for inclusion in the EIR analysis of alternatives. Included with this transmittal will be a letter to the consultant directing that the scope of work on the EIR does not include analysis of Transfer Station expansion as an alternative to the Tajiguas Landfill Expansion Project and a copy of County Counsel’s letter to attorney Phil Seymour, dated August 27, 1998, which was attached to the Board Letter.

Please call me if you have any questions.

cc: Phil Demery, Director Public Works
Mark Schleich, Interim Deputy Director, Solid Waste and Utilities
Imelda Cragin, Solid Waste and Utilities
Heidi Whitman, Solid Waste and Utilities
Members of the Community Advisory Committee to Review Long-Term Solid Waste Disposal Options
BOARDS OF SUPERVISORS
COUNTY OF SANTA BARBARA
STATEMENT REGARDING
THE COUNTY TRANSFER STATION ALTERNATIVE TO
THE TAJIGUAS LANDFILL EXPANSION PROJECT

1. The County of Santa Barbara owns and operates the Santa Barbara County Transfer Station. The Transfer Station (Assessor Parcel Number 059-140-023) is 8.35 acres, located at 4430 Calle Real Road, south of Cathedral Oaks Road and north of U.S. 101 in the Goleta area of the Second Supervisorial District. It is located west of a former municipal solid waste landfill. The Transfer Station site is essentially flat-lying and is bordered on the north and west by steep hillsides. The site is bordered on the south and east by Transfer Station Road. The Transfer Station is zoned Article III, REC (Recreation). The County Road Maintenance Yard, located to the north is zoned REC. The County Sheriff’s Department and jail, located to the south, is zoned REC. The area east of the Transfer Station is developed with Single Family residences and is zoned 10-R-1. The area west of the Transfer Station is developed with residences and is zoned DR-8.0.

2. The Transfer Station has operated under a Solid Waste Facility Permit issued by the Santa Barbara County Environmental Health Services with the concurrence of the California Waste Management Board (later incorporated into the California Integrated Waste Management Board (CIWMB)) since May 1978. The Transfer Station was then and is today, an important and vital component of the County’s solid waste management system that includes the disposal of solid waste at the Tajiguas Landfill. The operating permit allowed for up to 550 tons of waste per day.

3. In 1993, an Environmental Impact Report (92-EIR-15) was prepared to evaluate the environmental impacts associated with an expansion of the Transfer Station to include the continuation of existing operations, the construction of several new structures and facilities, and the implementation of new programs. The expansion project would have required a permit revision to allow the Transfer Station to accept up to 1000 tons of waste per day. Opposition to the proposed expansion project by members of the public, particularly those who lived near the Transfer Station, was immediate, organized and vocal.

4. In 1993, persons living in the neighborhoods surrounding the Transfer Station formed a "Coalition for Safe Neighborhoods" which participated in a Focus Group, which in turn participated in detailed technical discussions and meetings with County staff. The Goals of the Coalition, among others, are to eliminate the possibility that the Transfer Station will cause future industrialization of the area, reduce Transfer Station operations, and reduce or eliminate neighborhood hazards and impacts.

5. At the July 7, 1993 Planning Commission Hearing for the County Transfer Station General Plan Consistency Direction and Facility Operations Permit Revision
there was considerable public concern and controversy regarding the impacts of the Transfer Station, its proposed expansion and the compatibility of the facility with residential land uses in the vicinity. Over 25 questions and concerns were presented by the public and the Commission (see Memorandum dated July 13, 1993 from Al McCurdy, Deputy Director, Resource Management to various interested parties Re: Response to Comments from Planning Commission Hearing on the County Transfer Station General Plan Consistency Determination). The Planning Commission continued the hearing to a later date. Meetings between the Focus Group and the County continued for the next seven months regarding the proposed expansion of the Transfer Station.

6. In March 1994, the Board approved an amendment to increase the total compensation to the Transfer Station EIR consultant, in part due to the protracted disagreements with the neighborhood groups and residents. During the twenty-four months the consultant had been working on the Transfer Station expansion project, the original scope of work had been greatly modified in response to neighborhood concerns. Modification, additional studies and increased public participation has increased the cost of the EIR and had also extended the project time schedule far beyond that originally anticipated. Ultimately, the Planning Commission did not certify the Transfer Station EIR because the Solid Waste and Utilities Division withdrew the project. The Transfer Station EIR did determine that air quality impacts associated with the proposed expansion of the Transfer Station to 1,000 tons per day would be adverse and unavoidable, and that a Statement of Overriding Considerations would have been required.

7. As a consequence of the work performed by the Focus Group and the County, the County reduced the scale of the Transfer Station project description to the satisfaction of the neighbors. In June 1995, the Board of Supervisors approved both Santa Barbara County Transfer Station project (Case #95-GC-002) and Negative Declaration 95-ND-5.

8. At the request of the Focus Group, the Board also accepted the County Transfer Station Five Year Plan listing capital projects and operational changes anticipated to occur at the Transfer Station over the next five years, with updates in 1996 and 1997. Identified objectives in the Five-Year Plans are to “limit the Transfer Station in the long term to service self-haulers only, consistent with the development of the IDF discussed herein” (the IDF is the Integrated Diversion Facility, a project since abandoned by the County). Each Five Year Plan also contains a list of proposed projects which are limited to maintenance of current operations.

9. The acceptance by the Board of Supervisors of the Transfer Station Five-Year Plans and the abandonment by the County of the project to expand the facility in favor of a plan to limit its use in the long term constitute a policy direction by the Board that expansion of the Transfer Station is a disfavored land use for the site.

10. In April, 1998, the Public Works Department issued a Notice of Preparation (NOP) of an Environmental Impact Report for the proposed expansion of the Tajiguas Landfill. Included in the NOP was an initial listing of the potential range of alternatives
to the proposed expansion of the Tajiguas Landfill that would be analyzed in the ER (Case #98-P-033). The NOP noted that several of these alternatives (e.g., redirection of waste to another existing or new in-County landfill, redirection of waste to out-of-County landfills by truck or rail) may require the expansion of the existing Transfer Station and/or construction of a new transfer station. Through the scoping process of the EIR, oral and written comments were received by the County from the public and the Coalition for Safe Neighborhoods expressing the opinion that such expansion would be contrary to statements and prior Board actions regarding the future land use of the site, and that the Transfer Station expansion alternative identified in the NOP should be determined to be infeasible by the County, in accordance with the provisions of CEQA, because it would be inconsistent with the existing Five-Year Plans. The scoping comments indicated strong objection to any alternative to the proposed expansion of the Tajiguas Landfill that could result in the expansion of the existing Transfer Station.

11. The Board of Supervisors recognizes that an EIR must consider a reasonable range of feasible alternatives, and acknowledges its responsibility, as Lead Agency, to make the final determination of which alternatives are feasible and must be included in the EIR. CEQA Guidelines §15126 indicates that when addressing the feasibility of alternatives, the Lead Agency may take into account "site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations..." In light of (1) the Board of Supervisors' prior policy direction that expansion of the Transfer Station is a disfavored land use for the site, (2) the continued community opposition to such an expansion, and (3) the community and Board acceptance of the Five-Year Plans for the continued limited operation of the Transfer Station, it is the Board of Supervisors' determination that the expansion of the Transfer Station or its operations beyond its current size, capacity, structures, and specific equipment and operations is an infeasible alternative as it relates to the Tajiguas Landfill Expansion project. “Expansion” means any expansion of the Transfer Station, whether as a stand-alone alternative or as a component of another alternative. The Transfer Station may be included as a fixed component in any analysis of alternatives as long as the current size, capacity, structures, and specific equipment and operations are not expanded or intensified.
COUNTY OF SANTA BARBARA
September 15, 1998

Mr. William Poehler
585 El Sueno Rd
Santa Barbara, CA 93110

Dear Mr. Poehler:

The Board of Supervisors (Board) just adjourned for the day, and I thought I would take a moment to update you on County’s Transfer Station (located above Calle Real west of El Sueno Road).

Today, the Board adopted my proposal to strengthen the agreement that the Transfer Station will not be expanded. After a long battle, your neighborhood won this significant victory, and I’m glad to have played a part in this effort.

It has been a pleasure to work with representatives of the Coalition for Safe Neighborhoods (Mary Hicks, Mel Zaid, and Cliff Scholle). Working together, the four of us were able to create an agreement that reinforces the County’s pledge to not expand the Transfer Station.

If you have a moment, you should personally thank Mary, Mel and Cliff for their efforts on your behalf. We worked well together, and I was pleased to hear their kind words of support for my role in protecting your neighborhood.

Ensuring safe and adequate waste management is a challenge for every community. Yet it’s just plain wrong to expand a Transfer Station in an existing residential neighborhood.

Sincerely,

Jeanne Graffy
Letter no. 29a and 29b

Commenter: James Marino, 1026 Camino Del Rio, Santa Barbara

Date: September 20, 2014

Response:

29-1. The traffic study (Draft SEIR, Volume 2, Appendix K) summarized in the Draft SEIR is based on the anticipated use of the northbound U.S. 101/El Sueno Road off-ramp by inbound collection trucks (packer trucks). Outbound collection trucks and transfer trucks would use the U.S. 101/Turnpike Road on-ramps and not the El Sueno Road on-ramp. State Route 154 would not be used for waste transportation to the MRF at the SCRTS site. Employees shift hours would primarily be outside of the peak transportation period and solid waste transportation is distributed throughout the work day, such that only 14 inbound and 10 outbound truck trips (maximum) and 3 employee trips would occur during a.m. peak hour and only 1 inbound and 3 outbound truck trips (maximum) would occur during p.m. peak hour (see Table 5-30 of the Draft SEIR). As noted in Tables 5-31 and 5-32 of the Draft SEIR, with the addition of MRF-related traffic, affected roadways and intersections would operate at acceptable levels of service. The commenter does not provide any substantial evidence to support that impacts would be different than analyzed in the Draft SEIR.

29-2. With regard to traffic contributed by other planned developments (cumulative impacts), Impact ALT C T-CUM-1 indicates that MRF-related traffic when added to traffic volumes forecast in the Goleta Valley Community Plan update would not result in traffic congestion exceeding County standards. According to the EIR (SCH no. 2012091048) prepared for the Eastern Goleta Valley Community Plan, the number of allowable residential units at the MTD site (4678 Calle Real) would increase from 3 to 205, and this change is included in the forecast traffic volumes used in the cumulative traffic analysis for Alternative C.

29-3. If implemented at the Alternative C site, the MRF would accept waste only during the current permitted hours of Monday through Saturday from 7 a.m. to 5 p.m. Solid waste processing would occur from 7 a.m. to 11:30 p.m., with only maintenance/cleaning activity occurring during nighttime hours. Therefore, noise associated with heavy equipment would not occur after 11:30 p.m. and noise and traffic associated with MSW delivery activities would not occur after 5 p.m. In addition, noise modeling and odor modeling conducted for MRF operations at the Alternative C site indicates these impacts would be less than significant. Concerning light pollution, MRF-related lighting would be controlled by blinds to minimize the escape of interior lighting and shielding of exterior lighting. These measures would prevent significant light and glare impacts. The commenter does not provide any substantial evidence to indicate impacts would be different than analyzed in the Draft SEIR.
29-4. The MRF odor control technologies and building designs proposed under Alternatives B and C are not the same; therefore, odor modeling results are not the same at each location. An odor contour map was provided for Alternative C (see Figure 5-31), and was developed using air dispersion modeling, one year of hourly meteorological data from the nearest station (Santa Barbara Airport) and using specific building design and odor control technologies proposed for that site. As indicated in Table 5-25 of the Draft SEIR, detectable odors (exceeding the 5 OU/m³ guideline) would occur only a few hours per year at the closest receptors. Therefore, the potential for the MRF to cause odor-related nuisance was considered a less than significant impact.

29-5. See the response to Comment 4 regarding odors. The MRF would not generate any heavier-than-air gases such as carbon dioxide or landfill gas because solid waste would not be stored on site for sufficient periods to decompose. In any case, the jail (and adjacent uses) and the Alpha Resource Center are either located at a higher elevation than the SCRTS or on the opposite side of the cut slope along the western boundary of the SCRTS. Therefore, heavier-than-air gases (if present) could not flow towards the jail or Alpha Resource Center.

29-6. See the response to Comment 7 in Letter no. 2. See the response to Comment 3 regarding lighting impacts.

29-7. See the response to Comment 2 in Letter no. 2.

29-8. The Draft SEIR identifies that storm run-off during the construction period and during operations could significantly affect surface water quality (see Impacts ALT C WR-3 and WR-4). As listed on page 5-227 of the Draft SEIR, numerous measures (including trench drains at door thresholds, hydrodynamic separators at storm drains and sediment traps) have been incorporated into the MRF design to avoid discharge of fluids or contaminated storm run-off to surface waters. In addition, mitigation has been provided in the Draft SEIR to reduce water quality impacts to a level of less than significant. Therefore, a self-contained truck tire washing system is not necessary.

29-9. See the response to Comment 7 in Letter no. 10. With respect to changes that have occurred since the Policy Statement was issued, the baseline for the impact analysis includes all of the homes, commercial land uses, and public facility/institutional land uses present at the time the Notice of Preparation for the Draft SEIR was issued.

29-10. The Draft SEIR included a cumulative impact analysis for Alternative C addressing recently approved and pending development in the vicinity of the SCRTS. In addition, the cumulative traffic analysis included future traffic volumes associated with build-out of the Goleta Valley Community Plan update.
29-11. See the responses to Comment 6 in Letter no. 2 regarding noticing and Comment 7 in Letter no. 10 regarding the Board policy statement. Section 5.3.3.1, Page 5-132, Lines 15-20 of the Draft SEIR noted that significant neighborhood concern was likely in considering the SCRTS site for the location of the MRF under Alternative C. However, as required under CEQA and requested by members of the public during the Draft SEIR scoping period, alternative locations for the MRF, including other urban locations was included for analysis in the Draft SEIR.

29-12. See the response to Comment 7 in Letter no. 10 regarding the policy statement concerning the feasibility of SCRTS expansion. No significant new information has been provided by the commenter that would warrant recirculation of the Draft SEIR as required under the State CEQA Guidelines Section 15088.5. The commenter’s opposition to Alternative C will be forwarded to the decision-makers for their consideration.
Dear Ms. Leipner,

Please do not place the MRF at the Turnpike transfer station. I live on La Ramada drive and have for 14 years. Each day as I pick my kids up from school and drive home from work I am frustrated and saddened by the incredible increase in traffic due to the Adult Ed Center, the new condos, In and Out Burger and the County Mental Health and Sheriff's offices. There is so much going on in our area already any addition traffic, noise, pollution and potential accidents seems like too much for one neighborhood to bear.

Please don't do this to our neighborhood. The cost to our quality of life, health and safety is too much.

Sincerely,
Cheri Spencer
Letter no. 30

Commenter: Cheri Spencer, La Ramada Drive, Santa Barbara

Date: September 23, 2014

Response:

30-1. The Draft SEIR included a comprehensive analysis of the environmental impacts associated with the construction and operation of a MRF at the SCRTS site, including traffic, noise, air pollution (including health risk), water pollution and hazards (see Section 5.3.3.4 of the Draft SEIR). The commenter’s opposition to Alternative C will be forwarded to the decision-makers for their consideration.
Ms. Joddi Leipner  
130 East Victoria Street  
Suite 100  
S. B. Ca. 93101  

DEar Ms. Leipner:  

Re: Tajiguas Project  

I live in Rancho San Antonio, this has been my home for 50 years. I am totally against the expansion of the dump site planned in my area. This project affects vast residential areas and is a danger to the health and welfare of the citizens.  

Aside from the 24 hour a day noise we will be subjected to unhealthy fumes from this disposal. Many of the residents have health issues from breathing problems to old age.  

The County cannot guarantee that we will not be subjected to chemicals which are airborne, fire fumes which has happened before and will happen again.  

This expansion is against every "Clean Act" which is important to healthy living.  

Thank you for your consideration on this very vital issue. PLEASE "Stop" this from being a reality.  

Sincerely,  

Lorraine G. Morey  
1110 Camino del Rio  
S. B. Ca. 93110  

Phone # 805-967-8509
Letter no. 31

Commenter: Lorraine Morey, 1110 Camino Del Rio, Santa Barbara

Date: September 23, 2014

Response:

31-1. The commenter’s opposition to Alternative C will be forwarded to the decision-makers for their consideration. The Draft SEIR (see pages 5-178 to 5-180) included a health risk assessment associated with locating the MRF at the SCRTS site, and determined the cancer risk and non-cancer health risk would be less than significant based on the Santa Barbara County APCD thresholds.

31-2. Please see the response to Comment 2 in Letter no. 2 regarding noise impacts associated with Alternative C. See the response to Comment 1 above regarding unhealthy fumes.

31-3. Concerning fire fumes, Impact ALT C HAZ-3 of the Draft SEIR (see page 5-190) recognizes that very high fire hazard areas occur north of the Alternative C MRF site; however, with the existing fire protection services and the proposed fire suppression systems the potential increase in fire hazard would be less than significant.
Hello Mrs. Leipner,

I am a resident that lives relatively near the Transfer Station. It is with much concern I write this letter to you. Three are several risks that would arise if the MRF was built near the Transfer Station:

1. We are in a high fire area. The Painted Cave Fire still is vivid in my memory. This fire jumped the freeway & burned all of the area near the Transfer Station & beyond. The evacuation of residents & county personnel would be seriously impaired with the huge trucks & traffic that the MRF would bring.

2. A few years ago a junior high student was killed on Calle Real. The traffic on Calle Real & Turnpike is challenging already. 2 buses (public & county commuter) line up to turn right from Turnpike to Calle Real & stop traffic in all directions. The traffic would be backed up on the freeway, dangerous for San Marcos & CLL (Adult Ed) students, hotel residents, etc.

3. The health risks due to by-products of the MRF including dust, fungi, bacteria, etc. would cause individual harm & liability for the county.

4. Noise pollution would be extreme for everyone that is on the path of these giant trucks & the processing facility.

5. Quality of Life The proposed site is very close to family homes which is unacceptable.

6. It is my understanding that a few years ago the county bought land next to Tajiguas to insure that no neighbors would be disturbed by the process of utilizing the landfill. The small number of neighbors near the Tajiguas land fill do not compare with the numbers of families, homes, businesses, & COUNTY EMPLOYEES that would be extremely inconvenienced by building the MRF near the Transfer Station.

Each one of these points is enough to deny the Transfer Center option. The County needs to make the correct choice, limit its liability in so many arenas, & if they choose to move forward on the MR, choose Tajiguas.

Peggy Kearns
kearnsp@cox.net
Letter no. 32

Commenter: Peggy Kearns, Santa Barbara

Date: September 23, 2014

Response:

32-1. The traffic study prepared for the SEIR indicates that MRF-related vehicle trips would not result in traffic volumes exceeding the roadway capacity or traffic congestion exceeding County standards (see Impacts ALT C T-3 and 4). As discussed under Impact ALT C HAZ-4, traffic circulation and access to adjacent land uses would not be substantially affected such that emergency response and evacuation would not be impaired by the MRF at the SCRTS site. The commenter does not provide any substantial evidence to support that impacts would different than analyzed in the Draft SEIR.

32-2. The traffic study prepared for the SEIR indicates that MRF-related vehicle trips would not result in traffic volumes exceeding the roadway capacity or congestion exceeding County standards at the Calle Real/Turnpike Road intersection (see Table 5-32).

32-3. MRF operation at the SCRTS site would increase the amount of solid waste received and processed as compared to existing conditions. However, these activities would be conducted within a building with numerous features to control dust, odors, and any airborne microorganisms, such as a negative pressure internal environment, a dust collection system and bio-filters. In addition, a health risk assessment was conducted and determined that cancer risk and non-cancer health risk would be below Santa Barbara County APCD thresholds (see Impact ALT C AQ-4). The commenter does not provide any substantial evidence to support that impacts would different than analyzed in the Draft SEIR.

32-4. Concerning truck-related noise, see the response to Comment 2 in Letter no. 2. The commenter does not provide any substantial evidence to support that impacts would different than analyzed in the Draft SEIR.

32-5. The analysis of construction and operation of a MRF at the existing SCRTS site under Alternative C considers the surrounding governmental/institutional, residential and commercial use. (see Impact ALT C LU-1). With respect to residential land uses, the proposed operation of a MRF at this location would result in adverse but less than significant visual, noise, air quality, odor, nuisance, hazards, and traffic impacts, and potentially significant but mitigable impacts associated with the possible discovery and exposure of hazardous materials during construction. The commenters concern over the proximity of the Alternative C MRF site will be forwarded to the decision-makers for their consideration.

32-6. The Draft SEIR recognizes (Section 5.5) that placing the MRF in the urban environment of the SCRTS would result in greater impacts than the proposed project (MRF at the landfill). The commenter’s opposition to Alternative C and support for the proposed project at the Tajiguas Landfill will be forwarded to the decision-makers for their consideration.
Dear Ms. Leipner,

I live in the north Turnpike area. I am not in favor of building the MRF at at the transfer station. My concerns cover many areas that will negatively impact the surrounding residential and county offices area. Noise, traffic, big trucks, inadequate roads, intersections and so on.

Please put the MRF at Tajiguas where it belongs.

Sincerely,
Jeff Hanson
Letter no. 33

Commenter: Jeff Hanson, Santa Barbara

Date: September 23, 2014

Response:

33-1. The comments do not address the adequacy of the Draft SEIR, but present the commenter's opposition to Alternative C, concerns regarding traffic and noise, and support for placing the MRF at the Tajiguas Landfill. Traffic and noise impacts associated with Alternative C are discussed in Section 5.3.3.4 of the Draft SEIR. The comments will be forwarded to the decision-makers for their consideration.
Dear Ms. Leipner,

We are writing to express concern regarding the potential that some or all of the proposed expansion to the Tajiguas landfill will be redirected to the South Coast Recycling and Transfer Station (SCRTS) (Designated in the proposal as “Alternative C”). We attended the informational meetings held on September 3rd and 4th, and while it was made clear that the Tajiguas location is the site recommended for expansion by the Resource Recovery and Waste Management Division (RRWMD) of the Santa Barbara County Public Works Department, it was also made clear that they considered the SCRTS as a viable alternative should the Tajiguas site not be chosen.

As relatively new residents to the area, we were surprised to hear that a site nestled in a residential neighborhood would be even considered for such a major expansion to a waste recycling facility. We understand that the SCRTS has been working effectively for some time, but we believe that if expanded to the level suggested in the Tajiguas proposal, it would be very detrimental to the surrounding neighborhoods.

The SCRTS is located adjacent to the El Sueño, Rancho Santa Barbara, Oakcrest and Rancho San Antonio neighborhoods, the Samsun Clinic, a number of schools and several County Buildings including the County Jail facility. Clearly, no matter what noise, odor and traffic abatement methods would be used by the site, the risk of contamination would necessarily be higher in a location where the population density is greater than at the Tajiguas site.

Listed below are a few of the potentially disruptive conditions are that were presented by members of our neighborhood at the September 3rd and 4th meetings:

34-1 Increased noise from the 24 hour, six day per week operations. Garbage trucks are equipped with back up beeping that would permeate the neighborhood during the night. Street noise from the trucks at night would also disturb the neighbor.

34-2 Increased traffic on Calle Real and feeder roads. While the RRWMD presented that the increase would be negligible, it wasn't clear in the presentation that this conclusion was made on a comparative basis. That is, since the current Tajiguas site has very little to no existing residential traffic, an increase in traffic there would be less disruptive than at the SCRTS location which has significant residential traffic already.

34-3 The potential for increased odors. While the facility would be equipped with scrubbers, what happens to the smells when the doors are opened to let in the trucks? Also, the trucks carry and disburse odors when passing.

34-4 The fact that the SCRTS is in a high fire risk area. The Painted Cave fire in 1990 and fires as recent as 2009 have required residents to evacuate their homes on extremely short notice. How would the extra potential truck traffic impact the evacuation and what pollutants would be released should the facility be destroyed by a wildfire?

34-5 The impact on the views of a number of homes. While the RRWMD displayed a rendering of the impact of the view from Highway 101, it did not show how it would look from some of the higher elevation homes such as those on Sierra Madre Rd. or Paderno Ct. which overlook the site.

34-6 Finally, we would like to reiterate a fact that others may have brought to your attention. On September 15, 1998, the Santa Barbara County Board of Supervisors concluded that the SCRTS site was not a suitable alternative to expansion of the Tajiguas landfill. Since this time, the neighborhoods near the SCRTS have become more congested and we believe could not possibly have become more conducive to expansion of the SCRTS site.

Please seriously consider these objections and those of our neighbors in your final evaluation of this project.

Respectfully,

Dennis and Magdala LaLumandiere
4600 Camino del Mirasol
Santa Barbara

dlalu@yahoo.com  mmmlalu@gmail.com
Letter no. 34

Commenter: Dennis & Magdala LaLumandiere, 4600 Camino Del Mirasol, Santa Barbara

Date: September 25, 2014

Response:

34-1. If implemented at the Alternative C site, the MRF would accept waste only during the current permitted hours of Monday through Saturday from 7 a.m. to 5 p.m. Therefore, noise and traffic associated with delivery truck operations would not occur after 5 p.m. (no nighttime back-up beepers). Note that MRF operations would not affect the hours of solid waste collection (garbage trucks).

34-2. The Draft SEIR (see Impact ALT C T-4) determined that traffic congestion associated with operating the MRF at the SCRTS site under Alternative C would be less than County thresholds, which are based on volume to capacity ratios and intersection delay (see Table 5-32) during peak transportation periods (i.e. 7:00 am to 9:00 am and 4:00 pm to 6:00 pm). Traffic impacts of the proposed project would also be less than significant (see Table 4.9-12). However, placing the MRF at the SCRTS site would result in a greater average daily trip generation rate (308, see Table 5-30) as compared to the proposed project (84, see Table 4.9-10) and intersections in the vicinity of the Alternative C MRF site currently and under cumulative conditions operate at poorer levels of service. Therefore, although less than significant, traffic impacts associated with Alternative C would be greater than the proposed project.

34-3. The MRF building under Alternative C would be operated with a negative pressure, such that air would be drawn into the building and air exiting the building would pass through two bio-filtration units before being released. Based on odor modeling (see Figure 5-31) prepared for the Alternative C MRF, nuisance odor impacts would not be significant. Vehicles transporting the waste are required to be enclosed or tarped and the waste would be unloaded and processed within the MRF building.

34-4. Concerning fire-related evacuation, the traffic study prepared for the Draft SEIR indicates that MRF-related vehicle trips would not result in traffic congestion exceeding County standards (see Impact ALT C T-3 and 4). As discussed under Impact ALT C HAZ-4, traffic circulation and access to adjacent land uses would not be substantially affected such that emergency response and evacuation would not be impaired by the MRF at the SCRTS site. The MRF building would be provided with a new water main and sprinkler system to protect the building and prevent combustion of solid waste during a wildfire. Fire hydrants and other firefighting equipment would be stationed around the MRF site as required by the County Fire Department. The internal misting system for odor control would also help prevent ignition of solid waste. The project would process MSW from the residences and businesses currently served by the Tajiguas Landfill. The facility would not accept hazardous waste; therefore, no unusual release of pollutants is expected in the event of a wildfire.

34-5. See the response to Comment 7 in Letter no. 2.
34-6. See the response to Comment 7 in Letter no. 10.
September 27, 2014

Dear Supervisors and County Officials,

We live at 669 Alto Drive, Santa Barbara, CA 93110 and are writing to oppose the location of a massive trash receiving and sorting center ("Transfer Station C") in close proximity to our neighborhood. This facility, if approved, would cause heavy truck traffic 6 days a week, 24 hours a day. It would also cause high levels of pollution and noise, both during construction and during operation.

It makes no sense to place this trash center in the middle of a mature and developed neighborhood. Please register our strong objection to this proposed project.

Robert and Iris Cook
Letter no. 35

Commenter: Robert & Iris Cook, 669 Alto Drive, Santa Barbara

Date: September 27, 2014

Response:

35-1. The comments do not address the adequacy of the Draft SEIR, but presents the commenters concerns regarding traffic, pollution and noise, and opposition to Alternative C. Traffic, pollution and noise impacts are discussed in Section 5.3.3.4 of the Draft SEIR. The comments will be forwarded to the decision-makers for their consideration.
As nearby homeowners, we strongly object to the Tajiguas Resource Recovery Project. This type of operation should be located in an industrial zone or at a remote location far away from existing homes. We have previously voiced our objection to members of the Board of Supervisors.

Thank you for your consideration.

Louis & Janet Tedeschi
4655 Sierra Madre Road
Santa Barbara, CA 93110
Letter no. 36

Commenter: Louis & Janet Tedeschi, 4655 Sierra Madre Road, Santa Barbara

Date: September 28, 2014

Response:

36-1. This comment does not address the adequacy of the Draft SEIR, but presents the commenters opposition to Alternative C (MRF at the SCRTS site). The Draft SEIR recognizes (Section 5.5) that placing the MRF in the urban environment of the SCRTS would result in greater impacts than the proposed project (MRF at the landfill). The comments will be forwarded to the decision-makers for their consideration.
Letter no. 37

Leipner, Joddi

From: JSHAW9999@aol.com
Sent: Sunday, September 28, 2014 8:02 PM
To: Leipner, Joddi; Wolf, Janet; SupervisorCarbajal; Farr, Doreen; Adam, Peter; Lavagnino, Steve
Subject: County Transfer Station C

Dear Madams and Sirs,

We live at 4650 Sierra Madre which is on the hill just above the proposed Transfer Station C. My wife and are strongly opposed to this for the following reasons:

1. It would result in heavy traffic in the area 24 hours a day.
2. It would cause high levels of pollution and noise.
3. It is inappropriate to put a trash center in the middle of a developed neighborhood.

Sincerely,

James and Patricia Shaw
Letter no. 37

Commenter: James & Patricia Shaw, 4650 Sierra Madre Road, Santa Barbara

Date: September 28, 2014

Response:

37-1. The comments do not address the adequacy of the Draft SEIR, but present the commenters concerns regarding traffic, pollution and noise, land use compatibility and opposition to Alternative C. Traffic, pollution, noise, and land use impacts are discussed in Section 5.3.3.4 of the Draft SEIR. The comments will be forwarded to the decision-makers for their consideration.
Dear Joddi,

As a resident of Oak Grove condos, I want to voice my dissatisfaction with the above mentioned project proposal to be located right in my living area.

Just from the standpoint of increased traffic and noise alone, this proposed area should not be considered. With the number of families living right in this vicinity, we are already dealing with a tremendous amount of traffic/noise problems from all the county buildings in our area.

Thank you for adding this letter to your "not in favor" group of mail.

Jaan

Jaan Karsh
4541-B Oak Glen Dr
Santa Barbara, CA 93110
805 967-2799
Letter no. 38

Commenter: Jaan Karsh, 4541-B Oak Glen Drive, Santa Barbara

Date: September 29, 2014

Response:

38-1. The comments do not address the adequacy of the Draft SEIR, but present the commenter's concerns regarding traffic and noise, and opposition to Alternative C. Traffic and noise impacts are discussed in Section 5.3.3.4 of the Draft SEIR, these impacts were determined to be adverse but less than significant. The comments will be forwarded to the decision-makers for their consideration.
October 1, 2014

Joddi Leipner
County Public Works Department
Resource Recovery and Waste Management Division
130 E. Victoria Street, Suite 100
Santa Barbara, CA 93101


Dear Ms. Leipner:

The Santa Barbara County Air Pollution Control District (APCD) has reviewed the Draft Subsequent Environmental Impact Report (EIR) for the Tajiguas Landfill Resource Recovery Project. The County Public Works Department proposes to develop a resource recovery project that would process municipal solid waste for communities currently served by the Tajiguas Landfill. The project would include a materials recovery facility to sort recyclable materials from the waste stream, a dry fermentation anaerobic digestion facility to process organic waste biogas and digestate, and an energy facility that would use the biogas from the anaerobic digestion facility to produce electricity. The digestate would be further cured in outdoor windrows at the landfill site to produce biosolids to be used as compost or soil amendments. Any residual process waste would be disposed of in the landfill. No change in the landfill's permitted capacity is proposed. The proposed project is located at the Tajiguas Landfill facility at 14470 Calle Real in the unincorporated Gaviota area. The landfill property consists of three parcels, totaling approximately 497 acres, that are identified in the Assessor Parcel Map Book as APNs 081-150-019, -026, and -042.

APCD staff offers the following comments on the Draft Supplemental EIR:

1. **Section 4.2.2, Impact Analysis and Mitigation Measures, General Comment:** The APCD recognizes that fugitive dust and objectionable odors at the Resource Recovery area will be controlled through project design and the implementation of best practices. Standard dust mitigations (Attachment A), and fine particulate mitigations (Attachment B), are recommended during all construction, grading, and hauling activities. The APCD recommends that the control measures listed within Attachment A and Attachment B be included in a Mitigation Monitoring and Reporting Plan (MMRP); the MMRP should explicitly state the required mitigations, and establish a mechanism for enforcement.

2. **Section 4.2, Local Authority, Page 4.2-9:** Within the list of applicable rules and regulations governing the project, District Rule 311 is omitted. The proposed flare is subject to District Rule 311. Please update the list of applicable rules and regulations to reflect this information.
3. **Section 4.2.1.9, Odors, Page 4.2-16:** The EIR cites Section 41700 of the California Health and Safety Code (HSC), and states that the regulation "...allows air districts to adopt rules or regulations to protect the public from nuisance odor violations." It should be noted that Section 41705 (a)(2) of the HSC explicitly states that Section 41700 does not apply to odors emanating from compost (as defined within Section 40116 of the Public Resources Code). Santa Barbara County Environmental Health Services (SBCEHS), as the Local Enforcement Agency (LEA) under the California Department of Resources Recycling and Recovery (CalRecycle), is responsible for regulating odors from compost and other solid waste operations in the project area. Composting and other activities that are regulated by SBCEHS as the LEA, and their related Odor Impact Minimization Plan proposals, should be coordinated with SBCEHS. Also, within Section 4.2.1.9, please update the state and local authority information to reflect these requirements.

4. **Section 4.2, Operation Emissions Impacts, Page 4.2-46:** The values listed within Table 4.2-6 appear to originate from Table 1 and Table 3, Attachment C.1, Appendix C (Air Quality and Greenhouse Gas Technical Report). Table 1 and Table 3 indicate that emissions of CO, NOX, SOX, PM10, and PM2.5 from the CHP Engines are "zero". Table 1 and Table 3 also indicate that the flare’s ROC emissions value is "zero". Please explain the methodology and assumptions utilized during the creation of these tables, and explain the reason for the "zero" values.

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 961-8838, or via email at mmp@sbcapcd.org.

Sincerely,

Molly Pearson  
Planning and Grants Supervisor  
Technology and Environmental Assessment Division

cc: Michael Goldman, Manager, APCD Engineering Division  
Project File  
TEA Chron File
ATTACHMENT A
FUGITIVE DUST CONTROL MEASURES

These measures are required for all projects involving earthmoving activities regardless of the project size or duration. Proper implementation of these measures is assumed to fully mitigate fugitive dust emissions.

- During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.

- Minimize amount of disturbed area and reduce on site vehicle speeds to 15 miles per hour or less.

- If importation, exportation and stockpiling of fill material is involved, soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin.

- Gravel pads shall be installed at all access points to prevent tracking of mud onto public roads.

- After clearing, grading, earth moving or excavation is completed, treat the disturbed area by watering, or revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur.

- The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the Air Pollution Control District prior to land use clearance for map recording and land use clearance for finish grading of the structure.

**Plan Requirements:** All requirements shall be shown on grading and building plans and as a note on a separate information sheet to be recorded with map. **Timing:** Requirements shall be shown on plans or maps prior to land use clearance or map recordation. Condition shall be adhered to throughout all grading and construction periods.

**MONITORING:** Lead Agency shall ensure measures are on project plans and maps to be recorded. Lead Agency staff shall ensure compliance onsite. APCD inspectors will respond to nuisance complaints.
Particulate emissions from diesel exhaust are classified as carcinogenic by the state of California. The following is an updated list of regulatory requirements and control strategies that should be implemented to the maximum extent feasible.

The following measures are required by state law:

- All portable diesel-powered construction equipment shall be registered with the state’s portable equipment registration program OR shall obtain an APCD permit.

- Fleet owners of mobile construction equipment are subject to the California Air Resource Board (CARB) Regulation for In-use Off-road Diesel Vehicles (Title 13 California Code of Regulations, Chapter 9, § 2449), the purpose of which is to reduce diesel particulate matter (PM) and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles. For more information, please refer to the CARB website at www.arb.ca.gov/msprog/ordiesel/ordiesel.htm.

- All commercial diesel vehicles are subject to Title 13, § 2485 of the California Code of Regulations, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to five minutes; electric auxiliary power units should be used whenever possible.

The following measures are recommended:

- Diesel construction equipment meeting the California Air Resources Board (CARB) Tier 1 emission standards for off-road heavy-duty diesel engines shall be used. Equipment meeting CARB Tier 2 or higher emission standards should be used to the maximum extent feasible.

- Diesel powered equipment should be replaced by electric equipment whenever feasible.

- If feasible, diesel construction equipment shall be equipped with selective catalytic reduction systems, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by EPA or California.

- Catalytic converters shall be installed on gasoline-powered equipment, if feasible.

- All construction equipment shall be maintained in tune per the manufacturer’s specifications.

- The engine size of construction equipment shall be the minimum practical size.

- The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.

- Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite.

**Plan Requirements:** Measures shall be shown on grading and building plans. **Timing:** Measures shall be adhered to throughout grading, hauling and construction activities.

**MONITORING:** Lead Agency staff shall perform periodic site inspections to ensure compliance with approved plans. APCD inspectors shall respond to nuisance complaints.
Letter no. 39

Commenter: Molly Pearson, Santa Barbara County Air Pollution Control District

Date: October 1, 2014

Response:

39-1. Engineering design and best management practices, including standard APCD fugitive dust and fine particulate control measures, have been incorporated into the project to minimize air quality impacts and are assumed in the air quality calculations, such that significant impacts were not identified. Per the commenter’s request, the standard measures have been added to the Final SEIR (see Section 4.2.2.4). The selected construction contractor would be required to comply with State law regarding portable equipment registration, mobile construction equipment and truck idling. In addition, heavy equipment used to construct the project would be manufacturer certified (when new) to meet or exceed Tier I emission standards, which became effective in 1996. Due to the relatively isolated nature of the project site, carpooling of construction workers is anticipated and reflected in the traffic impact analysis (1.25 person average vehicle occupancy, see Table 4.9-7 of the Draft SEIR).

39-2. The SEIR (see page 4.2-9) has been revised to note that APCD Rule 311 (sulfur content of fuels) would apply to any combustion of natural gas or propane in the CHP engines or flare.

39-3. Section 4.2.1.9 (odors), page 4.2-16 of the SEIR has been revised to note that Section 41700 of the Health and Safety Code (nuisance) does not apply to composting operations as indicated in Section 41705(a)(2). The proposed project would operate under a revised solid waste facility permit enforced by the Santa Barbara County Environmental Health Department, and must comply with Title 14 of the California Code of Regulations which address nuisance and odors (see Sections 17408.5, 17867).

39-4. The Air Quality and Greenhouse Gas Technical Report (see Appendix C) has been revised in response to APCD comments provided as part of the permitting process. The peak day air pollutant emission rates currently reflect typical operations, while short-emissions scenarios (CHP engine start-up, SCR burn-in, flare operation) have been presented as peak hour values. Therefore, the revised Tables 1 and 3 in Appendix C do not contain zero values.
Date 9-29-14
Dear Jodi Leiphra

We live at [address] and are writing to oppose the location of a massive trash receiving and sorting center ("Transfer Station C") in close proximity to our neighborhood. This facility, if approved, would cause heavy truck traffic 6 days a week, 24 hours a day. It would also cause high levels of pollution and noise, both during construction and during operation. It makes no sense to place this trash center in the middle of a mature and developed neighborhood. Please register our strong objection to this proposed project.

(Name) Carol A. Wetter
Letter no. 40  

Commenter: Carol A. Weston, 4746 Sierra Madre Road, Santa Barbara  
Date: September 29, 2014  
Response: 

40-1. The comments do not address the adequacy of the Draft SEIR, but presents the 
commenters concerns regarding traffic, pollution, and noise, and opposition to 
Alternative C. Traffic, pollution and noise impacts are discussed in Section 5.3.3.4 of the 
Draft SEIR. The comments will be forwarded to the decision-makers for their 
consideration.
WHAT IS GOING ON?

BOARD OF SUPERVISORS OF THE COUNTY OF SANTA BARBARA
STATE OF CALIFORNIA
CLERK OF THE BOARD OF SUPERVISORS

*****

MINUTE ORDER
September 15, 1998, in the p. m.

Present: Supervisors Naomi Schwartz, Joanne Graffy, Gail Marshall,
Joni Gray, and Thomas Urbanske
Michael F. Brown, Clerk (Fiorillo)

Supervisor Marshall in the Chair

RE: County Counsel - Approve recommendations regarding Policy Statement that Transfer Station expansion is not a feasible alternative to Tajiguas Landfill Expansion, as follows: (98-20,739 & 20,731) (FROM SEPTEMBER 1, 1998) (EST. TIME: 20 MINS.)

a) Adopt the final language of the Policy Statement that Transfer Station expansion is not a feasible alternative to the Tajiguas Landfill Expansion Project;

b) Direct the environmental consultant responsible for the preparation of the Tajiguas Landfill EIR to include the Policy Statement in the EIR analysis of alternatives;

c) Direct the consultant that the scope of work on the EIR does not include analysis of Transfer Station expansion as an alternative to the Tajiguas Landfill Expansion Project.

COUNTY ADMINISTRATOR'S RECOMMENDATION: POLICY
Graffy/Urbanske

a) Adopted as revised per "Proposed Revisions to the Board of Supervisors Statement Regarding the County Transfer Station Alternative to the Tajiguas Landfill Expansion Project" dated September 15, 1998.

b) and c) Approved.

No: Marshall

Transfer Station may be included as a fixed component in any analysis of alternatives as long as the current size, capacity, structures, and specific equipment and operations are not expanded or intensified.

COUNTY OF SANTA BARBARA
September 15, 1998

Mr. William Poehlman
585 El Bueno Rd
Santa Barbara, CA 93110

Dear Mr. Poehlman,

The Board of Supervisors (Board) just adjourned for the day, and I thought I would take a moment to update you on County’s Transfer Station (located above Calle Real west of El Bueno Road).

Today, the Board adopted my proposal to strengthen the agreement that the Transfer Station will not be expanded. After a long battle, your neighborhood won this significant victory, and I’m glad to have played a part in this effort.

It has been a pleasure to work with representatives of the Coalition for Safe Neighborhoods (Mary Hicks, Mel Zaid, and Cliff Schollie). Working together, the four of us were able to create an agreement that reinforces the County’s pledge to not expand the Transfer Station.
THERE ARE MORE NEGATIVE THINGS ABOUT ALT #3 THAN CONCERNED HOME OWNERS
YOU ARE RISKING THE HEALTH OF YOUR OWN EMPLOYEES

THERE ARE HUNDREDS OF PATIENTS VISITORS & INMATES

CONDO/LOW INCOME RESIDENCE

SIERRA MARDE HTS

VISITOR INFORMATION

16 BUILDINGS

THE DISTANCE FROM THE SITE BUILDING (TOP) IS ONLY 1/2 MILE TO CALLE REAL.

Most employees work for the County and many come by bus.

SANTA BARBARA DOES NOT NEED ALT #3! GERRY ASPEN!
Letter no. 41

Commenter: Gerry Aspen, 4677 Sierra Madre Road, Santa Barbara

Date: October 1, 2014

Response:

41-1. Concerning health risks of employees at adjacent County facilities, see the response to Letter no. 13.

41-2. Concerning SCRTS expansion, see the response to Comment 7 in Letter no. 10.
Dear Supervisors Wolf, Carbajal, Farr, Adam, Lavagnino and Ms. Leipner,

I am a voter who lives at 4677 Sierra Madre Road, S.B. and strongly oppose Alternative C, Tajiguas and the Material Recovery Facility (MRF). It is a shock to learn what you have planned for our area now. In 1998 The Board of Supervisors passed a Policy Statement that SCRTS (Transfer Station) was NOT a feasible alternative. Do you actually believe that since the human population in the area has grown, it is now feasible!! ***We were not even notified of these terrible plans by.**

Please register my STRONG OBJECTION to Alternative C for the following reasons:

1. This project is surrounded by a densely populated (HUMAN) area.

2. This area is in a high fire zone. Those on Sierra Madre, El Rodeo and Alto have only one entrance-exit in an emergency. It would be difficult evacuate your "campus" site.

3. The fumes and odors from all the extra trucks, cars and buses, plus all the fumes from the operation would affect us. New parking for 97 vehicles is planned. There would be more unhealthy air. I have asthma and need good air to live here.

4. Constant noise, 24 hours a day from heavy equipment, generators and air compressors would be significant to quality of life for anyone in the areas. The impact of huge, heavy truck traffic 24 hours a day would also deteriorate our roads. ***If you remember, you have deferred $250.1 M in funds for public works to repair our roads. You also deferred $35.2 M to maintain county facilities.***

5. The process to thoroughly wash inside of each disposal truck to sterilize it would quickly deplete our low water reserves. The run off water would contaminate the land for centuries! Also, there would be more water needed to accomodate the additional workers and visitors.

6. Property values of our treasured homes will go down. Would you have "pride of ownership" if your home was by this facility! A recent poll ranked Santa Barbara the 14th best city in the country ---let's continue this positive position and not "dump it."

I hope you will support me and my neighbors. DO NOT CHOOSE ALTERNATE C. IT MAKES NO SENSE. Follow the thoughts of our former supervisors.

Sincerely,
Barbara Aspen, voter and tax payer

RECEIVED
OCT 1 2014
Resource Recovery & Waste Management

Page 9-145
Letter no. 42

Commenter: Barbara Aspen, 4677 Sierra Madre Road, Santa Barbara

Date: September 22, 2014

Response:

42-1. See the response to Comment 7 in Letter no. 10.

42-2. The Draft SEIR (pages 5-203 to 5-204) recognizes that the Alternative C MRF site is adjacent to residential areas and this is considered in the impact analysis for issue areas such as noise, air quality, visual, etc.

42-3. See the response to Comment 1 in Letter no. 2.

42-4. MRF operation at the SCRTS site would increase mobile equipment and vehicle emissions; however, these emissions would not exceed County thresholds (see Table 5-19 of the Draft SEIR). In addition, odor modeling (Impact ALT C AQ-6) indicates odor-related nuisance would not be significant.

42-5. See the response to Comment 2 in Letter no. 2.

42-6. Disposal trucks would not be washed at the MRF. The County’s franchise waste haulers are responsible for the maintenance and cleaning of their collection vehicles.

42-7. See the response to Comment 5 in Letter no. 2.
2 October 2014

Dear Jodzi & District Supervisors,

We live in the Oakcrest Neighborhood close to the location of the proposed building of a massive trash receiving and sorting center. As we live in a small community in close proximity to this recycling site we want to express objection to this proposed project.

This facility, if approved, would cause heavy truck traffic 6 days a week and 24 hours a day. It would also cause high levels of pollution and noise, both during construction, and later during operation. It makes no sense to place this trash center in the middle of a mature and developed neighborhood.

In addition, we also are concerned with the close proximity of this facility to the new Sansum medical center and hospital complex recently opened just off Foothill Road.

Please register our strong objections to this proposed project.

Hochberg family (Eric, Lena and Adel)
4710 Sierra Madre Road
Santa Barbara, CA 93110
Letter no. 43

Commenter: Hochberg family, 4710 Sierra Madre Road, Santa Barbara

Date: October 2, 2014

Response:

43-1. The comments do not address the adequacy of the Draft SEIR, but present the commenters' concerns regarding traffic and noise, and opposition to Alternative C. Traffic, pollution and noise impacts are discussed in Section 5.3.3.4 of the Draft SEIR. The comments will be forwarded to the decision-makers for their consideration.
October 2, 2014

Jodi Leipner
130 E. Victoria Street
Santa Barbara, CA 93101

RE: Tajiguas Resource Recovery Project

Dear Ms. Leipner:

I live at 233 Sherwood Drive and I attended the public hearing meeting on September 4, 2014. I was not surprised by the large turnout, standing room only. I'm sure there would have been many more in attendance if more people within close proximity of the project had been notified.

I listened to speaker after speaker which totaled around 15+ whom were totally against this project. I am in agreement with all of them. I feel a project of this magnitude would severely impact our health due to huge amounts of additional dust which is already extremely high. It will lower the value of our properties and cause an eyesore to many properties surrounding the area. I do not want the project to go forward. Some of the main reasons for my opposition are:

- Dust, noise, property devaluation
- 24 hr. operation, 6 days a week
- Giant, 6 story building, 88,600 sq. feet
- Projected 5-fold increase in very large trucks on local surface streets, hundreds of new truck trips per week
- Greater congestion at our freeway on and off ramps
- Odor and harmful air emissions
- Constant noise from trucks & processing
- Hazardous waste and pathogens
- Increased fire risk (lost my house in Painted Cave Fire of 1990)

We do not want this massive facility in the middle of our residential community. If the project is to be done, please do it at Tajiguas, as planned.

Sincerely,

James & Stella Woollum
Letter no. 44

Commenter: James & Stella Woollum, 233 Sherwood Drive, Santa Barbara

Date: October 2, 2014

Response:

44-1. See the responses to Comments 2, 5 and 7 in Letter no. 2. Comments concerning opposition to Alternative C will be forwarded to the decision-makers for their consideration.

44-2. Concerning dust, unloading solid waste in the MRF building (with dust collectors and bio-filters) would likely reduce dust generation as compared to existing conditions. See the responses to Comments 2 and 5 in Letter no. 2.

44-3. See the response to Comment 2 in Letter no. 2.

44-4. See the response to Comment 7 in Letter no. 2.

44-5. See the response to Comment 4 in Letter no. 2.

44-6. See the response to Comment 4 in Letter no. 2.

44-7. MRF operation at the SCRTS site would increase mobile equipment and vehicle emissions; however, these emissions would not exceed County thresholds (see Table 5-19 of the Draft SEIR). As solid waste would be tipped and processed within a building provided with emissions controls, fumes and odors associated with waste processing would likely be reduced as compared to existing operations. In addition, odor modeling (Impact ALT C AQ-6) indicates odor-related nuisance would not occur at the nearest occupied land uses, including the County campus.

44-8. Although the MRF would operate 24 hours per day, trucking hours and waste processing hours would be limited as discussed in Comment 2 in Letter no. 2, which would reduce nighttime noise.

44-9. Hazardous waste is not currently accepted at the SCRTS and would not be accepted at the MRF. Load checkers would identify and isolate any such materials found. Unloading and sorting solid waste within the MRF building (with dust collectors and bio-filters) would allow pathogens (if any) to be captured in the bio-filters and reduce the potential exposure of adjacent land uses, as compared to existing open air unloading and sorting.

44-10. See the response to Comment 1 in Letter no. 2.
October 1, 2014

Joddi Leipner, Senior Engineering Environmental Planner
Resource Recovery & Waste Management Division
130 E. Victoria Street, Suite 100
Santa Barbara, CA 93101

Ms. Leipner,

Here are our comments regarding the SEIR for the Tajiguas Resource Recovery Project. Although the intent is to provide you with specific responses to the SEIR, I thought I should give you a little of the human side of the issue and a brief history of how we got here. (SEIR Comments begin at the bottom of page 3)

We purchased our property on the Gaviota Coast in 2001. Since the property was next to the Landfill, we investigated how that would impact us. We contacted various officials and found that two years earlier (in 1999) the Board of Supervisors had voted to expand the Landfill, but also voted unanimously to not allow any future expansions. We were told the County was actively looking for new sites since the projection was that the Landfill would be reaching capacity and closing in about 15 years. Based on that information, we went ahead with the purchase which was leading to our dream of living in a quite rural area: on a large enough parcel that we could raise animals, and a place that had great ocean and mountain views. We still have the photo up in our home of my wife and I sipping champagne looking out across our land on the day that escrow closed. We named our property “Ranchito Corazon.” We have license plate frames with that name on our cars. We were on our way. We had crossed the first major hurdle (acquiring the land) on the road to fulfilling our dreams.
We hired a top architect, Don Pedersen, to design our dream home. We chose a building site that met the Board of Architectural Review criteria and afforded us the best ocean and mountain views, while not seeing any of the Landfill operations. When friends would ask what it was like being next to the Landfill, we would answer, “From our home site, we can’t see them, hear them or smell them, their great neighbors. Besides, in 15 years they’ll be closed and we’ll have one of the most private parcels on the coast since nothing can be built on an old Landfill.”

In an arduous process that took over 5 years (and lots of money), we were able to go through all of the steps to get our building permits. At the end, the Fire Department said that our existing road (that had been put in by a previous owner with a permit) was too steep and that it would preclude us from building. We had a civil engineer draw up new plans that would require fairly massive grading. We were able to get that final sign off, and could actually “break ground” on our dream home. We began the process and had all of the grading work done, put in the paved road, retaining walls, partial footings, etc. We were on our way.

During this process, the landfill moved their operations deck farther forward (South), which put it in our viewshed. Although it hadn’t been anticipated, it was within their right. Over time, they were also able to get permits to go higher and wider, which was extending the life of the Landfill. The landfilling operation was still behind the hill from us, so we didn’t have noise or visual concerns, plus they only operated on weekdays, during daylight hours and were closed by 5:00 each evening.

As a part of our dream fulfillment, even before we lived there, we got anxious and acquired animals. We had a “herd” of 5 llamas and a miniature horse. Life was good.

Then in early 2012, we got word of the proposal to put in a massive conversion technology project at the Landfill. At the time, our project was on a brief hiatus while we were trying to acquire construction financing. Although the project was only “proposed” at that time, we stopped any further construction activities until we investigated the Landfill proposal. Our investigation proved to us that we did not want to live next to this huge industrial complex. We attempted to sell the property. We listed it at $1,217,000, which was how much we had invested into
the property, including the original coast of the land plus the over $700,000 that we had spent up to that time in developing the property (grading, paving, retaining walls, dry well, water well, etc.) Although the real estate market was sluggish in 2012, we had a few potential buyers show real interest. After all, that was an incredibly great price for 24 ocean view acres with plans, permits, and construction underway. Three different buyers expressed that they wanted to buy the property. As required by law (and morality), we disclosed the possibility of the conversion technology project next door by giving the buyers the EIR Scoping Document. All three of them said that they were not willing to take the chance that the County would build the project right next to them. They all declined to bring a formal offer. We also asked the County to buy the property from us. We made it clear that we were willing to sell at $1,217,000 at that time, but that the price would not be the same if they waited a few years. The Board of Supervisors met in a closed session and decided not to buy the property. We were told that it was because the Conversion Technology project was only “proposed” and was not a sure thing.

By proceeding with the Tajiguas Resource Recovery Project, Santa Barbara County is not only shattering our dream, they are also taking real value from our property without our consent. We again feel that the only fair thing for the County to do if they plan to proceed with a massive industrial operation on the pristine, agriculturally zoned, Gaviota Coast, is to buy our property. We’d rather have them not build it and go back to life as we knew it, but we are also realistic enough to know that the Tajiguas location, although majorly affecting us, is not as burdensome on the rest of the community as the other alternatives.

Now, back to the more technical responses to the SEIR:

Re: Land Use

On Page 4.1.-1, the report states, “There are three industrial developments (PXP Point Arguello, Las Flores Canyon, and Tajiguas Landfill) on the coast... “

Per the County Planning and Development General Zoning Map, there are two properties on the Gaviota Coast with industrial zoning, PXP Point Arguello and Las Flores Canyon. The Tajiguas Landfill is zoned AG-II-320. It is unfortunate that the
preparers of the EIR stated the information in this manner to imply that the Industrial Operation that they are proposing falls within existing zoning when it does not.

There are some State mandates related to land use regulations that do not appear in the documents.

First, Government Code Section 65402 requires the Planning Commission to make a finding that the proposed buildings are consistent with the General Plan.

Second, Public Resources Code section 50000.5(b) states: ...any new or expanded solid waste disposal facility or transformation facility shall be deemed to be consistent with the general plan ONLY if BOTH of the following requirements are met:

1. The facility is located in a land use area designated or authorized for solid waste facilities in the applicable city or county general plan.
2. The land uses which are authorized adjacent to, or near, the facility are compatible with the establishment or expansion of, the solid waste disposal facility or transformation facility.

Based on the combination of these two state laws, I would anticipate that the Planning Commission will be unable to make a finding that this proposed Industrial use is consistent with our adjacent rural home site with Agricultural zoning.

I can agree that operating a land fill (as it is utilized today) can be found to be consistent with Agricultural zoning. They are moving dirt and operating tractors during daylight hours. Operating a large industrial plant 24 hours a day is clearly not consistent with Agricultural activities.

When we purchased our property, we knew that we were near the landfill. We accepted that and were willing (and still are) to have them as our next door neighbor. They have been good neighbors—actually very good neighbors. However, this proposed industrialization is NOT consistent with agricultural use.

Visual Impacts and Property Value:

“This analysis is based on photo-simulations, site reconnaissance, review of aerial photography”, etc.
The greatest visual impact from this project will be from our house site. It is hard
to fathom how a report of this detail could miss taking a photo from our site.
Instead photos and renderings were taken from locations from which the natural
topography hid the proposed site. There is a direct line of site from our home site
to the huge industrial complex that has been proposed, yet no photo was taken
from there. At the September 3, 2014 County Planning Commission meeting,
when I brought this forward, the Chair immediately directed staff to include a
photo and rendering of the project from our view. The staff comment was that
they would need to get permission from the landowner to be able to do so. We
have never received a request, the landfill has standing permission via a lease
agreement to come onto the property at any time, and the SEIR makes reference
to staff visits to our property.

The size and scope of the proposed buildings are not big, they are enormous.
Each one is at least 60,000 square feet. Plus the highest height proposed is 61
feet—which is higher than the courthouse (other than the clock tower) and higher
than the City of SB will allow any new construction. To put the size of these
buildings in perspective, an apartment building with at least 50 units could be
constructed in 60,000 sq. ft. Then within 60 feet of height a 5 story building could
be built. That means that one of these building is the size of a 250 unit 5 story
apartment building—and there are two of them proposed, one of which,
according to the SEIR, could be as big as 73,000 sq. ft.

These mammoth buildings will be clearly visible from our home site. The findings
of the SEIR are the “visibility of the Resource Recovery Project facilities from
private views is considered an adverse, but less than significant impact.”

We have to question who is making these determinations. We see the words on
the page, “less than significant impact,” and they are presented to us as if they
are facts. They are very subjective opinions, and in our opinion they are wrong.
The impact is so significant that we stopped the construction of our house once
this project was proposed. Potential buyers of our property thought our 24 acre
ocean view site was a great buy—until we disclosed the possibility of this
proposal. Every possible buyer walked away once the “possibility” of this project
was known to them, yet the preparers of this 2200 page document didn’t think it
was necessary to include a photo and rendering of the impact from our home and call the impact “less than significant.”

When we were going through the permitting process, we proposed to take advantage of the slope on our land and put a recreation room on a lower level. We were told that on the Gaviota Coast, we were restricted to a single level residence, and that although it was only one room on the lower level that followed the natural topography, that it would have the visual impact of being two stories. We were denied based on “mass, size and scope” of the project. Our zoning is Ag II-320. The Landfill’s zoning is AG-II-320. How can this mammoth project be approved and deemed compatible with adjacent land uses, as is required by state law, when our application for a lower rec. room was denied?

Noise Impacts:

Similar to my comments on visual impacts, noise is another issue. I happened to be awakened at 5:50 am a couple of days ago by a back-up beeper on a truck that I could tell was a quite a distance away. In the quiet early morning hours those kinds of noises are much more disruptive than they are during the day. Yet the noise impacts for the neighboring properties of this proposed 24 hour operation are deemed “less than significant.”

Unfortunately I have no training in understanding noise calculations, so the charts and calculations don’t mean much to me. However, I would think that noise standards and the determination of what is significant should be treated differently in the middle of the day versus the middle of the night. Per the SEIR, “The County Noise Ordinance (Section 40 of the County Code) prohibits excessive noise in all areas between the hours of 10:00 p.m. and 7:00 a.m., but does not set forth any other quantitative restrictions.” It appears that the drafters of the County Code agree with my assessment, but the determination of “less than significant impact” in the SEIR uses the same sound threshold for the middle of the night that it does for daytime hours.

This proposed 24 hour industrial operation is not consistent with the use of the neighboring parcel (ours). Back-up beepers, loader blades scraping on the concrete, workers yelling to each other, etc., can be annoying in the daytime. In the middle of the night those same noises become much “more than significant.” With this project being proposed in the direct line of sight from our home site,
coupled with the shape of the canyon acting like a megaphone, our home will most assuredly be impacted by noise. The finding of “less than significant” is an inaccurate assessment. If the authors of the SEIR were trying to sleep as near to that level of noise as would be heard from our home site, I cannot imagine that they could find the noise level to be “less than significant.”

In the SEIR it states that noise levels associated with blasting were also considered a less than significant impact. However, blasting will be limited to 8:00 am to 4:00 pm as a mitigation measure. Why would something need to be mitigated if it is “less than significant?” Why can’t the authors of this SEIR be honest and say the noise from blasting is significant, but it won’t happen often and it will be limited to daytime hours. Labeling everything as “less than significant” removes any sense of credibility from the report.

Odors:

We don’t know what type of odors will be generated by this operation. Currently we have no odor issue since the trash is buried so quickly and the landfilling operation is much further from our home site. We have no way to quantify the issue, but are very concerned that what is now labeled as “less than significant” will in the future be very significant. Then what?

Additional:

There were comments made to us by people who attended the Tajiguas Resource Recovery Project SEIR Hearing on September 4, 2014 at the Public Health Auditorium that are worth repeating, because they raise issues that should be included. One person questioned if a study has ever been done that showed the relationship of back up beepers to mental illness. Since the Transfer Station is being considered as an “alternative site,” dozens of residents who lived at a greater distance from the transfer station than our home site is to the “proposed project” were there to say, “Not in my backyard,” because the impacts were so significant to them. One person commented that the SEIR is lacking because it doesn’t take into account the loss of property values near the project. Most importantly, a woman there said, that with all of these findings being labeled as “less than significant” when they are clearly significant, makes you not be able to trust anything in this report.
This letter echoes those concerns, especially since it is proposed to be happening “in our backyard.” We ask that you be thoughtful neighbors and reevaluate this project with our concerns of land use, visual impacts, noise impacts, odor impacts, and the devaluation of our property.

Robert D. Hart
For Robert D. and Deborah D. Hart
Property Owners of 14450 Terra Vista Drive
Letter no. 45

Commenter: Bob & Debbie Hart, 494 N. La Cumbre Road, Santa Barbara

Date: October 1, 2014

Response:

45-1. The referenced statement is from the Gaviota Coast Plan (Initiation Draft) and was intended to provide context for the visual impact analysis regarding existing non-agricultural development present along the Gaviota Coast. As noted in Table 4.8-1 of the Draft SEIR, the landfill site is zoned for agriculture, Unlimited Agriculture (inland portion) and AG-II-320 (coastal portion) and as noted in Section 4.8.1.2 lines 33 through 36, pursuant to the Santa Barbara County Land Use and Development Code Section 35.10.040.G.1.b, the provisions of the Development Code do not apply to “development by the County or any district of which the Board is the governing body”. Further, the inland portion of the Tajiguas Landfill (including the proposed locations of the Resource Recovery Project facilities) has a Waste Disposal Overlay in the Comprehensive Plan and the Santa Barbara County Comprehensive Plan, Land Use Element, Public Facilities Policy 1a states “The development of public facilities necessary to provide public services is appropriate within the defined Rural and Inter-rural Areas.”

45-2. Pursuant to Government Code Section 65402, the Planning Commission will make a determination of the proposed project’s consistency with the Comprehensive Plan prior to the project being considered by the Board of Supervisors. As noted above in response to Comment 1, the inland portion of the Tajiguas Landfill (including the proposed locations of the Resource Recovery Project facilities) has a Waste Disposal Overlay in the Comprehensive Plan and Public Facilities Policy 1a identifies that development of public facilities is appropriate within Rural Areas. The Planning Commission has determined in the past that the Tajiguas Landfill is consistent with the Comprehensive Plan. The proposed project would modify landfill operations by providing for the recovery of recyclables and organic waste thereby extending the life of the Tajiguas Landfill. In addition, the project supports the County’s efforts to reduce GHG emissions and generate renewable energy as outlined in the County’s Energy and Climate Action Plan.

In light of the past consistency determinations and the preliminary policy consistency analysis completed in the Draft SEIR (Section 4.8.2.5), it is anticipated that the Planning Commission will find the project consistent with the current waste disposal facility overlay designation and with the County’s Comprehensive Plan. The ultimate determination on consistency is left to the discretion of the decision-makers. However, this process is unrelated to the adequacy of the SEIR in meeting the requirements of the State CEQA Guidelines and Public Resources Code. Section 50000.5 of the Public Resources Code addresses actions prior to the approval of the 1998 County-wide Integrated Waste Management Plan. Section 3.5.14 acknowledges that as a part of the proposed project, the County would need to amend the Non Disposal Facility Element of the Santa Barbara County-wide Integrated Waste Management Plan.
45-3. Both the State CEQA Guidelines and the County’s significance thresholds for aesthetic/visual impacts are based on impacts to public views and not private views; however, in the interest of full disclosure of potential impacts, private views were also addressed in the Draft SEIR. The specific guidelines for determining whether a visual impact is significant are listed in Section 4.1.2.1 of the Draft SEIR. Views of proposed project components from the planned residence (identified as the Hart Residence in the Draft SEIR) are discussed under Impact TRRP VIS-3. Based on site visits by RRWMD staff, the existing landfill operations trailers are visible from a small portion of the driveway to the Hart Residence and would be visible from a small area of the building pad (pool and northwestern corner of the patio). As the proposed AD Facility would be located at the location of the existing operations trailers, this component would be visible from the planned Hart Residence. Note that the affected view is across the active landfill and the AD Facility building would be somewhat distant (about 2,600 feet away). The AD Facility would be visible, but would not obstruct views from the residence, and would not be incompatible with surrounding facilities (water and leachate collection tanks, LFG collection system, fuel tanks, etc.). Therefore, project facilities are not anticipated to result in a significant visual impact as seen from the planned residence. The commenter disagrees with the determination that visual impacts to private views would be less than significant, but offers no substantial evidence to support the assertions that the determination is incorrect.

As a courtesy and in the interest of full disclosure of potential impacts, a photo-simulation from the Hart Residence was prepared as part of responding to comments on the Draft SEIR (see Section 9.4 of the Final SEIR). The view selected for analysis is from the southwest corner of the partially constructed pool deck, which provides the best view of the proposed MRF/AD Facility site from the planned residence. As indicated by the photo-simulation, the south and east sides of the AD Facility would be partially visible, with the MRF building behind (see center of the Permitted + Project Conditions simulation). Note that landscape screening provided as mitigation for significant impacts to public views (see MM TRRP VIS-1b) is not modeled, and would reduce the visibility of the AD Facility from Mr. Hart’s home site. This photo-simulation supports the finding of Impact TRRP VIS-3 of the Draft SEIR, that the proposed project would not result in a significant visual impact.

45-4. Noise modeling was conducted for each proposed facility (MRF, AD Facility, energy facility, composting area), and logarithmically added to existing waste disposal-related noise to identify the overall noise impact of the proposed project at noise-sensitive receivers (see Table 4.7-7 of the Draft SEIR). Noise sources addressed in the modeling included stationary sorting equipment, mobile equipment and trucks (including back-up beepers) (see Tables 4.7-2 through 4.7-4). It is important to note that the 65 dBA CNEL County threshold is a daily weighted average (adjusted to account for increased sensitivity and penalize noise occurring in the evening and nighttime). Therefore, the analysis and the noise thresholds do account for the additional impact of noise that occurs during evening hours.
As discussed under Impacts TRRP N-1 through N-3, noise impacts associated with construction and operation of the proposed project (including all of the sources listed above) would be less than significant (less than the 65 dBA CNEL exterior noise threshold, and noise increases less than 1.5 dBA). The commenter disagrees with the determination that noise impacts would be less than significant, but offers no substantial evidence to support the assertion that the determination is incorrect.

45-5. The proposed project would not involve any blasting. This comment refers to the 2001 EIR prepared for the Tajiguas Landfill Expansion Project (see Section 4.7.2.2 of the Draft SEIR), which determined that blasting impacts would be less than significant due to the distance to adjacent residences. The planned Hart Residence was not considered in the 2001 EIR, as a residence was not proposed at that time. The blasting discussed in the 2001 EIR was associated with the installation of the groundwater protection systems (landfill liners) and the last liner system requiring blasting was completed in summer 2014.

45-6. Potential sources of odors from operation of the Resource Recovery Project are identified in Section 4.2.2.4, and primarily include air treated through the bio-filters and the composting area. The County does not have a quantitative odor impact threshold. For purposes of the SEIR analysis, based on a literature review conducted by the Air Quality Technical Study consultants (AECOM), the determination of a potentially significant impact was based on the following: 1) exceedance of the 5 OU/m³ odor guidance concentration for more than two percent (175 hours) per year and 2) the exposure of a considerable number of persons to this guidance concentration. Odor modeling conducted for the Draft SEIR indicates that the proposed project would result in odors exceeding the 5 OU/m³ guideline concentration approximately 30 hours per year at the planned Hart Residence. This frequency does not exceed the two percent guideline (175 hours per year). In addition, a considerable number of persons would not be adversely affected, such that project-related odors are not anticipated to result in a nuisance, as defined in Santa Barbara County APCD Rule 303.

As discussed on pages 4.2-58 and 4.2-59 of the Draft SEIR, numerous odor reduction measures have been incorporated into the project, an Odor Impact and Mitigation Plan would be developed and implemented, and best available control technology has been adopted for proposed compost operations to reduce odors.

45-7. See the response to Comment 5 in Letter no. 2 concerning property values. Numerous technical studies (air, noise, traffic, water quality, hydrology, water supply, hazards, biology, geology, and cultural resources, were prepared to support the SEIR impact analyses. The determination of the significance of the impacts analyzed in the Draft SEIR is based on Federal, State and/or local regulatory standards and/or County thresholds of significance. The commenter disagrees with the determination that certain impacts would be less than significant, but offers no substantial evidence to support the assertion that the determination is incorrect.
Ms. Leipner:

Please note my opposition to Alternative C, Tajiguas Resource Recovery Project.

The noise, odor and light pollution, as well as the traffic congestion, make this NOT a solution to the issue. The hundreds of homeowners severely impacted by this potential "alternative" should not have to suffer the consequences of an ill-considered, previously deemed infeasible, action.

Mary O. Wiemann
Mary O. Wiemann
Professor Emeritus, Communication
Home: 805-683-5863
Fax: 805-683-9685
Cell: 805-680-6390
Email: profmary@cox.net
991 Camino del Rio
Santa Barbara, CA 93110
Letter no. 46

Commenter: Mary O. Wiemann, 991 Camino Del Rio, Santa Barbara

Date: October 3, 2014

Response:

46-1. Your comment regarding your opposition to the selection of Alternative C will be forwarded to the decision-makers for their consideration. The Draft SEIR acknowledges that a MRF at the Alternative C (SCRTS) would result in noise (see Impacts ALT C N-1 through N-3), odors (see Impact ALT C AQ-6) and night-time lighting (see Impacts ALT C VIS-3 and VIS-4). However, these impacts would be less than significant, when compared to adopted thresholds of significance. Concerning “previously deemed infeasible action”, it appears the commenter is referring to the Board of Supervisors statement (approved September 15, 1998) declaring that expansion of the SCRTS is an infeasible alternative as it relates to the Tajiguas Landfill Expansion Project (approved in 2002). Please see the response to Comment 7 in Letter no. 10 regarding the policy statement.
Leipner, Joddi

From: David Hennerman <hennerman@att.net>
Sent: Saturday, October 04, 2014 4:58 PM
To: Leipner, Joddi
Cc: Wolf, Janet; SupervisorCarbajal; dfarr@countypfsb.org; Adam, Peter; Lavagnino, Steve
Subject: county transfer station C

We live at 730 El Rodeo Road & oppose transfer station c as an alternative because it would change the residential nature of the area & make it much busier, noisier, more polluted.
Letter no. 47

Commenter: David Hennerman, 730 El Rodeo Road, Santa Barbara

Date: October 4, 2014

Response:

47-1. Your comment regarding your opposition to the selection of Alternative C will be forwarded to the decision-makers for their consideration. The Draft SEIR acknowledges that a MRF at the Alternative C (SCRTS) would increase traffic congestion (see Impact ALT C T-4), increase noise (see Impacts ALT C N-1 through N-3), and air pollution (see Impact ALT C AQ-1 through AQ-4. However, these impacts would be less than significant, when compared to adopted thresholds of significance.
Rancho San Antonio Homeowners Association  
Board of Directors  
c/o Cheri Bode, President  
940 Camino del Rio  
Santa Barbara, CA 93110  
Email: cheribode@cox.net

October 2, 2014

Jodi Leipner  
Division Planner  
Santa Barbara County  
Solid Waste Management Division  
130 East Victoria Street #100  
Santa Barbara, California 93101  
Email: jleipner@cosbw.net

COMMENTS ON THE ENVIRONMENTAL IMPACT REPORT FOR TAJIGUAS RECLAMATION PROJECT

Dear Ms. Leipner;

The Rancho San Antonio Homeowners Association Board is writing this letter on behalf of the 104 Homeowners in the Rancho San Antonio subdivision located in the 4500 block of Cathedral Oaks Road.

We have reviewed the lengthy and detailed EIR prepared for the Tajiguas reclamation project. Some of the comments made at the public hearing have expressed the concerns of the vast majority of the hundreds of home owners and residents including our Homeowners Association members that would be impacted if alternative C would somehow allow this project to be sited, in any part or component, at the current County Transfer Station off of Calle Real and adjacent to the County Jail and Sheriffs' Department. The analysis of this Alternative C site is grossly inadequate. Areas of inadequacy include the traffic and transportation analysis. The surface streets approaching this site, particularly from the Southeast are narrow. I assume NO trucks coming from the North County would be allowed to use the already extremely dangerous and congested San Marcos Pass Road. It is unlikely that trucks coming from the South would take the SR 154-State Street-Hollister Ave, turnoff and traverse that intersection which operates on a 5 cycle rotation and at times operates at a Level D now depending on the day of week and the time and the amount of travelers and residents headed over San Marcos Pass Road to the Santa Ynez Valley or returning from there. That route would take trucks along the narrow one lane Westbound Calle Real approach and they would then have to negotiate the signalized intersection at SR 154 which also operates at a level D at certain times of day and is also a 5 cycle rotation. The El Sueno exit from the 101 Northbound is too narrow and constricted to handle large waste hauling trucks, and the short sharply curved off ramp leads to traffic backing up onto the freeway when it is even slightly congested by large numbers of vehicles using the 4 way stop sign controlled intersection at El Sueno and Calle Real.
As a result virtually all of the trucks traveling to and from the proposed alternative C site would be utilizing the Turnpike-Calle Real-101 interchange. This is another 5 cycle signalized intersection which operates at levels of D to F at certain times of day depending upon the rush hour, school hours at the nearby San Marcos High School, meal times at In and Out Burger and drive through, and any traffic congestion and back-up on the 101 freeway coupled with the regular surface traffic in that area.

In articulating the traffic and transportation analysis it completely fails to consider the number of denser and more urbanized uses already planned for that immediate vicinity, such as the now vacant MTD property scheduled for several hundred homes, many slated to be so called affordable units.

In addition to the inadequacy of the traffic analysis the noise, odor and light pollution from this 24 hours, 6 day a week operation using heavy equipment and in the heart of a large suburban to urban residential area is inadequately assessed. By comparison using alternative B's odor overlay map, used for the Marborg site, it demonstrates the considerable distances which noxious odors can travel, depending of course on the winds of which there are two or three prevailing patterns at the transfer station site. Those winds are winds from the Northwest, generally the prevailing winds, Santa Ana or off shore winds, from the North and northeast and winds out of the South depending upon weather and approaching frontal systems.

It is clear that noxious odors and possibly heavier than air gases will travel from the transfer site downward to the jail where hundreds of prisoners are incarcerated, to the condominiums there and on the other side of the ridgeline to residences and the homes in the mobile home park where large numbers of elderly people reside and also to the Alpha center which is situated in a hollow where sound reverberates and heavier than air gases and odors will naturally descend and likely be trapped.

The size bulk and scale of the proposed facility far exceeds the residential profile surrounding most of the site and it will present negative visual impacts to those expensive homes on three sides of the site particularly from lighting and equipment operating at night. The acoustic characteristics of the canyons to the west and Northwest are such that they act like a geological megaphone and sound boards transmitting noise to the North, Southeast and West and the outdoor shooting range the Sheriff Department occasionally used in the past, had to be shut down due to numerous noise complaints from the hundreds of homes nearby where that sound was directed or reflected.

Because the site is elevated, surface run-off of pollutants and contaminated rainwater is another problem not adequately mitigated.

There is also the increased risk of fire that the expansion would bring in this residential neighborhood.
Perhaps most importantly of all, the subject of the expansion of the County Transfer Station was discussed at length over the years in conjunction with any needed expansion of the Tajiguas landfill. In 1998 the County and the Board of Supervisors concluded that any expansion of the County transfer station operations beyond its then scale and size was INFEASIBLE due to the residential character of the surrounding neighborhoods.

See the attached EXHIBIT A, the County Board of Supervisors' minute order making that finding in connection with the EIR being proposed for the Tajiguas landfill project then being discussed and considered. There has been no change in the surrounding neighborhoods since 1998 when the Board concluded that any expansion of the County transfer station beyond its then size and scale was disfavored and infeasible and further that it should not be considered at all as an alternative either standing alone or as a part of any other elements of the Tajiguas landfill expansion project.

In fact, if anything, the surrounding neighborhood has become more residential, denser and more populated since then with even more homes, condominiums, motels, restaurants and other businesses including the County Social services campus, the County Hospital, the Air Pollution Control District, SBCAG offices, Jail, Sheriffs' Department, County training facilities, County Road Department and many others. Also omitted from the EIR is the fact still many more residences and businesses are planned in the impacted surrounding neighborhoods for the immediate future.

The notice to the surrounding neighbors, home owners and businesses, including many county employees exposed to the negative impacts of this proposed alternative C was woefully inadequate and in most cases non-existent with many people finding out about alternative C being chosen not just as a feasible alternative, but rather as 'the environmentally preferred Alternative', only a day or two before the public hearing. It is believed by many that the failure to adequately notify the many hundreds of surrounding neighbors and properties was a result of the experience in 1998, as documented in the attached Exhibit A, that the County was well aware the suggestion of any expansion, particularly one of the magnitude of this one, would meet with widespread opposition.

Consequently it is widely suspected that the failure to adequately notify those logically and negatively impacted in the surrounding neighborhoods was an attempt to head off an anticipated uproar.

Given the long standing and well stated County Policy opposing any expansion or proposed expansion of the County Transfer Facility as evidenced by the attached Exhibit A, it is respectfully suggested that the alternative C should not only, not be considered the 'environmentally preferred alternative': but rather be determined to be infeasible as it has been for the past two decades and it should be removed as an alternative from the EIR. Numerous property owners and businesses have relied upon this long standing policy and invested in their homes, expensive properties and businesses based upon it!
We hope that the current EIR in circulation for comments, will be amended to reflect and include this long standing County policy as it should have at the outset and that if need be the EIR should be re-circulated for comment in view of this County policy with regard to any expansion of the transfer station facility beyond its current size, scale and scope of operations, a discussion which was completely omitted from the current EIR.

THE RANCHO SAN ANTONIO HOMEOWNERS STAND IN STRONG OPPOSITION TO THE PROPOSED TAJIGUAS RESOURCE RECOVERY PROJECT ALTERNATIVE C.

Sincerely,

The Rancho San Antonio Homeowners Board
Cheri Bode, President
Jane Giles, Secretary
Laura Ciontea, Treasurer
Greg Brunet and Lynda Rodrequez,
Directors at large
EXHIBIT

"A"

Policy Established by the County of Santa Barbara and the County Board of Supervisors in 1998, that use of the County Transfer Facility in Connection With any Expansion Project For the Tajiguas Land Fill Was and Is Infeasible
BOARD OF SUPERVISORS OF THE COUNTY OF SANTA BARBARA
STATE OF CALIFORNIA
CLERK OF THE BOARD OF SUPERVISORS

*****

M I N U T E O R D E R

September 15, 1998, In the p. m.

Present: Supervisors Naomi Schwartz, Jeanne Graffy, Gail Marshall,

Joni Gray, and Thomas Urbanske

Michael F. Brown, Clerk (Fiorillo)

Supervisor Marshall in the Chair

RE: County Counsel - Approve recommendations regarding Policy Statement that Transfer Station expansion is not a feasible alternative to Tajiguas Landfill Expansion, as follows: (96-20,739 & 20,731) (FROM SEPTEMBER 1, 1998) (EST. TIME: 20 MINS.)

a) Adopt the final language of the Policy Statement that Transfer Station expansion is not a feasible alternative to the Tajiguas Landfill Expansion Project;

b) Direct the environmental consultant responsible for the preparation of the Tajiguas Landfill EIR to include the Policy Statement in the EIR analysis of alternatives;

c) Direct the consultant that the scope of work on the EIR does not include analysis of Transfer Station expansion as an alternative to the Tajiguas Landfill Expansion Project.

COUNTY ADMINISTRATOR’S RECOMMENDATION: POLICY

Graffy/Urbanske

a) Adopted as revised per “Proposed Revisions to the Board of Supervisors Statement Regarding the County Transfer Station Alternative to the Tajiguas Landfill Expansion Project” dated September 15, 1998.

b) and c) Approved.

No: Marshall
Proposed Revisions to the Board of Supervisors Statement Regarding the County Transfer Station Alternative to the Tajiguas Landfill Expansion Project

9-15-98

4. In 1993, persons living in the neighborhoods surrounding the Transfer Station formed a "Coalition for Safe Neighborhoods" which participated in a Focus Group, which in turn participated in detailed technical discussions and meetings with County staff. The Goals of the Coalition, among others, are to eliminate the possibility that the Transfer Station will cause future industrialization of the area, reduce Transfer Station operations, and reduce or eliminate neighborhood hazards and impacts.

10. In April, 1998, the Public Works Department issued a Notice of Preparation (NOP) of an Environmental Impact Report for the proposed expansion of the Tajiguas Landfill. Included in the NOP was an initial listing of the potential range of alternatives to the proposed expansion of the Tajiguas Landfill that would be analyzed in the EIR (Case #98-CP-033). The NOP noted that several of these alternatives (e.g., redirection of waste to another existing or new in-County landfill, redirection of waste to out-of-County landfills by truck or rail) may require the expansion of the existing Transfer Station and/or construction of a new transfer station. Through the scoping process of the EIR, oral and written comments were received by the County from the public and the Coalition for Safe Neighborhoods expressing the opinion that such expansion would be contrary to statements and prior Board actions regarding the future land use of the site, and that the Transfer Station expansion alternative identified in the NOP should be determined to be infeasible by the County, in accordance with the provisions of CEQA, because it would be inconsistent with the existing Five-Year Plans. The scoping comments indicated strong objection to any alternative to the proposed expansion of the Tajiguas Landfill that could result in the expansion of the existing Transfer Station.

11. The Board of Supervisors recognizes that an EIR must consider a reasonable range of feasible alternatives, and acknowledges its responsibility, as Lead Agency, to make the final determination of which alternatives are feasible and must be included in the EIR. CEQA Guidelines §15126 indicates that when addressing the feasibility of alternatives, the Lead Agency may take into account "site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations..." In light of (1) the Board of Supervisors' prior policy direction that expansion of the Transfer Station is a disfavored land use for the site, (2) the continued community opposition to such an expansion, and (3) the community and Board acceptance of the Five-Year Plans for the its continued limited operation of the Transfer Station, it is the Board of Supervisors' determination that the expansion of the Transfer Station or its operations beyond conformance with its currently permitted size, capacity, structures, and specific equipment and operations of 550 tons per day as further described by Santa Barbara County-Transfer Station project (Case #95-CC-002) and Negative Declaration 95-ND-5 is an infeasible alternative as it relates to the Tajiguas Landfill Expansion project. "Expansion" means any expansion of the Transfer Station, whether as a stand-alone alternative or as a component of another alternative. The
Transfer Station may be included as a fixed component in any analysis of alternatives as long as the current size, capacity, structures, and specific equipment and operations are not expanded or intensified.
CONFIDENTIAL
Attorney/Client Communication

COUNTY COUNSEL
OFFICE MEMORANDUM

David C. McDermott
Deputy County Counsel

Telephone: (805) 568-2950
FAX: (805) 568-2982

September 22, 1998

To: Clerk of the Board

Subject: Final Approved Board of Supervisors Statement Regarding the County Transfer Station Alternative to the Tajiguas Landfill Expansion Project

Attached is the final Board of Supervisors Statement Regarding the County Transfer Station Alternative to the Tajiguas Landfill Expansion Project approved by the Board of Supervisors on September 15, 1998 (Identified as County Counsel “dcm\waste\tajiguas\expansio\transfer6.mem”).

Pursuant to Board direction on September 15, 1998, this office will forward a copy of this Statement to the Consultant responsible for the preparation of the Tajiguas Landfill EIR for inclusion in the EIR analysis of alternatives. Included with this transmittal will be a letter to the consultant directing that the scope of work on the EIR does not include analysis of Transfer Station expansion as an alternative to the Tajiguas Landfill Expansion Project and a copy of County Counsel’s letter to attorney Phil Seymour, dated August 27, 1998, which was attached to the Board Letter.

Please call me if you have any questions.

cc: Phil Demery, Director Public Works
Mark Schleich, Interim Deputy Director, Solid Waste and Utilities
Imelda Cragin, Solid Waste and Utilities
Heidi Whitman, Solid Waste and Utilities
Members of the Community Advisory Committee to Review Long-Term Solid Waste Disposal Options

Page 9-174
BOARD OF SUPERVISORS
COUNTY OF SANTA BARBARA
STATEMENT REGARDING
THE COUNTY TRANSFER STATION ALTERNATIVE TO
THE TAJIGUAS LANDFILL EXPANSION PROJECT

1. The County of Santa Barbara owns and operates the Santa Barbara County Transfer Station. The Transfer Station (Assessor Parcel Number 059-140-023) is 8.35 acres, located at 4430 Calle Real Road, south of Cathedral Oaks Road and north of U.S. 101 in the Goleta area of the Second Supervisorial District. It is located west of a former municipal solid waste landfill. The Transfer Station site is essentially flat-lying and is bordered on the north and west by steep hillsides. The site is bordered on the south and east by Transfer Station Road. The Transfer Station is zoned Article III, REC (Recreation). The County Road Maintenance Yard, located to the north is zoned REC. The County Sheriff’s Department and jail, located to the south, is zoned REC. The area east of the Transfer Station is developed with Single Family residences and is zoned 10-R-1. The area west of the Transfer Station is developed with residences and is zoned DR-8.0.

2. The Transfer Station has operated under a Solid Waste Facility Permit issued by the Santa Barbara County Environmental Health Services with the concurrence of the California Waste Management Board (later incorporated into the California Integrated Waste Management Board (CIWMB)) since May 1978. The Transfer Station was then and is today, an important and vital component of the County’s solid waste management system that includes the disposal of solid waste at the Tajiguas Landfill. The operating permit allowed for up to 550 tons of waste per day.

3. In 1993, an Environmental Impact Report (92-EIR-15) was prepared to evaluate the environmental impacts associated with an expansion of the Transfer Station to include the continuation of existing operations, the construction of several new structures and facilities, and the implementation of new programs. The expansion project would have required a permit revision to allow the Transfer Station to accept up to 1000 tons of waste per day. Opposition to the proposed expansion project by members of the public, particularly those who lived near the Transfer Station, was immediate, organized and vocal.

4. In 1993, persons living in the neighborhoods surrounding the Transfer Station formed a “Coalition for Safe Neighborhoods” which participated in a Focus Group, which in turn participated in detailed technical discussions and meetings with County staff. The Goals of the Coalition, among others, are to eliminate the possibility that the Transfer Station will cause future industrialization of the area, reduce Transfer Station operations, and reduce or eliminate neighborhood hazards and impacts.

5. At the July 7, 1993 Planning Commission Hearing for the County Transfer Station General Plan Consistency Direction and Facility Operations Permit Revision

1
there was considerable public concern and controversy regarding the impacts of the Transfer Station, its proposed expansion and the compatibility of the facility with residential land uses in the vicinity. Over 25 questions and concerns were presented by the public and the Commission (see Memorandum dated July 13, 1993 from Al McCurdy, Deputy Director, Resource Management to various interested parties Re: Response to Comments from Planning Commission Hearing on the County Transfer Station General Plan Consistency Determination). The Planning Commission continued the hearing to a later date. Meetings between the Focus Group and the County continued for the next seven months regarding the proposed expansion of the Transfer Station.

6. In March 1994, the Board approved an amendment to increase the total compensation to the Transfer Station EIR consultant, in part due to the protracted disagreements with the neighborhood groups and residents. During the twenty-four months the consultant had been working on the Transfer Station expansion project, the original scope of work had been greatly modified in response to neighborhood concerns. Modification, additional studies and increased public participation had increased the cost of the EIR and had also extended the project time schedule far beyond that originally anticipated. Ultimately, the Planning Commission did not certify the Transfer Station EIR because the Solid Waste and Utilities Division withdrew the project. The Transfer Station EIR did determine that air quality impacts associated with the proposed expansion of the Transfer Station to 1,000 tons per day would be adverse and unavoidable, and that a Statement of Overriding Considerations would have been required.

7. As a consequence of the work performed by the Focus Group and the County, the County reduced the scale of the Transfer Station project description to the satisfaction of the neighbors. In June 1995, the Board of Supervisors approved both Santa Barbara County Transfer Station project (Case #95-GC-002) and Negative Declaration 95-ND-5.

8. At the request of the Focus Group, the Board also accepted the County Transfer Station Five Year Plan listing capital projects and operational changes anticipated to occur at the Transfer Station over the next five years, with updates in 1996 and 1997. Identified objectives in the Five-Year Plans are to "limit the Transfer Station in the long term to service self-haulers only, consistent with the development of the IDF discussed herein" (the IDF is the Integrated Diversion Facility, a project since abandoned by the County). Each Five Year Plan also contains a list of proposed projects which are limited to maintenance of current operations.

9. The acceptance by the Board of Supervisors of the Transfer Station Five-Year Plans and the abandonment by the County of the project to expand the facility in favor of a plan to limit its use in the long term constitute a policy direction by the Board that expansion of the Transfer Station is a disfavored land use for the site.

10. In April, 1998, the Public Works Department issued a Notice of Preparation (NOP) of an Environmental Impact Report for the proposed expansion of the Tajiguas Landfill. Included in the NOP was an initial listing of the potential range of alternatives
to the proposed expansion of the Tajiguas Landfill that would be analyzed in the ER (Case #98-P-033). The NOP noted that several of these alternatives (e.g., redirection of waste to another existing or new in-County landfill, redirection of waste to out-of-County landfills by truck or rail) may require the expansion of the existing Transfer Station and/or construction of a new transfer station. Through the scoping process of the EIR, oral and written comments were received by the County from the public and the Coalition for Safe Neighborhoods expressing the opinion that such expansion would be contrary to statements and prior Board actions regarding the future land use of the site, and that the Transfer Station expansion alternative identified in the NOP should be determined to be infeasible by the County, in accordance with the provisions of CEQA, because it would be inconsistent with the existing Five-Year Plans. The scoping comments indicated strong objection to any alternative to the proposed expansion of the Tajiguas Landfill that could result in the expansion of the existing Transfer Station.

11. The Board of Supervisors recognizes that an EIR must consider a reasonable range of feasible alternatives, and acknowledges its responsibility, as Lead Agency, to make the final determination of which alternatives are feasible and must be included in the EIR. CEQA Guidelines §15126 indicates that when addressing the feasibility of alternatives, the Lead Agency may take into account "site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations..." In light of (1) the Board of Supervisors' prior policy direction that expansion of the Transfer Station is a disfavored land use for the site, (2) the continued community opposition to such an expansion, and (3) the community and Board acceptance of the Five-Year Plans for the continued limited operation of the Transfer Station, it is the Board of Supervisors' determination that the expansion of the Transfer Station or its operations beyond its current size, capacity, structures, and specific equipment and operations is an infeasible alternative as it relates to the Tajiguas Landfill Expansion project. "Expansion" means any expansion of the Transfer Station, whether as a stand-alone alternative or as a component of another alternative. The Transfer Station may be included as a fixed component in any analysis of alternatives as long as the current size, capacity, structures, and specific equipment and operations are not expanded or intensified.
Letter no. 48

Commenter: Rancho San Antonio Homeowners Association

Date: October 2, 2014

Response:

48-1. See the response to Comment 1 in Letter no. 29.

48-2. See the response to Comment 2 in Letter no. 29.

48-3. See the response to Comment 3 in Letter no. 29.

48-4. See the response to Comments 4 and 5 in Letter no. 29.

48-5. See the response to Comment 7 in Letter no. 2 regarding visual impacts of the MRF building. Concerning light pollution, MRF-related lighting would be controlled by blinds to minimize the escape of interior lighting and shielding of exterior lighting. These measures would prevent significant light and glare impacts.

48-6. See the response to Comment 8 in Letter no. 29.

48-7. See the response to Comment 1 in Letter no. 2.

48-8. See the responses to Comment 6 in Letter no. 2 and Comment 7 in Letter no. 10.

48-9. See the response to Comment 6 in Letter no. 2.

48-10. See the response to Comment 7 in Letter no. 10.

The commenter’s opposition to the selection of Alternative C will be forwarded to the decision-makers for their consideration.
Dear Ms. Leipner,

We applaud you and the county supervisor’s for looking into solutions to extend the life expectancy of the Tajiguas Landfill. However, an urban materials recovery facility (MFR) at 4430 Calle Real is not a suitable site. This is the only site that is located within a neighborhood. We live at 4707 Sierra Madre Rd, ~1/2 mile as the crow (and ords) flies from this site. If this MRF is built at 4430 Calle Real can you assure our family and neighbors that there will be no exposure to malodors, toxic chemicals and health hazards once it is up and functioning? The site is just too close to such a populous neighborhood to be considered a viable alternative site. We are writing to voice our vehement opposition to building a trash recycling facility “Transfer Station C” at 4430 Calle Real.

Sincerely,

John & Karen Long
Letter no. 49

Commenter: John & Karen Long, 4707 Sierra Madre Road, Santa Barbara

Date: October 7, 2014

Response:

49-1. Your comment supporting solutions to extending the life of the Tajiguas Landfill, but opposition to the selection of Alternative C will be forwarded to the decision-makers for their consideration. The Draft SEIR Section 5.3.3.4 provides an analysis of odors, hazards and health risk for the MRF under Alternative C. Based on the design of the MRF at the Alternative C site (which includes a negative pressure building with air filtration through two large bio-filters) odor and health risk impacts were determined to be less than significant, when compared to adopted thresholds of significance. An impact associated with the possible exposure to, and release of, hazardous materials during construction was determined to be potentially significant but mitigable.
Ms. Leipner,

Please find attached my letter regarding the proposed Material Resource Facility (Dirty MRF) to possibly be built at the Transfer Station site. I have cc'd the 2nd District Supervisor, Janet Wolf as it is my understanding that approval for development will not go before the planning commission, but go directly to the supervisors for a vote.

I have the distinct impression that Public Works has every intention of developing the Eastern Valley (Transfer Station), so I thought it would be wise to let the Superintendent of Schools be aware since San Marcos High School, El Camino and Foothill Elementary Schools are all within the district and close to the proposed site, as are the district offices. Mr. Cash may not be aware of these plans and I hope to enlist his support.

Please confirm receipt of this letter and let me know of any future hearings or public meetings associated with this topic. Thank you,

Ruth Von Eberstein
resident, 2nd district
Ms. Leipner,

I have attended two public hearings addressing the county’s plans to build a Materials Resource Facility (MRF) — one several years ago and most recently in September of this year. The plan has clearly evolved to include many outside contractors, in addition to a possible change in its location from Tajiguas to the Transfer Station. The relocation of the proposed MRF is the basis of this letter, having reviewed the EIR “Alternative Sites” document, I am very concerned that the Transfer Station has been earmarked for development.

The 368 page EIR outlining alternative sites, risk assessment and mitigation measures for each of the alternate locations — I found its review/assessments and ultimate findings and assigned risk levels to be debatable. There are an overwhelming number of factors associated with this proposed facility, as a result, I will focus on those key aspects that I find most daunting.

Alternative C — Urban Area MRF Alternative 2 SCRTS (Transfer Station): This property is publicly held and zoned recreational. Just 8.3 acres of the 143.48 acres is occupied by the Transfer Station. In 1998, a policy was passed by the Board of Supervisors stating that the Transfer Station was not a feasible alternative to the Landfill Expansion Project. Why then is it being considered for development? The vision for any planned development must include respect for the rights and needs of the property owners, those of us in the community. In fact, most of the 2nd district residents are unaware of this projects existence.

Although the EIR addressed some of risks, the proposed mitigation was unsatisfactory in many instances and the shear size of the proposed MRF, hours of operation, and types of material waste and recyclables to be off loaded and/or stored at the site will negatively impact this semi-rural residential neighborhood forever.

Of concern — the risks that can not be fully (100%) mitigated:

- **Fact:** There is a higher risk of fire associated with the operation of a MRF — proposed to be built in a high risk fire zone. This defies mitigation objectives established in the Wildfire Protection Plan.

- **Serious or fatal accidents due to increased vehicular traffic associated with the day-to-day operations of a MRF.** Hundreds more transport trucks and vehicles will travel Calle Real and Turnpike Road daily and encounter pedestrians, residents of the area, students walking to/from schools, residents making their daily commute. This intersection is already overly busy and can’t handle traffic associated with an industrial facility that hauls waste and recyclables daily.

- **Health risk due to by-products of a MRF, such as increased dust, airborne microorganisms, fungi, bacteria and endotoxins — all can cause health problems to those exposed.** There are no mitigation measure that will 100% contain these microorganisms, add to this human error, power failure...

- **Evacuation of such a large number of residents, county workers, students, etc. poses a very serious problem in the event of a fire, power failure or breach.** The existing roads will not accommodate the number of cars out or emergency vehicles needing to move in.

- **Limited resources such as technical staff to manage and contain a breach, douse a fire, handle a mass evacuation and house those displaced should a event or natural disaster occur.**

- **Quality of life — people must be adequately segregated from a MRF due to the associated risks.** The Transfer Station does not offer any segregation, the present facility is just yards from family homes, county offices, the sheriff’s station, county jail, etc.
Within the EIR the permitted capacity noted:

- Under the Solid Waste Permit, the SCRTS is permitted to transfer up to 800 tons/day, 6 days a week, operating 20 hours a day/night, not including cleaning and maintenance.

- The permitted traffic volume is 767 average DAILY trips.

- The permitted hours of receiving are Monday through Saturday, 7:00 a.m. to 5:00 p.m., although the MRF would truly be in operation 24 hours a day, 311 days a year.

- This equals 238,537 trips allowed annually. To be clear “Daily Trips” are associated with hauling and tipping of waste and does not include vehicular traffic associated with employees, maintenance and repair technicians, cleaning personnel, etc.

“Class III Impact, less than significant,” was the assessment repeated multiple times throughout the EIR with regard to Alternative C site. How this report considers the associated risk and the shear volume of traffic as “less than significant,” is astounding.

Development of any kind, public or private, should NOT be allowed to diminish current residential use of the surrounding property by converting public land to primarily industrial use to the exclusion of those surrounding the SCRTS. Not to mention, this publicly held property would generate profits for privately held companies, those who partnered with the county to build, operate and maintain the MRF.

As a homeowner in the unincorporated area, not far from the Transfer Station, I am asking those involved in the decision making to consider all of us who live here, invested here and have expectations that our elected officials and staff will protect our welfare and investment — An industrial facility brings with it the endless noise of vehicles, machinery running, the act of tipping waste (trash trucks), blowers, glass crushers, conveyor belts running for the purpose of sorting. Then there are the lights surrounding the gigantic facility, the starless night sky. Heat generated by trucks and equipment, vibrations and so on. It’s an environmental nightmare and health risk in our residential neighborhood!

Not one of these risk factors or permitted hours of operation/volume were mentioned at the public hearing (9/4/14) — individually significant enough to deny such a development at the Transfer Station, together they spell disaster and LIABILITY for the county and its partners in this project.

Does Santa Barbara need a Materials Resource Facility? The county staff would say yes, that our landfill will be full by 2026 without it. Staff have taken the environmental position when addressing the need for this facility, we are told their rationale but never are we asked to engage in the discussion. Transparency of this proposed facility is cryptic and late, plans have been made. As taxpayers we were never informed of options or details, for example what are the costs vs. the environmental benefits?

Would it be smarter to engage and educate residents to do a more accurate job of sorting at the front end rather than construct a $75 million facility that essentially sorts at the back end? Finally, what happens in 2036, when the landfill is estimated to close? Does the MRF get shuttered?

I’d like to go on record as stating that I have no objections to the construction and operation of a MRF, but only if it makes sense fiscally, environmentally and does not negatively impact our welfare. My objection, and I think I speak for many others, is the stealth way the county has gone about this project. The September 4 public hearing marks the first time most of the area residents learned of the MRF and the possibility of having it built at the Transfer Station. This news is late in coming and many of the details were not shared — making these plans even more suspect.

It is my understanding that there are not enough recycling facilities in the State of California to handle all those who want to recycle, more are needed in order to meet the state mandate. So why build a MRF in the county who’s need will end in 20 years. Why not strategically build a facility in an appropriate setting in collaboration with other county’s or municipalities and private haulers to serve a larger area for years to come. The financial burden and the recycle benefits are shared which makes good sense to me. This opinion comes too late to make a difference as plans have been made, in the short run, I urge our elected officials to uphold their policy of "not feasible" for the Transfer Station.

Ruth Von Eberstein
Resident and homeowner in the unincorporated area of Santa Barbara
Letter no. 50

Commenter: Ruth Von Eberstein, 133 Campo Vista Drive, Santa Barbara

Date: September 24, 2014

Response:

50-1. Fire Hazard. Impact ALT C HAZ-3 of the Draft SEIR recognizes that very high fire hazard areas occur north of the Alternative C MRF site; however, existing fire protection services and proposed fire suppression systems there would not be a significant increase in the fire risk. The El Sueno neighborhood has been designated an “at risk community” in the Santa Barbara County Communities Wildfire Protection Plan. However, the Plan does not include any specific requirements that would preclude development of a MRF.

50-2. Traffic Accidents. Alternative C would not alter existing collection truck routing in residential areas, or otherwise increase truck traffic in residential areas. However, truck trips and employee trips to and from the SCRTS site would increase, including 27 additional vehicle trips (including 24 heavy-duty truck trips) during the a.m. peak hour, and 4 additional trips during p.m. peak hour. As discussed under Impact ALT C T-3 and T-4, traffic associated with MRF operations at the SCRTS under Alternative C would not result in exceedance of roadway capacity or traffic congestion at the local intersections exceeding County standards. As no significant increase in traffic congestion would occur, no increases in accident rates are anticipated. No substantial evidence is provided supporting the commenter’s contention that serious or fatal accidents will increase as a result of the project.

50-3. Health Risk. All solid waste unloading and processing would be conducted within the MRF building which would be under negative pressure and provided with a dust collection system and bio-filters to capture and filter dust, microorganisms and odors generated during sorting and processing. In addition, a health risk assessment (including cancer risk) was conducted for the MRF at the SCRTS site, which focused on diesel particulate matter from mobile equipment and trucks. The results of the health risk assessment indicate that the Santa Barbara County APCD thresholds for cancer risk and non-cancer health hazards would not be exceeded. Health risk associated with MRF operations is primarily associated with operation of diesel-fueled equipment and trucks, which would not be increased due to human error or power outages.

50-4. Evacuation. Construction and operation of a MRF at the SCRTS site would not substantially affect traffic circulation or access to other land uses, such that evacuation in response to a wildfire or other natural disaster would not be impaired (see Impact ALT C HAZ-4).
50-5. **Limited Resources.** Operation of the MRF would require preparation of a Transfer Processing Report (TPR) as a part of the Solid Waste Facility Permit Process. The TPR includes an identification of emergency response equipment and procedures to ensure the safe operation of the facility. The MRF would be fully staffed and the staff would be trained to respond to upset conditions (e.g., fire, spills, power outages) that may affect operation of the facility. The MRF would also include fire suppression systems as required by County Fire Department and the Building Code. In the event of an upset condition at, or in the vicinity of the MRF, waste could be bypassed directly to the Tajiguas Landfill for disposal. MRF staff may need to be evacuated during a natural disaster, but would not be involved in a mass evacuation of surrounding residential areas or housing of displaced persons. These activities would be the responsibility of the County Office of Emergency Management and the County Fire Department.

50-6. **Quality of Life.** The Draft SEIR indicates that environmental impacts at the SCRTS site could be mitigated to a level of less than significant, such that project-related changes in quality of life are not anticipated.

50-7. **Traffic.** The commenter appears to mix the parameters of the currently permitted SCRTS with some of the proposed operating parameters of the Resource Recovery Project at the SCRTS under Alternative C. The SCRTS is currently permitted to operate Monday through Saturday from 7:00 a.m. to 5:00 p.m. (with the exception of 6 holidays), is permitted to transfer up to 550 tons of waste per day and has a permitted traffic volume of 767 ADT (see Section 5.3.3.1 of the SEIR). However, as presented in Table 5-18 the SCRTS has been operating at levels lower than its permitted levels. Under Alternative C, the MRF would process up to 800 tons per day which would include self-haul waste currently received at the SCRTS and up to 130 tons per day of CSSR which is also currently received at the SCRTS. The facility would be staffed 24 hours per day but the MRF would accept waste only during the current permitted hours of Monday through Saturday from 7 a.m. to 5 p.m. Solid waste processing within the MRF building would occur from 7 a.m. to 11:30 p.m., with only cleaning and maintenance activity occurring during nighttime hours (11:30 p.m. to 7 a.m.). New vehicle trips would be associated with receipt and processing of MSW currently hauled directly to the Tajiguas Landfill for disposal and for new employees that would operate the MRF under Alternative C.

As listed in Table 5-30 of the Draft SEIR, maximum daily trip generation resulting from implementation of a MRF at the SCRTS site under Alternative C would be 338 ADT. These trips would be distributed throughout the day with 27 trips in the a.m. peak and 4 trips in the p.m. peak. As discussed under Impact ALT C T-4, traffic associated with MRF operations at the SCRTS site would not result in traffic congestion exceeding County standards. The commenter disagrees with the conclusion of the Draft SEIR regarding the significance of the Alternative’s traffic impacts, but does not provide substantial evidence to support the assertion. The comment will be forwarded to the decision-makers for their consideration.

50-8. **Noise, Lighting, Heat and Vibration.** See the response to Comment 7 in Letter no. 28.
50-9. **Project Need and MRF Long-Term Operation.** There have been over one hundred presentations on this project since its initiation to a broad base of stakeholders that include: Environmental and Advocacy Organizations, Business Groups, City Councils and Board of Supervisors, Professional Organizations, Neighborhood Associations, Regulatory Agencies and Public Official Forums. The proposed project includes all project components at the Tajiguas Landfill; however, during the Draft SEIR scoping period, members of the public identified the need to look at potential urban locations for the MRF such as the SCRTS site and property owned by MarBorg in the City of Santa Barbara. Other possible urban locations were also identified, but were not studied in detail because they were either not feasible or would not meet most of the project objectives. Enhanced recycling/source separation was considered in the Draft SEIR (Section 5.1.4), but was not determined to be a feasible alternative to the proposed project. With respect to the project life, as discussed in Section 3.5.13 of the Draft SEIR, continued use of the Resource Recovery Project Facilities beyond the initial 20-year term is speculative and not reasonable foreseeable at this time. Prior to the end of the contract term the County would need to identify future waste management options/plan (which may include technologies that are not considered feasible at this time) in compliance with CalRecycle requirements and complete additional CEQA review for those plans.

50-10. **Noticing and Feasibility.** See the response to Comment 6 in Letter no. 2, and the response to Comment 7 in Letter no. 10.
Letter no. 51

Leipner, Joddi

From: NiftyNona1237@aol.com
Sent: Thursday, October 02, 2014 5:39 PM
To: Leipner, Joddi
Cc: mlandsfeld@gmail.com
Subject: (no subject)

Dear Ms. Leipner,

I am writing to inform you that I am in complete disagreement with the proposed Resource Recovery Project modification being considered for location in the South Coast Recycling and Transfer Station located at 4430 Calle Real, Santa Barbara, 93110, known as Urban Area MRF Alternative 2.

I live in Oak Grove Condominiums, right over the hill from this location. This entire area is surrounded by neighborhoods with housing filled with families. As well, San Marcos High School is located right by the Turnpike exit of the Freeway. It is completely inappropriate as a location for this type of facility. Please find somewhere else to locate this facility so that we can live in a healthy, quiet area.

Thank you for your consideration.
Nona Todd Andrews
4541-F Oak Glen Drive
Santa Barbara, CA 93110
Letter no. 51

Commenter: Nona Todd Andrews; 4541-F Oak Glen Drive, Santa Barbara

Date: October 2, 2014

Response:

51-1. The comments do not address the adequacy of the Draft SEIR. The commenter's opposition to the selection of Alternative C will be forwarded to the decision-makers for their consideration.
October 4th, 2014

Ms. Jodi Leipner
Project Environmental Planner
130 E Victoria St.
Santa Barbara, CA 93101

Re: Tajiguas Resource Recovery Project and Alternative C

Dear Sir or Madam,

On September 4th, 2014 I attended a public meeting for The Tajiguas Resource Recovery Project. A Project that until September 3rd, I had not even heard of.

I highly disagree with this Report on several issues with regard to the Alternative C Class I effects. The EIR states Alternative C “Neither the proposed project nor Alternative C would result in significant and unavoidable (Class I) aesthetic impacts.”

Visual Resources/Aesthetics “the views of the MRF would be limited from public and private viewing locations.” This building is 77’ tall covering 88,600 SF of floor area, hardly insignificant from any location higher than Cathedral Oaks Rd. From my windows I can see the entire hillside behind and below the solar panels, exactly where the building will sit. Building elevation from the bottom to the top is 253’-330’ above sea level. Our grade level is at 353’ or above the top of the building in direct line of site. Why were no photos taken from higher elevations to establish visual aesthetics?

Noise “Overall noise impacts would be greater under Alternative C.” This facility is scheduled to be in operation 24 hours a day, 6 days a week. Total Projected Trip Generation of 338 vehicles ADT, meaning 1 inbound and 1 outbound, is actually 676 vehicles scheduled to move in or out, the majority import and export trucks, and will be a significant noise factor to all neighbors, especially neighborhoods in the foothills as noise travels upward.

Alternative C Baseline + Project Intersection Operations Impact Summary “show no impact on traffic congestion.” Traffic congestion at Turnpike and 101 is backed up for several lights at peak hours. The intersection is currently affected by San Marcos High School, The Wake Center, County government traffic, transfer station semi-trucks and other vehicles and local traffic. Again, the EIR states 27 trips ADT in the peak am and 4 trips ADT in the peak pm, this is actually 54 in the morning and 8 in the afternoon, during school and work hours.

I am objecting to this particular project due to its scale and operating schedule. It will disrupt the quality of life and equity values of all the homeowners nearby.

Thank you,

Carol Ann Mineau

Cc: Janet Wolf, County Supervisor
105 E Anapamu St., 4th Flr
Santa Barbara, CA 93101
Letter no. 52

Commenter: Carol Ann Mineau, 4421 La Paloma Avenue, Santa Barbara

Date: October 4, 2014

Response:

52-1. Visual Resources/Aesthetics. See the response to Comment 7 in Letter no. 2.

52-2. Traffic Noise. As listed in Table 5-30 of the Draft SEIR, ADT refers to one-way trips and not round trips. For example, 13 export truck trips would generate 26 ADT. Therefore, the ADT values in Table 5-30 should not be doubled. Due to the small incremental increase in traffic volumes on nearby roadways compared to the existing roadway volumes, traffic noise increases associated with Alternative C at the SCRTS site are considered less than significant (see discussion under Impact ALT C N-3).

52-3. Traffic. As noted in the response to Comment 2 above, ADT refers to one-way trips and not round trips and should not be doubled. Table 5-30 of the Draft SEIR, identifies that the MRF would generate up to 27 a.m. peak hour trip and 4 p.m. peak hour trips. As discussed under Impact ALT C T-4, traffic associated with MRF operations at the SCRTS site would not result in traffic congestion exceeding County standards.

The commenter’s opposition to the selection of Alternative C will be forwarded to the decision-makers for their consideration.
From: Bill McKinnon <bill.mckinnon9@gmail.com>
Sent: Tuesday, October 07, 2014 3:05 PM
To: Leipner, Joddi
Subject: County Transfer Station C proposal

October 7, 2014,

Dear Joddi Leipner,

For 22 years my family and I have lived at 670 Alto Drive near (and overlooking) the site of the proposed new trash receiving and sorting center known as “Transfer Station C”. I am writing to strongly oppose this location for this purpose for the following reasons:

53-1 a. Heavy truck traffic six days a week.

53-2 b. Increased levels of pollution and NOISE day and night in an area surrounded on all sides by housing.

53-3 c. Visual pollution of a six story processing facility the top of which will be visible from almost every room in my house.

Put our family down as a strong NO for this location.

Thank you for your attention to our concerns,

William R. McKinnon

Patricia F. McKinnon
Letter no. 53

Commenter: William & Patricia McKinnon, 670 Alto Drive, Santa Barbara

Date: October 7, 2014

Response:

53-1. Truck Traffic. See the response to Comment 4 in Letter no. 2.

53-2. Pollution and Noise. Concerning potential surface water pollution, water quality protection measures would be incorporated into the MRF design (see page 5-227 of the Draft SEIR), including trench drains at door thresholds, hydrodynamic separators at storm drains and sediment traps. However, water quality impacts may occur at the SCRTS site, and mitigation measures have been proposed to reduce these impacts to a level of less than significant. Concerning air pollution, an air quality impact analysis was conducted for the Alternative C MRF and included both stationary and mobile sources at the MRF, as well as waste transportation trucks and employee vehicles. This analysis concluded that total air emissions (including sources at the landfill) would be less than County thresholds (see Table 5-19) and less than significant. In addition, a health risk assessment (including cancer risk) was conducted for the MRF at the SCRTS site, which focused on diesel particulate matter from mobile equipment and trucks. The results of the health risk assessment indicate that the Santa Barbara County APCD thresholds for cancer risk and non-cancer health hazards would not be exceeded at the nearest occupied land use. See the response to Comment 2 in Letter no. 2 concerning noise.

53-3. Visual Pollution. See the response to Comment 7 in Letter no. 2.

The commenter’s opposition to the selection of Alternative C will be forwarded to the decision-makers for their consideration.
Leipner, Jodd

From: John Park <jswpark@asamst.ucsb.edu>
Sent: Wednesday, October 08, 2014 10:20 AM
To: Leipner, Jodd
Subject: Tajiguas Landfill Resource Recovery Project

Dear Ms. Leipner,

My family and I live on 4611 Sierra Madre Road, a very short distance from the County Transfer Station on County Dump Road. I understand that the County is proposing to build an expanded facility at this site, on Transfer Station C, and I'm writing to oppose any expansion of that facility. I'm very concerned that any expansion will increase traffic and pollution in my neighborhood, and I believe that this kind of land use is improper when it's so close to so many established neighborhoods. I would prefer that the Transfer Station be closed altogether, as the trucks and other heavy vehicles there already kick up so much dust and cause a great deal of noise as well. I am definitely opposed to any expansion of this facility, and I ask that you register my strong objections.

Yours sincerely,

--

John S.W. Park, Ph.D.
Professor, Chair, and Associate Director Department of Asian American Studies and
The Center for New Racial Studies
5050 HSSB
University of California
Santa Barbara, CA 93106-4090
(805) 893 8573 (HSSB)
(805) 893 7766 (fax)
Letter no. 54

Commenter: John Park, 4611 Sierra Madre Road, Santa Barbara

Date: October 8, 2014

Response:

54-1. The commenter’s opposition to the selection of Alternative C will be forwarded to the decision-makers for their consideration. The Draft SEIR acknowledges that a MRF at the Alternative C (SCRTS) would increase traffic congestion (see Impact ALT C T-4), and air pollution (see Impact ALT C AQ-1 through AQ-4). However, these impacts would be less than significant, when compared to adopted thresholds of significance.
MEMORANDUM

To: Santa Barbara County Planning Commission
   Supervisor Peter Adam
   Supervisor Salud Carbajal
   Supervisor Doreen Farr
   Supervisor Steve Lavagnino
   Supervisor Janet Wolf

From: Kenneth A. Cohen
   989 Camino del Retiro
   Santa Barbara, CA, 93110
   kcohen@tmac.biz

Date: September 16, 2014

RE: Draft Environmental Impact Report for the Tajiguas Resource Recovery Project
    (the "Draft EIR"); Objections to Draft EIR

I am raising objections to the Draft EIR for the Tajiguas Resource Recovery Project (the
"Project") and, in particular to all parts of the Draft EIR that state, or would imply, that
using Alternative Site C (the South Coast Recycling and Transfer Site) for any part of the
Project would constitute an acceptable alternative to the use of the previously selected
Tajiguas site for the entire Project. Listed below are objections to both procedures used to
date for the preparation, dissemination and presentation of the Draft EIR as well as to
substantive provisions of the Draft EIR.

PROCEDURAL OBJECTIONS

1. It is improper to use an EIR Report that was authorized to address a single
   previously selected site and possible alternative sites to present a two site
   solution. In addition to being outside the scope of the mandate for the Draft EIR,
   common sense would dictate that creating new, adverse impacts (fire, noise, odor,
   bacteria, animals, birds, insects and all others that are applicable to either
   location) at two sites is significantly more detrimental than creating such impacts
   at a single location. The Draft EIR fails to evaluate or measure the combined
   adverse impacts of both sites in comparison to the use of the Tijeras proposed site
   alone. I question whether developing a multiple site solution is either wise or
   legally permissible even if permissible. The analysis of such a two site solution is
   not adequately discussed, is incomplete and inaccurate.

2. Neither the Draft EIR, nor adequate notice of hearings related to the Draft EIR,
   were provided to adversely impacted property owners in areas surrounding the
Alternative C site.

3. The presentation made by Waste Management at the Planning Commission on September 3 (and I assume at the September 4 hearing as well) described the Marborg site in downtown Santa Barbara as an alternative site when it had, supposedly, been withdrawn from consideration by its owner. Has any investigation been made as to Marborg's motives for this withdrawal, or whether their corporate plans, although perhaps unstated in written material, would be likely at some later date to add an even greater burden and adverse impacts to alternative site C. For example if Marborg determined that it would prefer to switch its operations to the alternative C site, perhaps that would allow Marborg to recognize gains from increasing real estate values in the downtown Santa Barbara area where its present recycling center is located. If this possibility exists, however remotely, the additional adverse impacts of a possible move must be considered. Alternatively, such a move must be completely ruled out and documented.

4. At the County Planning Commission hearing on September 3, it was indicated that public comments should be submitted in writing before September 24th, or made in person at the September 3 or September 4th public sessions to introduce and discuss the Draft EIR. However, public comments were significantly curtailed by the Planning Commission at the meeting on September 4th, denying many attendees their right to express concerns relating to the Draft EIR.

SUBSTANTIVE OBJECTIONS

1. The Alternative Site Screening Matrix, a part of the Draft EIR, is both incorrect and misleading in the ways it describes the Alternative C Site Surrounding Land Use, Existing Use, Known Regulatory or Environmental Constraints, Ability to Achieve Project Objectives, Feasibility and Potential to Reduce Project Impacts. These sections are either incorrect, or incomplete and contain significant omissions of relevant detail. Also, wording in the Matrix used to describe essentially the same conditions at other alternative sites are for some reason not used to describe these conditions as to Alternative Site C.

2. Statements in the Draft EIR about the absence of Environmental Justice issues at Alternative Site C are simply incorrect. No mention is made of obviously significant numbers of low-income residents in areas that would be adversely affected by the use of Alternative Site C.

3. The discussion of Adverse Visual Issues relating to the use of Alternative Site C is inadequate. There would be significant, new, adverse visual impacts from many residential and commercial locations surrounding Alternative Site C.

4. The adverse fire related issues applicable to Alternative Site C are not adequately discussed.

5. Issues relating to adverse impacts in areas surrounding Alternative Site C, from Odors, Noise, Health risks, Air Quality decline, Pathogens, Water Quality decline, Public Nuisances, and Construction Period effects are either stated incorrectly, or
inadequately addressed, in the Draft EIR.

6. No adequate analysis is made of the increased costs and inefficiencies that ensue from running multiple locations as described in the Alternative Site C section of the Draft EIR. Clearly, costs would be greater, and oversight more complex and prone to errors. These issues are not adequately covered.

7. Since the South Coast Recycling and Transfer Center would be operative daily for only half the hours that the Tajiguas site would be operative, it is reasonable to assume that there will be a backlog of garbage overnight, left waiting to be sorted when the Alternative C site reopens. There is no discussion of the adverse impacts additionally created by the almost certain waste backlog that will exist at Alternative Site C. This issue does not exist at the Tajiguas site.

8. Since the Tajiguas Project Site is already owned by the County, there would be no reduced costs incurred in using County owners Alternative Site C. Further, there is no adequately detailed analysis of the costs associated with the reopening of the Alternative Site C closed landfill and remediating these unique Site C issues that are not applicable to the Tajiguas Project site.

9. As to the Alternative C Site, no mention is made of adverse impacts to red-legged frogs and other flora and fauna, in the areas affected by the adverse impacts arising from the use of Alternative Site C. Certainly, very nearby areas contain prime red-legged frog habitats and a number of creeks or waterbeds exist in these areas. Other projects in similar areas have had to address these issues. However, the Draft EIR does not.

10. Sections of the Draft EIR mention the need to consider cumulative adverse impacts from nearby existing or planned projects in the surrounding area. In the Alternative Site C section, however, there is no such discussion even though a number of new construction projects of significant size and population are approved, or planned for adversely impacted nearby areas.

The draft EIR, by an improper sleight of hand, attempts to establish a physical and moral equivalence between the Tajiguas site and Alternative “C”. It does this by improperly defining (See the Alternative Site Screening Matrix) the surrounding land use as “Public (Institutional), Foothill, Landfill (open space) and Residential (El Sueño Neighborhood).” That is an improper and far too limited a description.

To the contrary, the surrounding land that would be adversely and dangerously impacted by an use of Alternative Site “C”, is densely populated by hundreds of homes occupied by thousands of residents including large numbers of elderly and, in many cases, low income residents. In addition there are numerous schools within this impacted area, including without limitation, the Alpha School for the disabled, Little Angels Pre School, La Collina Junior High School, and Bishop Diego Garcia High School. There is a large and growing number of significant medical facilities that would also be adversely impacted, including the brand new Sansum Clinic addition and the extensive County mental health and other medical/clinical facilities. There are churches and there are prisoners. None of these constituents of the surrounding, adversely impacted areas were supplied with copies of the draft EIR, nor adequately informed about the process for
raising objections to this document.

It is impossible to conclude that this large population of the elderly, the poor, the sick, the disabled and the mentally troubled should bear the brunt of the adverse impacts the use of Alternate site C will create, such as, to name a few, increased fire risk, noise, odors, nuisances, airborne, bird born, and animal born bacterial hazards, and disease together with the spread of contaminants unsurfaced by the reopening of the previously closed landfill site. It would take a willful or misguided EIR draftsman to overlook these issues and equate the Alternative C site to the remote Tajiguas site with its complement of three residents. Alternative C is an unacceptable site for any part of the subject project for the reasons cited in this memorandum.

I believe the County can expect the following:

A) Major pushback and litigation from the surrounding community as well as from supporters of the rights of those who cannot always speak for themselves (the children, the elderly, the poor, the infirm, the disabled and the troubled) to prevent the Resource Recovery Project from going forward in any manner if Alternative “C” is selected;

B) Inverse Condemnation actions if this Project is allowed to proceed in any way at the Alternate site C;

C) A major reduction in Santa Barbara County and possibly City property tax revenues as the assessed values of large numbers of residential and commercial properties in the adversely impacted areas will need to be substantially reduced.

For the above reasons, the Tajiguas Resource Recovery Project should remain, as proposed, entirely at Tajiguas.
Letter no. 55

Commenter: Kenneth A. Cohen, 989 Camino Del Retiro, Santa Barbara

Date: September 16, 2014

Response:

55-1. As discussed in Section 5.0 of the Draft SEIR, the State CEQA Guidelines mandate that a range of alternatives must be analyzed with the focus on meeting project objectives while reducing environmental impacts. Section 15126.6(f)(2) of the State CEQA Guidelines indicates alternative sites should be considered if they would reduce significant effects of the project. Alternative C was developed to reduce waste transportation-related impacts, since the SCRTS site is much closer to developed areas where the waste is generated. The Draft SEIR acknowledged that impacts would occur at both the MRF site and the landfill under Alternative C (see Section 5.4.2.13). Alternative C would have lower NOx and greenhouse gas emissions associated with waste transportation as compared to the proposed project. However, the proposed project would have lesser impacts overall.

55-2. See the response to Comment 6 in Letter no. 2.

55-3. The Alternative B MRF site (owned by MarBorg Industries) was included in the Draft SEIR because at the time the Notice of Preparation of the Draft SEIR was issued, members of the public identified the need to evaluate alternative urban locations for the MRF component of the Resource Recovery Project and MarBorg had formally requested that their proposal to build and operate a MRF on property they own in the City of Santa Barbara be evaluated in the Draft SEIR. However, during preparation of the Draft SEIR, MarBorg Industries formed an agreement with Mustang to operate the MRF being proposed by Mustang (see Section 5.3.2.3 of the Draft SEIR) and formally withdrew their MRF proposal. However, MarBorg identified their willingness to continue to have the alternative analyzed in the SEIR. Because MarBorg has formally withdrawn their proposal and acquisition of this privately-owned property may no longer be feasible. The County-owned SCRTS site has also be identified as an alternative location for the MRF under Alternative C as it is currently part of the County’s waste management system as described in Section 5.3.3.1 of the Draft SEIR. Proposed relocation of MarBorg’s existing MRF is not a part of the proposed project or Alternative C.

55-4. The September 3rd Planning Commission meeting was not a hearing on the environmental document, but was an informational meeting to brief the Commissioners regarding the Tajiguas Resource Recovery Project and the findings of the Draft SEIR. Members of the public were allowed to provide comments to the Commissioners during the meeting, but it was identified that comments on the Draft SEIR were not being formally accepted at that meeting and would be accepted at the public hearing on the Draft SEIR being held the following day (September 4th). As per standard protocol, commenters were provided three minutes to provide verbal comments and were encouraged to provide verbal comments at the Draft SEIR hearing and/or in writing.
All attendees at the September 4 public hearing were provided the opportunity to comment on the Draft SEIR, both verbally and by completing a comment form. In addition, the public comment period on the Draft SEIR was extended following the September 4th meeting from September 24th to October 9th, 2014 which allowed for additional time to submit written comments.

55-5. The commenter disagrees with the information provided in the Alternative Site Screening Matrix (Appendix Q of the Draft SEIR), but does provide any specific information or substantial evidence demonstrating that the information in the Matrix is inaccurate or incomplete. The purpose of the Matrix was to identify potential alternative sites for the project components, and through an initial screening process, determine which sites were infeasible or would not meet project objectives and would therefore not be carried forward for detailed review in the Draft SEIR. Based on the screening analysis, the SCRTS site was studied in detail in the SEIR. As discussed in Section 5.3.3.3 of the Draft SEIR, Alternative C is considered feasible and could attain all the basic project objectives.

55-6. The environmental justice analysis for Alternative C used 2010 census tract data to identify minority and low income populations near the MRF site (see Table 5-35). Based on these data, the local population that may be affected by MRF-related impacts does not have substantially higher percentages of Hispanics, minorities or persons living below the poverty level.

55-7. See the response to Comment 7 in Letter no. 2.

55-8. Impact ALT C HAZ-3 of the Draft SEIR identifies fire hazard impacts associated with Alternative C and recognizes that very high fire hazard areas occur north of the Alternative C MRF site. The commenter disagrees with the conclusions of the Draft SEIR regarding the significance of the project impacts on fire hazards, but offers no substantial evidence to support the assertion. The comment will be forwarded to the decision-makers for their consideration.

55-9. The commenter disagrees with the conclusions of the Draft SEIR regarding the significance of the project impacts on odors, noise, health risks, air quality, hazards, water quality, public nuisances, and construction-related impacts, but offers no substantial evidence to support the assertion. The comment will be forwarded to the decision-makers for their consideration.

55-10. The purpose of the Draft SEIR is to identify environmental impacts of the proposed project and alternatives, and does not consider project economics unless the costs make an alternative infeasible or lead to other environmental consequences. However, relative costs may be considered by the Board when deciding to approve the proposed project or an alternative.
55-11. Under Alternative C, the MRF would accept solid waste from 7 a.m. to 5 p.m., and process waste from 7 a.m. to 11:30 p.m. Trucking of organic waste and residual waste to the landfill would occur from 7 a.m. to 4 p.m. Therefore, organics and residual solid waste processed after 4 p.m. would remain within the MRF building until trucked out the next morning. However, large stockpiles would not be produced, and all storage would be within the MRF building equipped with dust and odor controls.

55-12. See the response to Comment 10 regarding costs. Note that the closed Foothill Landfill would not be re-opened and residual waste produced by the MRF would be trucked to the Tajiguas Landfill.

55-13. Biological impacts at the SCRTS site associated with Alternative C are fully addressed in the Draft SEIR (see pages 5-185 to 5-188). Note that the nearest known population of California red-legged frog is 6 miles to the west of the SCRTS site and would not be affected by operation of a MRF under this Alternative.

55-14. A cumulative impact analysis is provided under each issue area for Alternative C, based on the cumulative project list provided in Appendix S of the Draft SEIR.

55-15. Land uses surrounding the SCRTS site are accurately described on pages 5-203 and 5-204 of the Draft SEIR.

55-16. Land uses surrounding the SCRTS were considered in the Draft SEIR when analyzing environmental impacts, including the selection of odor receptors, health risk exposure, and noise-sensitive land uses. See the response to Comment 6 regarding low income residents. See the response to Comment 6 in Letter no. 2 regarding noticing. The comments do not address the adequacy of the Draft SEIR, but identifies what the commenter believes will be the reaction of the community if Alternative C is selected. These comments and the commenter’s support for implementation of the project at the Tajiguas Landfill will be forwarded to the decision-makers for their consideration.
Original Message-----
From: Gage Ricard [mailto:sbgage@verizon.net]
Sent: Wednesday, October 08, 2014 5:58 PM
To: Leipner, Joddi
Cc: Wolf, Janet
Subject: Opposition to Alternative C of "Proposed Tajiguas Resource Recovery Project"

Dear Ms. Leipner,

As long-term home owners in the Oak Grove condominium complex, we are deeply concerned about the possible expansion of use of the neighboring Transfer Station (aka, South Coast Recycling & Transfer Station or SCRTS), as suggested in Alternative C of the "Draft Subsequent EIR for the Proposed Tajiguas Resource Recovery Project."

Our key concerns are in the areas of ODOR, REDUCED AIR QUALITY (e.g., emissions of toxic air contaminants and dust), NOISE (essentially 24/7 year-round), WATER CONTAMINATION RISK, INCREASED FIRE RISK, and, consequently, REDUCED HOME VALUES. Mitigation measures for these and other known MRF (Materials Recovery Facility) risks may be inadequate, poorly implemented, and/or fail, which would adversely impact our health, safety and quality of life in our most treasured place---our home.

Additionally, it is frustrating to hear and read the Public Works Department boast of "comprehensive and transparent outreach efforts...[with]over 100 presentations in the last 6 years to area stakeholders."

Clearly, we are "area stakeholders" since we live next door to the Alternative C site (the Transfer Station), yet we were not made aware of this project's close proximity to our home until quite recently (late summer 2014). And the title of the proposed project ("Tajiguas Resource Recovery Project") advertised in a newspaper is not one that would get our attention or the attention of similar homeowners 23 miles away from Tajiguas. Instead, it is a title that would get the attention of Tajiguas-area stakeholders. So, as you heard at the September 4 public meeting, all of the "area stakeholders" near the Transfer Station were rather shocked to hear that this proposal includes the Transfer Station; and not as a distant contender, either. Even though the Transfer Station is listed as "Alternative C," it does not come in third place. Alternatives A ("no project alternative") and B ("MarBorg") aren't viable. It felt a bit like bait and switch.

This is a diverse, densely populated area that surrounds the Transfer Station (SCRTS). Transfer Station neighbors include not only many private homes, condos and the county's largest affordable housing complex, but also medical facilities, an in-patient psychiatric hospital, a school for children with developmental disabilities, a home for developmentally disabled children and adults, various county services, the county jail, and more. These are all in the immediate vicinity of SCRTS.

For all of the many reasons listed above and more, we feel it is not reasonable to increase the use of the Transfer Station site for more waste processing activities, including the building of a six-story facility. We strongly oppose Alternative C of the "Proposed Tajiguas Resource Recovery Project."

Sincerely,

Gage Ricard and George Azelickis
4555-E Oak Glen Drive, Santa Barbara, CA
Letter no. 56

Commeniter: Gage Ricard and George Azelickis, 4555-E Oak Glen Drive, Santa Barbara

Date: October 8, 2014

Response:

56-1. This comment does not address the adequacy of the Draft SEIR, but expresses concerns about odors, air quality, noise, water contamination, fire hazard and reduced home values in the commenter's neighborhood. Each of these environmental issues were fully addressed in the Draft SEIR for the MRF at the SCRTS site, see Impacts ALT C AQ-1 through AQ-6, N-1 through N-3, WR-1 through WR-4 and HAZ-3. Each of these impacts were found to be less than significant, except potential impacts to surface water quality caused by storm water run-off from the MRF site. Mitigation measures were provided to minimize storm water contamination through project design features, best management practices and planning. The comment will be forwarded to the decision-makers for their consideration.

56-2. There have been over one hundred presentations on this project since its initiation to a broad base of stakeholders that include: Environmental and Advocacy Organizations, Business Groups, City Councils and Board of Supervisors, Professional Organizations, Neighborhood Associations, Regulatory Agencies and Public Official Forums. The proposed project includes all project components at the Tajiguas Landfill; however, during the Draft SEIR scoping period, members of the public identified the need to analyze potential urban locations for the MRF such as the SCRTS site and property owned by MarBorg in the City of Santa Barbara. As a courtesy to concerned citizens, the County provided mailed notice of the public hearing and availability of the Draft SEIR to all properties within 1,000 feet of outer boundary of the parcel that the SCRTS is located on and published a display ad regarding the availability of the Draft SEIR and notice of the public hearing in the Santa Barbara News Press and the Santa Maria Times. The display ad identified all of the alternatives that were being studied in the Draft SEIR. Internal SCRTS neighborhood communication regarding the project was also apparently substantial and effective in providing broader notification regarding the proposed project and Alternative C as evidenced from the large turnout at the September 4th public hearing and the large number of comment letters received from neighbors in the vicinity of Alternative C. As identified in the Draft SEIR, the proposed project would have lesser impacts overall, as compared to Alternative C.

56-3. Land uses surrounding the SCRTS were considered in the Draft SEIR when analyzing environmental impacts, including the selection of odor receptors, health risk exposure, and noise-sensitive land uses.

The commenter's opposition to the selection of Alternative C will be forwarded to the decision-makers for their consideration.
we live at 740 and 750 alto drive SB ,CA 93110

we are writing to oppose the location of a massive trash receiving and sorting center

("Transfer Station") in close proximity to our neighborhood. This facility, if approved, would douse heavy truck traffic 6 days a week, also cause high levels of pollution and noise, both during construction and during operation. It makes no sense to place this trash center in the middle of a mature and developed neighborhood. Please register our strong objection to this proposed project.

sincerely:

Jinous, Mo, Miry, Steve Amjadi
Letter no. 57

Commenter: Amjadi family, 740 & 750 Alto Drive, Santa Barbara

Date: October 8, 2014

Response:

57-1. This comment letter does not address the adequacy of the Draft SEIR, but expresses concerns regarding traffic, pollution, and noise associated with construction and operation of a MRF at the SCRTS under Alternative C and the commenter’s opposition to selection of Alternative C. Each of these environmental issues were fully addressed in the Draft SEIR for the MRF at the SCRTS site, see Section 5.3.3.4. Each of these impacts were found to be less than significant, except potential impacts to surface water quality caused by storm water run-off from the MRF site. Mitigation measures were provided to minimize storm water contamination through project design features, best management practices and planning. The comment will be forwarded to the decision-makers for their consideration.
October 8, 2014

Jodi Leipner, Senior Engineering Environmental Planner
County of Santa Barbara Public Works Department
130 E. Victoria Street, Suite 100
Santa Barbara, CA 93101

Re: Resource Recovery Project Draft SEIR Comments

Dear Ms. Leipner:

The City of Santa Barbara partners with the County of Santa Barbara and other local agencies on regional waste management issues, including the proposed Resource Recovery project. The City would be a Responsible Agency for environmental review of the proposed Resource Recovery Project under California Environmental Quality Act (CEQA) provisions. The City would need to use the Final SEIR for the project in making CEQA findings for approval of a waste management agreement with the County in conjunction with the project. In addition, in the event that the Alternative B site within City jurisdiction is selected for the project, the FSEIR would need to be used by the City for City permitting of the project.

City staff has reviewed the County’s Draft SEIR for the proposed Resource Recovery project, with particular focus on the analysis of the Alternative B site located within the City. The City Planning Commission also held a public hearing on the DSEIR on September 4, 2014. At that hearing, City Planning Commission members voiced serious concerns about the Alternative B Marxborg site compared to the less-impacting Tajiguas and SCRTS sites, given the numerous significant and unmitigated environmental impacts identified for the Alternative B site. Some Commissioners stated that Alternative B should be eliminated from consideration, since it results in more significant adverse effects than then proposed project at Tajiguas and the SCRTS MRF alternative.

The City of Santa Barbara offers the following comments on the Draft SEIR:

Meeting Project Objectives

As part of the comparative analysis of alternatives, the discussion should note that the Alternative B site is located closer to recyclable markets in Los Angeles and Long Beach than the Tajiguas and SCRTS sites, and additional analysis should be done to determine if this location could result in lower overall transportation and air quality effects associated with that component of the project.

Feasibility of Alternatives

The Environmental Impact Report feasibility analysis should focus on physical and technical feasibility of the project and alternatives and discuss factors that may potentially affect economic, social, and legal feasibility (including the coordinate of multiple owners/operators), while leaving definitive conclusion statements about such feasibility or infeasibility to decision-makers.

Air Quality

For the Alternative B analyses of potential impacts associated with Nitrogen Oxide (NO₂) emissions (Impact AQ-3) and health risk effects from diesel particulates (Impact AQ-5),
the analyses should be revised to assume that the identified mitigation measure of air emissions stack design represents standard feasible technology and would be required under air quality permit regulations. These revised assumptions would be consistent with the assumptions made in the EIR analysis of odor impacts and may feasibly reduce these impacts to less than significant levels (Class II). The related analyses of cumulative air quality impacts and environmental justice should be reexamined with any changes to the air quality impact conclusions.

Odor

MM AQ-2 for Alternative B identifies measures to reduce potentially significant odor-related impacts to a less than significant level (Class II), however no EIR analysis is provided to support that conclusion. Please model the results of the mitigation and evaluate whether the mitigation reduces the impact level to less than significant. Please also describe the effects of open bay doors and trucks entering and exiting the building on odor containment.

Noise

The Alternative B analysis of project operational noise impacts to surrounding land uses (Impact N-2) identifies average daily noise increases to the surrounding area. Please add to the discussion a description and estimates of the quantities of real time noise levels of the various associated types of intermittent noise effects, such as truck engine noise, periodic back-up beeping, idling, door slams, braking, etc., and address how the identified barrier wall mitigation measure would reduce these effects during the time of the impacts.

Land Use Compatibility

The Alternative B project description indicates that commodity trucks would be operated by contractors and would park elsewhere. As part of the land use compatibility analysis, please address the effect of this to on-street parking in the area.

Transportation/ Circulation

The reader cannot easily understand the comparative traffic impacts identified for the project vs. site alternatives. Please explain the differing traffic baseline conditions and trip generation assumptions used for the traffic impact analysis of the Tajiguas, SCRTS, and MarBorg property sites.

Public Health/ Nuisance

Please clarify regulatory provisions addressing vector control and any established criteria for content of vector management plans.

Class III Impacts

The EIR analysis and project would be improved with the inclusion of recommended mitigation measures consistent with County and City policies that would reduce identified adverse, but already less than significant impacts.
Thank you for the opportunity to comment on the environmental analysis for this important project. If you have questions regarding the comments, please contact me or Dan Gullett of this office at d.gullett@santabarbaraca.gov or (805) 564-5470.

Sincerely,

Bettie Weiss, City Planner
CALL TO ORDER:
Chair Schwartz called the meeting to order at 1:02 P.M.

I. ROLL CALL
Chair Deborah L. Schwartz, Vice Chair Addison Thompson, Commissioners Bruce Bartlett, John P. Campanella, Mike Jordan, Sheila Lodge, and June Pujo.

STAFF PRESENT:
Renee Brooke, Senior Planner
N. Scott Vincent, Assistant City Attorney
Matt Fore, Environmental Services Manager
Steve Foley, Supervising Transportation Planner
Dan Gullett, Project Planner
Kathleen Kennedy, Associate Planner
Barbara Shelton, Project Planner/Environmental Analyst
Julie Rodriguez, Planning Commission Secretary

II. PRELIMINARY MATTERS:
A. Action on the review of the following Draft Minutes and Resolutions:
   1. Draft Minutes of August 14, 2014
   2. Reso No. 020-14
      1605 Cecil Cook Place
   3. Reso No. 021-14
      Recommendation to City Council – Average Unit-Size Density Incentive Program
   4. Reso No. 022-14
      3626 San Remo Drive

MOTION: Lodge/Bartlett
Approve the minutes and resolutions as corrected.
This motion carried by the following vote:
Ayes: 6  Noes: 0  Abstain: 1 (Campanella)  Absent: 0
5. Draft Minutes of August 21, 2014

Commissioners Jordan and Bartlett sought clarification on a revised motion for Item IV.

6. Reso No. 023-14
2201 Edgewater Way

**MOTION: Lodge/Campanella**

Approve the minutes and resolutions as corrected.

This motion carried by the following vote:

Ayes: 7  Noes: 0  Abstain: 0  Absent: 0

**B. Requests for continuances, withdrawals, postponements, or addition of ex-agenda items.**

None.

**C. Announcements and appeals.**

Ms. Brooke made the following announcements:

1. The semi-annual Joint City Council/Planning Commission meeting will be held next Thursday, September 11, 2014, at 9 A.M. in the David Gebhard Public Meeting Room at 630 Garden Street.

2. The regularly scheduled Planning Commission meeting of Thursday, September 11, 2014, has been cancelled.

**D. Comments from members of the public pertaining to items not on this agenda.**

Chair Schwartz opened the public hearing at 1:24 P.M. and, with no one wishing to speak, closed the hearing.

**III. ENVIRONMENTAL HEARING:**

**ACTUAL TIME: 1:24 P.M.**

**RESOURCE RECOVERY PROJECT**

The proposed Resource Recovery Project includes the construction and operation of a materials recovery facility and an anaerobic digester at the Tajiguas Landfill. One of the project alternatives contemplates siting the materials recovery facility component on property located at the east corner of Quinientos Street and Calle Cesar Chavez within the City of Santa Barbara. The purpose of the Environmental Hearing is to receive comments from the Planning Commission on the adequacy and completeness of the Draft Subsequent Environmental Impact Report (SEIR) prepared by the County of Santa Barbara for the Tajiguas Resource Recovery Project. Written comments on the Draft SEIR, incorporating those made by the Planning Commission, will be prepared by City staff and submitted to the
County prior to the close of the comment period at 5:00 p.m. on Wednesday, September 24, 2014. No action on the Draft SEIR or project will be taken at this hearing.

The Draft SEIR is available for review at the Santa Barbara County Resource Recovery & Waste Management Division office, 130 E. Victoria Street, Santa Barbara, CA 93101, and at: http://resourcerecoveryproject.com/pages/downloads.php/environmental-documents.php

The County of Santa Barbara will accept written and oral comments on the Draft SEIR until the close of the comment period. The County will also hold a public hearing and take public testimony on the Draft SEIR at 5:00 p.m. on September 4, 2014 at the Santa Barbara County Public Health Department Auditorium, 300 N. San Antonio Road, Santa Barbara. Members of the public are encouraged to provide comments at the County’s public hearing or directly to the project environmental planner, Joddi Leipner, at 130 E. Victoria Street, Santa Barbara, CA 93101, Phone 805-882-3614, Fax 805-882-3601.

City Contact: Dan Gullett, Project Planner
Matt Fore, Environmental Services Manager
Email: DGullett@SantaBarbaraCA.gov
MFore@SantaBarbaraCA.gov
Phone: (805) 564-5470, ext. 4550
Phone: (805) 564-5470, ext. 5678

Dan Gullett, Project Planner gave the Staff presentation. Matt Fore, Environmental Services Manager, and Barbara Shelton, Environmental Analyst, were available to answer any of the Commission’s questions.

Representative from Santa Barbara County Resource Recovery and Waste Management Division, Mark Schleich, Division Deputy Director, and Leslie Wells, Collections & Materials Manager, were also available to answer any of the Commission’s questions.

Chair Schwartz opened the public hearing at 1:59 P.M. and, with no one wishing to speak, the public hearing was closed.

The Commissioners made the following comments:

1. Commissioner Schwartz referenced page 5-21 of the EIR and asked City Staff to look closely at the number of traffic trips and their potential impacts.

2. Commissioner Schwartz referenced page 5-26, Neighborhood Parking, and asked that an impact analysis of Alternative B be completed.

3. Commissioner Schwartz referenced page 5-28, Odors and Dust, and requested to see details on containment and leakage of odors to exterior of the building.

4. Commissioner Schwartz noted page 5-49 and wants consideration of coordination of multi-owners and operators.

5. Commissioner Jordan asked that consideration be given to the possible use of City land for the MRF and potential collaboration between the City and a private operator.
PC6. 6. Commissioner Jordan requested that if Alternative B moves forward, with its many significant impacts, a Planning Commission concept review be held to address issues earlier rather than later.

PC7. 7. Commissioner Bartlett sees that Alternative B is in an environmentally inferior site with many Class I impacts, compared to Alternative C. Alternative B is also a gateway site to Santa Barbara and viewable from the freeway. He hoped that Alternative C would take precedence over Alternative B.

PC8. 8. Commissioner Pujo expressed concern about the City’s responsibility for further environmental review, and any related costs, if the City does make comments and they are not incorporated into the final document, especially if a Coastal Development Permit (CDP) was requested for Alternative B.

PC9. 9. Commissioner Pujo asked Staff to review Class 3 impacts. Would prefer to see recommended mitigation measures included.

PC10. 10. Commissioner Lodge agreed with Commissioner Bartlett and Pujo’s comments and does not think that Alternative B should be pursued further. Wants staff to make additional efforts to reduce inflow of trash.

PC11. 11. Commissioner Thompson said that Alternative B should be eliminated and that the EIR should conclude that it was studied and eliminated.

PC12. 12. Commissioner Schwartz said that if Alternative B were to come back to the Commission for a CDP, she could not support it with the four identified Class I impacts and 11 identified Class II impacts without sufficient mitigation. Does not see any value in continuing to have it listed as one of seven alternatives. If it does return, Staff will have a significant task to mitigate the impacts identified today.

PC13. 13. Commissioner Campanella said that even though Alternative C does not have all the environmental concerns as Alternative B and is the environmentally superior alternative, it is still not better than the proposed project. Agrees with peers that Alternative B is not needed.

PC14. 14. Commissioner Campanella was not pleased to see the amount of construction waste that ends up in the landfill. Hopes that the new facility can separate the materials before they go into the landfill.

PC15. 15. Commissioner Schwartz stated that based on the staff report, Alternative C is the environmentally superior alternative of the seven alternatives studied and presented, and that unless there is overriding value for the City to Consider Alternative B, then she does not see how Alternative B could be contemplated further.

Commissioner Schwartz called for a recess at 2:51 P.M. and reconvened the hearing at 3:11 P.M.

IV. DISCUSSION ITEM

ACTUAL TIME: 3:12 P.M.

RECUSALS: As Board Members of the Riviera Association, to avoid any actual or perceived conflict of interest, Commissioners Lodge and Thompson recused themselves from hearing this item. Both Commissioners did not return to the dais after the recess.
APPLICATION OF TRISH ALLEN, SUZANNE ELLEDGE PLANNING & PERMITTING SERVICES, AGENT FOR BELMOND EL ENCANTO, ORIENT EXPRESS HOTELS, 800 ALVARADO PLACE, APN 019-170-022, R-2/4.0/R-H; TWO FAMILY RESIDENTIAL/ 4 UNITS PER ACRE/ RESORT-RESIDENTIAL HOTEL ZONES, GENERAL PLAN DESIGNATION: LOW DENSITY RESIDENTIAL (MAX 3 DU/ACRE) (MST2007-00140)

The Belmond El Encanto Hotel received approval from the Planning Commission for a Master Plan in 2004 and a Revised Master Plan in 2009. Condition of Approval A.7, of Planning Commission Resolution No. 057-04, states that employees must park onsite. The current proposal is a Substantial Conformance Determination request to allow hotel employees to park at an approved off-site parking lot rather than onsite. The purpose of the hearing is to receive input from the Planning Commission and the public regarding the request. Staff will make the final determination as to whether or not the proposal is in substantial conformance with the approved project; therefore, no action on the part of the Planning Commission is required.

Case Planner: Kathleen Kennedy, Associate Planner
Email: KKeneddy@SantaBarbaraCA.gov  Phone: (805) 564-5470, ext. 4560

Kathleen Kennedy, Associate Planner, gave the Staff presentation.

Trish Allen, Suzanne Elledge Planning & Permitting Services, introduced Elizabeth Fajardo, Director of Human Resources, Belmond El Encanto, who gave the Applicant presentation.

Chair Schwartz opened the public hearing at 4:07 P.M.

The following people expressed concerns about hotel employees parking in the neighborhood:

1. Beverly Johnson Trial
2. Lynda Courtney
3. Matt Hall
4. Trevor Martinson
5. Greg Parker
6. Lalla Brutoco
7. Nan Bedford
8. John Bedford
9. Sheri Parker
10. Shelly Bookspan, Riviera Association President
11. Susan Cappiello, provided a letter expressing concerns about the employee parking problem.

Louise Komp, whose Mira Vista St. property shares an easement with the hotel, wants assurance that access to the three land-locked homes will remain.
With no one else wishing to speak, the public hearing was closed at 4:32 P.M.

Commissioner Schwartz called for a recess at 6:15 P.M. and reconvened the meeting at 6:24 P.M.

The Commission collectively suggested that, prior to a decision by staff on the requested Substantial Conformance Determination, the Applicant return to the Planning Commission within 90 days with a complete and comprehensive employee parking management plan, and provided the following suggestions:

1. The patrolling area should include Alameda Padre Serra to the west of Orpet Park.
2. The hotel should participate in surveys by SBCAG Traffic Solutions on an on-going basis.
3. The hotel management should look into hand-held technology for monitoring employee vehicles.
4. The 30-day notice to City upon termination of the off-site parking lot agreement is insufficient.
5. Local hotel management should involve upper management/owners in addressing the employee parking issue and solutions.
6. Include information about employees who use MTD or walk to the off-site parking lot.
7. An updated parking demand study should be prepared to understand peak parking needs.
8. Staff shall provide information on options to enforce the parking management plan and, if necessary, consequences of non-compliance.

I. ADMINISTRATIVE AGENDA

ACTUAL TIME: 7:19 P.M.

E. Committee and Liaison Reports

1. Staff Hearing Officer Liaison Report
   a. Commissioner Jordon reported on the Staff Hearing Officer meeting of September 3, 2014.

2. Other Committee and Liaison Reports
   a. Commissioner Bartlett reported on Architectural Board of Review meeting of September 2, 2014.
Planning Commission Minutes
September 4, 2014
Page 7

3. Report from the Chair
   a. Chair Schwartz restated that on September 11, 2014 at 9 A.M., there will be a Joint City Council and Planning Commission meeting at 630 Garden Street, in the David Gebhard Public Meeting Room.
   b. The Santa Barbara Museum of Natural History will hold a reception for the ‘Artist of Distinction’ exhibit on Friday, September 26, 2014 from 6 to 8 P.M.
   c. Encouraged everyone to participate in First Thursday.

II. ADJOURNMENT

Chair Schwartz adjourned the meeting at 7:21 P.M.

Submitted by,

Julie Rodriguez, Planning Commission Secretary
Letter no. 58

Commenter: City of Santa Barbara Community Development Department

Date: October 8, 2014

Response:

58-1. Meeting Project Objectives. Section 5.1.1 and Appendix Q of the Draft SEIR notes that urban locations (such as the Alternative B MRF site) were considered due to their potential to reduce waste transportation impacts. The air quality analysis conducted for the Draft EIR (see Appendix C) included a comprehensive investigation of the changes in the number and length of truck trips and emissions associated with Alternatives B and C, as compared to the proposed project. Tables 5-2 and 5-20 indicate Alternative C would have lower off-site vehicle emissions than Alternative B. Table 4.2-7 indicates off-site vehicle NOx emissions associated with the proposed project would be greater than either Alternative B or C, but less than the significance threshold.

58-2. Feasibility of Alternatives. Section 15126.6 of the State CEQA Guidelines requires a range of feasible alternatives to be identified and analyzed in an EIR. Therefore, the feasibility of alternatives must be discussed in the EIR, and allows for an informed decision by the Board of Supervisors. Each of the alternatives included in the detailed analysis presented in Section 5.0 for the Draft Subsequent EIR are considered technically feasible. Other economic, legal or social issues that may affect the overall feasibility are also discussed and a preliminary determination of feasibility is provided. The decision-makers have the discretion to change the conclusions in the SEIR so long as the action is supported by substantial evidence.

58-3. Air Quality. The air dispersion modeling conducted for the impact analysis was based on the engineering design of the MRF provided by MarBorg Industries, and determined that the MRF building exhaust and source configuration would cause air pollutant standards and health risk thresholds to be exceeded. It is not possible to apply “standard feasible technology” and revise the air dispersion modeling, as it requires site-specific inputs such as building and stack dimensions, source locations, exhaust flow rate and temperature, and emissions rates combined with hourly meteorological data. As discussed on page 5-64 of the Draft SEIR, ventilation engineering and revised source locations (e.g., relocating the emergency generator further from the property boundary) would need to be input into the air dispersion modeling to determine if the proposed MRF building exhaust-related air quality impacts could be reduced to a level of less than significant. This type of analysis is often iterative, requiring multiple model runs until the optimum design and source placement can be determined.
It is beyond the scope of CEQA to conduct engineering analysis to develop mitigation for an alternative that is considered infeasible. The SEIR concluded the impact was significant based on the current absence of substantial evidence in the record that the impact could be reduced to a less than significant level. Until such analysis is completed, it is unknown if mitigation could reduce ambient concentrations such that air pollutant standards and health risk thresholds would not be exceeded. Therefore, these impacts are considered to be significant and unavoidable. See the response to Comment 4 regarding odor mitigation.

58-4. Odor. As compared to criteria pollutants and health risks, no numeric significance thresholds exist for odor impacts. Based on the available literature, a guideline level of 5 OU/m³ was identified as a level which may be considered to be a nuisance. Odor modeling was completed for the project and alternatives to determine the extent and frequency of possible odor emissions and to provide a basis for comparing the alternatives. **MM ALT B AQ-2** provided in the Draft SEIR includes numerous measures to address odors, including good housekeeping measures, waste management measures (e.g., promptly managing or bypassing of unusually odorous loads), odor monitoring and response to odor complaints, upgraded odor removal systems, and treatment of odor events (deodorants or neutralizing agents). These measures are generally accepted solid waste management industry best management practices for reducing odor impacts from waste management facilities and are consistent with the South Coast AQMD’s Rule 410 which regulates odors from Transfer Stations and Material Recovery Facilities. Therefore, these control measures, in combination with the MRF building ventilation stack modifications required under **MM ALT B AQ-1**, are anticipated to reduce odor impacts to a less than significant level. It is important to note that no odor concerns have been noted by the LEA during routine inspections of the MarBorg C&D RTF (which currently consolidates and transfers MSW from areas west of Santa Barbara) and green-waste chipping facility at 119 N. Quarantina Street which are both in proximity to the proposed MRF under Alternative B.

Regarding the effects on odor containment of open bay doors and trucks entering and exiting the building, the MRF building would be maintained under negative pressure, which would minimize untreated air from leaving the building through the open doors. Trucks entering the facility building may entrain some outdoor air into the building, but trucks leaving the building would entrain minimal amounts of air (possibly including odors), if any, out of the building because of the negative pressure inside the building. The MRF building would also be equipped with fast acting doors and the doors would remain closed whenever possible. However, it may not be operationally practical to continually close and open the doors during the peak MSW delivery times (9-11 am and 3-4 pm).
58-5. **Noise.** The Alternative B noise analysis is based on the City’s noise thresholds, which are average daily time-weighted values (CNEL). Noise modeling of MRF operations used the same noise sources as the proposed project (see Table 4.7-2 of the Draft SEIR), which included MRF equipment, truck-related noise and back-up alarms. The sound transmission loss of concrete block (8”x8”x16”) is 34 dBA. Assuming loss of noise attenuation due to openings and limited length and height, it anticipated a concrete block noise wall would reduce operational noise by at least 13 dBA, which would be more than adequate to reduce modeled MRF-related noise at the residences along Nopalitos Way (73 dBA CNEL) to ambient conditions (~70 dBA CNEL, see Figure 5-14).

58-6. **Land Use Compatibility.** When not loading at the MRF site, the trucking company servicing the Alternative B MRF would park their trucks at their own facilities. They would not park their trucks on the streets surrounding the MRF. Proposed employee parking at the MRF is in compliance with the City’s parking requirements.

58-7. **Transportation/Circulation.** Trip generation was developed for the proposed project and Alternative C based on existing scale house data at the landfill and SCRTS, and expected volumes of materials (MSW, separated organic waste, recyclables, residual waste). Trip generation for Alternative B was based on data provided by MarBorg. The number of trips coming to the MarBorg MRF under Alternative B is greater than the number expected to come directly to SCRTS because MarBorg uses smaller collection vehicles in the Montecito area and then consolidates these smaller loads into larger vehicles which then deliver to the Tajiguas Landfill. In addition, based on the technology proposed to be used at the Alternative B MRF, a larger workforce was expected which resulted in more employee trips. For the SCRTS alternative, the existing waste consolidation is already reflected in the Tajiguas Landfill scale house data. In addition, CSSR which is currently consolidated at SCRTS is not included in the trip generation rates for Alternative C, but would be new trips for the proposed project and Alternative B.

Trip generation rates are presented in Table 4.9-10 (proposed project), Table 5-12 (Alternative B) and Table 5-30 (Alternative C). The proposed project would have lower trip generation because trips bringing solid waste to the landfill are already occurring. The baseline for existing solid waste facilities (landfill and SCRTS) used a 2008 baseline because scale house data indicates these volumes are representative of conditions expected when the project would be operating (end of the economic down-turn represented by low truck volumes in 2012). Additional discussion regarding the traffic baseline is provided in Section 4.9.1.5 in the Draft SEIR. Since the Alternative B MRF would be a new waste processing facility, all trips to this facility would be new although some may be redirected from the existing MarBorg RTF.

58-8. **Public Health/Nuisance.** Section 4.11.2.1 of the Draft SEIR provides regulatory requirements regarding nuisance, including vectors. The vector management plan to be prepared for Alternative B (if implemented) is expected to be similar to that described for Alternative C on page 5-141 of the Draft SEIR.
58-9. **Class III Impacts.** Consistent with Section 15126.4(a)(3) of the State CEQA Guidelines, mitigation measures were not provided for effects which are not found to be significant, but if Alternative B moves forward, the City may consider including additional measures to address Class III impacts as a part of its land use permit process and to ensure consistency with the City’s General Plan.

**September 4, 2014 Planning Commission Meeting Minutes**

**Commissioners Comments**

PC1. Trip generation and traffic impacts associated with Alternative B were thoroughly analyzed on pages 5-109 to 5-117 of the Draft SEIR.

PC2. See the response to Comment 6 above.

PC3. Odors and other air quality impacts were thoroughly analyzed on pages 5-62 to 5-75 of the Draft SEIR. See also the response to Comment 4 above regarding odors.

PC4. This comment does not address the adequacy of the Draft SEIR; therefore, no response is required.

PC5. Pursuant to CEQA Guidelines Section 15126.6(f), the SEIR considered a reasonable range of alternatives.

PC6. This comment does not address the adequacy of the Draft SEIR; therefore, no response is required.

PC7. This comment does not address the adequacy of the Draft SEIR; therefore, no response is required. The commenter’s concerns regarding Alternative B will be forwarded to the decision-makers for their consideration.

PC8. This comment does not address the adequacy of the Draft SEIR; therefore, no response is required.

PC9. Please refer to response to comment 9 above.

PC10. This comment does not address the adequacy of the Draft SEIR; therefore, no response is required. See the response to Comment PC7. The commenter’s concerns regarding Alternative B will be forwarded to the decision-makers for their consideration.

PC11. The Draft SEIR concludes that Alternative B is not considered feasible at this time; however, the purpose of the SEIR is to disclose relative impacts of the alternatives and not eliminate alternatives under consideration by the Board of Supervisors.

PC12. This comment does not address the adequacy of the Draft SEIR; therefore, no response is required. The commenter’s concerns regarding Alternative B will be forwarded to the decision-makers for their consideration.

PC13. This comment is correct, the proposed project would have lesser impacts overall as compared to Alternative C.

PC14. This comment does not address the adequacy of the Draft SEIR; therefore, no response is required.
PC15. This comment does not address the adequacy of the Draft SEIR; therefore, no response is required. The commenter’s concerns regarding Alternative B will be forwarded to the decision-makers for their consideration.
October 8, 2014

Joddi Leipner  
County of Santa Barbara Public Works Department  
Resources Recovery and Waste Management Division  
130 E. Victoria Street, Suite 100  
Santa Barbara, CA 93101

Dear Ms. Leipner

Subject:  Tajiguas Landfill Resource Recovery Project (#42-AA-0015)  
Draft Subsequent Environmental Impact Report 12EIR-00000-00002

This office is in receipt of the subject DSEIR filed in compliance with the California Environmental Quality Act (CEQA). The Tajiguas Landfill Resource Recovery Project (Project) will involve the construction and operation of a Materials Recovery Facility (MRF), a Dry Fermentation Anaerobic Digestion (AD) Facility, and a cogeneration Energy Facility. The project objectives are to further recover recyclable material from the waste stream and to provide an alternative to burying organic waste.

The existing solid waste facility permit (Permit) allows up to 1500 tons of waste disposal and 184 vehicles per day, plus 50 vehicles daily for employees and visitors, and has a design capacity of 23,300,000 cubic yards. The maximum elevation is 620 feet, with an estimated closure in the year 2023. The disposal area encompasses 118 acres, and the facility boundary is permitted for 357 acres. The Resource Recovery Project will not require modification of any of these Permit limits. The life of the landfill will be extended to approximately 2036.

The Project will involve placement of a MRF, AD and Energy facility complex just west of the landfill footprint after enlarging the operations deck. The complex will comprise of approximately six acres. Curing areas for the AD product totaling four to six acres will be located within the landfill footprint as indicated on Figure 3-4. The MRF would comprise a 60,000 to 70,000 square foot (sf) area to allow sorting of municipal solid waste into three streams, recyclables for resale, residue for landfill disposal and organics that would be recovered for processing in the AD Facility.
Joddi Leipner  
October 8, 2014  
Page 2 of 3

An optional project element involves a facility to sort curbside commingled source-separated recyclables (CSSR). The 66,000 sf AD Facility would convert all the recovered organics and possibly source-separated organics into two products: biogas and digestate. The biogas, primarily methane, would be used to power two 1,537 horsepower engines to generate 1+ net megawatt of power. The digestate would then be cured into compost and/or soil amendments. The digestate would require an additional four to six acres of space for curing that would occur within the landfill disposal footprint. The compost product would be marketed for agricultural or landscape use or used for reclamation projects.

As a responsible agency under CEQA, Environmental Health Services (EHS) as the Local Enforcement Agency (LEA) under the California Department of Resources Recycling and Recovery (CalRecycle) submits comments on the DSEIR. These comments are intended to assist the lead agency in preparing a Final SEIR that will be adequate for purposes of issuing a revised solid waste facilities permit (SWFP) for the Tajiguas Landfill. The LEA must find that the proposed permit revision is supported by and consistent with any existing CEQA analysis.

**LEA comments are submitted as follows:**

1. **Section 1.4.3, Tajiguas Landfill Permits.** The most current SWFP#42-AA-0015 was issued on February 10, 2014. This SWFP will need to be revised to allow changes described in the project description. In the event that an alternative is selected, the Tajiguas Landfill SWFP will also need to be revised to allow the changes proposed in Alternatives B, C and D.

2. **Table 2-1, MM TRRP WR-1.** An application for construction permit for the proposed new water supply well will be reviewed and approved by EHS prior to construction. The well would need to be drilled by a licensed C-57 driller. The on-site construction and subsequent well drillers report will be reviewed by EHS prior to considering the well for any potable water supply system.

3. **Table 3-5, Project Staffing Summary.** Due to the number of staff (66 to 86) anticipated to work at the facility, it will be necessary to submit an application to EHS for a Non-transient, Non-community Domestic Water System permit.

4. **Figure 3-4, Project Facilities Plan.** The plan shows provision for two sewage treatment systems. An Onsite Wastewater Treatment System (OWTS) will be necessary to accommodate the employee restrooms. Further, an application based on peak flow for construction of an OWTS will be reviewed and approved by EHS prior to construction.

5. **Section 4.1.2.4, MM TRRP VIS 1b: Landscape Screening.** The applicant may wish to consider the impact to the residential viewseshed to the southeast of the
facility and mitigate with landscape vegetation as visual screening in accordance with the California Code of Regulations (CCR) Title 14, Section 17419.1.

6. **Section 4.4.2.4, MM TRRP HAZ-2: Fire Protection and Prevention Plan.** Please submit the Fire Protection and Prevention Plan to the EHS CUPA Section for review, approval, and implementation prior to operating the project facilities.

7. **Section 5.3.2, Alternative B, MarBorg MRF.** This alternative would require an application for a new SWFP. In addition, although a detailed analysis was completed for this alternative, further CEQA analysis may be necessary to support the issuance of a SWFP at this location.

8. **Section 5.3.3, Alternative C, South Coast Recycling and Transfer Station MRF.** This alternative would require an application to revise the existing SWFP. In addition, although a detailed analysis was completed for this alternative, further CEQA analysis may be necessary to support the issuance of a SWFP at this location.

9. **General Comments.** Preliminary closure plans will need to be amended prior to issuance of a revised SWFP. Plans should include decommissioning of Project structures as part of the closure cost estimate. Please include impacts of decommissioning the proposed Project structures at the end of the landfill life and mention the closure process as part of each of the alternatives in the SEIR.

It is noted that the proposed Resource Recovery Project, including its MRF and AD components, will not increase the capacity or footprint of the existing Tajiguas Landfill, nor will it result in any Class I environmental impacts. However, as stated in Section 2.4, it will extend the life of the landfill from approximately 2026 to approximately 2036, which will extend “the duration of time over which some previously disclosed landfill impacts would occur.” A statement of Overriding Considerations was prepared for these significant and unavoidable Class I impacts as part of the 2009 Final SEIR.

If you have any questions about this letter, you may contact me at (805) 681-4942.

Sincerely,

Lisa Sloan
Senior Environmental Health Specialist

cc: Mark Schleich, Resource Recovery & Waste Management, Public Works Department
    Imelda Cragin, Resource Recovery & Waste Management, Public Works Department
    Dianne Ohiaumua, CalRecycle
    Virginia Rosales, CalRecycle
    Ryan Lodge, Regional Water Quality Control Board
    Molly Pearson, Air Pollution Control District
Letter no. 59

Commenter: Santa Barbara County Public Health Department Environmental Health Services

Date: October 8, 2014

Response:

59-1. This comment addresses future permitting requirements for the proposed project or alternatives (if selected) and not the adequacy of the Draft SEIR. The comment is acknowledged.

59-2. This comment addresses future permitting requirements for the proposed well and not the adequacy of the Draft SEIR. The comment is acknowledged.

59-3. This comment addresses future permitting requirements for the proposed domestic water system and not the adequacy of the Draft SEIR. The comment is acknowledged.

59-4. This comment addresses future permitting requirements for the proposed domestic wastewater treatment systems and not the adequacy of the Draft SEIR. The comment is acknowledged.

59-5. As discussed in Section 4.1.2.4 of the SEIR, the analysis of visual impacts is focused on public views. However, to provide full disclosure of potential impacts, private views were also considered. As shown in Figure 4.1-2 of the Draft SEIR, the residential area to the southeast (Arroyo Quemada) does not have views of the MRF/AD Facility site. Therefore, proposed landscape screening focuses on areas to the south (primarily U.S. 101).

59-6. This comment addresses future approval requirements for the proposed fire protection and prevention plan and not the adequacy of the Draft SEIR. The comment is acknowledged.

59-7. As noted in the comment, the Alternative B MRF was studied at high level of detail including project level analysis for aesthetics, air quality, traffic, cultural resources, noise, and environmental justice. The comment addresses future permitting and CEQA requirements for the Alternative B MRF and not the adequacy of the Draft SEIR. The comment is acknowledged. If the Board takes an action other than to approve the proposed project, then the project would be referred back to staff for appropriate findings and conditions and a determination would be made as to whether additional CEQA review is required.

59-8. As noted in the comment, the Alternative C MRF was studied at high level of detail including project level analysis for aesthetics, air quality, traffic, cultural resources, noise, and environmental justice. This comment addresses future permitting and CEQA requirements for the Alternative C MRF and not the adequacy of the Draft SEIR. The comment is acknowledged. If the Board takes an action other than to approve the proposed project, then the project would be referred back to staff for appropriate findings and conditions and a determination would be made as to whether additional CEQA review is required.
59-9. With regards to the amended closure plans, the comment addresses future permitting requirements for the proposed project and not the adequacy of the Draft SEIR. The comment is acknowledged. With respect to landfill closure, except for the extension of life of the landfill, which would delay final landfill closure, no change in landfill closure activities is proposed under the proposed project or Alternative A, B, C or D. Closure would proceed as described in the prior Environmental Documents prepared for the Tajiguas Landfill Project. Additional information regarding decommissioning has been added to Section 3.5.13 and the impact analyses in Section 4 of the document have been revised to include decommissioning to the extent these impacts can be determined at this time. It is too speculative to provide details describing specific decommissioning activities and potential impacts that could occur far into the future. As such, the impact assessment of decommissioning activities provided is based on the scope of these activities that can reasonably be expected at the time of the writing of this EIR. It is assumed that environmental impacts generated during future decommissioning would be similar to (but less than) the environmental impacts generated during the construction phase of the proposed project.

Specific issues related to decommissioning that are not known at this time include the future physical conditions of the area surrounding the landfill property, future air basin characteristics with regard to air quality and GHG emissions, the location of future sensitive receptors, future traffic volumes and patterns, future public service levels, and future regulations that may govern environmental resources.
Hi Jodi,
We want to oppose the alternative C
I attended the public hearing
I felt the environmental report did not address the problems accurately
All the problems and concerns listed about Tajiguas are the same as Alternative site C
However they are even more serious due to the dense population living in next to site C
Then there is the huge fire issue
I have lived in my house for 22 years in the past 4 years we have been evacuated 3 times
Then there is the traffic issue every morning and night the traffic is backed up on the 101 and 154 and with site C how many more trips with huge trucks of trash on surface streets.
Then there is the noise that will carry up the canyon
Odor is another problem
Health Hazards
Proximity to dry creeks that when it rains flow right to the ocean
Please do not put that project on site C
Thank you
Laina Mayfield Condon

Sent from my iPad

Begin forwarded message:

From: "Wolf, Janet" <jwolf@countyofsb.org>
Date: October 3, 2014 at 2:40:10 PM PDT
To: 'Laina Mayfield Condon' <lainajmc@gmail.com>
Subject: RE: Alternative C

Dear Laina
Thank you for your email. Please see the Notice of Availability for comment on this project- the public comment period has been extended to October 9, 2014. The notice contains detailed contact information for Jodi Leipner, to whom formal comments should be addressed.
Sincerely,
Supervisor Janet Wolf

From: Laina Mayfield Condon [mailto:lainajmc@gmail.com]
Sent: Wednesday, September 03, 2014 9:05 AM
To: Wolf, Janet
Subject: Fwd: Alternative C

Dear Ms. Wolf,
Please see email below I sent to the Santa Barbara Supervisors. I entered your email address incorrectly

Dear Supervisors,

I have lived and owned 4490 La Paloma Avenue the cross street is Via Chaparral. I have lived in Santa Barbara since 1973. The neighborhood is very upset to hear you are considering placing a transfer station for Garbage on Cathedral Oaks Road and Calle Real.

I do not know if you are aware of the beautiful properties in this neighborhood. We are a hidden jewel in the Santa Barbara Foothills. We are known for being Quite and serene. Please go to Zillow or Google Earth put in my address and then go to birds eye view and scroll around the neighborhood especially properties on Meadow Lark and Via Chaparral. Michael McDonald just purchased a house in the neighborhood and is in the process of adding pool and renovations. Across 154 on the east you have 4mm estates. None of these home owners and tax payers want see, hear (dump trucks day and night) or smell a GARBAGE transfer station.

It is imperative that you put it where it belongs at Tajiguas as planned

Thank You,
Laina Mayfield Condron

Sent from my iPad

Sent from my iPad

Begin forwarded message:
From: Laina Mayfield Condon <lainajmc@gmail.com>
Date: September 3, 2014 at 8:37:12 AM PDT
To: "jwolf@sbcbos.org" <jwolf@sbcbos.org>,
   "SupervisorCarabajal@sbcbos1.org" <SupervisorCarabajal@sbcbos1.org>
Cc: "dfarr@countyofsb.org" <dfarr@countyofsb.org>,
   "peter.adam@countyofsb.org" <peter.adam@countyofsb.org>,
   "steve.lavagnino@countyofsb.org" <steve.lavagnino@countyofsb.org>, Laina
   Mayfield Condon <laina.mayfield-condron@wellsfargo.com>, Mike Condon
   <michaelcondron@mac.com>
Subject: Alternative C

Dear Supervisors,

I have lived and owned 4490 La Paloma Avenue the cross street is Via Chaparral.
I have lived in Santa Barbara since 1973.
The neighborhood is very upset to hear you are considering placing a transfer
station for Garbage on Cathedral Oaks Road and Calle Real

I do not know if you are aware of the beautiful properties in this neighborhood.
We are a hidden jewel in the Santa Barbara Foothills. We are known for being
Quite and serene. Please go to Zillow or Google Earth put in my address and then
go to birds eye view and scroll around the neighborhood especially properties on
Meadow Lark and Via Chaparral. Michael McDonald just purchased a house in
the neighborhood and is in the process of adding pool and renovations. Across
154 on the east you have 4mm estates. None of these home owners and tax payers
want see, hear (dump trucks day and night) or smell a GARBAGE transfer
station.

It is imperative that you put it where it belongs at Tajiguas as planned

Thank You,
Laina Mayfield Condon

Sent from my iPad
Letter no. 60

Commenter: Laina Mayfield-Condron

Date: October 8, 2014

Response:

60-1. The commenter disagrees with the conclusions of the Draft SEIR and raises concerns regarding fire hazards, traffic, noise, odors, health hazards, and storm water quality, but offers no substantial evidence to support the assertion that impacts were not accurately disclosed. Each of these environmental issues were fully addressed in the Draft SEIR for the MRF at the SCRTS site, see Section 5.3.3.4. Each of these impacts were found to be less than significant, except potential impacts to surface water quality caused by storm water run-off from the MRF site. Mitigation measures were provided to minimize storm water contamination through project design features, best management practices and planning. The commenter also opposes selections of Alternative C. The comments will be forwarded to the decision-makers for their consideration.
Lauren Hanson and Mary Jones  
288 Sherwood Drive  
Santa Barbara, CA 93110

Ms. Joddi Leipner  
Project Environmental Planner  
130 E. Victoria Street, Suite 100  
Santa Barbara, CA 93101

Hand delivered and via e-mail: jleipner@cosbpw.net  
October 8, 2014

RE: Draft Subsequent EIR for the proposed Tajiguas Resource Recovery Project

Dear Ms. Leipner:

We commented at the Public Hearing on September 4. Today we are providing written comments, as well, regarding the Draft Subsequent EIR's discussion of "Alternative C" of the Tajiguas Resource Recovery Project. Thank you for receiving our comments in both forms and for including them in the official record of this process.

Our areas of concern in the discussion of Alternative C (the Transfer Station) include:

Traffic---We question the methodology of analysis that describes effects of a massive increase in trucking activity as less than significant. Further, the EIR does not consider the cumulative effects of the Goleta Community Plan update that introduces over 200 housing units on the MTD property on Calle Real adjacent to the County Campus and over 270 housing units on the Tatum property behind the Vons Shopping Center off Turnpike. Both of these projects will significantly increase traffic on the roadways and intersections serving the Transfer Station and the freeway on- and off-ramps proposed to be used by trash hauling trucks associated with a Materials Recovery Facility (MRF) at the Transfer Station. Additionally, Santa Barbara City College proposes an upgrade/expansion at the Wake Center on Turnpike just north of Calle Real, which, if done, will add additional congestion on the same roads, intersections and freeway ramps.

Affected communities---The EIR understates the immediate residential communities that would be affected by a MRF at the Transfer Station. It needs to address the multiple communities left out of the report by adequately describing the neighborhoods that surround the facility. These include communities on Cathedral Oaks, Turnpike, Calle Real and on the western side of Highway 154. The EIR also needs to adequately address the "environmental justice" effects on the lower income families that live within the County Campus in Oak Grove, and to the east in four mobile home parks, as well as on the infirm who dwell and/or receive services within the County Campus and on those incarcerated at the County Jail 650 feet away from the proposed MRF. The EIR also needs to acknowledge the existence of the Alpha School on the County Campus and its close proximity to the proposed MRF. A full listing of all the uses on the County Campus is necessary to show the breadth and diversity of activities within this relatively
small piece of land. A massive, highly industrialized MRF building complex is not compatible with the health and safety of everyone there. These multiple existing uses need to be added to the list in the EIR.

Noise, Odor, Air Quality, Visual Blight and other Impacts—The EIR needs to give the same level of attention to these named Impacts, and all others, as was provided in the analysis of Alternative B. The analysis needs to acknowledge the wider range of affected communities as described above, and consider the individual and cumulative impacts on them. It is our opinion that the EIR understates the myriad impacts of 24-hour-a-day operations in and around a facility that is only partially enclosed.

Fire—The EIR needs to correctly describe the history of fires at the Transfer Station and the adjacent landfill (both when that landfill was active and after it closed). The EIR currently states, for example, that the Painted Cave Fire (PCF) of 1990 "destroyed the SCRTS maintenance shop." This building, containing hazardous materials, had actually caught fire earlier in the day, unrelated to the PCF, necessitating the evacuation of the nearby neighborhoods due to the spewing of toxic fumes from the building.

The EIR downplays risks of fire from wildfires and hazardous materials sites like the closed landfill and from Transfer Station operations.

It needs to fully address the possibility of fire associated with out-gassing of the closed landfill in proximity to the MRF facility.

It needs to adequately describe the emergency outreach needed and magnitude of evacuation necessary for the communities surrounding the Transfer Station, as described above, in the event of fire at the MRF or its associated facilities.

Hazardous Waste—The EIR needs to adequately report the way "hospital waste" will be transported to the Transfer Station, stored, sorted and removed. "Hospital waste" includes but is not limited to the "trash" generated at hospitals and all other medical facilities within the service area considered in the EIR. If anything beyond "trash" is included in the materials from such hospitals and medical facilities, how that material is to be handled at the Transfer Station needs to be fully described. A full explanation of the handling of "sharps," as described in the EIR as being one of the types of items to be stored outside the building, needs to be expanded. The EIR also needs to fully describe how other hazardous waste in regular, community "trash" is to be handled at the Transfer Station.

SCRTS—The EIR needs to fully describe how the Transfer Station evolved into the South Coast Recycling and Transfer Station, or SCRTS, without any apparent community input or involvement. It is our understanding that agreements were reached by the County and community that the Transfer Station was not to be expanded or its usage.
changed from what was in effect in 1998. Subsequently, however, Marborg recycling activity became a component of Transfer Station operations, seemingly in direct conflict with Board of Supervisors policy direction. While the tonnage limits of the Transfer Station permit may not yet have been exceeded, the usage, by other than self haulers, and the type of operation have changed significantly from what was agreed to and envisioned by the community and the Board of Supervisors. That seems to be an important component to include in the EIR.

The Closed Landfill Adjacent to the Transfer Station---The EIR needs to address the remaining hazards and Landfill Gas (LFG) issues associated with this old, unlined, possibly unregulated landfill and the unique problems it would present for any construction activity or expanded operations on or adjacent to it.

In conclusion, we repeat our strong preference, as community members, that Alternative C NOT be selected as an alternative to the Project as proposed.

Sincerely yours,

Lauren Hanson and Mary Jones
Letter no. 61

Commenter: Lauren Hanson and Mary Jones, 288 Sherwood Drive, Santa Barbara

Date: October 8, 2014

Response:

61-1. The methodology used in the traffic analysis in presented on pages 5-213 and 5-214 of the Draft SEIR and the Traffic Study is included in Volume 2, Appendix K. The traffic impact analysis uses the County’s adopted traffic thresholds for determining the significance of the project impacts. The project’s contribution of new trips to the local roadway segments and to area intersections during the peak commute hours was determined to be adverse but less than significant based on comparison to the adopted thresholds. With regard to cumulative traffic impacts associated with other development projects in the area, Impact ALT C T-CUM-1 indicates that MRF-related traffic when added to traffic volumes forecast under build-out of the Goleta Valley Community Plan update would not result in traffic congestion exceeding County standards. The commenter disagrees with the conclusions regarding the significance of traffic impacts, but does not offer substantial evidence to support the assertion that traffic impacts are underestimated. This comment will be forwarded to the decision-makers for their consideration.

61-2. Pages 5-203 to 5-204 of the Draft SEIR identifies that the land uses surrounding the County-owned parcel on which the SCRTS site is located are residential, and specifically identifies the El Sueno neighborhood as being the closest residential neighborhood to the SCRTS. The Draft SEIR also includes a summary of land uses at the County campus which immediately borders the SCRTS site. Impacts to surrounding land uses (including residential areas and the County campus) were addressed in the Draft SEIR, including health risk (see Figure 5-30), odors (see Figure 5-31) and noise (see Figure 5-32). Visual impacts were assessed from various public viewing locations (see Figures 5-25 through 5-29) surrounding the SCRTS site. The commenter suggests that the Draft SEIR understates the residential communities that would be affected by the MRF under Alternative C, but does not provide substantial evidence to support the assertion. The environmental justice analysis for Alternative C used 2010 census tract data to identify minority and low income populations near the MRF site (see Table 5-35). Based on these data, the local population that may affected by MRF-related impacts does not have substantially higher percentages of Hispanics, minorities or persons living below the poverty level.
61-3. The impact analysis prepared for Alternative C provides the same level of detail as that prepared for Alternative B, and nearly the same as the proposed project. Each of the issue areas mentioned was fully addressed, including cumulative impacts. Proposed operating hours of the MRF were considered in the traffic, noise and air quality and other applicable impact analyses. Section 2.6 and Section 5.5 acknowledge that impacts would be greater under Alternative C because of the more densely populated area surrounding the Alternative C MRF site. The commenter believes that noise, odor, visual and other impacts have been understated, but does not provide substantial evidence that the impacts have been inaccurately or inadequately disclosed in the Draft SEIR. This comment will be forwarded to the decision-makers for their consideration.

61-4. See the response to Comment 1 of Letter no. 2. The discussion on page 5-189 of the Draft SEIR has been updated to reflect that two separate fires occurred on June 27, 1990. We are not aware of an evacuation order that was issued in association with this fire and no incident report was available from the County Fire Department regarding this fire. The commenter believes that EIR downplays wildfire hazards, but does not provide substantial evidence that the impacts have been inaccurately or inadequately disclosed in the Draft SEIR. This comment will be forwarded to the decision-makers for their consideration.

61-5. Under Alternative C, the MRF building would avoid buried refuse at the closed Foothill Landfill, but a portion of the parking lot would be located over buried refuse (see Figure 5-19). Construction of the parking lot would not affect the existing landfill cover and would not affect the production or emissions of landfill gas. In addition, the MRF building would be provided with a landfill gas barrier system and interior monitors to detect landfill gas accumulation within the MRF building. Therefore, no increase in landfill gas emissions or related fire hazard would occur.

61-6. The MRF at the SCRTS site is not anticipated to increase fire hazard, see Impact ALT C HAZ-3, and is not anticipated to be the cause of any wildfires requiring evacuation. An Emergency Action Plan (EAP), that addresses evacuation in the event of a fire or other emergency is currently in place at the existing SCRTS and is required for other county facilities at the County Campus. The SCRTS EAP would be modified to include operation of the MRF at site if Alternative C were selected. Construction and operation of a MRF at the SCRTS site would not substantially affect traffic circulation or access to other land uses, such that evacuation in response to a wildfire would not be significantly impaired (see Impact ALT C HAZ-4). The County Fire Department and the Santa Barbara County Office of Emergency Management would continue to be responsible for emergency planning and coordination for the area surrounding the Alternative C MRF site.
61-7. As specified in Solid Waste Facility Permit 42-AA-0015, the Tajiguas Landfill is prohibited from accepting any hazardous waste, designated waste, liquid waste, liquid sludge or septic tank pumping, burning waste or hot ash, non-hazardous waste requiring special handling, radioactive waste or medical waste (as defined in the California Health and Safety Code, Division 104, Part 14, Section 117690) except as identified in the Joint Technical Document and LEA-approved amendments thereto and as approved by other federal, state, and local agencies. The MRF either at the Tajiguas Landfill or at any of the alternative locations studied in the SEIR would operate in compliance with this prohibition. Hospital waste that does not contain medical waste would be accepted. Section 1.3.1 of the SEIR has been updated to provide information regarding medical waste management. Consistent with current operations, a tipping floor sorter would identify and isolate any hazardous materials (including medical waste) that residents or businesses inadvertently dispose of in their trash for proper disposal. With respect to sharps handling, no sharps are stored at the SCRTS. Empty, new sharps collection containers are stored, and would be stored at the SCRTS for distribution to residents.

61-8. A description of the existing SCRTS is provided in Section 5.3.3.1 of the Draft SEIR. Recycling activities (which were occurring prior to 1995) were specifically included and analyzed in the Final Negative Declaration/Initial Study (95-ND-05) prepared for the Revised Solid Waste Facility Permit. This project was approved by the Board of Supervisors on June 6, 1995 and reflected in the revised Solid Waste Facility Permit. Those activities are part of the environmental baseline. Regarding agreements related to expansion of the SCRTS, please see the response to Comment 7 in Letter no. 10. The comment will be forwarded to the decision-makers for their consideration.

61-9. Impact ALT C HAZ-5 addresses landfill gas issues associated with the closed Foothill Landfill. See the response to Comment 5.

61-10. This comment does not address the adequacy of the Draft SEIR, therefore, no response is required. The commenter’s opposition to the selection of Alternative C will be forwarded to the decision-makers for their consideration.
Dear Joddi Leipner:

No doubt you have received a considerable number of objections to the placement of the proposed MRF facility as part of the Tajiguas Resource Recovery Project at the South Coast Recycling and Transfer Station site (Alternative C). Please add Judy and me to the list of concerned neighbors. Among the many negatives, I think the potential traffic hazards and sound, odor and air quality impacts are of the most concern to us. In that regard, I find it highly inconsistent that the EIR finds that those very environmental impacts at the Marborg site in downtown Santa Barbara (Alternative B) are quite significant (Class II), but apparently they are only considered Class III impacts at the SCRTS location. I think it would be hard to make a meaningful distinction between the two sites in that regard. The Turnpike/Calle Real intersection has already become significantly congested, with increased traffic brought about by more commercial development and denser housing along Calle Real, and it has a level of foot traffic greater than most intersections like it because of San Marcos High School and the Wake Center being located in the immediate area. Increasing the number of 40 foot trailers and garbage trucks using the intersection by a factor of two to four times would have a major impact on the safety and traffic flow of that intersection that I do not believe is adequately disclosed or remediated by anything in the EIR.

I know that others have also brought the earlier conclusions of the Board of Supervisors to your attention, but it bears repeating that the Board in 1998 was very clear in its conclusions when it eliminated the expansion of the SCRTS site as a component of a Tajiguas landfill expansion project that was being considered at that time. Among other things, the Board cited: (1) its prior policy direction that the “expansion of the Transfer Station is a disfavored land use for the site”; (2) the continued community opposition to such an expansion (which is evident again today); and (3) the community and Board’s acceptance of the Five-Year Plans for the “continued limited operation” of the Transfer Station. (See attachment, page 3, paragraph 11).

The Board concluded: “. . . it is the Board of Supervisors’ determination that the expansion of the Transfer Station or its operations beyond its current size, capacity, structures, and specific equipment and operations is an infeasible alternative as it relates to the Tajiguas Landfill Expansion project . . . The Transfer Station may be included as a fixed component in any analysis of alternatives as long as the current size, capacity, structures, and specific equipment and operations are not expanded or intensified.”

Meanwhile, the Draft Subsequent EIR for the current proposed project specifically states: “The operation of the MRF at this alternative site would involve an increase in the intensity of the existing uses (by increasing the volumes of materials processed and through the inclusion of night-time operations) and increase in the amount of onsite development by replacing the existing outdoor paved area of the SCRTS site with an 88,600 sf facility with a maximum building height of 60 feet (above the tipping floor).” (SEIR, page 5-204). In other words, use of the SCRTS site as an alternative for the current project would be in direct contradiction to the spirit, intent and conclusions reached by the Board in 1998. The public in general, and the immediate neighbors in particular, should be able to rely upon conclusions like this reached by the Board on a planning decision that is this important to the safety and quality of life in our neighborhood. It was the right decision in 1998, and is the right decision today.

For the reasons stated above, we oppose any resolution to place the MRF facility at the South Coast Recycling and Transfer Station site, and we ask that you remove this as an option in your plan.

Brian and Judy Gough
4605 Sierra Madre Road
Santa Barbara, CA 93110

or

Brian G. Gough, Esq.
Howell Moore & Gough LLP
812 Presidio Avenue
Santa Barbara, CA 93101
(805) 962-0524
(805) 962-0534 Fax
bgough@hmglaw.com
www.hmglaw.com
Letter no. 62

Commenter: Brian & Judy Gough, 4605 Sierra Madre Road, Santa Barbara

Date: October 9, 2014

Response:

62-1. The analysis of Alternatives B and C were based on site specific MRF designs provided by the proposed vendors at each site. The MRF design under Alternative B would result in eight Class I (significant and unavoidable) impacts (see Section 5.4.2.13 of the Draft SEIR), while Alternative C would result in no Class I impacts. The greater impacts at the Alternative B MRF site is primarily due to the greater visibility of the MRF site in downtown Santa Barbara from public viewing locations (e.g., U.S. 101, South Calle Cesar Chavez, Cabrillo Boulevard, Chase Palm Park, etc.), the Alternative B MRF building exhaust design which does not provide adequate dispersion for air quality emissions, and the presence of a minority population in the Census Tract.

62-2. As indicated in Table 5-30 of the Draft SEIR, the MRF at the SCRTS site would generate up to 338 vehicle trips per day (224 truck trips), with 27 additional vehicle trips during a.m. peak hour, and 4 additional trips during p.m. peak hour. As indicated in Table 5-32, traffic associated with MRF operations at the SCRTS site would not result in traffic congestion at the Calle Real/Turnpike Road intersection exceeding County standards under project specific or cumulative conditions. The commenter believes that EIR does not adequately disclose traffic impacts at that intersection, but does not provide substantial evidence that the impacts have been inaccurately or inadequately evaluated in the Draft SEIR. This comment will be forwarded to the decision-makers for their consideration.

62-3. See the response to Comment 7 in Letter no. 10.

62-4. Pursuant to CEQA Guidelines Section 15126.6, the SEIR must include a reasonable range of alternatives. The commenter’s opposition to the selection of Alternative C will be forwarded to the decision-makers for their consideration.
October 7, 2014

Ms. Joddi Leipner, Senior Engineering Environmental Planner
County of Santa Barbara
Public Works Department
Resource Recovery and Waste Management Division
130 East Victoria Street, Ste. 100
Santa Barbara, CA 93101


Dear Ms. Leipner:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments for this proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

Proposed Project Description

The proposed project is an expansion of operations at the existing Tajiguas Landfill to allow the implementation of the Resource Recovery Project. The proposed project would add the following facilities to the existing Tajiguas Landfill: Materials Recovery Facility (MRF), Dry Fermentation Anaerobic Digester (AD) Facility, with the Energy Facility. The following items will also be included: administration/visitor center, new groundwater well, self-contained wastewater treatment plant, parking lot, fire suppression water storage tanks and biofilters. The total acreage of the landfill property is 497 acres (APN 081-150-019, 026 and 042). The proposed Resource Recovery Project Facility would be located on approximately 6 acres on APN 081-150-019. The digestate curing site(s) would occupy approximately 4-6 acres on APN 081-150-019 and/or APN 051-150-026 and the water storage facilities would be on APN 081-150-019 and APN 081-150-042. The proposed Resource Recovery Project Facility would be located in the existing operation deck which houses the current landfill administration facilities.

The approximately 60,000 or 70,000 square foot Material Recovery Facility would process municipal solid waste (MSW) into three waste streams. In addition, source separated recyclable and organic wastes from the existing and future local recycling program may be processed at the MRF. The approximately 66,000 square foot Dry Fermentation Anaerobic Digestion Facility and associated 3,000 square foot Energy Facility would convert all organic waste recovered at the MRF into biogas and digestate. The biogas from the AD Facility would produce electricity. The digestate from the AD Facility would be...
further cured in outdoor windrows at the landfill to create compost and/or soil amendments. Residual waste (residue) from the processing would be disposed of in the landfill if not prohibited. The design capacity of the MRF would be 800 tons/day of MSW or approximately 250,000 tons per year. Of the 250,000 tons per year processed through the MRF, approximately 60,000 tons/year of organic waste would be recovered and processed in the AD facility, approximately 90,000 tons per year of recyclable material would be recovered and sold for reuse, and the remainder 100,000 tons/year would be landfilled. No component of the currently proposed project would expand the permitted landfill capacity or increase the maximum permitted amount of waste that can be accepted on a daily basis.

The Lead Agency has identified several potentially significant project related impacts in the Draft SEIR. These potentially significant project related impacts were all reduced to less than significant levels by project or design features and/or mitigation measures. The only significant and unavoidable impacts were extension of significant operational air quality and biological resources impacts associated with extending the life of the Tajiguas Landfill. The Lead Agency indicated that the previous Findings and Statement of Overriding Considerations adopted for the Tajiguas Landfill project would remain applicable to the impacts associated with extending the landfill’s life.

Comments

Notice of Preparation (NOP)
CalRecycle provided comments on the NOP on May 18, 2012, and those comments have been addressed. CalRecycle staff has no further comments on the project as proposed at this time.

Solid Waste Facilities Permit (SWFP)
The Santa Barbara County Department of Public Health, Environmental Health Services (as the Local Enforcement Agency (LEA) for Santa Barbara County) and CalRecycle are responsible for providing regulatory oversight of solid waste handling activities, including permitting and inspections. The permitting and regulatory requirements for waste disposal, transfer/processing, and compostable material handling are contained in Title 14 or Title 27 of the California Code of Regulations (14 or 27 CCR). The LEA contact for this proposed project is Lisa Sloan and she can be reached at (805) 681-4942 or by email at Lisa.Sloan@sbchphd.org. The proposed project may require a revision of the existing SWFP issued on February 10, 2014. Please contact the LEA to discuss the proposed permit revision for the proposed project.

Conclusion

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on this environmental document and hopes that this comment letter will be useful to the Lead Agency in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent environmental documents including, the Final Subsequent Environmental Impact Report, copies of public notices, and any Notices of Determination for this project. Please refer to 14 CCR, Section 15094 (d) that states:

"If the project requires discretionary approval from any state agency, the local lead agency shall also, within five working days of this approval, file a copy of the notice of determination with the Office of Planning and Research [State Clearinghouse]."
Ms. Leipner
Page 3 of 3
October 7, 2014

If the environmental document is adopted during a public hearing, CalRecycle staff requests ten days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests ten days advance notification of the date of the adoption and project approval by the decision-making body.

If you have any questions regarding these comments, please contact me at 951.782.4168 or by e-mail at Dianne.Ohiosumua@calrecycle.ca.gov.

Sincerely,

[Signature]

Dianne Ohiosumua, Environmental Scientist
Permitting and Assistance Branch – South Unit
Waste Permitting, Compliance and Mitigation Division
CalRecycle

cc: Virginia Rosales, Supervisor
Permitting and Assistance Branch – South Unit

David Brummond, Supervisor
County of Santa Barbara – LEA

Lisa Sloan, Senior Environmental Health Specialist
County of Santa Barbara - LEA
Letter no. 63

Commenter: California Department of Resources Recycling and Recovery

Date: October 7, 2014

Response:

63-1. This letter notes that comments raised in response to the Notice of Preparation have been addressed in the Draft SEIR, and the solid waste facilities permit would need revision to accommodate the proposed project. As the comment letter does not address the adequacy of the Draft SEIR, no further response is necessary.
Letter no. 64

September 17, 2014

Sonja Cutner
360 Sherwood Drive
Santa Barbara CA, 93110

County of Santa Barbara

To whom it may concern:

I attended the County’s meeting regarding the expansion of the facilities at the Tajiguas landfill and its alternatives. I am writing this to express my concern about the alternative Option C. I acknowledge that with a growing population and an increased focus on sustainability and green choices that we should seek more earth friendly alternatives in regards to our disposal needs. However I do not think that the options presented were truly the best solutions.

I am a Santa Barbara/Goleta native and have been fortunate enough to make a life for myself here after college. That being said my home is where I plan to raise my family and happens to be in the zone directly affected by Option C and this worries me greatly for numerous reasons.

This is a very volatile situation not only because it affects a significant number of property values but also because of the environmental concerns which I do not feel like they were adequately explored in the proposal. Option C does not sound safe nor does it seem like a well thought out idea, because who of a sound mind would choose to build a giant structure 6 stories tall spanning two acres in the middle of a developed area. In this diverse area there are schools, senior living facilities multifamily homes, single family residences, mobile home parks and our veteran affairs facility plus many more; they are all within close proximity to Option C’s proposed MRF site. The inhabitants of this area will be negatively affected by this facility and the limits of these side effects are unknown.

During the September 4, 2014 meeting it was also stated that there would be no level 1 (first tier) intrusions and I find this hard to believe. Who was the person creating this scale and did they live in an environment where these types of activities transpired before determining the level of the effects? I doubt it. My home is my immediate environment and to hear that it may be filled with increased noise, seeping gases, additional traffic, including their harmful Co2 emissions, and other negative side effects makes me feel like my home is now an unsafe place for me to live and more importantly raise children. My home will most likely be the largest investment my husband and I will make in our lifetime and with these threats lingering in our backyard I am scared that my investment will be devalued not only monetarily but also environmentally.

I am also saddened by the manner in which our local government and its officials chose to communicate this proposal. The limited notice and relative silence on the topic is foreboding and sends the message that the county is trying to hide something. This message is also further supported by the fact that only
a small portion of residents around the proposed alternative C site received information relating to the project. The fact that Option C was disclosed and purported as the most economically friendly solution out of all of those suggested including the original proposal is alarming. Additionally the photographs used to show the visual impact of the structure were done in such a manner that grossly minimized or masked the true visual impact. These actions state that the County and its local officials are well aware of the hazards and dangers that this MRF facility will bring to the local area and yet they do not care, and are clearly willing to manipulate the public for their own agenda even though it is at the detriment of their constituents.

It was brought to the public’s attention during the September 4th meeting by a local resident that this site (Alternative C) was already evaluated for a smaller version of a MRF and was determined to be unsuitable because the ground was considered unstable. If this 1995 study and evaluation is to be believed how is it even possible to contemplate that a larger facility is now acceptable?

Lastly with a new landfill being developed in Santa Maria I think the most prudent solution would be to build all of these new and additional facilities at this Landfill site so that its life could be extended to its full potential as it will probably be the future site of the south coast community’s refuse. It also makes the most sense to have these additional facilities at this new landfill location because as new developments (housing or otherwise) are being built it will be with the understanding that there is already a landfill in close proximity and people will not be blindsided with the possibility of a gross monstrosity being shoved into their already developed and blossoming community, nor will it negatively affect the already well-established property values in its vicinity.

I agree that it is important to find as many environmentally conscious options as possible for our waste removal and disposal however I don’t feel as though the County or its officials have done its due diligence in regards to seeking out the best alternatives for the communities that it serves. I strongly urge you to consider additional alternatives or to increase the focus on the original proposal rather than Option C.

Sincerely,

Sonja Cutner
360 Sherwood Drive
soniacutner@gmail.com
805-252-5257
Letter no. 64

Commenter: Sonja Cutner, 360 Sherwood Drive, Santa Barbara

Date: September 17, 2014

Response:

64-1. CEQA requires that an EIR examine alternatives to a proposed project to potentially reduce significant project impacts. During the NOP review process, members of the public suggested that urban locations for the MRF portion of the project should be analyzed to reduce potential traffic and transportation related air quality impacts. The Draft SEIR fully addressed impacts of the MRF at the SCRTS site, including noise, air quality, fire hazard (seeping gases), traffic and greenhouse gases (including CO₂), and determined these impacts to be less than significant when evaluated against adopted federal, state and local thresholds of significance. The commenter believes that EIR does not adequately disclose impacts of constructing the MRF at the SCRTS under Alternative C, but does not provide substantial evidence that the impacts have been inaccurately or inadequately evaluated in the Draft SEIR. This comment will be forwarded to the decision-makers for their consideration.

64-2. See the response to Comment 5 in Letter no. 2.

64-3. See the responses to Comments 6 and 7 in Letter no. 2.

64-4. See the response to Comment 7 in Letter no. 10.

64-5. The Santa Maria Integrated Waste Management Facility (SMIWMF) will be owned and operated by the City of Santa Maria. Although a Final EIR was completed for the SMIWMF in April 2010 and the EIR has been certified and the project approved by the City Council, all of the permits necessary to implement the project have not yet been acquired. While the project description includes possible locations for a future MRF, the MRF is not part of the current project description and the project does not include diversion and processing of organic waste. Therefore, it is not feasible for the County to construct the proposed project facilities at this site. In addition, because of the distance, consolidation of the waste into larger transfer trucks would still be required which may require transfer and consolidation of waste at existing facilities such as the SCRTS and MarBorg's existing transfer station to reduce the costs and environmental impacts associated with the longer haul distance. With regards to environmental impacts, construction and operation of the SMIWMF is anticipated to result in several Class I impacts including air quality, GHG emissions, biological impacts (loss of 3,200 mature coast live oak trees) and numerous Class II impacts. Constructing the MRF, AD Facility and related facilities at the planned SMIWMF would not meet the project objectives; as it would not extend the life of the Tajiguas Landfill, it would not be reasonably accessible to communities served by the landfill since all solid waste would need to be hauled to Santa Maria, and it would not be cost-effective. Therefore, the suggested alternative would not be considered feasible.
64-6. The commenter’s opposition to the selection of Alternative C will be forwarded to the decision-makers for their consideration.
October 9th, 2014

Joddi Leipner  
Environmental Planner, County of Santa Barbara  
130 E. Victoria Street, Suite 100  
Santa Barbara, CA 93101

Re: Comment letter from CEC on Tajiguas Resource Recovery Project draft EIR

Dear Ms. Leipner,

The Community Environmental Council is one of Santa Barbara’s largest environmental non-profits, and has catalyzed environmental solutions since 1970. CEC established Santa Barbara’s first curbside recycling program and ran these waste management programs for decades. We currently focus on moving our region toward clean energy and reduction of greenhouse gas emissions, thus this project is of particular interest to CEC.

CEC has the following comments on the draft EIR:

- The draft EIR analysis does not appear to have any significant discussion of the contamination issues when linking a Municipal Solid Waste (MSW) Materials Recovery Facility (MRF) with an Anaerobic Digestion (AD) system. What is the capacity of the MRF's clean up system to assure proper quality, and what is that quality? What are the downstream consequences to the viability of the project if the material isn’t clean enough to meet market specifications? The State’s CalRecycle is developing very stringent new compost and AD standards with contamination rates as low as .1% by weight—though this level is being proposed and is not adopted. The Regional Water Boards are placing more stringent conditions on soil products derived from MSW. We see no discussion in the EIR of current and proposed standards and how this project might conform to those standards.

- A project alternative should be considered which starts with the AD system first, without the MRF, using source separated commercial food and residential green as the AD feedstock. This would lessen the overall recovery rate option and not have as significant an impact on lengthening the life of the landfill, but it would likely assure the success of the AD component. If this were done a MRF could be built nearer Santa Barbara or in Santa Barbara –i.e. the Marbord facility of the Transfer Station. The benefit of this option would be that the MRF would be approximately 25 miles closer to the end use markets in Southern California and the Long Beach and LA Harbors where most of the recyclables recovered would be shipped.

- The draft EIR should assess the effects of the implementation of a South Coast comprehensive residential composting program on the project and the alternatives being considered. Data from the California Air Resources Board and CalRecycle indicate that composting rather than anaerobic digestion can lead to a 20%-70 increase in GHG emission benefits (see table below). CEC is
supportive of such a program and will be requesting the City of Santa Barbara take the lead in initiating a pilot single family residential composting program in the coming year. The inclusion of such a program element in the project could lead to further reductions in greenhouse emissions.

Assessment of GHG Emission Benefits from Diverting Organics from Landfills

<table>
<thead>
<tr>
<th>Process</th>
<th>Organics Disposed in Landfills (tons/year)</th>
<th>Annual Tons Diverted (50% of total disposed in years 2015-2020)</th>
<th>Resulting GHG Emissions Benefits from 50% Diversion MMTCO2e per year (2015-2020)</th>
<th>Annual Tons Diverted (75% of total disposed in years 2020 and beyond)</th>
<th>Resulting GHG Emissions Benefits from 75% Diversion MMTCO2e per year (2020 and beyond)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Composting</td>
<td>2.5 million</td>
<td>1.63 – 2.38</td>
<td>3.75 million</td>
<td>2.48 – 3.56</td>
<td></td>
</tr>
<tr>
<td>Anaerobic Digestion</td>
<td>2.5 million</td>
<td>0.18</td>
<td>3.75 million</td>
<td>2.05</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>10 million</td>
<td>3.03 - 3.78</td>
<td>7.5 million</td>
<td>4.54 - 5.62</td>
<td></td>
</tr>
</tbody>
</table>

1 Estimated using Emission Reduction Factor (ERF) of 0.42 MTCO2e/ton material processed (ARB draft Mandatory Recycling Report) plus adjusted avoided landfill ERF of 0.24 MTCO2e/ton material processed (adjusted by ARB)
2 Estimated using ERF of 0.42 MTCO2e/ton material processed (ARB draft Mandatory Recycling Report) plus avoided landfill ERF of 0.53 MTCO2e/ton material processed (CalRecycle)
3 Estimated using ERF of 0.55 MTCO2e/ton material processed by HSAD (ARB LCFS report)

Source: http://www.calrecycle.ca.gov/Actions/Documents%5C%77%5C2013%2013%5C900%5CComposting%20and%20Anaerobic%20Digestion.pdf

There appears to be no discussion in the document of producing biogas that could be injected into the natural gas pipeline that runs below the landfill and used for transportation fuel to power the Marborg fleet and/or other commercial users. The existing Marborg fleet using natural gas could use this fuel without engine modifications. Accessing the line is challenging, but this option should not be ruled out. Fleet usage of the biogas from this facility instead of creating electricity could result in much larger emission reductions, particularly as electricity export offsets GHG reductions become smaller and smaller in future years as our electricity grid carbon intensity decreases.

The discussion of GHG emission reductions is very rambling and lacks cohesion. There are various ways the project reduces GHGs, and they are spread throughout the chapter with differing time horizons. A summary at the front of the Air Quality chapter with a table that used similar years and showed the various GHG benefits by source (from decreased methane emissions, increased recycling, energy production, etc.) would be helpful. Right now the material is spread all over the chapter and very hard to view in a comprehensive manner. For example, the largest GHG benefits seem to come from additional recycling, which are calculated at 67,775 MTCO2e/year, which is much larger than the benefits from energy production, of 2,316 MTCO2e/year. Benefits from decreased methane production are also a large benefit and vary depending on the time horizon used.
• Total GHG emissions estimated to be produced at the landfill from 2015-2066 under existing conditions is 3,288,000 MT carbon dioxide equivalent (CO2e), with an estimated annual average over the 52-year period of 63,231 MT CO2e. The project expects to reduce GHGs by 1,001,440 MT, or 19,258 MT/year over 52 years. Many of the calculations are for project life until 2036 and 2046, not totals until 2066, which is as long as the landfill will be emitting methane. Additionally, there is no discussion of how much gas is currently captured, what is predicted for capture in the future, and what emissions would be without capture? Could capture become more efficient in the future as technology improves?

• Electricity export offsets use SCE’s current electricity intensity of 630.90 lbs CO2/MWh, which will decrease as more renewables and lower carbon energy cleans up the grid, thus these benefits are overstated. The analysis should use projected electrical intensity rather than current.

• The landfill is a large emitter and will be subject to Cap and Trade. There is little discussion of Cap and Trade. How will this program affect the GHG emissions and what economic benefits could the project see from selling Cap and Trade offsets?

CEC looks forward to seeing the responses to our comments incorporated into the final document. Thank you for your consideration.

Sincerely,

[Signature]

Dave Davis
President and CEO
Community Environmental Council
Letter no. 65

Commenter: Community Environmental Council

Date: October 9, 2014

Response:

65-1. The commenter raises concerns regarding the ability of project compost to meet market specifications. With respect to this concern, the MRF would include a series of trommel screens, anti-wrapping screens, magnets, eddy current separators, air separation, vibratory separation and optical sorting devices to remove metals, plastics, glass and other inert contaminants from the organic fraction of the municipal solid waste (MSW) to be delivered for processing via two in-vessel anaerobic digestion (AD) cycles and thereafter 6 weeks of turned aerobic composting of the digestate for moisture evaporation, compost stability and maturity. Following the 6 weeks of aerobic composting/maturation, the compost would then be screened for inert contaminant removal with a 2” screen, a 3/8” screen and a densimetric table which removes higher density glass and stones in the 1/8”-3/8” size fraction. An identical post-aerobic composting screening protocol of MSW based compost has been implemented effectively by Z-best Compost, in Gilroy, CA since 2001. Additionally, the proposed project, similar to Z-best, intends to sample and test all of its compost and soil amendment products using the US Composting Council Seal of Testing Assurance protocols for nutrient value, contaminant levels and pathogen reduction (see page 3-18 of the Draft SEIR). Following screening and removal of the inert contaminants down to 1/8”, the finished compost would then be blended with source separated organics compost to create quality compost that has found widespread market acceptance. The MSW based compost has a higher nitrogen content due to a predominance of food waste in the MSW leading to a higher nutrient value to the agricultural customers. Zbest does not charge for the material and covers the transportation cost to agricultural customers for land application as a soil amendment and for water retention. The demand for this product has increased 300 percent in the past 18 months.

The above described pre-AD and post-aerobic composting contaminant screening protocols anticipated to be implemented by the proposed project are, as has been verified by independent lab analysis of Z-best’s MSW compost product, anticipated to meet and exceed CalRecycle’s proposed 0.1% by weight physical contaminant limits contemplated in their proposed revisions to CCR Title 14 and 27 regulations regarding compostable materials. CalRecycle has specifically set the 0.1% physical contaminant limit based on feedback from the AD and compost community as CalRecycle acknowledges that composting and AD processing of source separated organic waste and organic waste contained in MSW must be removed and processed into compost in order to achieve CalRecycle’s 75% landfill diversion guideline established by AB 341. It is anticipated that up to 25,760 tons per year of finished compost product would be produced after the AD and composting processes are complete and similar to other organic processors, based on the characteristics of the finished product, suitable markets would be identified.
The proposed project and its composting operation has been designed and engineered and would be operated based on the State Water Board’s Composting General Order for Composting Operations Requirements issued in August 2014 and based on more than 3+ years of discussions and agreement of the proposed organic waste based compost processing and environmental mitigation protocols between the County, the project vendor and the Central Coast Regional Water Quality Control Board.

65-2. Sufficient source separated organic waste is not available to operate an AD Facility at a cost-effective scale, and would not meet most of the project objectives. Residential green-waste alone does not have the suitable characteristics to run a successful bio-gas capture system. Feedstocks containing food waste or materials with higher methane production upon decomposition are necessary for a bio-gas collection system. As described in the response to Comment 29 in Letter no. 69 regarding the expansion of source separated collection programs, between the City of Santa Barbara, the City of Goleta, the County of Santa Barbara and UCSB, currently only 4,100 tons of source-separated food waste is collected with the potential of adding an additional 3,700 tons with the future expansion of commercial food waste collection programs compared to the expected 38,000 tons of food waste expected to be digested at the proposed project. The source separated green waste collected at the curbside is already processed into beneficial mulch widely used by local agriculture, parks and residents. Concerning locating the MRF near Santa Barbara, the Draft SEIR includes a detailed assessment of Alternatives B and C, which are based on operating an AD Facility at the landfill and locating the MRF near waste generation areas, including Santa Barbara (MarBorg site: Alternative B) and Goleta (SCRTS site: Alternative C). The relative impacts of these two alternatives were extensively analyzed in the Draft SEIR, and the proposed project would have lesser impacts overall.

65-3. This comment suggests that residential composting be considered as an alternative or an additional component of the proposed project. The data provided is taken from a draft paper prepared by CalRecycle (Composting and Anaerobic Digestion, dated 6/18/13) which provides rough estimates of greenhouse gas (GHG) emissions benefits associated with diverting organic materials from landfills, including composting and AD. As stated in the draft paper, these are rough estimates, using preliminary GHG emissions reduction factors. The most recently released study (October 2014) comparing aerobic composting to AD was released by the Oregon Department of Environmental Quality which evaluated existing studies on the highest and best use for managing food waste. Results indicated that AD performed equally to aerobic composting products for soil benefit, AD performed better for greenhouse gas reductions, and AD used significantly less energy than aerobic composting, indicating both are important means of managing organics but energy displacement related to the capture of bio-gas from AD and production of renewable energy enhances AD’s environmental benefits over aerobic composting.
Residential composting is one of many programs that can be used to divert organic waste from landfills and reduce GHG emissions, including both a backyard composting program and the source separated collection of compostable material. The County has provided a comprehensive backyard composting program to area residents and businesses since 1990 including selling composting bins at discounted prices, preparing and distributing educational materials and holding public instructional workshops. While members of the public are active participants in the backyard composting program, such a program could not be considered as an alternative to the proposed project because a small percentage of households are likely to begin participating in the program resulting in the diversion of a less significant level of tonnage, it would not meet project objectives, and backyard compost piles would produce methane if not properly maintained which would substantially affect GHG emissions reductions. Project objectives not met by such a program include: ensure the 75 percent diversion requirement is met by 2020, long-term solution to solid waste management needs, substantially extend the life of the Tajiguas Landfill, achieve a 60 percent diversion rate of solid waste received at the landfill, maximize GHG reductions, provide green energy and adapt to the changing waste management needs of the region.

With regards to expanding the existing collection of source-separated green waste to include other organics, the separate collection of a material is dependent on the customer’s willingness and ability to manage the material separately in their homes and businesses. In reviewing results from communities with long standing residential and commercial organics collection programs, there continue to be members of a community that refuse to participate in a collection program or choose to participate to a limited extent so the opportunity to recover that material is lost as soon as the material is disposed. Many communities have learned this lesson and in an attempt to further divert organics and recyclables from the landfill are now supplementing their source-separated collection programs with facilities capable of sorting mixed waste to have the capability to further process this discarded material. Examples include the City of San Francisco and San Jose who also have aggressive Zero Waste goals. However, it is important to note that if the region decides to implement the curbside collection of food waste sometime in the future, the AD facility proposed to be built as part of the project would be able to process this material to create a valuable soil amendment as well as capture bio-gas to be used as a renewable energy source. Project objectives not met by such a program include: substantially extend the life of the Tajiguas Landfill, achieve a 60 percent diversion rate of solid waste received at the landfill, and maximize GHG reductions. Therefore, residential composting (both backyard composting and expansion of residential source-separated collection) is not considered a feasible alternative to the proposed project and though a reasonable range of alternatives was analyzed, expanded residential composting was not analyzed in the Draft SEIR.
65-4. This comment suggests that use of bio-gas produced by the proposed project as a transportation fuel would result in larger GHG emissions reductions as compared to proposed green energy production. GHG emissions would be virtually the same whether the bio-gas is combusted in truck engines or the proposed CHP engines, and would not produce any green energy. Using Biogas as a Fuel for Trucks and Tractors (Hansen, et al., 2007) indicates that bio-gas (with 30 percent CO₂) can be used in farm vehicles and trucks; however, the CO₂ content of the bio-gas reduces horsepower rating proportionately. The bio-gas produced by the proposed project may have CO₂ content up to 50 percent, such that treatment (CO₂ removal) of the bio-gas to increase energy content would likely be required to provide useable horsepower in truck engines. Such a treatment facility would result in additional energy consumption, GHG emissions and other impacts not addressed in the Draft SEIR.

The project vendor initially evaluated the possibility of upgrading the bio-gas to pipeline quality standards for injection into the SoCal Gas natural gas grid high pressure line that runs along U.S. Highway 101. While it may be feasible to do, there currently is no feed-in-tariff in California that requires utilities to purchase such upgraded bio-gas at prices that would be comparable to those available via feed-in-tariffs available for the purchase of renewable electric power. Further, upgraded bio-gas for transportation uses is only financially feasible (i.e., at a price comparable to that available via electricity feed-in-tariff rates) if a natural gas vehicle fleet user is prepared to make a long term commitment for such purchases. As no available fleet user or users was identified in the Southern California area that was prepared to purchase such bio-gas for transportation uses on a 20 year firm commitment basis, the project vendor pursued the production of renewable electricity that will be sold to SCE pursuant to a 20 year fixed price power purchase agreement. Overall, this alternative is not considered feasible, would not reduce impacts and was not addressed in the Draft SEIR.

65-5. Differing time scales (annual vs. life-cycle) that affect GHG emissions are complex, and the Draft SEIR attempted to simplify these issues. Impact TRRP AQ-8 of the Draft SEIR has been revised to help clarify these issues. In summary, the GHG analysis provided in Impact TRRP AQ-7 describes the annual GHG emissions inventories and sums them over time to provide a complete picture of GHG emissions that take place within Santa Barbara County or close to it (e.g., offset electricity generation emissions). However, this analysis does not include a life-cycle assessment. An annual GHG emissions inventory and a life-cycle assessment are two different types of analyses that are not directly comparable, but each serves to provide useful information. The life-cycle GHG reduction benefits associated with the recycling activities of the proposed MRF offer further benefits that are not reflected in the annual GHG emissions inventory.
A landfill is the end location for resource use. Recycling material (rather than landfill disposal) and reusing it, reduces the need for additional resources (extraction, energy, and production), thereby decreasing emissions in the production system. Using the USEPA’s Waste Reduction Model (WARM), the RRWMD in consultation with the TRRP vendor has estimated that the additional GHG reduction benefits of recycling materials recovered by the MRF processing activities would be 67,675 MTCO\textsubscript{2}e over the life-cycle of the waste diverted. The WARM Model is a tool designed to help managers and policy-makers understand and compare the life-cycle GHG and energy implications of materials management options (recycling, source reduction, landfilling, combustion with energy recovery, and composting) for materials commonly found in the waste stream.

By comparing a baseline scenario (e.g., landfilling) to an alternate scenario (e.g., recycling), WARM can assess the GHG implications that would occur throughout the material life-cycle. Please see Appendix P for the RRWMD/vendor’s recycling recovery tonnage assumptions and the WARM Model life-cycle GHG emissions reduction estimates for the proposed MRF and the benefits of recycling. As the WARM model calculation of GHG emission reductions uses different assumptions than the annual GHG analysis, primarily related to the geographic boundary of the analysis, the WARM estimates of the GHG emission reduction benefits related to recycling are presented separately from the analysis discussed under Impact TRRP AQ-7.

65-6. This comment refers to the differing time spans used to calculate lifetime total GHG emissions (Table 4.2-15 of the Draft SEIR). Project-related GHG emissions would occur over the project life (2017 to 2036), while landfill GHG emissions were estimated through the year 2066. Note that there was an error in row 4 of Table 4.2-15, year 2046 should have read 2036. This has been corrected in the Final SEIR. No changes in the calculations contained in the Table were necessary in response to the correction. Concerning future changes in landfill gas capture rates, the current gas capture rates used in the GHG analysis in the Draft SEIR were based on rates and assumptions used in mandatory reporting of GHG emissions at the Tajiguas Landfill. The proposed project would have no effect on capture rates and any changes to the existing landfill gas system at the landfill would be addressed as a separate project under CEQA. Therefore, potential increases in future landfill gas capture efficiency were not used in the calculations.

65-7. The current SCE electricity intensity rate was selected for the Draft SEIR as a conservative estimate so as to not overstate the emissions offset by energy generation. When assessing offset emissions from renewable sources, such as bio-gas energy generation, it is a common practice to assume that fossil fuel energy generation with the least GHG emissions is offset. For instance, a fuel cell, which is currently the industry standard for efficient fossil fuel energy generation, emits over 300 pounds of CO\textsubscript{2} per megawatt-hour more than the SCE grid average used in the analysis. Further, sufficient data are not available to accurately predict the exact make-up of the future SCE grid, and would be speculative to forecast what the future electricity intensity would be related to this project.
In order to be included in the Cap & Trade Program, an entity must be required to be in the California GHG Reporting Program as stated in 17 Code of California Regulations (CCR) § 95812. Fugitive methane emissions from a landfill are explicitly exempted from the California GHG Reporting Program under 17 CCR §95101(f)(6). Therefore, only combustion emissions at the project site could be considered as part of inclusion into the GHG Reporting Program. Since the combustion emissions from the project are not expected to exceed 25,000 metric tons CO$_2$e, the proposed project is not anticipated to be subject to the California GHG Reporting Program and therefore will not be included in the Cap & Trade Program.
Leipner, Joddi

From: Alexandra Geremia <zebradaisy@aol.com>
Sent: Thursday, October 09, 2014 3:48 PM
To: Leipner, Joddi
Subject: Tajiguas

I have a house on arroyo Quemada road. Needless to say, I have great concerns about what will happen with the new project at the landfill. Traffic now is not the easiest .......especially if you are coming from Santa Barbara to Arroyo Quemada ..I have had the trucks come across the freeway to head south when I am in the turn lane to turn south....honk at me and try to force me to turn before I think it is safe....!

I wonder what will happen to the wells we have now? Will what little water they produce be contaminated? I would think the new project would use more water from the Tajiguas aquifer?

Will the new plant make noise? Contaminate the air even more? When the East wind blows now...all kinds of trash from the landfill blows down to us and into the ocean....it litters everywhere!!

Thank you....

Alexandra Geremia  Zebradaisy@aol.com

Sent from my iPad
Response:

66-1. Traffic. Traffic generated by the proposed project when added to baseline volumes would not exceed County thresholds regarding traffic operations and congestion along U.S. Highway 101 and the landfill access road (see Section 4.9.2.4).

66-2 Groundwater Contamination. The water demand of the project would primarily be met by a new well in the Sespe-Alegria Formation, which based on the Hydrogeologic and Water Supply Impact Analysis Report (Appendix O) is expected to provide an adequate safe yield and not significantly affect local groundwater supplies (see Impact TRRP WR-2). We understand that the Arroyo Quemada community is served by wells completed in the Monterey Formation. As shown in Table 4.10-1 of the Draft SEIR, no increase in groundwater production (Well no. 3) in the Monterey Formation is proposed. Impact TRRP WR-6 of the Draft SEIR identifies that landfill gas could migrate into the new Sespe Alegria well if improperly constructed. However, mitigation has been provided to ensure the well is constructed properly to avoid landfill gas migration. Also, as noted above the well would not be constructed in the same groundwater formation as the Arroyo Quemada wells.

66-3. Noise. Noise modeling conducted for the Draft SEIR indicates that construction-related noise and operational noise would not exceed significance thresholds at nearby noise-sensitive receptors, including the Arroyo Quemada community (see Impacts TRRP N-1 through N-3).

Air Quality. The air quality impact analysis prepared for the Draft SEIR indicates that construction-related air emissions, operational air emissions, vehicle emissions, ambient air pollutant concentrations, health risk and odors would not exceed significant thresholds and are considered less than significant impacts (see Impacts TRRP AQ-1 through AQ-5, AQ-9 and AQ-10).

Litter. As indicated under beneficial Impact TRRP NUI-3, litter would be reduced as compared to existing conditions as all unloading of incoming solid waste would be conducted in a negative pressure building instead of the open, active face of the landfill, which would reduce the potential for paper and plastics to blow off-site.
October 9, 2014

Jodi Leipner, Project Environmental Planner
Department of Public Works
Resource Recovery and Waste Management Division
County of Santa Barbara
130 E. Victoria Street
Santa Barbara CA 93101

RE: Comment Letter on the Draft Subsequent EIR for the Tajiguas Resource Recovery Project (SCH #2012041068)

Dear Ms. Leipner,

Thank you for the opportunity to provide comments on the County of Santa Barbara’s Draft Subsequent Environmental Impact Report (SEIR) for the Tajiguas Resource Recovery Project (Project) dated August 2014. The Project is located at the Tajiguas Landfill, an important regional waste disposal facility, and is identified as such in the City’s General Plan. In the event that landfill capacity is reached, waste disposal would be limited. Consequently, the City takes interest in any alteration to the operations at the Tajiguas Landfill that may change the timeframe under which the City may rely on the landfill for waste disposal needs. The Project objectives are noteworthy in that they provide a long-term solution to region-wide solid waste needs.

Project objectives also aim to reduce the greenhouse gas emissions associated with the Tajiguas Landfill. The Project includes electric generation from the bio-gas produced from the anaerobic digestion facility, resulting in reduced greenhouse gas emissions associated with waste disposal and provides a consistent source of renewable energy at the facility. The anaerobic digestion facility and related electric generation capability are also noteworthy elements of the Project and further the objectives set forth in the City’s Climate Action Plan.
We look forward to the further development of this project as it supports the long-term needs of our community. If you have any questions or comments regarding this Draft SEIR comment letter, don’t hesitate to call me at (805) 961-7557 or Everett King at (805) 961-7565.

Sincerely,

Anne Wells
Advance Planning Manager
City of Goleta

cc: Jennifer Carman, Planning and Environmental Review Director
    Rosemarie Gaglione, Interim Public Works Director
Letter no. 67

Commenter: City of Goleta

Date: October 9, 2014

Response:

67-1. This letter expresses support of the project objectives, but does not address the adequacy of the Draft SEIR. The comments will be forwarded to the decision-makers for their consideration.
Letter no. 68

Susan E. Millhollan  
1091 Camino Del Rio  
Santa Barbara, CA 93110  
susan.elizabeth@cox.net

Jodi Leipner  
Division Planner  
Santa Barbara County  
Solid Waste Management Division  
130 East Victoria Street #100  
Santa Barbara, CA 93101

Re: "Alternative C" The Tajiguas Landfill Resource Recovery Project

Dear Ms. Leipner,

As a concerned resident of the County of Santa Barbara and nearby homeowner, I am writing to voice my opposition to the "Alternative C" Tajiguas Landfill Resource Recovery Project. This type of facility does not belong in a largely residential community and will impact the health, safety well being of all persons residing, doing business and commuting in the proximity of this "alternative" site. Including but not limited to bicyclist, joggers, marathons and as an emergency alternative corridor to Highway 101.

The site was "deemed infeasible for expansion" by the County and Board of Supervisors in 1998. Why, when there are so many more residences, health facilities and schools in close proximity should this be considered a possible "alternative" now? Would this type of facility be beneficial to all concerned in the local and surrounding areas ... "I think not". Please don't allow this facility to be built here now or ever.

Sincerely yours,

[Signature]

Susan E. Millhollan

cc: Salud Carbajal, Peter Adam & Steve Lavagnino
From:
Susan E Millhollan
Fax No. - 805.681.8182
susan.elizabeth@cox.net

TO:
Clerk of the Board
Fax No. - 805.568.2249

Please distribute a copy of my letter to all board members. The letter is addressed to Jodi Leipner regarding my opposition to the “Alternative C” Tajigues Landfill Resource Recovery Project. Thank you.

Salud Carbajal
Doreen Farr
Peter Adam
Steve Lavagnino
Letter no. 68

Commenter: Susan E. Millhollan, 1091 Camino Del Rio, Santa Barbara

Date: October 9, 2014

Response:

68-1. The Draft SEIR addressed potential impacts to the surrounding community, including health risk (see Figure 5-30), odors (see Figure 5-31), noise (see Figure 5-32) and traffic (see Table 5-32) and found these impacts to be less than significant based on federal, state and local standards and thresholds of significance.

68-2. See the response to Comment 7 in Letter no. 10. Your opposition to the selection of Alternative C will be forwarded to the decision-makers for their consideration.
October 9, 2014

Ms. Joddi Leipner
Santa Barbara County
Public Works Department
Resource Recovery and Waste Management Division
130 E. Victoria Street, Suite 100
Santa Barbara, California 93101

By Email: JLiepner@COSBPW.NET

RE: Draft Subsequent Environmental Impact Report for the Proposed Tajiguas Resource Recovery Project

Dear Ms. Leipner:

This office represents the Gaviota Coast Conservancy ("GCC") in this matter. GCC is a California public benefit non-profit corporation dedicated to the protection of the environment and rural character of the Gaviota Coast. While GCC overwhelmingly supports developing alternatives to landfilling of solid waste, GCC is concerned that the proposed location for the Resource Recovery Project ("Project") at Tajiguas Landfill on the Gaviota Coast will cause significant environmental impacts from the expansion and perpetuation of industrial activities and structures on the extraordinarily sensitive Gaviota Coast.

It is critical that the Environmental Impact Report ("EIR") for this Project identify clearly each of the myriad of adverse environmental impacts to inform the public, responsible agencies, and decisionmakers of the full environmental ramifications of this Project and ensure a careful and searching assessment of feasible environmentally superior alternatives. The EIR fails to properly recognize the extraordinary qualities of the Gaviota Coast and thus reveal the significance of the permanent impacts that the Landfill has already had. Further, the EIR fails to fully disclose the impacts which will be made incrementally worse, and for a much longer time, as a result of the Project. The EIR must fully and accurately describe the Project and its environmental setting, as well as identify, analyze, and mitigate all significant environmental impacts, and identify and analyze feasible alternatives that avoid significant environmental impacts. The DSEIR’s conclusion that the Project will have no Class I impacts is absurd, and relies on a jaundiced analysis that seeks to minimize and otherwise fail to disclose impacts as required by CEQA. GCC submitted substantial and detailed comments on the scoping document (dated May 18, 2012), identifying specific information to be included in the DSEIR, yet the comments were not integrated into the draft environmental review document and GCC’s extensive comments were systematically ignored and downplayed, such that GCC’s vociferous and detailed objections were not even worthy of identification as points of substantial
controversy in the environmental review document. Discussed below, the DSEIR suffers from numerous material omissions and errors, some of which will require recirculation of the EIR.

Our scoping comments emphasized the importance of a robust alternatives analysis, that identifies and thoroughly analyzes various potentially feasible Project alternatives and locations for the Project that satisfy the core Project objective of reducing MSW buried at Tajiguas (and thereby extending the life of Tajiguas), while avoiding and reducing numerous significant environmental impacts. GCC identified an “Enhanced Source Separation” alternative to the MRF component of the Project that would result in an enormous cost saving and would yield more valuable recyclable materials and a cleaner source of organics that could improve the digestate and ultimate compost quality. Unfortunately the DSEIR rejects this and other apparently feasible alternatives out of hand, resulting in an environmental document that includes no alternatives capable of avoiding many of the Project’s significant impacts including its Class I impacts.

1. **A Subsequent EIR is the Wrong Environmental Review Document**

CEQA strongly favors tiering “whenever feasible” for projects involving successive EIRs. Public Resources Code § 21093(c). Tiering is the accepted manner of addressing serial Projects in an area or with overlapping impacts, as with the instant Project. The failure to properly classify the Project’s environmental review document as being tiered from a previous document allowed the Proponent/Lead Agency to shortcut disclosure of the nature, contents, and location of the underlying analysis upon which the Project’s environmental impact analysis is based.

A Subsequent EIR is appropriate when there are changes or modifications to an existing project. In this case, an entirely new set of processes is proposed atop an existing facility. There are not changes in circumstances or new information about project impacts; rather the Proponent and Lead Agency and a chosen third party want to install a Costco-sized building on top of the previously reviewed solid waste landfill. This is not a mere modification or new information, but a wholly new project. CEQA contemplates such a situation, and directs the use of tiering, not the use of a piecemeal, add-on subsequent EIR for an entirely new Project located atop an existing project.

The distinction is fundamental, and infects the adequacy of the entire environmental review document. As a tiered environmental review document, the DEIR must contain a series of elements that assist the reader in both finding the earlier environmental review document and the specific analysis that is being incorporated and relied on. Guidelines § 15150; 15152. As one court put it, the second tiered EIR must give the reader a road map to the information it intends to convey from the earlier documents. *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 443.
The Project DEIR fails in this regard, and as noted by commenters, the Proponent/Lead Agency’s web site includes defective links to different documents than indexed, and is otherwise inadequate to direct the reader to the specific impact issue analysis that underlies the DSEIR. Prior impact conclusions are summarily referenced without citation and it is impossible, in conjunction with the flawed baseline (see Visual Resources comments, infra), to determine whether Project impacts have been disclosed at all.

2. Project Description

In order for an EIR to adequately evaluate the environmental ramifications of a project, it must first provide a comprehensive description of the project itself. “‘Project’ means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment”. (CEQA Guidelines § 15378 (a)). An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR. San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus (1994) 27 Cal. App. 4th 713, 730 (quoting County of Inyo v. City of Los Angeles (1977) 71 Cal. App. 3d 185, 193). As a result, courts have found that even if an EIR is adequate in all other respects, the use of a truncated project concept violates CEQA and mandates the conclusion that the lead agency did not proceed in the manner required by law. San Joaquin Raptor, 27 Cal. App. 4th at 729-30. Furthermore, “[a]n accurate project description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity.” Id. at 730 (citation omitted). Thus, an inaccurate or incomplete project description renders the analysis of significant environmental impacts inherently unreliable.

a. Failure to Identify Significant Impacts Associated With Reasonably Foreseeable Future Consequences of the Project

Future consequences of a project must be assessed in the initial project EIR “if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future ... action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.” Laurel Heights Improvement Association v. Regents of the University of California (1988) 47 Cal. 3d 376, 47 Cal. 3d 376, 396. Here, there are several reasonably foreseeable consequences of the Project which involve significant impacts that were not disclosed in the DSEIR.

i. AD Failure

In our Scoping Comments, we cite numerous sources cautioning that AD is a costly\(^1\) and yet-untested technology. Accordingly, we requested that the draft EIR fully describe the AD process, its effectiveness, and what occurs if the process is unsuccessful. The DSEIR

\(^1\) http://www.compost.org/pdf/compost_proc_tech_eng.pdf
unfortunately fails to provide this information and analysis as requested. Discussed below (and in our Scoping Comments) the literature reports a host of problems that are reasonably foreseeable to occur with the AD component of the Project. Revisions to the DSEIR are necessary to include a thorough discussion of this reasonably foreseeable Project consequence.

The Statewide AD EIR notes that “if the digestate fails the standards set forth for metals or pathogens set in Title 14 CCR Sections 17868.2 and 17868.3, the end product would require additional processing or disposal.” (p. 3-16). However, that Statewide AD EIR does not describe the circumstances under which the digestate could fail, identify what additional processing steps might be necessary, what disposal options would exist, or evaluate the impacts associated with AD failure.

AD facilities with capacities of 10,000 to 20,000 tons/yr work well in Europe, however, there is little track record for larger plants currently in operation that are more similar to the 60,000 tons/year capacity of the AD facility proposed as part of the RRP. (See Municipal Solid Waste (MSW) Options (2006, Natural Resources Canada and Environment Canada, p. 164).)

One recent assessment of MSW anaerobic digestion facilities in Thailand reports that “most of them have failed, including the major investment of about USD 26.5 million in a 240-320 tons MSW/day [facility] in Chonburi.” (Cherdasatirkul, Generation and disposition of municipal solid waste (MSW) management in Thailand (2012, Earth Engineering Center, Columbia University, p. 10)).

Another study explains what can cause an MSW anaerobic digester to fail as follows:

Organic loading rate (OLR) is a measure of the biological conversion capacity of the AD system. Feeding the system above its sustainable OLR results in low biogas yield due to accumulation of inhibiting substances such as fatty acids in the digester slurry (VandeVivere, 1999). In such a case, the feeding rate to the system must be reduced. OLR is a particularly important control parameter in continuous systems. Many plants have reported system failures due to overloading (RISE-AT, 1998). VandeVivere (1999) reports OLR is twice in HS in comparison to LS.

(Verma, Anaerobic Digestion of Biodegradable Organics in Municipal Solid Wastes, Columbia University, p. 8).

---


Toxicity is also a significant issue with AD facilities that must be identified and thoroughly analyzed. This problem is described in one report as follows:

Toxicity: Mineral ions, heavy metals and detergents are some of the toxic materials that inhibit the normal growth of bacteria in the digester. Small quantities of minerals, (sodium, potassium, calcium, magnesium, ammonium and sulphur), also stimulate the bacterial growth, but heavy concentrations will have a toxic effect. Heavy metals such as copper, nickel, chromium, zinc, lead are essential for bacterial growth in small quantities, but higher quantities will also have a toxic effect. Detergents such as soap, antibiotics, organic solvents also inhibit the bacteria. Recovery of digesters following toxic substances inhibiting the system can only be achieved by cessation of feeding and diluting the contents to below the toxic level.

(Review of Current Status of Anaerobic Digestion Technology for Treatment of Municipal Solid Waste (RISE-AT (Regional Information Service Center for South East Asia on Appropriate Technology), 1998). Dilution volumes would presumably be quite high, and thus the process infrastructure must accommodate such circumstances.

The sensitivity of AD systems is demonstrated in a recent study of anaerobic digestion of different ratios of fruit and vegetable waste to general food waste in China. This study found that if there is not enough fruit and vegetable waste relative to other food wastes, the system failed due to high levels of volatile fatty acids (VFA). (Lin et al., Effects of mixture ratio on anaerobic co-digestion with fruit and vegetable waste and food waste of China (Journal of Environmental Sciences, 2011).

Further demonstrating the sensitive nature of AD systems is the following description of a yard waste AD system that failed due to insufficent food and paper inputs:

The City of Greensboro, North Carolina conducted a pilot project in the year 2000 to process 30,000 tons per year of yard waste using anaerobic digestion technology. The yard waste comprised of leaves, grass clippings, plant material and branches. The anaerobic digestion system was designed by Duke Engineering & Services, which invested two-thirds of the required capital, with the City investing the remaining one

---

5 http://www.ist.cmu.ac.th/riseat/documents/adreview.pdf

third. The team intended to turn the pilot into a full scale system and to show that anaerobic digestion was viable for garden waste. The pilot was not successful and the plant was eventually dismantled. The system encountered many problems including difficulty maintaining the necessary heat in the reactor to optimize biogas generation; the lignocellulosic material failed to break down and removal of plastic bag pieces in the feedstock created problems. This operating experience illustrates the sensitivity of anaerobic digestion to incoming feedstocks and the need to add sufficient food and paper to the digester to ensure high gas production to make the anaerobic digestion facility energy self sufficient.

(Municipal Solid Waste (MSW) Options (2006, Natural Resources Canada and Environment Canada, p. 41)). 7 Adding more paper to balance the organics may not be the “highest and best use” of fiber/paper, and the draft EIR should include a “highest and best use” analysis for paper to ensure that diverting paper into the AD is not an environmental step backward.

The EIR must identify the reasonably foreseeable consequences of AD failure, and the associated environmental impacts.

The DSEIR should be revised to include a thorough review of the above publications and all other relevant data and literature that document the experiences at other AD facilities and that discuss the causes, risks, environmental impacts and other relevant consequences associated with failure of a given AD process. The revised DSEIR also must identify, analyze, and avoid the environmental impacts associated with failed AD processes, and should also document how AD system failure could effect anticipated diversion rates and the integrated operation of the facilities. This information is necessary for a complete disclosure of the Project’s environmental impacts, and to permit a reasoned choice of project alternatives.

Additionally, the EIR’s analysis must account for future variability in the waste stream including significant reductions in organics entering the MSW stream that could cause digestate failure and/or financial collapse of the AD facility (i.e. from the increased use of modular in-vessel compost units on-site at restaurants to allow restaurants to process their own food waste and avoid the substantial cost of municipal disposal, or future requirements that paper (necessary for effective AD processing (see discussion of failed Greensboro pilot program, above), and other reasonably foreseeable circumstances that could shrink the organics stream).

ii. Reduction in Curbside Separation

Another reasonably foreseeable consequence of utilizing a dirty MRF to further separate the contents of the brown bin, is creating a disincentive to source separation. Currently, many

producers of waste within the Tajiguas Wasteshed are incentivized to source separate recyclables and organics by the knowledge that everything put in the brown bin will end up in the landfill. Residential customers for example have no other incentive to avoid filling their brown bin to capacity. The DSEIR must be revised to discuss this reasonably foreseeable consequence of the Project, and analyze or mitigate its impacts. For example mitigation in the form a public information campaign may be required.

b. Ramifications of Expansion and Perpetuation are Ignored

The DSEIR overlooks the effect of the Project on the continuation and expansion of activities at the Tajiguas Landfill. The Board of Supervisors directed staff on August 3, 1999 to “develop another County Landfill site as a long-term disposal solution,” and authorized environmental review of only a 15 year project, but staff interpreted this as 15 years of capacity, and maintains authorization to continue expansion of the site. Without accepting this interpretation as relevant, GCC notes that the effect of this project is to not only expand the intensity of operations at the facility and add new structures, but also to extend the operational life of the landfill well beyond its most-recently authorized closure date. The SDEIR relies on the continued presence of the landfill as part of the baseline, but systematically downplays the incremental Project impacts and the cumulative impact of extending the life of Tajiguas Landfill, potentially indefinitely. The SDEIR is bereft of analysis of this environmental consequence, despite the requirements of CEQA.

3. Inaccessibility of Documents and Truncated Public Participation

The online and CD version of the DSEIR is chopped up into a dozen or more files, making considerably more difficult the public’s review of the document as a whole. The County should make available a single file for download (where there are no size limits) of the entire SDEIR and all environmental review documents, and not require the manipulation of more than a dozen files simultaneously for a cohesive review.

GCC requested a written copy of the document, but were told that none were available. Most agencies have a few extra copies printed up, but the print budget for this EIR was reportedly too tight to allow this. Yet, PWD staff has a more than ample budget to undertake an aggressive propaganda campaign in support for the Project.

GCC has invested heavily in this process and project, but when a reasonable request was made to extend the comment period to allow experts to investigate and address technical issues, only a miserly extension was granted. The only public hearing on the DSEIR was scheduled on the date of GCC’s annual major event, set every year as part of First Thursday activities.

Cumulatively, the proponent/lead agency has not sought to integrate comments of those critical of the project, seeking to improve it as required by CEQA, but rather to fend off such
input and instead propagated input of those supporting its views. The CEQA process should be administered in an even handed manner, and encourage the submittal of critical comments to make for the best possible project. This has not been done.

4. **Environmental Setting**

To permit an adequate analysis of the Project’s impacts, the DSEIR must describe the Project’s environmental setting. The CEQA Guidelines provide:

Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project. The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context.

(CEQA Guidelines § 15125.)

The DSEIR lacks a section titled “environmental setting” however does include a description of the Project Location and Surrounding Land Uses. This section omits any mention of the Gaviota Coast where the Project is located. Instead it describes the Project location as “a coastal canyon known as Canada de la Pila, approximately 26 miles west of the City of Santa Barbara...” This section must be updated in a revised DSEIR to include a discussion of the Gaviota Coast, and update the environmental analysis to ensure that the uniqueness of the region and its resources are fully taken into account.

The Gaviota Coast is “one of the last remaining rural landscapes on the Southern California coast.” (Gaviota Coast Draft Feasibility Study and Environmental Assessment, Part 1, Chapter 3, attached hereto as Exhibit 1). The area “has retained much of the character and scenery of its ranching history.” *Id.* The visual, biological, agricultural, recreational, cultural and other resources of the Gaviota Coast are unparalleled. The Gaviota Coast is one of the rarest global biomes meets all four National Park Service criteria for national significance, 1) it is an outstanding example of several types of resources, 2) it possesses exceptional value in illustrating both natural and cultural themes of our nation’s heritage, 3) it offers superlative opportunities for public use and enjoyment, and scientific study of rich biotic and cultural resources and 4) it retains a high degree of integrity as a true, accurate, and relatively unspoiled example of these natural and cultural resources. *Id.* pp. 52-53.

This exceptional environmental setting must be fully taken into account when evaluating the RRP.
5. Impact Analysis

“A legally adequate EIR . . . ‘must contain sufficient detail to help ensure the integrity of the process of decisionmaking by precluding stubborn problems or serious criticism from being swept under the rug.’” (Kings County Farm Bureau v. City of Hanford (1990) 221 Cal. App. 3d 692, 733). “An EIR must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.” (Laurel Heights Improvement Assn. v. Regents of the University of California (1988) 47 Cal. 3d 376, 404-405). All phases of a project must be considered when evaluating its impact on the environment. (Guidelines § 15126). Agencies have a duty under CEQA to avoid or minimize environmental damage whenever feasible to do so, and must give major consideration to preventing environmental damage. (Guidelines § 15021 (a)). Agencies must make information relevant to the significant effects of a project, alternatives, and mitigation measures that substantially reduce project impacts as soon as possible in the environmental review process (Pub. Resources Code § 21003.1 (b)) and should not defer the formulation of mitigation measures to some future time (Guidelines § 15126.4 (b)). For the reasons articulated herein, the impact analysis for the Project is inadequate pursuant to the above standards.

The Project is a complex series of processes in specialized facilities. The EIR needs to separate out and identify each potential impact associated with each major step of each of the processes alternatives so an analytically robust, ‘head to head’ comparison of alternatives for each process can be demonstrated.

a. Visual Impact Analysis

i. Baseline

The DEIR uses a pick and choose methodology to definition of the baseline for the environmental impact analysis – using the existing conditions for the MRF/AD area visual impact assessment, but choosing the permitted baseline for the composting operations area. The DEIR is crafted to avoid examination and disclosure of Project impacts through manipulation of the baseline. The DEIR downplays Project impacts by assuming that the permitted capacity is the baseline for many of the project’s impacts, rather than the existing physical condition. Little explanation is provided for this perversion of the environmental impact disclosure process, yet it has an enormous difference in the nature of the Project’s impacts. The top parts of the waste cells are the most visible, from the Highway 101 corridor, from the near-shore and distant ocean view perspectives, and from recreational and residential viewing locations above and generally to the north of the Project. It is inappropriate to base the Project’s environmental impact analysis on future physical conditions that may or may not occur under existing permits.

The skewed baseline is particularly misleading and problematic (from a full disclosure perspective) since the effect of the Project is to extend the life of previously permitted aspects of
the facility. In essence, the “pick and choose” baseline, combined with the mistaken reliance on previously permitted operations and structures as exempt from environmental impact analysis at this stage, utterly thwarts CEQA’s mandate of a good faith effort at full disclosure of environmental impacts, and extends impacts from those previously assessed under earlier environmental review documents.

ii. Inadequate Visual Simulations

The visual simulations (photographs and correlated simulations) included in the DSEIR are low resolution and appear pixilated. Given the visual quality and sensitivity of views on the Gaviota Coast, higher quality photos and simulations should be included in a revised DSEIR.

In addition to View 6 depicting the view of the AD and MRF facilities from Highway 101, the EIR should also include a visual simulation of this view from passing trains and of future pedestrians utilizing the planned Coastal Trail segment identified in the Draft Gaviota Coast Plan (Figure 4.3 – Gaviota Coast Plan – Proposed PRT – Central Panel (attached hereto as Exhibit 2).

The DSEIR provides that the baseline for assessing impact of the composting area is the "condition expected to exist at the time of construction." (p. 4.1-3) “Since the precise interim landfill condition at the time the Resource Recovery Project would be constructed is not fully known” the visual simulations do not depict the interim condition used as the baseline in the analysis. (ld.) The DSEIR must be revised to include visual simulations of one or more reasonably foreseeable interim conditions to enable the public and decisionmakers to comprehend the environmental analysis.

iii. Improper Discounting of Visual Impacts

The DSEIR concludes that Impact TRRP Vis-2 (Project as seen from southbound Highway 101) is Class II, in part because “Viewers from this perspective are typically motorists on the heavily traveled highway and would typically be moving at a speed of about 65 miles per hour. Thus, the duration of the view (a few seconds) would be very brief”. (DSEIR p. 4.1-12.) The DSEIR however does not disclose whether other viewers, including bicyclists and pedestrians (i.e. along the planned Coastal Trail segment, see Exhibit 2). The DSEIR is silent on whether the facilities visible in the View 6 (DSEIR Figure 4.1-7) simulations are visible to slower-moving travelers. Without this information it is improper to discount the significance of Project impacts from View 6 based on a short view duration.

Additionally, the DSEIR’s discussion of extension of landfill life impacts related to aesthetics relies on the absurd assumption that “the public has become accustomed to the current visual condition” of the Landfill (see p. 4.1-16) – the Landfill is a unique and unwelcome
iv. Improper Reliance on Vegetation to Mitigate Visual Impacts

The DSEIR relies on MM TTRP Vis-1b: Landscape Screening, to mitigate the Project’s visual impacts (see p. 4.1-13). The DSEIR’s reliance on vegetative screening is problematic because vegetation is not permanent. Fire, drought, disease, wind, and other natural forces can destroy vegetation, and further there is no prohibition against future owners removing vegetation. The visual impact analysis therefore must assume no vegetative screening for an accurate assessment of the Project’s potential visual impacts. The CBAR practice is to eliminate consideration of vegetation as screening of proposed projects in evaluating visual impacts and policy consistency, and this should be the convention employed in this EIR. Moreover, the DSEIR only requires native vegetation to the extent feasible. The DSEIR acknowledges that native plants “maximize visual compatibility with the surrounding vegetation communities, minimize irrigation requirements, minimize spread of invasive species, and augment nearby wildlife habitat.” (p. 4.1-13.) Accordingly the use of native vegetation must be required.

v. Failure to Recognize Temporal Significant Impacts

The DSEIR does not isolate and recognize as significant the effect of the Project on extending the period before final restoration and site rehabilitation occurs, at which point visual impacts are reduced in significance. During the extended operational phase, the Project will have a prolonged significant adverse visual impact from all visible vantage points.

b. Air Quality and Greenhouse Gas Emissions

Discussed above in the context of the Project Description, AD for MSW is not yet a road-tested technology in California, and there are a number of scenarios that can result in AD failure. GCC is concerned that the DSEIR has understated the limitations and risk of failure associated with AD technology. Because the capture and utilization of bio-gas from the digesters in the CHP engines is relied upon heavily in the DSEIR’s analysis of the Project’s air quality and GHG impacts, it is vital that the DSEIR not underestimate the frequency and duration of operational scenarios in which could result in greater emissions. For example, the DSEIR calculates maximum daily emissions based on assumptions regarding how long each CHP engine would operate and that a maximum of 36 start-ups would occur per year which increase criteria pollutant emissions (see p. 4.2-25). The DSEIR fails to disclose the basis for these critical assumptions and whether they take into account scenarios where the digesters fail to optimize production of biogas or fail all together (see above discussion). This information must be disclosed and the impact analysis revised accordingly.
c. Land Use

The DSEIR concludes that the Project’s Land Use Impact TTRP LU-1 (The Project could result in land use conflicts with adjacent and nearby residential, agricultural and recreational uses) is Class II, because with implementation of identified mitigation measures potential land use conflicts would be potentially significant but mitigable. (DSEIR p. 4.8-10.) In its analysis however, the DSEIR incorrectly states that “all potential biological impacts would be reduced to a level of less than significant”. In fact, extending the life of the Tajiguas Landfill results in Class I impacts to biological resources associated with the delay in landfill cover revegetation and abandonment or avoidance of foraging and breeding habitat by sensitive birds and mammals due to landfill operations and human activity. (DSEIR pp. 4.3-46 – 4.3-47.)

In discussing the policy ramifications of the Project’s visual impact, the Land Use impact discussion fails to account for the Project’s significant impact associated with extending the life of Tajiguas Landfill. Discussed above, the Landfill degrades the uniquely valuable visual resources of the Gaviota Coast. Not only would the Project would add incrementally to that degradation, but it has the effect of prolonging the Landfill’s visual impact at least 10 years into the future. Increasing the duration of visual impacts particularly from Highway 101 (see Photo-Simulation View 6) and from the Upper Outlaw Trail (see Photo-Simulation View 8) results in increased policy conflicts with Visual Resources Policy 2, and concomitant significant Land Use impacts. (See DSEIR p. 4.8-18.)

d. Traffic

i. Environmental Baseline for Traffic Analysis

CEQA requires that environmental impacts be evaluated against existing physical conditions on the ground, not hypothetical situations. (County of Amador v. El Dorado County Water Agency (1999) 76 Cl. App. 4th 931, 955.) Rather than use existing landfill traffic volumes as the baseline for analysis, the DSEIR utilizes the peak traffic volume recorded in 2008 landfill traffic volumes as the traffic baseline. (DSEIR p. 4.0-3.) The DSEIR explains that permitted peak traffic volume is unrealistically high because it “has not been reached even when the peak daily MSW volume of 1500 tons/day was recorded”, but that “existing landfill traffic volumes were also determined to not be representative of baseline conditions because economic conditions (recession) have impacted waste disposal rates and as the economy reboinds, it is anticipated that [waste disposal] will increase”. (DSEIR p. 4.0-3.)

Utilizing the highest peak volume as the baseline artificially reduces the significance of the Project’s impact relative to that baseline, also skewing the alternatives analysis. The DSEIR does not adequately justify on the basis of substantial evidence that the 2008 peak volumes are likely to represent existing conditions better than the existing traffic volumes, such that an evaluation relative to existing conditions would be misleading or uninformative. (See Neighbors
for Smart Rail v. Exposition Metro Line Construction Authority et al. (2013) 57 Cal.4th 439, 449). Anticipating that waste disposal rates will increase back to 2008 levels is speculative, as disposal rates may be decreasing due to other factors such as increased recycling and less packaging materials used. The DSEIR must be revised and recirculated to provide an analysis of the Project’s traffic impacts (and to the extent applicable, the Project’s vehicle emission impacts) relative to the existing traffic baseline.

ii. Significant Traffic Safety Impacts

Trucks entering and exiting the Tajiguas Landfill currently would utilize an at-grade crossing on Highway 101. The DSEIR concludes that Impact TRRP T-4 (Traffic Safety Impacts) would be less than significant, based primarily on Caltrans accident data showing an accident rate below the statewide average for similar intersections. (DSEIR p. 4.9-20.) However, Caltrans has emphasized with respect to other Projects along this same stretch of coastline (i.e. Paradiso del Mare) that directing additional traffic to utilize at grade crossings does in fact result in significant traffic safety impacts. (See Exhibits 3, 4 – Caltrans comments on Paradiso del Mare).

e. Sea Level Rise

The environmental review process must acknowledge and disclose as a significant impact the future, eventual rise in sea level associated with global warming to levels that erode to the toe of the landfill and cause failure of the structural integrity of the waste cells. This would lead to discharge of some of the landfill’s contents to the ocean. This impact is not a question of if, but when. The EIR must grapple with the issue and question of how long ahead should the County consider in planning its infrastructure. If catastrophic landfill failure happens 800 years from now, is that a significant impact? If it is 8000 years from now, is there no reasonably foreseeable impact? There is new information that increases annually in certainty and accuracy as to the future sea level rise associated with climate change, with newer information indicating the rates and levels of sea rise may be grossly underestimated.

f. Water Quality

In analyzing the Project’s water quality impact associated with run-off from the composting area the DSEIR admits “Large-scale municipal composting of anaerobically digested MSW is relatively new in California. Therefore, the types and potential concentrations of contaminants in runoff from anaerobically-digested compost windrows have not been specifically studied.” (DSEIR p. 4.10-34.) The DSEIR utilizes water quality data from composting facilities in California, Oregon and Washington in its analysis, however, “feedstock for these facilities was primarily composed of green-waste and wood waste, with a few including manure or food waste. None of these facilities involved anaerobic digestion prior to composting.” (Id.) Based on this available data the DSEIR posits, “storm run-off from
composting facilities may exceed water quality objectives for aluminum, arsenic, copper and zinc.” (Id.) The DSEIR then makes the remarkable assumption that contaminants in the AD digestate is likely to be lower than the contaminants in the compost facilities studied. This assumption is based on the mechanical sorting that would occur, the AD process removing VOCs, and AD removing most pathogens. However, the identified contaminants – aluminum, arsenic, copper and zinc are not VOCs or pathogens that would be removed during the AD process. Moreover, the DSEIR does not disclose whether the organics in the composting facilities studied were derived from a comingled or source separated organics stream. If source separated, the organics are likely to have fewer contaminants to begin with, particularly when compared to organics that have been comingled with MSW and subsequently sorted.

To reduce this impact, the DSEIR relies on the preparation of a Water Quality Monitoring and Corrective Action Plan, which would include identifying potential pollutant sources at the composting area that may affect storm water discharge quality. (DSEIR p. 4.10-36.) However, until the potential pollutant sources are known, it is premature to classify Impact WR-9 as Class II – rather it should be Class I.

6. Alternatives

“A major function of an EIR ‘is to ensure that all reasonable alternatives to proposed projects are thoroughly assessed by the responsible official.’ (Save Round Valley Alliance v. County of Inyo (2007) 157 Cal. App. 4th 1437, 1456). The alternatives analysis is the core of CEQA, and forms the foundation for CEQA’s “substantive mandate” which prohibits approval of projects “if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.” (Citizens for Goleta Valley, 52 Cal. 3d at 564-565; Pub. Res. Code § 21002).

Alternatives identified in our Scoping Comments include alternative locations, lower-tech composting methods as alternatives to AD, enhanced source separation as an alternative to the MRF, and waste reduction/prevention. Unfortunately, the DSEIR rejects the most cost-efficient and straightforward alternative to the MRF component of the Project - enhanced source separation – with no data or analysis provided to substantiate its rejection. (See DSEIR p. 5-8.) Not only does enhanced source separation require a fraction of the cost of constructing and operating the MRF, it yields more valuable recyclable materials, and reduces impacts associated with using a contaminated organics stream to feed the AD. The DSEIR also rejects numerous potentially feasible alternative locations (see DSEIR p. 5-9). Ultimately, the only alternatives analyzed besides the No Project Alternatives (A, E, F, G) are: MarBorg MRF location on Quinientos Street (B), SCRTS MRF location (C), and aerobic composting at the Engel & Gray facility in Santa Maria with disposal of residual waste at the Tajiguas Landfill (D).

Extending the life of the Tajiguas Landfill results in numerous significant impacts including Class I impacts including impacts to biological resources associated with the delay in
landfill cover revegetation and abandonment or avoidance of foraging and breeding habitat by sensitive birds and mammals due to landfill operations and human activity. (DSEIR pp. 4.3-46 – 4.3-47.) Unfortunately no alternative analyzed in the DSEIR avoids these Class I impacts. Additionally there are a host of Class II impacts associated with developing the AD and MRF facilities at Tajiguas that are not addressed by any alternative analyzed in the DSEIR including biological impacts, visual impacts, and differential settlement associated with constructing portions of the Project (MRF and AD parking areas, composting area) on previously buried MSW (see DSEIR pp. 4.5-16- 4.5-17.)

The DSEIR cannot serve its function as an informational document with such a limited range of alternatives. Accordingly, the DSEIR must be revised to include an analysis of other alternatives that actually avoid the significant impacts of the Project, including impacts associated with extending the life of Tajiguas Landfill.

a. Improper Rejection of Alternatives that Do Include Residual Disposal at a Location Other than Tajiguas Landfill

Although the Project’s only identified Class I impacts are associated with extending the life of Tajiguas Landfill (air quality and biological resource impacts) and the Project will result in a host of additional impacts associated with extending the life of Tajiguas, the DSEIR does not analyze an alternative that would avoid these impacts. The DSEIR specifically rejects consideration of any alternative that involves residual disposal at a location other than Tajiguas Landfill (see p. 5-8). However, the “rule of reason” applied to the range of alternatives analyzed in the EIR requires that the EIR identify and analyze alternatives that are actually capable of reducing the Project’s significant environmental impacts.

b. Improper Rejection of Enhanced Source Separation Alternative to the MRF

The DSEIR fails to analyze enhanced recycling/source separation programs as an alternative to the Project, because “it is the opinion of the professional solid waste management staff of the participating jurisdictions, based on experience in our own community as well as experience in communities throughout the nation, that to significantly reduce the amount of material being buried requires the use of facilities like those proposed in the Resource Recovery Project.” (DSEIR p. 5-8.) This alternative would avoid the need for a MRF at Tajiguas, substantially reducing a host of environmental impacts. Additionally it appears that the alternative is in fact capable of satisfying the basic Project objectives of increasing diversion rates and extending the life of Tajiguas. Moreover, the alternative would have the ancillary benefits of yielding cleaner and hence more valuable recyclable material, and cleaner organic waste stream to feed the digesters, resulting in a cleaner and more valuable compost product. Rejection of this alternative is improper for a number of reasons, discussed more specifically below, and the EIR must be revised and recirculated to include analysis of this alternative (see CEQA Guidelines § 15088.5(a).)
First, to comply with CEQA the “opinion” of the Project Proponent(s) that significantly increasing the existing 73% diversion rate is not achievable with enhanced source separation must be established with facts and analysis. (*Santiago Water District v. County of Orange* (1981) 118 Cal. App. 3d 818, 831 (“The EIR must contain facts and analysis, not just the bare conclusions of a public agency”)).

Second, this “opinion” that the Enhanced Source Separation Alternative (“ESSA”) is not worthy of consideration appears *not* to be supported by the facts and data available publically. Even with the substantial existing diversion rate, the DSEIR reports (from the 2009 Waste Characterization Study) that the composition of waste disposed of at Tajiguas includes “a large percentage of . . . recyclable materials and organics” - specifically 37.2% organics, 17% paper, 2.2% glass, 5.6% metal, and 7.2% plastic. (DSEIR p. 1-6, Table 1-2.) Currently, only the City of Santa Barbara collects food waste, and only from businesses. Implementing a food-waste collection program alone could considerably increase the diversion rate by itself. From these numbers, it appears that diverting an additional 2-7% (2% to meet the State goal of 75%, or 7% to match the Project’s anticipated diversion rate) is readily achievable through enhanced source separation. Moreover, plastic bags were just banned in California, and jurisdictions around the country are in the process of banning Styrofoam. Additionally, as technology improves more items become recyclable (i.e. waxed cardboard was recently added to the list of recyclable items locally). This changing legal, regulatory, and technological landscape will reduce the volume of materials being landfilled in the near future.

The DSEIR refers to the education campaigns to increase recycling, however there currently is no incentive other than the moral imperative to avoid landfiling for residential customers not to simply fill the brown bin to capacity. Smaller bins, less frequent collection, higher costs for MSW collection have all been implemented successfully in other communities to maximize the diversion of recyclables (and also organics.) (See e.g. San Francisco Zero Waste by 2020 [http://www.sfenvironment.org/zero-waste](http://www.sfenvironment.org/zero-waste), achieving a diversion rate of 80% focusing on enhanced source separation of recyclables and compostables ([http://www.sfenvironment.org/news/update/san-francisco-sets-north-american-record-for-recycling-composting-with-80-percent-diversion-rate](http://www.sfenvironment.org/news/update/san-francisco-sets-north-american-record-for-recycling-composting-with-80-percent-diversion-rate)).

In short, the ESSA is capable of satisfying the primary objectives of the Project including reducing landfill dependence by diverting MSW, meet or exceed the State 75% diversion requirement, provide a long-term solution to solid waste management, and substantially extend the life of Tajiguas Landfill. Additionally the ESSA would satisfy project objectives of locating project elements in reasonable proximity to existing developed solid waste facilities (ESS would occur at the curbside, AD at Tajiguas or aerobic composting at Engle & Gray), provide long-term financial stability at a much reduced cost to the County. The ESSA would also satisfy the “Additional Project Objectives”, perhaps better than the Project itself.
c. Inadequate Characterization And Comparison Of Alternatives

The DSEIR does not adequately or fairly compare the impacts of either alternative MRF location with the proposed location at Tajiguas. The DSEIR does not allow comparative evaluation of MRF location alternatives and recognize that the redundant (back and forth) hauling of unsorted trash 22 miles (for South Coast waste) to be sorted and the recyclables returned (back to or through Santa Barbara) is a prime factor in determining the environmental comparisons.

Further, the continued lack of an adequate transfer mechanism to eliminate the use of small collection trucks to haul to the landfill causes significant impacts that could be avoided by a properly located MRF/Transfer Station in or near urbanized areas.

7. Conclusion

The DSEIR fails to provide adequate information, particularly regarding Project alternatives, to permit a reasoned analysis of the Project. Accordingly we request that the DSEIR is comprehensively revised and recirculated for additional public review.

Sincerely,

LAW OFFICE OF MARC CHYTIL0

Marc Chytilo
Ana Citrin
For Gaviota Coast Conservancy

Exhibit 1: Gaviota Coast Draft Feasibility Study and Environmental Assessment, Part 1; Chapter 3
Exhibit 2: Figure 4.3 – Gaviota Coast Plan – Proposed PRT – Central Panel
Exhibit 3: Caltrans DEIR comments on the Paradiso del Mare Project
Exhibit 4: Caltrans FEIR comments on Paradiso del Mare Project
Significance
3. Significance

The National Park Service (NPS) uses four basic criteria to evaluate the national significance of proposed areas. These criteria, listed in the National Park Service Management Policies, state that a resource is nationally significant if it meets all of the following conditions:

1. It is an outstanding example of a particular type of resource.
2. It possesses exceptional value or quality in illustrating or interpreting the natural or cultural themes of our nation’s heritage.
3. It offers superlative opportunities for public enjoyment, or for scientific study.
4. It retains a high degree of integrity as a true, accurate, and relatively unspoiled example of a resource.¹

National significance for cultural resources is evaluated by applying the National Historic Landmark evaluation process (See Appendix D).

Background

National Park Service professionals, in consultation with subject matter experts, scholars, and scientists determine whether a study area is nationally significant. Natural and cultural resource experts and scholars, locally, and within the National Park Service, contributed research and technical review for the study area’s statement of significance. A list of those who provided information and technical review is included in the section “Study Team and Preparers” at the end of this report.

Nationally significant natural and cultural resource attributes are identified below.

Natural Resources

✓ The study area is part of one of the rarest global biomes, the Evergreen Sclerophyllous Forest (Mediterranean communities), characterized by a mild Mediterranean climate caused by the interaction of global weather and cold-water upwelling on the west coast of a continent. It is one of only five such locations in the world that contain this unique climate and associated vegetation.²

![Blueplanet Biomes](image1)

✓ The study area is the only location in the nation that features an ecological transition zone between northern and southern Mediterranean communities. “The Gaviota Coast is a transition zone among many factors of contrast, perhaps the most significant of which is the transition between central (or northern) California and Southern California. Many northern plant species reach their southern geographic limits north of the Santa Ynez Mountains and many southern species reach their geographic limits south of the Santa Ynez Mountains.”³

![Map of Endemic Species](image2)

Stein, Kutner, and Adams, 2000
通过对两种主要洋流的交汇处和大陆架的形状的研究，研究区的生物多样性得到了突出。海洋和陆地生态系统在 Point Conception 处相互作用，形成了独特的物种和栖息地。\(^4\)

- Gaviota Coast 是南加州最大的连续沿海土地，也是最健康的部分沿海生态系统。虽然 Coal Oil Point 和 Point Sal 之间的沿海区域只占南加州海岸线的 15%，但它包括了大约 50% 的沿海区域。\(^5\)

- 研究区的稀有和濒危栖息地包括山毛榉森林，檀香橡树林，谷橡林，沿海灌木林，中央沿海灌木林，本地草草地，湿地，河岸林，沿海沙丘和岸边，以及海洋生态系统，如海草床，海草，和岩石沿海潮间带。\(^6\)

- 研究区估计有 1,400 种生物。\(^6\) 各种地方、州和联邦机构的物种检查报告表明，研究区包括 24 种联邦或州级濒危或受威胁的植物和动物物种和另外 60 种稀有和特殊关注的物种（包括提议濒危、受威胁、候选和敏感物种）。

- 在 Point Sal 地区的火山岩形成具有全国性重要性，因为它们对科学研究在地球地壳的形成方面的贡献。火山岩序列在 Point Sal "最为完整，而且在海崖和波浪切割带中暴露良好。" 这个系列是暴露最好和研究最多的火山岩系列之一在北美洲。\(^7\)
Cultural Resources

In addition to nationally significant sites listed on the National Register of Historic Places, the four types of cultural resources within the study area that have national significance include: 1) the archeological evidence of more than 10,000 years of Native American habitation, 2) the Juan Bautista de Anza National Historic Trail, 3) the Cold War military resources on Vandenberg AFB, and 4) Rancho del Cielo, once known as the “Western White House.”

Significant cultural resource features of the Gaviota Coast are:

- The Gaviota Coast contains some of the oldest and best-preserved Native American archeological sites in California spanning over 10,000 years. “The archeological resources of the Gaviota Coast are exceptionally valuable due to their relatively preserved state...” These resources are unique to the State of California and the nation.8

- The entire study area coast is traversed by the Juan Bautista de Anza National Historic Trail. The trail commemorates the route taken by Juan Bautista de Anza in 1775-76 when he led a group of colonists from Mexico to found a presidio and mission for New Spain at San Francisco. “The Gaviota Coast represents one of the most significant, intact, historic landscapes along the Anza Trail. Outside of the California deserts, this is the one place that trail visitors can go to get a feel for what the Anza Expedition would have seen and experienced two centuries ago.”9

- Nationally significant sites listed on the National Register of Historic Places include the SS Yankee Blade Shipwreck, and the Point Conception Light Station Historic District.
Vandenberg AFB contains one of the most comprehensive assemblages of Cold War missile and space launch facilities in the country, offering opportunities for preservation and interpretation of an important era in American foreign policy and global political influence in the nuclear age. During the Cold War period, Vandenberg AFB was the only site in the United States from which intercontinental ballistic missiles (ICBMs) were test-launched under operational conditions. Designs of the 1980s, Space Launch Complex 10 is a National Historic Landmark. It represents the best surviving example of a launch complex built in the 1950s at the beginning of the American effort to explore space. An additional 69 cold war and space launch sites surveyed on Vandenberg AFB have been evaluated as nationally significant by the California State Office of Historic Preservation.

The study area is home to the Rancho del Cielo, known as the "Western White House" during President Ronald Reagan's terms in office. Rancho del Cielo was President Reagan's private ranch, and served as the location for historic events and visits from world leaders such as Mikhail Gorbachev and Margaret Thatcher. Even though the Rancho del Cielo is significant for events that have happened within the last fifty years, the association with President Reagan and the political events that took place at this location are of transcendent importance to United States history.

POSSIBLE FURTHER SIGNIFICANCE

Additional resources that may be found to be nationally significant include the cultural landscape represented in the ranching land use pattern established by the Spanish and Mexicans and carried on to this day, and the collection of significant historical maritime resources found along the coast. Further research and studies are needed to evaluate the collective significance of maritime resources and the cultural ranching landscape.

As one of the last remaining rural landscapes on the southern California coast, the study area has retained much of the character and scenery of its ranching history. Large ranches such as Sudden on Vandenberg AFB, Cojo-Jalama, Santa Anita, and Rancho Refugio have changed little since Mission times.11-12

The Gaviota Coast has a rich maritime history; associated maritime resources include light stations, wharves, shipwrecks, and archeological sites associated with maritime activities of commerce. Areas such as the Point Pedernales disaster site, the worst naval peacetime disaster recorded in U.S. Navy history, have significant potential for interpretation.
Summary Statement: Significance

As described at the beginning of this section, there are four basic criteria for national significance. The following summary demonstrates the extent to which the study area resources meet these criteria:

Criterion 1: It is an outstanding example of several types of resources.

The primary aspect of the study area that sets it apart as an outstanding landscape is that it is the most striking biogeographic transition zone on the west coast of the United States. Because of the unique topography and geology, both oceanic and geographic transitions take place in the study area. The Transverse Ranges form the longest east-west trending coast on the Pacific shore, excluding Alaska. These ranges form the terrestrial barrier between northern and southern California species. In addition, the study area contains relic forests such as tanbark oak which remain from ages when the area had a much cooler and wetter environment. The marine transition zone can be attributed to the confluence of the two major ocean currents and the shape of the continental shelf at Point Conception. It is rich in nutrients providing food for juvenile fish larvae, marine mammals, and many resident and migratory bird species adding to richness of the terrestrial ecosystems.

Outstanding cultural resources include nationally significant archeological sites and cold war era historical resources. The study area contains some of the oldest and best-preserved archaeological sites in California spanning over 10,000 years of human occupation. The comprehensive assemblage of Cold War resources at Vandenberg AFB offers opportunities for preservation and interpretation of an important era in American foreign policy and global political influence in the nuclear age.

Criterion 2: It possesses exceptional value in illustrating both natural and cultural themes of our nation's heritage.

The National Park Service uses a series of natural and cultural themes to evaluate potential areas for inclusion in the National Park System. The themes are evaluated by two criteria: 1) significance and 2) adequacy of representation within the National Park System. Study area natural and cultural resources possess exceptional value in illustrating the themes represented in the lists below. The section on suitability includes an evaluation of themes represented by resources in the study area in terms of the criteria.

Natural themes: The coastal environment and geological landforms of the Gaviota Coast create one of the most diverse ecosystems in the United States. These resources represent many NPS themes such as:

- **Landforms of the Present**
  - Mountain Systems
  - Seashores, Lakeshores, and Islands
  - Works of Volcanism
  - Eolian Landforms (Sand Dunes)

- **Land Ecosystems**
  - Dry Coniferous Forest and Woodland
  - Mixed Evergreen Forest
  - Chaparral

- **Aquatic Ecosystems**
  - Marine Environments
  - Estuaries
  - Lakes and Ponds (Riparian)

Cultural themes: The archeological and cultural resources on the Gaviota Coast include significant examples of archeological and cultural sites. NPS Cultural Resource Themes represented include:

- **Peopling Places**
  - Ethnic Homelands (Chumash)

- **Shaping the Political Landscape**
  - Military Institutions and Activities (Cold War)
  - Political Ideas, Cultures and Theories (Cold War)

- **Expanding Science and Technology**

---

National Park Service
Technological Applications (Military and Space Launch Technology)

- Changing Role of the United States in the World Community
  International Relations (Cold War)
- Developing the American Economy
  Extraction and Production (Ranching)
  Transportation and Communication (Maritime)

---

Criterion 3: The study area offers superlative opportunities for public use and enjoyment, and scientific study of rich biotic and cultural resources.

The 76-mile rural coastline has striking scenic beauty combined with rich biological and cultural resources that make it unique along the coast of southern California. The south-facing seashore sheltered by the offshore Channel Islands creates a warmer and milder setting for public use and enjoyment.

The ecoregions that transition within the study area are two of the most biologically diverse ecoregions in the world and have some of the highest concentrations of globally important, rare species in the nation. This provides the opportunity for scientific study of many endemic and rare species where they meet their southernmost and northernmost limits. The offshore marine environment provides opportunities for observing many types of marine wildlife. For example, since gray whales use Point Conception as a reference point during their migration, they can often be seen just a few hundred meters from the shore.

The ophiolites at Point Sal have excellent research value. The series is one of the best-exposed and best-studied ophiolites in North America. Detailed study and reconstruction of the California Coast Range ophiolite series has been hindered by tectonic shifting and disruption of the sequence, and by generally poor exposures. The ophiolitic sequence at Point Sal, however, "comes nearest to being complete, and it is also relatively well-

exposed in sea cliffs and wave-cut patterns."19

The richness and concentration of archeological sites in the study area provide significant opportunities for scientific study of the adaptation of native cultures to the marine coastal environment and their interactions with other coastal groups.20

The study area provides exceptional opportunities for education and interpretation about Cold War era events. These events range from intercontinental ballistic missile and space launches in the 1950s to significant events at President Reagan’s Rancho del Cielo.

---

Criterion 4: The overall study area retains a high degree of integrity as a true, accurate, and relatively unspoiled example of these natural and cultural resources.

The Gaviota Coast is the largest continuous stretch of undeveloped coastal land in southern California. This is significant in that southern California is among the top four areas in the United States with the greatest number of endangered species. The study area is home to 84 rare and endangered species including 24 federally- and state-listed threatened or endangered species, and 60 species of concern and established rarity. With the extensive impacts of urbanization and pollution on much of the southern California landscape, the plant communities within the study area provide a refuge for wildlife populations that have been severely reduced from their former range. Over the past 150 years, development south of the study area has had a significant impact on habitat. For example, wetlands south of the study area have been degraded by flood control measures such as damming, diverting or channeling creeks, grazing livestock, introduction of invasive species, wastewater discharge, stormwater runoff, and development.21

Endangered and severely reduced habitats within the study area include riparian areas, native grasslands, coastal dunes and strand, central maritime chaparral coastal sage scrub, and
wetlands. Rare habitats include tanbark oak forest and bishop pine forest.

Because the study area coast is the largest and healthiest remaining coastal area in southern California, its protection is important to coastal ecosystems such as the Channel Islands National Marine Sanctuary (CINMS), located just off the study area coast. The CINMS is internationally recognized as a United Nations, Educational, Scientific and Cultural Organization (UNESCO) biosphere reserve.

The undeveloped nature of the study area coast also accounts for the richness and concentration of archeological sites. The study area offers exceptional potential for research and interpretation that will answer questions about human activities along the coast. Many of the plants and animals important to the early cultures and the Chumash who resided at these sites are still present, allowing the study and appreciation of these sites in their ecological context. In addition, many portions of the area have not been extensively surveyed and inventoried. It is estimated that in the coastal zone from Gaviota to Point Sal, the proportion of archeological sites that are disturbed is estimated at fewer than 10% as compared to 90% for urban areas between Ellwood and Carpinteria. The number of sites in the undisturbed areas is unknown. As surveys on Vandenberg AFB have uncovered approximately 1,300 sites, we can assume that areas in the western portion of the study area would yield a high number of sites if comprehensive surveys were completed.

The study area meets all four of the requisite criteria for national significance.

Notes
6. California Coastal Conservancy, 2001:

October 24, 2012

Ms. Nicole Lieu, Planner 05-SB-101-29
Santa Barbara County Planning Department
123 Anapamu Street
Santa Barbara, CA 93101

Subject: Paradiso del Mare Ocean Draft Environmental Impact Report (DEIR)

Dear Ms. Lieu:

Thank you for the opportunity to review the revised DEIR for the proposed Paradiso del Mare Ocean project. For many years, this location has been the subject of attempted development. Proposals have ranged from two houses to a tournament grade golf course. For the past seventeen years, Caltrans has discussed and written concerning its perspective about the driveway intersection, the highway median crossover, and recommended solutions. Therefore it is with much concern that Caltrans receives the revised draft DEIR that offers nothing in the form of highway access improvements and control for this current project.

Caltrans offers the following comments:

1. The DEIR offers no improvements upon US 101. The purpose of the improvements discussed over the past seventeen years is to promote safety and maintain operational integrity by establishing clear paths of travel that reduce turning movements, merging conflicts and driver confusion. This project offers none of these benefits. On the contrary, the conclusions promote sustained usage of an expressway shoulder, a driveway flare, and turning movements across a high-speed facility. The shoulder is not a structural section of pavement and is not designed for regular usage as is proposed. The driveway flare is of unknown quality as it is not addressed within the analysis. In addition, the use of the shoulder for motor vehicle acceleration and deceleration has potential to create safety conflicts with bicyclists using the facility. This portion of US 101 is designated as part of the Pacific Coast Bicycle Route and is a regular route for bicyclists.

2. Caltrans disagrees with the conclusion obtained from the DEIR with respect to ingress and egress to the project driveway. As early as the construction phase, with the addition of 62 ADT over a two-year period, the project will alter the transportation character at this location. In addition, the proposed project will add momentum to this area transitioning from an agricultural, occasional use to a more sustained, populated, and daily recreational use as the traffic characteristics continue to operate as a freeway type facility in terms of speeds and volume growth.

"Caltrans improves mobility across California"
Ms. Nicole Lieu  
October 24, 2012  
Page 2

3. The traffic study inaccurately used the San Diego Association of Governments (SANDAG) trip generation manual, which resulted in an underestimation for the proposed development's trip generation. Trip generation rates also need to be determined for the guest housing and included into the total trip generation. The Estate Housing trip rate, applied to the main dwelling and guest dwelling, is only applicable to "a single dwelling unit on an individual lot of 1 acre or more" (SANDAG Trip Manual, Pg. C-7).

The SANDAG Manual was employed to determine Residential Estate Lot trip generation, yet was not employed to determine beach access parking lot trip generation. Instead of using SANDAG's established beach access trip rates, the traffic study used a different trip rate based on a series of surveys. However, the newly derived trip rate is much lower than the already established trip rates presented in SANDAG's trip generation manual. SANDAG's trip generation manual is arguably the most extensive source for empirical data related to beach access parking lots and is therefore most reliable. Caltrans requests the use of SANDAG's trip generation manual to determine beach access parking.

4. At project completion, there will be four residential structures and a 20-space parking lot for coastal access. The Department anticipates traffic will grow beyond 62 ADT. This is based on the 24 residential trips (the DEIR did not include trips for the guest houses), and 38 trips accessing the parking lot. We foresee that the number of additional recreational users will increase over time as awareness of the parking feature grows, particularly due to the locale's proximity to a major population center.

5. The traffic study estimates 10% of the trips will turn left onto NB US 101, but does not conduct analysis depicting that movement. Since this is the critical movement for the intersection, we would need to see an analysis of project conditions with at least one egress vehicle turning left.

6. The traffic study states that the security guard would no longer be stationed once the security gate is removed but the executive summary states that the security gate will be moved back and reconstructed. If a security guard will be stationed at the new location, this will have an impact on the number of trips to and from the location.

a. "The existing security gate located at the site entry would be removed and a new security gate would be installed down the existing driveway approximately 200 feet south of the existing gate. An additional gate would be installed at the entrance to the shared access driveway serving the residential sites, just west of the Highway 101 right-of-way." (Paradiso Del Mare Executive Summary, Pg 5)

b. "As noted, the existing traffic generated by security guard stationed on the project site and the construction crew working along Calle Real would not exist when the project is developed and is therefore not assumed in the Existing + Project analysis." (Paradiso Del Mare Traffic Study, Pg. 9)

"Caltrans improves mobility across California"
Ms. Nicole Lieu  
October 24, 2012  
Page 3

7. The DEIR notes that water pipelines and utilities would need to be extended to the project site but does not describe what alignment would be taken and who’s right of way it would encroach upon. Caltrans policy does not permit non-CPUC controlled, privately owned utilities within its right of way except in very limited conditions. Additionally, all longitudinal encroachments are prohibited unless granted an Exception to Policy, which is unlikely given the details of the proposed development.

8. In the event that this project is approved as currently conditioned, and an encroachment permit is required from Caltrans for any direct or ancillary work, the proponent and lead agency should be aware that the Department will require highway improvements to be part and parcel of the encroachment permit. Those works of improvement will be consistent with the past years of correspondence and recommendations.

9. The lead agency should continue to plan for and consider off-highway frontage roads to serve land uses in this area. Consideration should be made to condition this project to dedicate right of way that would support the eventual extension of Hollister Avenue to serve this and other local properties.

10. The Department’s goals for US 101 include upgrading the facility to eliminate all at-grade intersections in order to better provide mobility and safety for regional and statewide travel. Given the State’s continuing growth, the reasonable foresight of future development, and the region’s desire to increase local coastal access opportunities (and thereby increasing area visits by the public) it would be prudent to view the US 101 strategically and maximize the safety of the traveling public.

Given the traffic related conclusions reached in the DEIR, the Department does not support the project in its current form. However, Caltrans looks forward to working toward a safe and effective solution with the lead agency, which should be implemented prior to the start of construction.

If you have questions about this letter please contact me at (805) 549-3131.

Sincerely,

[Signature]

Adam Fukushima, PTP  
Caltrans District 5  
Development Review Coordinator

Attachment

“Caltrans improves mobility across California”
Ms. Nicole Lieu
October 24, 2012
Page 4

c: L. Newland (D5)
P. McClintic (D5)
S. Price (D5)
S. Senet (D5)

"Caltrans improves mobility across California"
March 18, 2013

Ms. Nicole Lieu, Planner
Santa Barbara County Planning Department
123 Anapamu Street
Santa Barbara, CA 93101

Subject: Paradiso del Mare Ocean and Inland Estates Final Environmental Impact Report (FEIR)

Dear Ms. Lieu:

Caltrans has reviewed the FEIR for the proposed Paradiso del Mare project and the response to our comments of October 24, 2012. For many years, this location has been the subject of attempted development. Proposals have ranged from two houses to a tournament grade golf course. For over seventeen years, Caltrans has discussed and written concerning its perspective about the driveway intersection, the highway median crossover, and recommended solutions. Therefore it is with great concern that Santa Barbara County continues to not propose any highway improvements that meet the burden of CEQA and address the ingress and egress concerns of Caltrans.

Caltrans offers the following specific comments:

1. The response to comments contends that the project will not generate significant traffic impacts to US 101. Caltrans analysis has determined that the introduction of a single northbound left-turning vehicle will degrade operations to an unacceptable level of service (LOS). Furthermore, the Draft EIR indicates an existing LOS of E for northbound left turns. However, this information was omitted from the FEIR and constitutes an inconsistency. The proposed development will intensify use and further degrade LOS. Additional trips at LOS of E may constitute a significant impact. The FEIR leaves this unmitigated.

2. Due to the safety concerns as a result of the proposed development and increased trips, Caltrans contends that a median barrier to restrict left turns to northbound US 101 and left turns into the driveway must be included as a condition of approval.

3. Relative to the median barrier, right-in and right-out only channelization must be constructed at the property access point with proper acceleration and deceleration lanes that comply with Caltrans geometric standards.

4. There must be a single point of access for both the private dwelling and the coastal access parking lot.

"Caltrans improves mobility across California"
5. All transportation related improvements should be in place prior to occupancy.

In summary, Caltrans does not support the conclusions reached in the FEIR. However, we remain open to working toward a safe and effective mitigation strategy that protects the traveling public and provides safe access to coastal resources.

If you have questions about this letter please contact me at (805) 549-3131.

Sincerely,

[Signature]

Adam Fukushima, PTP
Caltrans District 5
Development Review

Attachment

c: L. Newland (D5)
P. McClintic (D5)
S. Senet (D5)
Letter no. 69

Commenter: Marc Chytilo, representing the Gaviota Coast Conservancy

Date: October 9, 2014

Response:

69-1. See the response to Comment 27 regarding the development and analysis of alternatives in the Draft SEIR. See the response to Comment 28 regarding enhanced source separation as an alternative to the proposed project.

69-2. The proposed project is integrally tied to the Tajiguas Landfill Expansion Project and its Final EIR (certified in 2002) as it relies on continued construction of waste cells, disposal and closure to provide sites for project facilities. The proposed project would substantially alter landfill operations as identified in the Final EIR, with regard to the character of waste buried, waste disposal rates and landfill closure dates. Therefore, consistent with Section 15162(a)(1) of the State CEQA Guidelines, a subsequent EIR was prepared to acknowledge substantial changes to landfill operations as identified in the Final EIR. The Draft SEIR addresses the whole of the action, including proposed facilities and project-related changes to landfill operations. The use of the term “piecemeal” in a CEQA context is erroneous as this refers to dividing one large project into multiple smaller projects to qualify for an exemption to the CEQA statutes.

Concerning assisting the reader in finding earlier environmental analysis and defective links, the Draft SEIR includes a listing of all impacts identified in the Final EIR as a preface to project-related impact analysis, under each issue area. For example, Section 4.2.2.2 provides a listing of each air quality impact identified in the Final EIR for the Tajiguas Landfill Expansion Project. Printed copies of the prior environmental documents were available for review at the RRWMD offices throughout the public comment period. In addition, as a courtesy and to enhance the public’s access to these documents, copies of these prior environmental documents were posted electronically in pdf format on the RRWMD website. The table of contents for the Draft EIR for the Tajiguas Landfill Expansion Project was inadvertently omitted in the initial electronic posting, but was provided to the commenter directly at their request on September 2, 2014 and immediately added to the project website. In summary, the impacts identified in the prior Tajiguas Landfill environmental documents were provided in the Draft SEIR, hard copies of the prior environmental documents were available for review at RRWMD, and the prior environmental documents were posted electronically, thereby providing ample opportunity for the public to understand the environmental impacts of the prior landfill projects. Concerning the baseline used in the aesthetics impact analysis, see the response to Comment 69-15.
69-3. The Draft SEIR (see Section 3.5.2) provides a detailed description of the proposed AD Facility, including the dry fermentation technology and operating characteristics. As discussed in the responses to Comments 4-8, processing of organic materials from municipal solid waste using AD is not an untested technology. Therefore, failure of the proposed AD Facility is not considered a reasonably foreseeable event. However, if the proposed project needs to be modified in the future due to AD failure or any other unforeseen reason, additional CEQA review would be required.

69-4. The comment pertains to information contained in the Program EIR prepared for CalRecycle’s AD Initiative, not the Draft SEIR. AD processing of municipal solid waste is a common practice in Europe with over 200 plants operating in 17 countries. Based on a partial list of AD projects available on the CalRecycle website, there are 12 operational AD projects in California, one in commissioning, one in construction and nine in the permitting phase. Therefore, failure of the proposed AD Facility is not considered a reasonable foreseeable event and was not considered in the Draft SEIR. Should operational problems develop with the AD Facility, separated organic materials from the MRF and/or substandard digestate would be buried in the landfill until such problems could be solved. This scenario would be similar to existing waste disposal practices and would not result in any additional or more severe impacts than disclosed in the Draft SEIR. If the proposed project needs to be modified in the future due to AD failure or any other unforeseen reason, additional CEQA review would be required.

69-5. The report cited in this comment was published in April 2006. Since that time, Europe has more than doubled its installed AD capacity for processing organics recovered from municipal solid waste with a number of plants operating at more than 60,000 tons/year capacity. The Zero Waste Energy Development AD facility opened in December 2013 in the City of San Jose, is designed to process 80,000 tons/year of organics from municipal solid waste and is based on a dry fermentation German AD technology design nearly identical to that to be used by the proposed project.

69-6. Developing countries have struggled with the implementation of best waste management practices including advanced processing of organics using AD technology. The project vendor is aware of at least six AD failures that have been reported in the literature. Each of the AD failures reported involved a wet fermentation process technology and primarily involved failure to maintain proper pH and organic loading rate. Maintaining pH and organic loading rate is materially easier to achieve with a dry fermentation technology such as that proposed for the project.
Potential adverse effects of toxicity and volatile fatty acids on the AD process are applicable primarily to wet fermentation AD systems that have historically been widely used for the processing of sewage sludge, not municipal solid waste. The proposed Bekon dry fermentation technology has not had any toxicity or volatile fatty acids related events that have caused any impact, shutdown or other failure of their AD biologic processes at any of their 20 operating plants. Importantly, the pre-processing of the organic fraction of the municipal solid waste by the proposed MRF would remove metals and other non-biodegradable, hazardous waste materials. Further, the project vendor has completed laboratory analysis on 22 samples of Santa Barbara County organic waste from municipal solid waste confirming its viability as appropriate, non-toxic, non-hazardous feedstock for the proposed Bekon dry fermentation AD technology.

The City of Greensboro wet fermentation AD pilot project developed in 2000 failed for various feedstock related reasons. The operating characteristics of the City of Greensboro’s AD pilot project are not comparable or applicable to the proposed Bekon dry fermentation AD technology as the two technologies are significantly different. A wet fermentation facility involves processing materials in tanks as a slurry and is typically used for the treatment of sewage waste and this type of facility is more sensitive to contaminants. The AD technology proposed for this project is a dry fermentation facility which uses limited amounts of water and is tolerant of higher levels of contaminants and is suitable for processing organics from municipal solid waste. Also note that AD-related technology has advanced in the last 14 years as the number of successfully operating facilities has increased tremendously (see response to Comment 4).

The feedstock was not comparable to that of the proposed project. Testing of the proposed dry fermentation AD Facility local feedstock has been conducted to verify its suitability for this type of processing technology. Paper commonly mixed with municipal solid waste often has a moisture content in excess of 20 percent, is often soiled with other waste that renders it unrecoverable for recycling purposes and is often smaller than 2” in size, but makes it ideal feedstock for dry fermentation AD processing. The only paper that is anticipated to be part of the proposed project’s organic waste feedstock is paper with a moisture content or soiled contamination that renders such paper as non-recoverable for recycling purposes and would otherwise be landfilled.

See the response to Comment 4 regarding possible failure of the AD process and potential impacts. Based on testing of anticipated AD feedstock (municipal solid waste disposed at the Tajiguas Landfill) and use of Bekon’s dry fermentation AD technology, failure of the AD process is not reasonably foreseeable. Additionally, a review of the literature (see www.c2es.org/technology/factsheet/anaerobic-digesters) demonstrates AD technology has been successfully implemented in more than 8,000 facilities in Europe processing organic waste while providing significant environmental, social and economic benefits.
Proposed facilities have been designed to accommodate future variability in the waste stream. Both the AD Facility and the MRF were designed and engineered to provide a wide range of operational flexibility to accommodate changes in waste composition and volume over the effective life of the facilities. Additionally, all project components were designed to accommodate potential changes in the waste stream associated with alternative collection strategies including enhanced source separation alternatives such as a wet/dry two bin food waste collection strategy. If the proposed project needs to be modified in the future due to AD failure or any other unforeseen reason, additional CEQA review would be required.

69-11. The proposed project would not alter existing source separation activities and programs. It is anticipated that continued community outreach (including RRWMD’s Lessismore.org website and Recycling Resource Guide and MarBorg’s “Your Daily Trash” newsletter) would maintain high rates of consumer source separation of recyclables. This project would actually support the further growth of these programs by providing the infrastructure to locally process source-separated materials into reusable and recyclable materials as well as further recover recyclables currently being buried similar to facilities operating in communities implementing their Zero Waste goals, such as the City of San Jose.

69-12. The closure date of the landfill in the Solid Waste Facility Permit and within the EIR prepared for the Tajiguas Landfill Expansion Project has always been an estimated date based on capacity and not a drop dead closure date. Section 1.4 of the Landfill Expansion Project EIR states: “The proposed expansion of the Tajiguas Landfill is intended to increase the solid waste disposal capacity for 15 years, or approximately until the Year 2020.” Because of the success of the County’s recycling and education programs and because of the recession, waste disposal rates have been less than projected in the 2002 EIR and therefore, landfill space/capacity has been preserved and the permitted capacity of the landfill is not currently anticipated to be reached until 2026. The proposed Tajiguas Resource Recovery Project would not expand the permitted capacity of the landfill but would extend the life of the permitted capacity. The landfill does have a fixed capacity and its life cannot be extended indefinitely. As a stated objective of the project, the Draft SEIR specifically addresses impacts associated extending the life of the Tajiguas Landfill, under each issue area. For example, Section 4.2.2.6 discusses the project-related extension of significant air quality impacts associated with landfill operations. The presence and operation of the landfill is part of the environmental baseline, as discussed in Section 4.0 of the Draft SEIR. However, impacts associated with the project-related approximate 10 year extension of the landfill’s life are fully addressed in the Draft SEIR.
69-13. The Draft SEIR was provided electronically as separate files for each issue area to facilitate downloading and manipulation on lower performance computers. The reviewer had the option of downloading and appending these smaller files into one large file. Printed hardcopies of the Draft SEIR were also available for review at the RRWMD office and were available at the following libraries: Buellton Library; Carpinteria Public Library; Goleta Branch Library; Montecito Public Library; Santa Barbara Public Library; Solvang Public Library; and UCSB Library Reference Department. As electronic copies of the Draft SEIR were readily available and provided free of charge to the public on a CD, an electronic copy was posted on the RRWMD website, and hardcopies were available at RRWMD and the local libraries, production of hardcopies was limited. In an August 21, 2014 e-mail, the commenter was provided the option of purchasing a hard copy from RRWMD, reviewing a hardcopy of the Draft SEIR at the RRWMD office, or reviewing the document at one of the local libraries. The commenter responded by e-mail on the same day that they would work with the free CD provided. With respect to the extension of the public comment period, in response to the commenter’s request letter dated September 9th (See Letter no. 8), and other public comments, RRWMD extended the public comment period on the Draft SEIR from September 24th, 2014 5:00 p.m. to Thursday, October 9th, 2014 5:00 p.m. to provide additional time for the public to review of the Draft SEIR. The commenter was directly notified of the extension by email on September 11, 2014 and written notice of the extension was mailed and published in the Santa Barbara News Press and Santa Maria Times on September 17, 2014.

The commenter suggests that CEQA public review process has not been completed in an even-handed manner, but does not provide substantial evidence that the procedural requirements of CEQA with respect to public review have been violated. With respect to the public review process, a comprehensive Notice of Preparation scoping document was prepared and distributed to affected agencies and interested parties (including the Gaviota Coast Conservancy) to solicit input. In addition, a public scoping hearing was conducted on May 14, 2012. Notice of the availability of the Draft SEIR and the public hearing was posted at the Planning & Development Department public bulletin board, posted at the Clerk of the Board of Supervisors, posted on-line at the County Public Works Department RRWMD website, mailed to properties within 1,000 feet surrounding the Tajiguas Landfill property boundary, mailed to the properties within 1,000 feet of the outer boundary of the parcel that the Alternative C MRF is located on, mailed to property owners and interested parties adjacent to the Alternative B MRF site, mailed to interested members of the public and community groups requesting to be noticed, mailed to regulatory agencies, and a display advertisement was published in the Santa Barbara News-Press and Santa Maria times to provide the opportunity for all potentially affected persons to submit comments on the Draft SEIR. Outside of the CEQA process over 100 public meetings have been held to solicit input on the project. RRWMD has solicited and addressed comments to improve the SEIR in compliance with CEQA.
69-14. The environmental setting was provided separately for each issue area, typically numbered 4.X.1. The location of the proposed project within the Gaviota Planning Area was noted in the land use section of the Draft SEIR. It is important to realize the proposed facilities would be entirely located within the disturbed landfill site, and significant unavoidable impacts were not identified.

69-15. A detailed description of the facilities and operational processes for the project and alternatives was provided in the Draft SEIR for use in the impact analysis (see Sections 3-5 and 5-3). Analysis of the Project considered all phases of the project, including potential decommissioning. Significant impacts are mitigated to the maximum extent feasible; however, Class I impacts remain, for which the decision-makers will need to make statements of overriding consideration to approve the Project. The comment will be forwarded to the decision-makers for their consideration. The environmental impacts of the Project have been analyzed before the County has committed itself to any definite course of action and mitigation measures are set forth in detail in the Subsequent EIR. The impact to any one resource is the sum of the impacts from each facility and process that comprise the project or alternative. CEQA does not require the EIR to analyze each step of an alternative separately from the impacts of the alternative as a whole. Although the alternatives vary with regard to facilities involved and their location, the impacts associated with each facility were identified for each alternative to allow a comparison of the sum total of impacts for each alternative (see Table 5-46 of the Draft SEIR).

69-16. As stated under Impact TRRP VIS-2, the proposed location of the area of the landfill property (operations deck) where the MRF and AD Facility are proposed to be constructed has reached its final permitted elevation. Therefore, the photo-simulation of the view from U.S. 101 (Figure 4.1-7, Existing + Permitted Conditions) accurately reflects conditions present when the project would begin operation. Simulated views of the composting area (Figures 4.1-3 and 4.1-9) are also based on expected conditions when the project would begin operation (permitted landfill contours), as waste filling is currently occurring in this area and the composting area would be constructed on the landfill top deck following placement of the final landfill cover. These permitted physical conditions are anticipated to occur based on current planning and waste cell construction. The use of existing conditions for visual impact analysis would be misleading and not disclose the full effect of higher waste fill slopes in combination with project facilities. Although it is not reasonably foreseeable, if the landfill does not reach the permitted capacity, the visual impacts of the facilities would be less.
The resolution of the photo-simulations provided in the Draft SEIR is adequate to disclose the aesthetics impacts of the project, which are mostly limited by intervening topography. For example, the proposed composting area windrows are detectable in Figure 4.1-3, although they comprise a very minor feature of the modeled view. Figure 4.1-7 (View 6) is based on a photograph from Calle Real, which is much closer to the project site than the railroad tracks. As project facilities would comprise a larger proportion of the view at closer distances, a more distant view (passing trains) would be less obtrusive than View 6. Concerning views from the proposed Coastal Trail, it would be speculative to model views from a trail that does not exist, has been in the planning stages since the 1980’s and may never be built. In any case, views from this trail would be further from View 6 and therefore, less obtrusive. Note that the view from the closest trail to the project site was modeled (see Figure 4.1-9), and impacts were found to be less than significant as existing views are currently dominated by the landfill.

Note that proposed facility sites would be at permitted elevations when project operations would begin. However, portions of the landfill would continue to increase in elevation after the project would begin operation (see red and blue contours in Figure 3-3). The use of interim landfill elevations (at the time the project would begin operations) for preparation of photo-simulations would only affect Figure 4.1-9, and would not substantially change the view. In any case, a discussion of interim elevations of the landfill in the context of project visual impacts is provided in the Draft SEIR (see page 4.1-12).

See the response to Comment 17 regarding views from the proposed Coastal Trail. As pedestrians and bicyclists using the Coastal Trail (if built) would be moving slowly, they would have a (partial) view of the proposed MRF and AD Facility for a longer period of time. However, it is important to remember that this view requires one to look directly up Canada de la Pila (View 2 or View 6), and is limited to a sector of roughly 15 degrees by the canyon slopes. Due to the area’s world class visual resources, the public (including motorists, bicyclists and pedestrians) are expected to be looking towards the ocean and not the landfill, especially if using a coastal trail. The Draft SEIR acknowledges that the proposed project would result in a significant but mitigable aesthetic impact associated with the brief, limited view of the project facilities on the operations deck, and includes mitigation to reduce this impact to a less than significant level. However, the impact of merely extending existing visual impacts of the landfill would be less than significant, because the impact has already occurred as a result of existing operations and would not be worsened by the extension of life. In addition, most future landfill operations would occur in the back canyon and not be visible from most public viewing locations.

As discussed in the Draft SEIR and responses to these comments, the vast majority of visual exposure of the public to the landfill is a motorist’s view traveling at about 65 mph, requiring one to turn their head ~180° away from an ocean view to look directly up the canyon to see a small glimpse of the landfill, which appears as a modified landform. As the landfill has been in operation since 1967, this view has become part of the local environment and because of the limited, brief view, the landfill is largely unnoticed by most passing motorists.
69-19. The landscape screening proposed under MM TRRP VIS-1b would be irrigated and protected from wildfire by proposed on-site fire prevention procedures and fire suppression systems. In addition, the mitigation measure has been modified to indicate that the vegetation will be maintained and replaced, as needed, over the life of the project. Therefore, this landscaping is expected to be permanent and serve to break-up and soften the angular buildings from the limited public views available of the MRF and AD Facility.

The County would retain ownership of the landfill property and the Tajiguas Resource Recovery Project would be operated under a site lease issued by the County. Mitigation measures identified in the Subsequent EIR would be included in the site lease agreement and RRWMD would continue to monitor for compliance. Therefore, there would be no future owners who would have the potential to remove the vegetation. Native vegetation is preferred for biological reasons, and as indicated in the mitigation measure will be used to the maximum extent feasible. However, because native vegetation alone may not be entirely suitable for screening due to low growth rates, sparse canopy and sensitivity to irrigation, it may be supplemented with non-native, non-invasive plants to maximize the visual screening.

69-20. The Draft SEIR does address the visual impact (see Impact TRRP VIS-6) of extending the life of the landfill, which would delay closure and revegetation in the back canyon area of the landfill. The front canyon and the landfill slopes visible from U.S. 101 would receive a final cover system and would be revegetated prior to implementation of the project. However, even with revegetation, the visual impact of the landfill as seen from the landfill entrance road, northbound U.S. 101 when passing the entrance road, and from the Pacific Ocean, was identified as significant and unavoidable in 01-EIR-05. This impact occurs regardless of the proposed project and is a permanent impact. Since views of the landfill are very limited, the landfill has been in operation since 1967, permanent views of the landfill (even with revegetation) were previously determined to be significant, and future landfilling operations would occur primarily in the back canyon area, the extension of visual impacts is not considered significant.

69-21. See the responses to Comments 3-8 regarding the potential for operational problems with the AD process. If the AD Facility does not produce adequate volumes and quality of bio-gas, the CHP engines would not operate or would be supplemented with propane, which would reduce air pollutant and greenhouse gas emissions. Peak day air emissions estimates were highly conservative and included scenarios when one CHP engine would be in start-up mode and the flare combusting digester gas with both CHP engines off-line. There are no reasonably foreseeable scenarios that would produce greater emissions. In the unlikely event the AD process produces less bio-gas than anticipated, the air pollutant emissions associated with bio-gas combustion would be proportionately reduced. Concerning operational assumptions used to identify maximum emissions, see Appendix C (Volume 2) of the SEIR.
69-22. The statement that all potential biological impacts would be reduced to a level of less than significant on page 4.8-10 of the Draft SEIR did not include impacts associated with extending the life of the landfill. This has been clarified in the Final SEIR (page 4.8-10). However, the finding that implementation of all project mitigation measures would prevent land use conflicts remains valid. Significant land use conflicts were not identified in the Final EIR for the Tajiguas Landfill Expansion Project; therefore, extending the landfill life would also not result in significant land use conflicts.

69-23. See the responses to Comments 18 and 20 regarding visual impacts of extending the life of the landfill. Regarding consistency with Visual Resource Policy 2 of the County’s Comprehensive Plan, visual impacts of proposed facilities would be mitigated to a level of less than significant, and visual impacts of extending the life of the landfill were found to be less than significant. Therefore, the project is considered potentially consistent with this policy.

69-24. As discussed in Section 4.9.1.5, both existing and permitted traffic volumes associated with landfill operations would not adequately represent conditions at the time the project would begin operation. Therefore, traffic volumes from a year (2008) representing optimistic economic conditions (which have historically been correlated with increased volumes of waste being disposed) were used in the analysis as a baseline. Existing landfill traffic volumes were determined to not to be representative of baseline conditions because economic conditions (recession) have impacted waste disposal rates and as the economy rebounds, it is anticipated that businesses will produce more (resulting in more byproducts), consumers will buy (and dispose of) more, and construction will increase (resulting in more C&D waste) (CalRecycle 2010, CalRecycle 2013, SWANA 2009). Because MSW disposal volumes and landfill traffic volumes fluctuate, the peak traffic volume of (132 vehicles/day + additional 35 additional vehicles/day miscellaneous traffic), as recorded in 2008 and, as representative of pre-recession conditions, was selected to represent landfill baseline traffic volumes. Traffic volumes on U.S. Highway 101 are based on data collected in 2012. Thresholds of significance used for traffic impacts are based on an incremental change from existing (or baseline) conditions, and this increment is smaller with low levels of service (i.e., 15 trips at LOS D and 5 trips at LOS F). Therefore, using 2008 traffic volumes as a baseline (with higher volumes, and potentially lower level of service) is more conservative (resulting in greater impacts) than using existing traffic volumes as a baseline.
69-25. Although Caltrans indicated that a median barrier (to prevent left turns onto U.S. 101) should be included as a condition of approval for the Paradiso de Mare project (see Exhibit 4 of the comment letter), they did not specifically indicate that traffic impacts of that project should be considered significant. In any case, these Caltrans comments do not apply to the proposed project, as the U.S. 101 intersections that serve the two sites are very different. They have different lane geometries, sight-lines, traffic volumes, etc. The U.S. 101/landfill access road intersection has been substantially improved (under Caltrans encroachment permits) with both deceleration and acceleration lanes that allow it to operate in an acceptable manner with landfill traffic. The Draft SEIR clearly shows that the U.S. 101/landfill access road intersection currently operates acceptably in the LOS A-C range and would continue to operate acceptably with the addition of project traffic. The accident analysis completed for the intersection confirms that no significant safety impacts would be generated by the project. It is also important to note that County staff and the SEIR traffic consultants met with Caltrans staff at the outset of the SEIR process to discuss the access road intersection and determine the level of traffic analysis that would be required for the SEIR. More importantly, Caltrans did not submit any comments on the Draft SEIR expressing concerns regarding safety at the U.S. 101/landfill access road intersection.

69-26. The projected year 2100 A.D. sea level elevation is just over 11 feet above msl (mean sea level) near the landfill site. The maximum published projection for sea level rise for year 10,000 A.D., is on the order of 13-20 feet above msl. The lowest elevation within the existing landfill is over 130 feet above msl. The proposed pad elevation of the MRF and AD Facility would be 394 feet above msl (see Figure 3-6 of the Draft SEIR), and 620 feet above msl for the proposed composting area (see Figure 3-12). Based on this information, the landfill or proposed facilities would not be adversely affected (inundation, wave erosion or slope stability) by sea level rise under any foreseeable future condition. In addition, the purpose of CEQA is to study the impact of the project on the environment, not the impact of the environment on the project.

69-27. The purpose of including a discussion of storm run-off water quality data from existing composting facilities was to list potential deleterious substances that may be found in the run-off, assess the project’s design features and identify mitigation measures which would effectively prevent or reduce the discharge of those substances. The proposed project includes many design features to capture and re-use the run-off for most rainfall events and to prevent contact between rainfall and the compost in the event of very large rainfall events which result in run-off from the site. The project does not rely on the preparation of a Water Quality Monitoring and Corrective Action Plan (WQMCAP) to reduce the impact of contaminants in the run-off. The WQMCAP is just one tool of many to be employed on this project to assess and minimize potential project impacts.
The Draft SEIR recognizes there are substantial differences in the compost produced at the facilities where storm water quality data was available (summarized in Table 4.10-4 of the Draft SEIR) and the compost that would be produced by the proposed project. The available storm water quality data is from compost facilities with feedstocks that were predominantly green waste, wood waste and some animal manure. The feedstocks did not include municipal solid waste. The likely sources of trace metals in these feedstocks comprise airborne pollutants adhering to foliage, natural absorption of metals into plant materials from soil, wood preservatives and contaminants such as nails.

The project compost feedstock would be predominantly food waste and paper with small amounts of inert materials and green-waste that has been processed first through the MRF which removes metal particles using shredders, shakers and magnets. The organic waste recovered by the MRF would be processed using dry fermentation AD. The AD process would greatly reduce volatile organic compounds and live pathogens. The project compost feedstock is likely to contain lower concentrations of trace metals than the facilities from which storm water quality data was available because metal particles would be removed by the MRF and because food and paper contain these substances in extremely low concentrations.

The composting area has also been designed with numerous features to prevent run-off that has contacted the compost from being discharged from the project site. The composting area would be surrounded by berms to contain and direct run-off into a storm drain system. The storm drains would direct the run-off into Baker tanks, where internal baffles would trap solid particles. From the Baker tanks, the clarified run-off would be pumped into a storage tank. The run-off would then be pumped through bag filters which trap very small particles to a secondary tank from which water is drawn to replenish the moisture content of the compost piles. In the event that a large rainfall is predicted that may exceed the run-off storage tank capacity, the compost rows would be covered with water resistant tarpaulins. The aisles between rows would be swept and the clean run-off would be diverted to the landfill sediment pond. In addition, the entire project would be required to obtain coverage under, and comply with the General Industrial Storm Water regulations. The WQMCAP would be used to monitor the effectiveness of these processes and to require changes to existing measures, or additional best management practices, to ensure that the project does not result in storm water discharge exceeding RWQCB standards. Due to all of these factors, the potential environmental impact of the composting operation on surface water quality is correctly classified as Class II.
A reasonable range of alternatives were considered in the Draft SEIR including those suggested by the commenter. As discussed in Sections 5.0, 5.1 and Appendix Q of the Draft SEIR, a large number of alternatives were initially considered (including alternative locations, alternative technologies, and disposal alternatives), and seven alternatives were selected for detailed analysis that had the potential to be feasible, reduce impacts and meet at least some of the basic project objectives. This approach is consistent with Section 15126.6 of the State CEQA Guidelines. Additional information has been provided in Section 5.1.4 of the Final SEIR regarding source separation as an alternative to the project. The implementation of enhanced recycling/source separation programs and/or waste reduction/prevention programs, while valuable, are not considered a feasible alternative to the proposed project for analysis in the SEIR. See the response to Comment 29 regarding enhanced source separation as an alternative to the proposed project.

Because a basic objective of the project is to extend the life of the landfill (thereby delaying environmental impacts and costs of building a new landfill), all of the alternatives that meet this objective would in turn result in an extension of the landfill life related impacts. However, the no project alternative and the no project alternative of waste exportation to either the Simi Landfill or the Santa Maria IWMF would not extend the life of the Tajiguas Landfill, thereby eliminating the extension of life impacts. However, as noted in Sections 5.3.6.4 and 5.3.7.4, under Alternatives F and G disposal of waste from the Tajiguas wasteshed would contribute to Class I and Class II impacts at these sites.

A reasonable range of alternatives was analyzed in the SEIR. The alternatives were initially identified and selected because it was believed they had the potential to reduce transportation-related air quality, traffic, biological and visual impacts of the project. In several cases, the alternatives (B, C and D) reduce these impacts at the landfill, but generate additional impacts or new impacts at the alternative site such that when all impacts were considered, in sum, the impacts of the alternatives were greater than the proposed project. The SEIR identifies that Alternative C is the environmentally superior alternative among the alternatives, but it is not superior to the proposed project because impacts would occur at both sites and because of the larger population surrounding the Alternative C site.

With respect to other possible alternatives, it is neither reasonable nor required to speculate about alternatives that may reduce impacts (such as extension of landfill life impacts, and some Class II impacts at the landfill site) if they are not feasible or do not meet project objectives. Disposal of residual waste at another landfill was not considered as an alternative as it would not meet many of the project objectives, including:

- Extending the life of the landfill;
- Ensure project elements can function together efficiently;
- Provide long-term financial stability to rate payers; and
• Provide a cost-effective tipping fee.

Disposing of residual waste at another landfill would not reduce impacts as compared to the proposed project, but would result in greater air quality, noise and greenhouse gas impacts associated with waste transportation to a more distant landfill site (i.e., 72 miles to Simi or 59 miles to the Santa Maria IWMF versus 20 miles to the Tajiguas Landfill).

69-29. This comment suggests that enhanced source separation (consumer and commercial recycling) could be substituted for the proposed MRF and meet the project objectives. The following provides more detail related to the different aspects of this type of program. It is important to note that this alternative would divert albeit a smaller volume of material than the proposed project, any increased diversion from the burying of waste will extend the life of the Tajiguas Landfill and therefore will result in Class I extension of landfill life impacts (the only Class I impacts identified as related to the proposed project). Responses to the specific points listed in the comment are provided below.

Effect of Enhanced Source Separation on Landfill Diversion Rates. To be considered a feasible substitute for the MRF, enhanced source separation would have to result in similar diversion rates and recover similar amounts of recyclables and organic waste as compared to the proposed project in order to meet the objectives of diverting 60% of the material currently being buried and significantly extending the life of the Tajiguas Landfill. The comment requested “facts and analysis” to substantiate the decision that it was not a feasible alternative. This information has been added to the discussion regarding the enhanced recycling alternative in Section 5.1.4 of the Final SEIR.

The communities served by the landfill already participate in a broad variety of existing programs that have enjoyed early and ongoing success, but will not provide any substantial increase in future diversion of waste from the landfill. For example, the residential curbside commingled recycling program that services the South Coast of Santa Barbara County (excluding the City of Carpinteria, but including the cities of Goleta and Santa Barbara) has been in existence in its current form since 1997 in the County and City of Goleta and since 1998 in the City of Santa Barbara. Since that time, hundreds of thousands of dollars have been spent on education and outreach in support of this program. This has included direct mail, newspaper ads, television commercials, radio commercials, regular segments on government TV Channels 19 and 20, comprehensive website, Recycling Resource Guide, brochures, and new stickers placed on recycling bins every few years. In addition, the region’s waste management services have included in-class and field trip presentations on what is recyclable, source reduction and composting as well as providing recycling containers, posters, and stickers to the area’s K-12 schools since 1990.
These programs continue to enjoy a high rate of participation (for example in the unincorporated area of the County >98% of residents have a recycling container that is regularly served by a trash hauler). Currently, there are more residential recycling containers than service customers in circulation in the communities served by the Tajiguas Landfill (in the unincorporated area of the County there are 8,356 more recycling carts than trash customers at residences). Despite these efforts, the amount of source-separated recyclable tons collected has remained relatively constant; between 21,000-23,000 tons per year for the past ten years.

Another example of early success in recycling programs is the mandatory commercial recycling ordinance passed in the unincorporated area of the County in 2002. Within three years of its passage, the unincorporated area had over 99 percent compliance from the commercial sector (only 5 of 1,500 businesses were out of compliance). This program increased the total diversion rate within the unincorporated community by 3 percent but the total tons of materials diverted from this program has remained relatively constant over the last 10 years.

Similar to the success of the County’s commingled recycling programs, the County’s commercial and residential green-waste recycling has had consistently high levels of participation. All single family residents on the South Coast have been offered a green-waste cart, free of charge, as part of their regular trash service over the past decade. The County grinds this material and generates around 35,000 tons of mulch per year which is used in local orchards, farms, parks, and private residences. Despite the financial incentives and educational campaigns promoting this program, 9.6 percent of what our community buries can be classified as green-waste.

The communities projected to use the proposed project also have several other recycling programs (including but not limited to mandatory recycling of construction & demolition material, free electronics waste recycling, and household and small business hazardous waste collection) that have been in place for several years. These programs are recognized nationwide in management excellence; one example includes the Solid Waste Association of North America Gold Award for Integrated Solid Waste Management awarded to the County in 2008. Considering the breadth of successful and nationally recognized programs that have been developed by the participating jurisdictions since the passage of AB 939 in 1989, it is not expected that there are any new programs that can approach the expected diversion rate of the proposed project.

**Enhanced Food Waste Collection.** This comment states that implementing a food waste collection program alone could considerably increase the diversion rate by itself. At the end of 2009, the City of Santa Barbara implemented a food waste collection program that targets commercial food waste generators. Currently it collects just over 3,100 tons of food waste per year from 170 businesses. The City plans to expand this program to reach nearly all food serving businesses which is projected to bring in a total of 5,800 tons per year (the City of Santa Barbara hosts the largest number of food serving businesses and will be the largest generator of commercial food waste on the South Coast).
The County in partnership with the City of Goleta has recently implemented a similar food waste collection program targeting commercial generators such as restaurants, schools, and business and hospital cafeterias. At full implementation, it is estimated that approximately 1,000 tons of source-separated food waste will be collected in the South Coast unincorporated area as well as the City of Goleta. UCSB has already implemented a comprehensive food waste collection program and currently diverts approximately 1,000 tons per year. In aggregate, the total tonnage of commercial food waste collected separately on the South Coast is not expected to exceed 7,800 tons per year which represents only 3,700 additional tons of food waste beyond what is currently being collected. It is necessary to compare the anticipated increase in food waste collection of 3,700 tons to the proposed project that is projected to capture an additional 38,000 tons per year of food waste and over 60,000 tons in total organics (including material like soiled paper products).

While an important component of an integrated waste management system, the separate collection of a material is dependent on the customer’s willingness and ability to manage the material separately in their homes and businesses. In reviewing results from communities with long standing residential and commercial organics collection programs, there continue to be members of a community that refuse to participate (or participate in a limited way) in a collection program so the opportunity to recover that material is lost as soon as the material is disposed. Many communities have learned this lesson and are now supplementing their source-separated collection programs with facilities capable of sorting mixed waste to have the capability to further process this discarded material. Examples include the City of San Francisco and San Jose who also have aggressive Zero Waste goals.

**Plastic Bags and Styrofoam.** This comment indicates the recent State-wide ban of single-use plastic bags, and possible banning of styrofoam containers would reduce the amount of waste landfilled. According to CalRecycle, 0.4% of material buried in landfills constitutes “plastic grocery and other merchandise bags”. The State-wide ban does not apply to all plastic bags, only to the ones distributed by grocery stores and pharmacies. Therefore, the State-wide plastic bag ban, although having many other environmental benefits such as the reduction of litter, has the potential to reduce the amount currently buried by less than 0.4%.

According to Santa Barbara County’s own 2009 waste characterization of the Tajiguas Landfill, this material accounts for 0.4% of all material currently buried. It should also be noted that there are no plans for any of the five participating jurisdictions to enact a ban on styrofoam. Although potentially beneficial to the environment for other reasons, the removal of both single-use plastic grocery bags and food grade styrofoam combined would equate to a reduction of less than 1% of material currently buried (as opposed to over 60% reduction through the use of the proposed facilities) and would not achieve project objectives.
City of San Francisco’s 80 Percent Diversion Rate. This comment refers to San Francisco, the community in the state with the highest diversion rate at 80 percent, as an example of what can be achieved through enhanced source separation programs. San Francisco, like the communities served by the Tajiguas Landfill, does indeed have a variety of successful recycling programs. However, San Francisco also relies upon materials recovery facilities for the processing of their municipal solid waste to achieve their high diversion rate. The current estimated diversion rate of San Francisco is 5 to 7 percent higher than the communities served by the Tajiguas Landfill. The proposed project would provide similar MSW processing capabilities as San Francisco, and allow the communities served by the Tajiguas Landfill to surpass San Francisco’s current diversion rate.

Processing of Recovered Organic Waste. This comment suggests organic materials collected through enhanced source separation programs could be processed using an AD facility at the landfill or aerobic composting at the Engel & Gray facility. As discussed above, enhanced source separation programs would not provide a meaningful increase in diversion rates.

Enhanced Source Separation Programs May Yield Cleaner Materials. This comment suggests that enhanced source separation programs would yield “cleaner hence more valuable” materials for recycling and composting, as compared to the proposed project. As mentioned in the Draft SEIR, the proposed project will not affect existing programs to collect materials like recyclables (blue bin) and green-waste (green bin) separately. Efforts will continue to be made to maintain and encourage increased participation in these programs. The proposed project is to further recycle materials that continue to be buried despite these existing source-separation collection programs.

Incentives to Increase Recycling. This comment suggests that there is a lack of financial incentive in place to decrease the quantity of material disposed and encourage recycling. There are two widely used methods for encouraging the recycling of materials and are linked to the cost of providing the services. The first approach is to charge a lower cost to recycle than dispose of trash. The participating agencies through their individual franchise agreements with the local waste haulers have all chosen to intentionally set rates so that it is always less expensive to recycle than it is to dispose of materials in the trash. For example, a typical business in the County can have their recyclables collected at about 50 percent of what the same amount of trash collection would cost. A business on the South Coast that pays $220.44 per month for a 3 cubic yard trash bin collected once per week would pay only $128.21 for a recycling bin of the same size. This discount can be offered because it costs less to process and receive revenue from the sale of recyclables than to dispose of this same material.
Residents throughout the County have recycling included in their basic service and can get extra recycling carts at no charge upon request. Green-waste is also included at no charge in basic residential service, and depending on where you live extra carts are available at no charge or at a discounted rate. For example, an extra trash container on the South Coast in Zone 1 costs $7.15 per month, while an extra green waste cart is $5.10. Furthermore, at both County operated facilities such as the South Coast Recycling & Transfer Station and private facilities like MarBorg’s Construction & Demolition Recycling & Transfer Station, it is less expensive to bring in source separated items than mixed waste because of the lower cost to manage this material.

The second approach used in the region is variable can pricing. In many communities throughout the country, residents and businesses pay a fixed price for trash service regardless of the amount of waste, recyclables, and green waste that they generate. The South Coast uses a rate structure that is based on the level of service to which a customer subscribes. For example, a customer who has two 90 gallon trash containers serviced once a week pays significantly more than a customer who has one 32 gallon trash container serviced once a week. This pricing structure encourages a customer to maximize the use of their recycling and green waste containers and reduce their level of trash service.

**Ability of Enhanced Source Separation Programs to Meet Project Objectives.**

Enhanced source separation as an alternative to the proposed project would not meet most of the project objectives, including:

- Providing a 20 year solution to the region’s waste management needs (would not provide 20 years of waste disposal capacity, and meet future diversion requirements);
- Substantially extend the life of the landfill (increases in diversion rates would be minimal);
- Provide long-term financial stability to rate payers (future requirements for recycling and diversion, and lack of long-term landfill capacity would affect rates);
- Divert 60 percent of MSW received at the landfill (increases in diversion rates would be minimal);
- Maximize reduction in future greenhouse gas emissions (increases in source-separated organic waste diversion would be minimal compared to the total amount buried resulting in continued landfill gas emissions);
- Provide green energy (recovered organic material would be insufficient to support full scale AD, such that bio-gas and green energy production would be infeasible or much less than the proposed project);
- Cost-effective tipping fee (lack of long-term landfill capacity would affect rates);
- Adapt to changing waste management needs (recycling and materials recovery would reach a maximum early with enhanced source separation, with no room for meaningful improvement and limited flexibility).
Therefore, while the expansion of collecting source separated materials is an important component to an integrated waste management system, it was not considered to be a feasible alternative to the proposed project. However, as required pursuant to CEQA Guidelines Section 15126.6, a reasonable range of alternatives was analyzed in the Draft SEIR.

69-30. Alternatives B and C were developed and analyzed based on the concept that locating the MRF near urbanized areas would reduce waste transportation requirements. The alternatives impact analysis was conducted at a very high level of detail (including 368 pages of analysis) to allow meaningful comparison of the impacts of the alternatives to the proposed project. A summary of the impacts of these alternatives is provided in Section 5.4, and the impacts of the alternatives are compared in Section 5.5 and Table 5-46 of the Draft SEIR.
October 9, 2014

Via E-Mail and U.S. Mail

Jodi Leipner
130 E. Victoria Street, Suite 100
Santa Barbara, CA 93101
jleipner@cospbw.net

Re: Subsequent Environmental Impact Report, Tajiguas Resource Recovery Project

Dear Ms. Leipner:

This firm represents the Santa Barbara Chapter of the Surfrider Foundation on matters related to the environmental review for the Tajiguas landfill and we submit these comments on Surfrider’s behalf.

The Tajiguas landfill is located in Gaviota Coast planning area, an ecologically diverse area, unique to southern California. The Gaviota Coast is extremely important to the community and local ecology for its unparalleled beauty, biological diversity, agricultural resources, and cultural history. While much of the southern California coast is heavily developed, the Gaviota Coast is not. Instead, the area is characterized by extensive open space and agricultural land that has retained its rural character and provides habitat for a diverse array of biological resources. The County is currently in the process of adopting a new plan to protect this rural area.

Although Surfrider supports efforts to reduce the waste stream and implement additional composting and recycling, it is also concerned about project elements that would intensify use of the Tajiguas landfill. The landfill is not an appropriate use in this rural/agricultural landscape. Therefore, Surfrider objects to any project that will intensify the use of the landfill and introduce a new industrial use to the Gaviota Coast.

The subsequent draft environmental impact report identifies two alternatives – Alternatives B and C – that would at least partially reduce impacts associated with intensifying the industrial use of the landfill site. Surfrider believes that either alternative is superior to the proposed project and would avoid conflicts with the Gaviota Coast Plan...
and the character of the area. In fact, the SEIR identifies Alternative C as the environmentally superior alternative.

An EIR must describe a range of alternatives to the proposed project, that would feasibly attain the project’s basic objectives while avoiding or substantially lessening the project’s significant impacts. Pub. Res. Code § 21100(b)(4); CEQA Guidelines § 15126.6(a). Citizens for Quality Growth v. City of Mount Shasta (1988) 198 Cal.App.3d 433, 443-45. Laurel Heights Improvement Ass’n v. Regents of the University of California (1988) 47 Cal.3d 376, 404. Although Alternatives B and C are improvements over locating both the anaerobic digester and the materials recovery facility at the landfill, the SEIR should also evaluate an alternative that locates both the anaerobic digester and the MRF off-site. Because a significant portion of the waste for the landfill is generated in the north County area, the EIR should also include an alternative that would include an MRF north of the Santa Ynez mountains, in addition to the MRF at Marborg or SCRTS.

When the County approved an expansion of the Tajiguas landfill in 2003, it had indicated that the landfill would reach its capacity by 2017 and that it would not be expanded past that point. Now that timeline has been extended to 2026 and with the Project, the landfill’s capacity will be extended to 2036. While there may be good reasons to reduce the waste stream, alternatives that would intensify use of the landfill prior to its closure are inconsistent with protection of the rural/agricultural resources of the Gaviota Coast. Therefore, Surfrider urges the County to develop and consider an alternative that would avoid these impacts by locating both the MRF and the anaerobic digester off-site.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

[Signature]

Ellison Folk
Letter no. 70

Commenter: Ellison Folk, Shute Mihaly & Weinberger LLP, representing the Surfrider Foundation

Date: October 9, 2014

Response:

70-1. As summarized in Sections 5.4 and 5.5 of the Draft SEIR, although some individual impacts would be reduced, collectively both Alternatives B and C would have greater overall impacts than the proposed project, primarily because impacts would occur at both locations, and by placing the MRF in the urban area a greater number of people would be exposed to adverse but less than significant project impacts. The Gaviota Coast Plan is only in draft form, has not been adopted and therefore does not apply to the project. In addition, the project would not result in significant unavoidable impacts (except those associated with extending the life of the landfill), such that the project would not alter the character of the area.

70-2. As required under CEQA Guidelines Section 15126.6, a reasonable range of Alternatives was analyzed in the SEIR. An alternative involving locating the MRF and AD Facility off-site (not at the Tajiguas Landfill) would also need to include the composting area. Initial site screening as documented in Appendix Q of the Draft EIR could not identify a suitable site for these facilities within reasonable proximity to waste generation areas or the residual waste disposal area (landfill). Therefore, an alternative involving locating all project components off-site was not considered in the Draft SEIR.

Only a small proportion of the waste disposed at the Tajiguas Landfill (less than 10%) originates from the northern portion of the County (Buellton, Solvang, Santa Ynez, Cuyama). Therefore, locating a MRF in this area would require substantially greater waste transportation (and impacts) to take south coast waste (at least 90% of waste currently disposed) for processing and returning sorted materials to the landfill for AD, composting and disposal. Therefore, such an alternative was not considered in the Draft SEIR.

70-3. The life of the landfill expansion approved in 2002 was estimated to be approximately 15 years based on the additional waste disposal volume provided by the expansion and the waste disposal rates analyzed in 01-EIR-05. Because of the reduction in the waste disposal rates due to the success of the County’s recycling programs and the recession, landfill space has been preserved and it is estimated that the capacity will not be reached until 2026. The proposed project does not expand the permitted landfill capacity. As discussed in the Draft SEIR, all proposed facilities would be located within the existing landfill site, with no loss of rural or agricultural lands. In addition, all land use conflicts could be mitigated (see Impact TRRP LU-1, page 4.8-9). This comment does not address the adequacy of the Draft SEIR. The comment will be forwarded to the decision-makers for their consideration.
Hi Jodi! Great to see you on Wednesday at the planning commission meeting. Thank you for all your work on this SEIR, I thought it a very readable, robust EIR, one of the best I have seen in the many I have read.

I have one comment about the night-time lighting impacts in the discussion on p. 4.1-15. Would like to see the county consider Dark Sky lighting standards for this project where exterior lighting is conditioned to be “full-cut off.” This is the highest standards for lighting and will ensure that the intent of minimizing glare, offset impacts and protecting nearby habitats is achieved. The standards of “downward directed” and “shielded” while helpful aren’t precise enough to achieve the stated objectives with certainty. Rather, specify that IES (Illuminating Engineering Society) "Full Cut Off" lighting fixtures are used. This type of lighting is independently certified by the manufacturers to not allow light to be emitted above the fixture, reduces glare by limiting the light output to less than 10% at and below 10 degrees below the horizontal.

Cecilia Brown
398 N. Kellogg Ave
Santa Barbara, CA 93111
Letter no. 71

Commenter: Cecilia Brown (Planning Commission member, 2nd District), 398 N. Kellogg Avenue, Santa Barbara

Date: September 6, 2014

Response:

71-1. The use of dark sky compliant, full cut-off lighting fixtures (as defined by the Illuminating Engineering Society of North America) is proposed for this project and is required by the draft outdoor lighting ordinance for the Gaviota Coast (proposed amendments to Section 35.30.120 of the Land Use & Development Code). The text in Section 3.5.5.7 of the SEIR has been revised to clarify the design of the proposed exterior lighting.
CONVERSION STUDY COMMENTS FOR TAJIGUS RECOVERY PROJECT

By Linda and Dan Smith 5 Arroyo Quemada Lane, Goleta California
805 968-3077

Neighbor to Tajiguas Landfill for 39 years, fulltime neighbor

 resource recovery & waste management

OCT 9 2014

Historical Impact to Arrovo Quemada Lane
1) Massive dust storms during off shore winds.
2) Plastic bags flying into our trees and landing in the ocean, also other debris*.
3) Garbage from Pila creek washing on the shores and in the ocean. This used to be much worse before fencing. Small objects such as Styrofoam still come through.
4) Toxic water from Pila Creek flowing into the ocean.
5) Terrible odors when an off shore breeze blows. This has increased.
6) Large landfill trucks nearly running off the 101, This has decreased.
7) Our water wells have substances now that were not present before, why?
8) Air quality changes as a result of the landfill.

* The plastic bag problem belongs to anyone who uses them. Glad to see the ban for California. I documented this problem by way of photos showing the flight of bags, the bags floating in the ocean with birds being tangled in them, as well as bushes trees littered with the bags.

Concerns of the Recovery Project

1) WATER
    a. Arroyo Quemada Lane has ten homes, with have wells. Our well has tested positive with chemicals we never had before in recent years. This is a concern for us.
    b. Speaking for another neighbor on the lane, he is certain his well dried up several years ago when a new well went into operation at the landfill.
    c. Our aquifer source seems to be connected to the same watershed. We are always concerned about the safety of the contents of our water, and the future of our underground water. It sounds like the project will use and enormous amount of water for the operation.

2) PILA CREEK
    a. When Pila Creek flows, we fear it is highly toxic. Why? Because it smells, it often has a strange color. it foams. and one never sees birds in or around the creek as with other creeks in the area.
    b. Pila Creek needs to have WEEKLY CHEMICAL ANALYSIS TESTING when it is flowing. A bacterial count would also be advised.
Right now as I look out at the ocean. I see dozens of lobster traps that will be directly impacted by the flow of Pila Creek. Will you want to eat those lobsters? The entire food chain of this rich kelp bed is impacted by Pila Creek.

- Clean and purify the creek before it flows into the sea! Check out graphene water treatment. Lockheed Martin may be a leader in this treatment as they have a patent for this process. I have noticed other counties treat water before it enters large bodies of water.

3) AIR

- Dust and toxic particles are carried with the wind. How are you going to control this problem? I know there has been some effort, but it still is a problem.
- Toxic gases have been mentioned in the report. Of course this has our attention. H2S is highly toxic as we know, and it doesn’t take much to be deadly. We are pleased to know the methane gases will be captured and safely contained.
- How efficient are the scrubbers and capture systems?
  (I really would like to know, you have my mailing address)
- What if the transfer trucks were electric and used electricity produced from the landfill to operate with 0 emissions.

4) LIGHT

- PLEASE, NO night lights!! The Gaviota Coast already has two large industries that pollute the night with light. What a shame to lose the beautiful starry night. Many residences here are star gazers. Do not light up Pila Canyon.

5) ODOR

- The odors from the landfill (composting?) can be pretty awful. Sometimes we just have to leave our property to get away from the smells. It seems to me, having visited many composting events, that the current fermenting process could be improved. It shouldn’t smell that bad.

BARON RANCH / ARROYO QUEMADA CANYON

I was fortunate to know this canyon (and Pila Canyon) before it was converted to avocados. It was a grand and majestic canyon overflowing with wildlife. PLEASE, continue to restore it and NEVER consider it to be used in any way for the landfill operation!! Thanks to the county for making public trails, and encouraging all things natural and wild to live a protected life.

HONDO PRESERVE

All beings from the Hondo Canyon will appreciate a clean operation as it’s neighbor. Hondo Canyon is pristine canyon that deserves to have clean water, clean air, and safe neighbors.
THE FUTURE

When will you start planting the landfill with natives? I keep asking this, as it is such a scare on the landscape.

Please keep in touch with us. **WE ARE IMPACTED** by the landfill. You need to know we would appreciate personal contact. Ask us how things are before we have to complain. Keep us informed. Only one person got information about this opportunity to write at the last dead line. We need to be in the loop.

We want your operation to be perfect. We want our waste to be recycled. We want there to be a recovery methane system even though it means industry in our backyard. We want a composting operation. BUT, we want it in a safe, clean, non-toxic, in healthy way.

My one-year old granddaughter lives here. We want her to be able to step in the tide pools that are safe from toxins from Pila Creek. We want her to breathe air that is clean. When the wind blows, we want to smell the sage, not rotten stuff. We live here because we love nature.
Letter no. 72

Commenter: Linda & Dan Smith, 5 Arroyo Quemada Lane, Goleta

Date: October 9, 2014

Response:

72-1. Water. See the response to Comment 2 in Letter no. 66. The commenter suggests that groundwater use at the Tajiguas Landfill has resulted in a neighbor’s well drying up, but does not provide substantial evidence to support this claim.

72-2. Pila Creek. The commenter raises concerns regarding surface water quality effects of the existing Tajiguas Landfill. The commenter expresses concern that Pila Creek is toxic, but does not provide substantial evidence to support this claim. Storm water sampling is conducted in Pila Creek by the RRWMD as required by the Regional Board’s Water Discharge Requirements (WDR Order no. R3-2010-0006), which includes collecting samples at four locations of two storm events each year and by the Industrial Storm Water Permit (NPDES) which requires sampling of two storm events at the landfill’s discharge point each year. Table 2 of Appendix O provides a summary of the analytical results of this sampling, and does not indicate any violations with the Landfill’s WDRs or NPDES requirements. The proposed project may include new sources of storm water pollutants; however, best management practices (e.g., indoor unloading and processing of MSW, reuse of storm water at the composting area, moisture monitoring of compost piles, covering of compost piles during rain events) to protect storm and surface water has been included in the project design and additional mitigation has been identified to reduce these impacts to a level of less than significant (see Impacts TRRP WR-7, WR-8 and WR-9).

72-3. Air. The commenter raises concerns regarding air quality associated with the existing Tajiguas Landfill. Dust generated by existing landfill operations is controlled by periodic watering, hydroseeding following liner construction projects, and closing the landfill during extreme wind conditions. The proposed project would result in unloading solid waste within the MRF building instead of the active face of the landfill. The MRF building would be maintained with a negative internal pressure and provided with dust collectors and bio-filters to control dust and odors. H₂S and organic sulfides may be produced during anaerobic digestion, but would be removed by combustion in the proposed CHP engines. The production of H₂S and organic sulfides during composting would be avoided by maintaining aerobic conditions in the compost piles. The combination of dust collectors and bio-filters would reduce fugitive dust emitted by the MRF building exhaust by approximately 99.9 percent. In addition, the bio-filters would reduce odors by at least 90 percent from the MRF building exhaust and AD Facility. Assumptions regarding the performance of the emission control systems are included in Volume 2 of the SEIR Appendix C (Air Quality and Greenhouse Gas Technical Report).
The air quality impact analysis prepared for the Draft SEIR indicates that construction-related air emissions, operational air emissions, vehicle emissions, ambient air pollutant concentrations, health risk and odors would not exceed significant thresholds and are considered less than significant impacts (see Impacts TRRP AQ-1 through AQ-5, AQ-9 and AQ-10). Therefore, conversion to an electric fleet is not required to reduce air quality impacts. However, the comment will be forwarded to the decision-makers for their consideration. It should be noted that many of the MSW collection vehicles currently transporting MSW to the landfill are fueled with CNG and transport of recyclables recovered by the MRF would use a CNG-fueled truck fleet.

72-4. Light. Project nighttime lighting impacts would be controlled by external blinds to reduce the visibility of interior lighting and shielding of exterior lighting. These measures would prevent significant light and glare impacts. For clarification, the language in the project description (Section 3.5.5.7) which specified that exterior lighting would be “energy efficient and positioned to minimize off-site impacts by being directed inward and downward with appropriate shielding” has been modified to specifically state that exterior lighting will be dark sky compliant, full cut-off lighting fixtures, as this was the original intention of the project lighting design.

72-5. Odors. The commenter contends that significant odors occur in association with the existing landfill operations. However, data obtained from the LEA (e-mail from Lisa Sloan, LEA 2/11/13) indicates that over the past 10 years there have been no odor complaints in association with the landfill operations. In addition, the landfill operates under an odor management plan in compliance with its Solid Waste Facilities Permit. The landfill does not currently include a composting facility; however, the community’s green-waste is currently delivered to the landfill and processed into mulch. Odor modeling was conducted and included odor sources at the proposed MRF, AD Facility and composting area. No significant odor-related nuisance impacts would occur at adjacent land uses, including the Arroyo Quemada community (see Impact TRRP AQ-9). Composting odors would be minimized by the implementation of an odor impact mitigation program and best management practices to reduce odor (see pages 4.2-58 and 4.2-59 of the Draft SEIR).

72-6. Baron Ranch/Hondo Preserve. The proposed project would not have any effect regarding ongoing native habitat restoration activities at Baron Ranch. Project impacts to the Arroyo Hondo Preserve would be limited to less than significant visual impacts from the Upper Outlaw Trail. Your support for restoration activities and the public trail at the Baron Ranch, and opposition to the use of Baron Ranch for landfill activities, will be forwarded to the decision-makers for their consideration.
72-7. Future. The proposed project would extend the life of the landfill and postpone final closure activities. This delayed closure may result in continued abandonment and avoidance of foraging and breeding habitat in the landfill area by sensitive wildlife and this impact was considered significant and unavoidable, see Impact TRRP BIO-16. However, phased closure will proceed as waste fill elevations are reached in areas of the landfill and closure will include revegetation of landfill slopes with native plants. Please see response to Comment 13 in Letter no. 69, regarding the public notice of the availability of the Draft SEIR. Notice of future decision maker hearings will be provided to all parties on the original notice list, all individuals who commented on the Draft SEIR, and any other individuals requesting to be noticed. The commenter is in support of the proposed project providing it can be completed in a way that does not impact the environment. This comment will be forwarded to the decision-makers for their consideration.
From: Steven Johnson [mailto:steven.johnson1@gmail.com]
Sent: Thursday, August 21, 2014 4:19 PM
To: Farr, Doreen
Cc: Henson, Chris; Schleich, Mark; McGolpin, Scott
Subject: Re: Tajiguas landfill expansion

Doreen

I did this last time at great expense to myself. It was fruitless The county has already spent considerable amounts of money to do what they absolutely intend to do even though projects such as the methane recovery and reuse are highly controversial on their own rights.

I absolutely positively guarantee that the county will approve this project. There is no way the county is spending this money to be denied. Moreover it is the county asking itself if it can break rules for themselves that they impose on others. The Tajiguas landfill is already an admitted polluter yet the county agrees to "mitigate" that. The county has unlined pools that contaminate ground water and this is a fact

I will bet you dinner at the boat house that they will indeed approve this. They will also represent it is not an expansion even though it adds 10 years to the life of the landfill. But that is not an expansion at least by their definition of the term.

I only ask that I be afforded all exceptions to all rules that the Tajiguas landfill has and in turn I will provide public access to the beach over nearly 1 mile of ocean front.

Steve Johnson
Doreen

I am Steven Johnson and am a part owner of land immediately below the Tajiguas landfill. I received a notice about the proposed expansion to include a 60,000 sq ft facility at the landfill.

So the first question is do you support this expansion?

2nd question if you do I presume you are enough of an American to support a similar proposal by a different landowner withing 500 feet of the Tajiguas landfill.?

Third Question. Are you aware that in 2002 The county's expansion of that facility committed that this would be the last expansion.? Are you aware that the county is claiming this is not an expansion even though it will extend the life of the landfill by an additional 10 years?

And now the county proposes this.

I participated in the last expansion and spent money to provide evidence of disruptions to my land by the landfill. All were ignored. It seems to me that it is only fair that the County treat itself on the same manner that it treats others. In order to make such a move in the public interest I will grant access to the beach over my property which extends for nearly a full mile along the coast.

There is no way that if I proposed even a modest 1500 sq ft facility on my land that the county would approve it. Too many rules to say no. Even if I provided a significant public benefit such as access to the beach.

Now the county proposes a 2  60,000 sq ft facility which would significantly increase traffic, water contamination power generators. Generators that will increase the air pollution by burning natural and methane gas.

What am I to do. The county wont even let me put an small structure on my land but continue to degrade the value of the property by building huge and ugly facilities immediately adjacent to the land.

I appreciate your response

Steven C. Johnson
Letter no. 73a & 73b

Commenter: Steven C. Johnson, property owner near the Tajiguas Landfill

Date: August 21, 2014

Response:

73-1. The purpose of the Draft SEIR is to disclose the environmental impacts of the proposed project and alternatives, and does not provide recommendations to the decision-makers (Board of Supervisors) regarding project approval. Concerning the allegation that the existing Tajiguas Landfill is an “admitted polluter” see the response to Comment 1 in Letter no. 16.

73-2. The proposed project would extend the life of the landfill by further diverting recyclable materials that are disposed of in the trash and are currently buried at the landfill, but would not result in the expansion of landfill capacity, disposal area, landfill disturbance limits or property boundaries (see discussion in Section 3.5.10 of the Draft SEIR).

73-3. See the response to Comment 2 regarding landfill expansion. The commenter provides no details or evidence regarding “disruptions to my land by the landfill”.

73-4. As discussed in the Draft SEIR, the proposed project would result in less than significant traffic impacts (see Section 4.9), significant but mitigable water quality impacts (see Section 4.10) and less than significant air quality impacts (see Section 4.2). Mitigation measures have been identified to reduce all potentially significant environmental impacts (excluding extension of landfill life) to a level of less than significant. The Draft SEIR acknowledges that significant unavoidable impacts associated with existing landfill operations identified in the Tajiguas Landfill Expansion Project EIR would be extended in time and remain significant.

73-5. Economic or social impacts are not treated as significant effects on the environment under CEQA, unless these impacts result in physical changes or are used to determine the significance of physical changes (see State CEQA Guidelines Section 15064(e)). The Draft SEIR indicates that environmental impacts at the landfill site could be mitigated to a level of less than significant (excluding extension of landfill life). No substantial evidence is provided to support the assertion that a reduction in property values would occur and would result in a significant physical change to the environment.
Andy Caldwell of COLAB, asked Scott McGolpin, County Director of Public Works, what if any impacts there would be to agricultural water supply in the Baron Ranch as a consequence of this project’s water needs and the addition of a new well. This question was asking in person on August 19, 2014.

Is that good enough?

Some sort of record of the conversation would be helpful with the date of the phone call or conversation and Andy’s questions/comments.

Joddi
I don’t unfortunately. It was a conversation between Scott and Andy. What is the protocol for this type of comment?

Hi Carlyle,

Do we have an original e-mail from Andy or a transcribed phone message we can include in the EIR so we have something specifically to respond to?

Joddi

Joddi Leipner
Senior Engineering Environmental Planner
Resource Recovery and Waste Management
130 E. Victoria Street, Suite 100
Santa Barbara, CA 93101
(805) 882-3614
From: Johnston, Carlyle  
Sent: Monday, September 15, 2014 11:17 AM  
To: Leipner, Joddi  
Cc: Matt Ingamells (mingamells@PADREINC.com)  
Subject: FW: Updated Memo  

Mark Schleich has asked that a question made by Andy Caldwell to the Public Works Director be responded to in the official response in the EIR. Mr. Caldwell expressed concern that the proposed project would dry up neighboring wells (particularly those in the Baron Ranch) through intensive water use through additional wells and thus negatively impact agricultural operations on the Gaviota Coast. Before Mark made this request (he was on vacation at the time) I wrote a formal memo on behalf of the PW Director responding to this issue (see attached). Please feel free to use (may save time) or disregard for the Final EIR.

---

From: Johnston, Carlyle  
Sent: Wednesday, August 20, 2014 11:45 AM  
To: McGolpin, Scott  
Cc: Wells, Leslie  
Subject: Updated Memo  

A sentence fragment was not saved on the previous version that clarifies the increase in water supply. Please disregard the earlier version.
130 East Victoria Street, Suite 100
Santa Barbara CA 93101

O - 805 882-3617
F - 805 882-3633

Doing something different with our waste:
www.ResourceRecoveryProject.com

THE local recycling resource:
www.LessIsMore.org
Response to Oral Comments

The following are responses to oral comments received during the Draft SEIR public comment period. The comments were primarily received during the public hearing held on September 4, 2014, in the County Public Health auditorium located at 300 N. San Antonio Road, Santa Barbara. The oral comments have been summarized in this section; however, a full written transcript of the public hearing is attached. Several individuals who commented at the public hearing also provided written comments and where applicable, the response to the oral comment refers back to the responses to the written comments included in Section 9.1.

Oral Comments no. 1

Commenter: Andy Caldwell, Coalition of Labor, Agriculture and Business

Date: August 19, 2014

Oral Comment to Scott McGolpin, County Director of Public Works:

What if any impacts would there be to agricultural water supply at Baron Ranch as a consequence of this project’s water needs and the addition of a new well?

Response:

The proposed project would not result in significant impacts to water resources supporting agricultural irrigation at Baron Ranch. Table 4.10-1 (on page 4.10-8 of the Draft SEIR) shows an estimated net increase of water consumption of 11.5 acre-feet per year by the project and can be broken down into three components (more detailed information may be found in Appendix O of the Draft SEIR):

- **Facility Operations.** Up to 3.1 acre-feet per year would be consumed by operation of the MRF and AD Facility.
- **Bio-filters.** Up to 7.8 acre-feet per year would be used to maintain moisture levels of the bio-filters used at the MRF and AD Facility for odor control.
- **Windrow Composting.** Up to 0.6 acre-feet per year would be used at the composting area to maintain moisture levels in the compost windrows.

The estimated 11.5 acre-feet per year increase in water consumption has the following “adverse but less than significant” Class III impacts:

- **Impact TRRP WR-3:** Project-related increases in groundwater pumping would not significantly degrade groundwater quality – Class III Impact (see page 4.10-24 of the Draft SEIR for additional detail).
- **Impact TRRP WR-4:** Project-related increases in groundwater pumping would not result in significant interference or adversely affect groundwater production of other wells – Class III Impact (see page 4.10-24).

---

1 Note these comments/questions were submitted prior to the public hearing.
• **Impact TRRP WR-5:** Project-related increases in groundwater pumping would not significantly impact rising groundwater at springs, and stream baseflow – Class III Impact (see page 4.10-25).

The increase in landfill water consumption associated with the proposed project would be offset by the installation of Well no. 6 in the Sespe-Alegria formation (see Figure 4.10-1 on page 4.10-5). This formation’s groundwater is used by both the Baron Ranch and the Tajiguas Landfill. Previous consumption of water from this formation at similar rates resulted in no change to groundwater levels (see page 4.10-23). In addition, the SEIR prepared for the Tajiguas Landfill Reconfiguration and Baron Ranch Restoration Project shows beneficial Class IV impacts to the Sespe-Alegria groundwater supply that will result in a greater groundwater supply over time due to the restoration of the riparian corridor at the Baron Ranch.
TAJIGUAS RESOURCE RECOVERY PROJECT
DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT
September 4, 2014 Public Hearing – Speaker Slip/Comment Form

The purpose of this hearing is to solicit public comments on the adequacy of the Draft Subsequent EIR in addressing the requirements of the California Environmental Quality Act. Please fill out this speaker slip and focus your comments on environmental issues. You may provide comments by speaking at the hearing, provide written comments using this form, or submit comments by letter or e-mail to Joddi Leipner (jleipner@cosbpw.net) 130 E. Victoria Street, Suite 100, Santa Barbara, CA 93101 by 5:00 pm, September 24, 2014.

Statement attached (revised)

Santa Barbara League of Women Voters

Name (print): CONNIE HANNAH

Address: 5788 Encina Rd #3 Santa Barbara, CA 93117
Oral Comments no. 2

Commenter: Connie Hannah, League of Women Voters of Santa Barbara

Date: September 4, 2014

Summary of oral comments at the public hearing:

1. The landfill has a history of unresolved water problems, poses a threat of releasing leachate to the ocean, not covered in the SEIR very well, this Class I impact noted earlier is not repeated in the SEIR.

2. As trucks already carry unsorted trash to the landfill, there is not much of an advantage to locating the MRF at the transfer station (SCRTS).

3. Concerned about harmful stress on the landfill that may be caused by placing digestate on top of the landfill.

4. The proposed project (all components at the landfill) would increase industrialization of the Gaviota coast.

Response:

1. See the response to Comment 1 in Letter no. 16.

2. See the response to Comment 2 in Letter no. 16. As shown in Table 5-19 of the Draft SEIR, siting the MRF at the SCRTS site would reduce waste transportation emissions because the average truck trip length would be reduced as collection trucks would be routed to the SCRTS site instead of the landfill. This is one of the primary reasons for considering Alternative C in the Draft SEIR. Although Alternative C was considered the environmentally superior alternative among the alternatives studied, the proposed project (at the Tajiguas Landfill) would have lesser impacts overall.

3. See the response to Comment 3 in Letter no. 16.

4. The Tajiguas Landfill has a Waste Disposal Facility overlay in the Land Use Element of the Comprehensive Plan recognizing its use as a waste disposal facility. The proposed project is comprised of improved solid waste processing, recycling and recovery, would be fully integrated with existing operations at the landfill and would not result in any unmitigable environmental impacts. The commenters concerns that the proposed project would increase industrialization of the Gaviota coast do not pertain to the adequacy of the Draft SEIR. The comment will be forwarded to the decision-makers for their consideration.
TAJIGUAS RESOURCE RECOVERY PROJECT
DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

September 4, 2014 Public Hearing – Speaker Slip/Comment Form

The purpose of this hearing is to solicit public comments on the adequacy of the Draft Subsequent EIR in addressing the requirements of the California Environmental Quality Act. Please fill out this speaker slip and focus your comments on environmental issues. You may provide comments by speaking at the hearing, provide written comments using this form, or submit comments by letter or e-mail to Joddi Leipner (jleipner@cosbpw.net) 130 E. Victoria Street, Suite 100, Santa Barbara, CA 93101 by 5:00 pm, September 24, 2014.

Lorraine Morey

Name (print): _______________________________________________________________________

Address: ___________________________________________________________________________
Oral Comments no. 3

Commenter: Lorraine Morey, Rancho San Antonio, Santa Barbara

Date: September 4, 2014

Summary of oral comments at the public hearing:

1. Not informed of the public hearing.
2. The project does not belong in my backyard, the majority of people at the public hearing are against it.

Response:

1. See the response to Comment 6 in Letter no. 2.
2. This comment does not address the adequacy of the Draft SEIR. The commenter’s opposition to Alternative C will be forwarded to the decision-makers for their consideration.
Oral Comments no. 4

Commenter: Kas Terhorst, 4477 F. Shadow Hills Blvd, Santa Barbara

Date: September 4, 2014

Summary of oral comments at the public hearing:

Represents 50 families of the Shadow Hills Homeowners Association, objects to Alternative C and is concerned about truck traffic in residential neighborhoods near the SCRTS site.

Response:

Alternative C does not include altering existing collection truck routing in residential areas, or otherwise increasing truck traffic in residential areas. However, an increase in truck trips to and from the SCRTS site (which is located on County Road) would occur, including up to 338 average daily trips, 27 additional vehicle trips (24 heavy-duty truck trips) during a.m. peak hour, and 4 additional trips during p.m. peak hour. As discussed under Impact ALT C T-4, traffic associated with MRF operations at the SCRTS site would not result in traffic congestion exceeding County standards. The commenter’s objection to Alternative C will be forwarded to the decision-makers for their consideration.
TAJIGUAS RESOURCE RECOVERY PROJECT
DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

September 4, 2014 Public Hearing – Speaker Slip/Comment Form

The purpose of this hearing is to solicit public comments on the adequacy of the Draft Subsequent EIR in addressing the requirements of the California Environmental Quality Act. Please fill out this speaker slip and focus your comments on environmental issues. You may provide comments by speaking at the hearing, provide written comments using this form, or submit comments by letter or e-mail to Joddi Leipner (jleipner@cosbw.net) 130 E. Victoria Street, Suite 100, Santa Barbara, CA 93101 by 5:00 pm, September 24, 2014.

[Signature]
I will speak and submit written comments at a later date

Name (print): Bob Hart
Address: 494 N. La Cumbre Rd. SB
Oral Comments no. 5

Commenter: Bob Hart, 494 N. La Cumbre Road, Santa Barbara

Date: September 4, 2014

Summary of oral comments at the public hearing:

1. Page 4.1-1 of the Draft SEIR falsely indicates the landfill site is an industrial development, it is not located in an industrial zone.
2. The visual impact of the proposed project from the commenter’s home site would be significant, as "the mountain view across the canyon would be filled with this proposal" and would include a 61 foot-tall structure, taller than any building allowed in Santa Barbara.
3. Concerned about the impact of the project on his property values.
4. Believes the impact assessments are subjective opinions.

Response:

1. See the response to Comment 1 in Letter no. 45.
2. See the response to Comment 3 in Letter no. 45.
3. Economic or social impacts are not treated as significant effects on the environment under CEQA, unless these impacts result in physical changes or are used to determine the significance of physical changes (see State CEQA Guidelines Section 15064(e)). The Draft SEIR indicates that environmental impacts at the landfill site could be mitigated to a level of less than significant. No substantial evidence is provided to support the assertion that a reduction in property values would occur and would result in a significant physical change to the environment.
4. The impact analysis provided in the Draft SEIR is based on data and analyses conducted by specialized consultants and documented in the technical studies (see Volume 2 of the Draft SEIR). The determination of the significance of these impacts is based on recognized/adopted Federal, State and County thresholds. Therefore, the analysis is not based on unsupported opinions.
TAJIGUAS RESOURCE RECOVERY PROJECT
DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

September 4, 2014 Public Hearing – Speaker Slip/Comment Form

The purpose of this hearing is to solicit public comments on the adequacy of the Draft Subsequent EIR in addressing the requirements of the California Environmental Quality Act. Please fill out this speaker slip and focus your comments on environmental issues. You may provide comments by speaking at the hearing, provide written comments using this form, or submit comments by letter or e-mail to Joddi Leipner (jleipner@cosbpw.net) 130 E. Victoria Street, Suite 100, Santa Barbara, CA 93101 by 5:00 pm, September 24, 2014.

______________________________

Speaker slip

______________________________

______________________________

Name (print): Lauren Hanson

Address: ____________________________
Oral Comments no. 6

Commenter: Lauren Hanson
Date: September 4, 2014

Summary of oral comments at the public hearing:
1. Concerned that the Draft SEIR was mistaken about impacts of the “60-foot tall building”, impacts of 24 hour per day operations and “interesting new sounds and smells” at the SCRTS site.
2. Concerned that the SEIR did not consider proposed housing developments associated with the Goleta Valley Community Plan in the traffic analysis for the SCRTS site.
3. Concerned about traffic impacts of additional truck trips on local streets and freeway ramps near the SCRTS site.
4. Concerned that the additional solid waste that would be processed at the MRF site (under Alternative C) may contain hazardous materials.
5. The SCRTS site is not an appropriate location for a “large industrial project”.

Response:
1. See the responses to Comments 2 and 7 in Letter no. 2.
2. See the response to Comment 3 in Letter no. 22.
3. See the response to Comment 4 in Letter no. 2.
4. Hazardous materials/wastes are not accepted at the SCRTS or landfill, and the RRWMD has developed numerous programs (less is more, community hazardous waste facility, etc.) to facilitate the proper disposal of these materials (see SEIR Section 1.4). In addition, trained personnel (load checkers) inspect solid waste as it is unloaded at the SCRTS and landfill to find and isolate any hazardous materials that residents or businesses may inadvertently throw in the trash. The MRF at either the Tajiguas Landfill, under the proposed project, or the SCRTS site (under Alternative C) would continue to include a load checking program. Note that unloading solid waste within the enclosed MRF building and the additional sorting of the solid waste would facilitate load checking process and the recovery of any improperly disposed of hazardous materials, thereby reducing the potential for impacts to the public or to the environment. All identified hazardous wastes, whose generator can be identified and can be legally returned, would be given back to the generator for proper disposal. Hazardous waste that cannot be returned, or whose generators are not identified, would be containerized and stored in compliance with federal and state regulations and would be removed from the site in compliance with these regulations by a licensed hazardous waste hauler under contract to the project.
5. The comment does not pertain to the adequacy of the Draft SEIR. The comment will be forwarded to the decision-makers for their consideration.
TAJIGUAS RESOURCE RECOVERY PROJECT
DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

September 4, 2014 Public Hearing – Speaker Slip/Comment Form

The purpose of this hearing is to solicit public comments on the adequacy of the Draft Subsequent EIR in addressing the requirements of the California Environmental Quality Act. Please fill out this speaker slip and focus your comments on environmental issues. You may provide comments by speaking at the hearing, provide written comments using this form, or submit comments by letter or e-mail to Joddi Leipner (jleipner@cosbpd.net) 130 E. Victoria Street, Suite 100, Santa Barbara, CA 93101 by 5:00 pm, September 24, 2014.

__________________________________________________________________________________________
__________________________________________________________________________________________
__________________________________________________________________________________________
__________________________________________________________________________________________
__________________________________________________________________________________________
__________________________________________________________________________________________
__________________________________________________________________________________________

Name (print): LAINA MAYFIELD - CONDOR
Address: 4490 LA PALMA AVE
          93105
Oral Comments no. 7

Commenter: Laina Mayfield-Condron

Date: September 4, 2014

Summary of oral comments at the public hearing:

1. Concerned that she was not informed of the public hearing until Sunday (August 31).
2. Concerned that the analysis conducted for Alternative C was not as detailed and impacts associated with Alternative C were not adequate addressed as compared to the proposed project.
3. Concerned about the effect of Alternative C on property values of residences near the SCRTS site.

Response:

1. See the response to Comment 6 in Letter no. 2.
2. The Draft SEIR included a comprehensive analysis of the impacts of Alternative C (see pages 5-132 to 5-233) to allow meaningful comparison of the impacts to the proposed project and in compliance with CEQA.
3. See the response to Comment 5 in Letter no. 2.
TAJIGUAS RESOURCE RECOVERY PROJECT
DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

September 4, 2014 Public Hearing – Speaker Slip/Comment Form

The purpose of this hearing is to solicit public comments on the adequacy of the Draft Subsequent EIR in addressing the requirements of the California Environmental Quality Act. Please fill out this speaker slip and focus your comments on environmental issues. You may provide comments by speaking at the hearing, provide written comments using this form, or submit comments by letter or e-mail to Joddi Leipner (jleipner@cosbpw.net) 130 E. Victoria Street, Suite 100, Santa Barbara, CA 93101 by 5:00 pm, September 24, 2014.

Name (print): ________________________________

Address: ________________________________
Oral Comments no. 8

Commenter: Mary Jones, 288 Sherwood Drive, Santa Barbara

Date: September 4, 2014

Summary of oral comments at the public hearing:

1. The Draft SEIR did not include a complete list of land uses at the County campus (near the Alternative C MRF site).

2. Concerned about explosion and fire risk associated with the adjacent closed landfill (Foothill Landfill) in combination with hazardous and flammable materials recovered from trash sorting and the difficulty of evacuating the area if a fire were to occur.

3. The Draft SEIR did not describe the Painted Cave Fire correctly and downplays the risks of fire from hazardous materials and wildfires.

4. Concerned that mitigation measures for hazards identified in the Draft SEIR “will work”.

Response:

1. Pages 5-203 to 5-204 of the Draft SEIR identifies the land uses surrounding the parcel the SCRTS site is located on as mostly residential, and includes a summary of land uses at the County campus. Please refer to the response to Comment 2 in Letter no. 61.

2. The MRF building would be provided with a landfill gas barrier and venting system and monitoring system to detect any build-up of potentially flammable landfill gas. Alternative C would not have any effect on current conditions and management of the closed Foothill Landfill; therefore, no increase in explosion or fire risk would occur. Please refer to the response to Comment 6 in Letter no. 61 regarding evacuation in case of wildfire.

3. See the response to Comment 1 in Letter no. 2.

4. Hazards mitigation for the SCRTS site proposed under Alternative C is limited to a contaminated soils work plan and soils management plan, should soil contaminated with hazardous materials be found during MRF construction. These plans are commonly implemented at construction sites and would reduce impacts to the public and environment to a level of less than significant.
TAJIGUAS RESOURCE RECOVERY PROJECT
DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT
September 4, 2014 Public Hearing – Speaker Slip/Comment Form

The purpose of this hearing is to solicit public comments on the adequacy of the Draft Subsequent EIR in addressing the requirements of the California Environmental Quality Act. Please fill out this speaker slip and focus your comments on environmental issues. You may provide comments by speaking at the hearing, provide written comments using this form, or submit comments by letter or e-mail to Joddi Leipner (jleipner@cosbpm.net) 130 E. Victoria Street, Suite 100, Santa Barbara, CA 93101 by 5:00 pm, September 24, 2014.

Name (print):  
Address:

Page 9-347
Oral Comments no. 9

Commenter: Judith Roberson, 476 El Sueno Road, Santa Barbara

Date: September 4, 2014

Summary of oral comments at the public hearing:

1. Concerned that current conditions are used as the environmental baseline for the SCRTS, and not conditions present before recyclables and construction materials were accepted.

2. Concerned about the combined impacts of odors, noise, traffic congestion and visual to surrounding residents.

3. Believes that Alternative C is not environmentally better than Tajiguas.

Response:

1. As required by the State CEQA Guidelines, the environmental baseline represents the conditions present when the Notice of Preparation was released. See the response to Comment 24 in Letter no. 69 regarding the use of 2008 as the traffic baseline.

2. See the response to Comment 2 in Letter no. 10.

3. This correct, as discussed in Section 5.5 of the Draft SEIR the proposed project (at the Tajiguas Landfill) would have lesser impacts overall as compared to Alternative C.
TAJIGUAS RESOURCE RECOVERY PROJECT
DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

September 4, 2014 Public Hearing – Speaker Slip/Comment Form

The purpose of this hearing is to solicit public comments on the adequacy of the Draft Subsequent EIR in addressing the requirements of the California Environmental Quality Act. Please fill out this speaker slip and focus your comments on environmental issues. You may provide comments by speaking at the hearing, provide written comments using this form, or submit comments by letter or e-mail to Joddi Leipner (jleipner@cosbw.net) 130 E. Victoria Street, Suite 100, Santa Barbara, CA 93101 by 5:00 pm, September 24, 2014.

THE ENVIRONMENTAL ANALYSIS FOR ALTERNATIVE C IS COMPLETELY INADEQUATE AND THE NOTICE TO NEGATIVELY IMPACTED NEARBY PROPERTIES, NEIGHBORS AND BUSINESS WAS LEGALLY DEFECTIVE

Name (print):  JAMES E. MARINO
Address:  1026 CAMINO DEL RIO SB 93110
Oral Comments no. 10

Commenter: James Marino, 1026 Camino Del Rio, Santa Barbara

Date: September 4, 2014

Summary of oral comments at the public hearing:

1. Refutes conclusion that Alternative C is the environmentally superior alternative and a viable alternative.
2. Concerned about back-up beepers (alarms) and fumes at the County campus and the effect on the jail and Alpha School.
3. Concerned that heavier-than-air gases produced at the facility may collect at the Alpha School.
4. Concerned about lack of noticing of residents near the SCRTS site, may have “legal defects”.

Response:

1. As Alternative C would have the least environmental impacts of the alternatives studied, it is considered the environmentally superior alternative. This approach is consistent with the State CEQA Guidelines. However, the proposed project would have fewer impacts than Alternative C. In addition, the commenter does not provide substantial evidence to support the contention that Alternative C is not the environmental superior alternative among the alternatives.
2. See the responses to Comments 3 and 4 in Letter no. 29.
3. See the response to Comment 5 in Letter no. 29.
4. See the response to Comment 6 in Letter no. 2. The commenter does not provide substantial evidence that the public notice for the Draft SEIR did not meet the requirements set forth in the State CEQA statutes and guidelines and the County’s implementing guidelines.
TAJIGUAS RESOURCE RECOVERY PROJECT
DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT
September 4, 2014 Public Hearing – Speaker Slip/Comment Form

The purpose of this hearing is to solicit public comments on the adequacy of the Draft Subsequent EIR in addressing the requirements of the California Environmental Quality Act. Please fill out this speaker slip and focus your comments on environmental issues. You may provide comments by speaking at the hearing, provide written comments using this form, or submit comments by letter or e-mail to Joddi Leipner (jleipner@cosbpw.net) 130 E. Victoria Street, Suite 100, Santa Barbara, CA 93101 by 5:00 pm, September 24, 2014.

Our Neighborhood does not want you to change the location of this project. We want it to stay up in Tajiguas.

Name (print): Cheri Bode
Address: 940 Camino del Río SB 93110

President of The Ranchos San Antonio Homeowner
Oral Comments no. 11

Commenter: Cheri Bode, 940 Camino Del Rio, Santa Barbara

Date: September 4, 2014

Summary of oral comments at the public hearing:

Represents the homeowners association of Rancho San Antonio, stated that the SCRTS site is not a viable location for the MRF.

Response:

This comment does not address the adequacy of the Draft SEIR, but states that the Rancho San Antonio neighborhood does not support Alternative C (MRF at the SCRTS site). The comment will be forwarded to the decision-makers for their consideration. The State CEQA Guidelines Section 15126.6 requires that an EIR include an analysis of project alternatives that have the potential to reduce environmental impacts of the proposed project.
TAJIGUAS RESOURCE RECOVERY PROJECT
DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

September 4, 2014 Public Hearing – Speaker Slip/Comment Form

The purpose of this hearing is to solicit public comments on the adequacy of the Draft Subsequent EIR in addressing the requirements of the California Environmental Quality Act. Please fill out this speaker slip and focus your comments on environmental issues. You may provide comments by speaking at the hearing, provide written comments using this form, or submit comments by letter or e-mail to Joddie Leipner (jleipner@cosbpw.net) 130 E. Victoria Street, Suite 100, Santa Barbara, CA 93101 by 5:00 pm, September 24, 2014.

Please put me on the speaker list.

I cannot find the seat.

Susan Riparelli
4414 Meadowlark Lane

Name (print):

Address: 
Oral Comments no. 12

Commenter: Susan Riparetti, 4444 Meadowlark Lane, Santa Barbara

Date: September 4, 2014

Summary of oral comments at the public hearing:

Suggested that another site be considered instead of the SCRTS site, and concerned about the “big building” (MRF) going up.

Response:

The proposed project is to be located at the Tajiguas Landfill. However, as required under CEQA, the Draft SEIR included an analysis of project alternatives. Siting of the MRF component of the project at alternative urban locations was requested by members of the public during the NOP comment period to reduce potential transportation related impacts. Two urban locations, a Marborg-owned property in the City of Santa Barbara and the SCRTS were analyzed in detail as alternative locations for the MRF. In addition, a number of other possible urban and rural sites were identified during preparation of the SEIR (see Appendix Q). However, as discussed in Appendix Q, these sites were determined to not be feasible and were not studied in detail in the Draft SEIR. The size and height of the building is a function of the need for sufficient floor area and vertical clearance within the building to allow for the operation of large pieces of mobile equipment (e.g., loaders and material handlers) and to accommodate the various sorting machinery, connecting conveyor systems, tippling floor area, storage area for recovered recyclables, load out area, and office space.
TAJIGUAS RESOURCE RECOVERY PROJECT
DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

September 4, 2014 Public Hearing – Speaker Slip/Comment Form

The purpose of this hearing is to solicit public comments on the adequacy of the Draft Subsequent EIR in addressing the requirements of the California Environmental Quality Act. Please fill out this speaker slip and focus your comments on environmental issues. You may provide comments by speaking at the hearing, provide written comments using this form, or submit comments by letter or e-mail to Joddi Leipner (jleipner@cosbpw.net) 130 E. Victoria Street, Suite 100, Santa Barbara, CA 93101 by 5:00 pm, September 24, 2014.

Name (print): BARBARA KLOOS
Address: 531 LOS FELIZ, SB, 93110
Oral Comments no. 13

Commenter: Barbara Kloos, 531 Los Feliz Drive, Santa Barbara

Date: September 4, 2014

Summary of oral comments at the public hearing:

1. Concerned that the visual analysis of the MRF building at the SCRTS site only included one view.
2. Concerned about the effect of the MRF on property values near the SCRTS site.

Response:

1. See the response to Comment 7 in Letter no. 2 regarding visual impacts.
2. See the response to Comment 5 in Letter no. 2 regarding property values.
Oral Comments no. 14

Commenter: Pamela Poehler, 585 El Sueno Road, Santa Barbara

Date: September 4, 2014

Summary of oral comments at the public hearing:

Noise impacts at the Alternative C MRF site are significant to the commenter. Concerned about noise generated by back-up beepers (alarms) as the berm constructed at the SCRTS is ineffective. Concerned about at least two years of construction impacts, such as dust, noise and back-up beepers.

Response:

See the response to Comment 1 in Letter no. 20. Construction impacts associated with the estimated 15 month construction period are fully addressed in the Draft SEIR, including noise, biology, air quality and traffic. Significant construction-related impacts identified included disturbance of nesting birds, exposure of hazardous materials, disturbance of unreported cultural resources, storm run-off, and temporary re-direction of SCRTS traffic to downtown Santa Barbara. Mitigation has been provided in the Draft SEIR to reduce construction-related impacts to a level of less than significant.
TAJIGUAS RESOURCE RECOVERY PROJECT
DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

September 4, 2014 Public Hearing – Speaker Slip/Comment Form

The purpose of this hearing is to solicit public comments on the adequacy of the Draft Subsequent EIR in addressing the requirements of the California Environmental Quality Act. Please fill out this speaker slip and focus your comments on environmental issues. You may provide comments by speaking at the hearing, provide written comments using this form, or submit comments by letter or e-mail to Joddie Leipner (jleipner@cosbw.net) 130 E. Victoria Street, Suite 100, Santa Barbara, CA 93101 by 5:00 pm, September 24, 2014.

IN 1995 SB COUNTY PREPARED A STUDY TO COVER THE CURRENT TRANSFER STATION. THIS WAS DENIED.

THE SITE WOULD HAVE BEEN 1 ACRE AND 5 STORIES

Name (print): DAVID COURT

Address: 464 EL SUEDO
Oral Comments no. 15

Commenter: Dave Court, 464 El Sueno Road, Santa Barbara

Date: September 4, 2014

Summary of oral comments at the public hearing:

An environmental review was conducted in 1995 for a cover at the SCRTS, and found to be unsuitable. The proposed MRF would be larger than the cover.

Response:

See the responses to Comment 7 in Letter no. 10.
TAJIGUAS RESOURCE RECOVERY PROJECT
DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

September 4, 2014 Public Hearing – Speaker Slip/Comment Form

The purpose of this hearing is to solicit public comments on the adequacy of the Draft Subsequent EIR in addressing the requirements of the California Environmental Quality Act. Please fill out this speaker slip and focus your comments on environmental issues. You may provide comments by speaking at the hearing, provide written comments using this form, or submit comments by letter or e-mail to Joddi Leipner (jleipner@cosbpw.net) 130 E. Victoria Street, Suite 100, Santa Barbara, CA 93101 by 5:00 pm, September 24, 2014.

________________________________________

Multiple items spoken verbally.

________________________________________

________________________________________

________________________________________

________________________________________

________________________________________

________________________________________

________________________________________

________________________________________

________________________________________

________________________________________

________________________________________

________________________________________

________________________________________

________________________________________

________________________________________

________________________________________

________________________________________

________________________________________

________________________________________

Name (print): Sanja Cutner
Address: 360 Sherwood Dr.
Oral Comments no. 16

Commenter:  Sonja Cutner, 360 Sherwood Drive, Santa Barbara

Date:  September 4, 2014

Summary of oral comments at the public hearing:

1. Concerned that the SCRTS site is the preferred site for the MRF.
2. The visual analysis of the MRF building at the SCRTS site only included one view (from the freeway).
3. Concerned about noise and odor increases near the SCRTS site.

Response:

1. Of the feasible alternatives studied, Alternative C would have the least impacts overall and was identified as the environmentally superior alternative. However, the proposed project consists of all components at the Tajiguas Landfill (no MRF at the SCRTS site) and would have fewer impacts than Alternative C.
2. See the response to Comment 7 in Letter no. 2 regarding visual impacts.
3. See the response to Comment 2 in Letter no. 2 regarding noise and odors.
TAJIGUAS RESOURCE RECOVERY PROJECT
DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

September 4, 2014 Public Hearing – Speaker Slip/Comment Form

The purpose of this hearing is to solicit public comments on the adequacy of the Draft Subsequent EIR in addressing the requirements of the California Environmental Quality Act. Please fill out this speaker slip and focus your comments on environmental issues. You may provide comments by speaking at the hearing, provide written comments using this form, or submit comments by letter or e-mail to Joddi Leipner (jleipner@cosbpw.net) 130 E. Victoria Street, Suite 100, Santa Barbara, CA 93101 by 5:00 pm, September 24, 2014.

Best Available -

Prevent -

General Plan -

Name (print): Bobbi McGrinnis
Address: 4575 Camino Molinero

SB, CA 93110

Page 9-362
Oral Comments no. 17

Commenter: Bobbi McGinnis, 4575 Camino Molinero, Santa Barbara

Date: September 4, 2014

Summary of oral comments at the public hearing:

Concerned about placing industrial land uses in residential areas, and if it is allowed under the County’s General Plan.

Response:

The construction and operation of a MRF at the SCRTS site under Alternative C would be similar to existing solid waste processing activities. The SCRTS is located on a County-owned parcel that has a land use designation of Institution/Government Facility and is zoned for recreation (REC), which includes public facilities. The Draft SEIR analysis (see Draft SEIR pages 5-206 to 5-212) found that Alternative C would be potentially consistent with applicable County Comprehensive Plan policies. If the site were selected as the preferred alternative, the project would require a Government Code 65402 General Plan Conformity Determination prior to being considered by the decision-makers (Board of Supervisors).
TAJIGUAS RESOURCE RECOVERY PROJECT
DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

September 4, 2014 Public Hearing – Speaker Slip/Comment Form

The purpose of this hearing is to solicit public comments on the adequacy of the Draft Subsequent EIR in addressing the requirements of the California Environmental Quality Act. Please fill out this speaker slip and focus your comments on environmental issues. You may provide comments by speaking at the hearing, provide written comments using this form, or submit comments by letter or e-mail to Joddi Leipner (jleipner@cosbpw.net) 130 E. Victoria Street, Suite 100, Santa Barbara, CA 93101 by 5:00 pm, September 24, 2014.

Bruce McKaig

Name (print): Bruce McKaig
Address: 4589 Camino Molineo SB
Oral Comments no. 18

Commenter: Bruce McKaig, 4589 Camino Molinero, Santa Barbara

Date: September 4, 2014

Summary of oral comments at the public hearing:
Concerned about recent facilities constructed on the County campus (including the SCRTS site), and does not support any additional facilities.

Response:
The comment does not address the adequacy of the Draft SEIR, no response in necessary. As indicated in the Draft SEIR under Alternative C, the MRF would be constructed at the SCRTS site with no additional project facilities at the County campus. The commenter’s opposition to Alternative C will be forwarded to the decision-makers for their consideration.

Following the last speaker, several members of the audience asked questions regarding the Draft SEIR noticing. See response to Comment 13 in Letter no. 69 regarding the public noticing process.
In The Matter Of:
PUBLIC HEARING

September 04, 2014

Tri-County Court Reporters
420 East Carrillo Street
Santa Barbara, California  93101
877.963.0294   Fax: 805.963.9740
www.tricountycourtreporters.com
SANTA BARBARA, CALIFORNIA
SEPTEMBER 4, 2014, 5:00 P.M.

INTRODUCTION

MS. ALMY: Good evening. It's 5:00 o'clock. My name is Anne Almy. I'll be the public hearing officer running this hearing and I welcome you. I will start the environmental hearing on the Subsequent Environmental Impact Report, Tajiguas Resource Recovery Project now.

Tonight is not the time for us to talk about the merits of this project; we do not care tonight. We are not the decision-makers who care about whether this is a good project or whether this is a bad project. What we need is your input on the adequacy of the environmental analysis that we've conducted. The purpose is to improve our document as much as we can so that the Board of Supervisors, ultimately, the decision-maker, will have enough information so then they will know what they're deciding on and will understand the environmental impact.

So that's what tonight is about.

What we're going to do tonight is hear a PowerPoint presentation from the project team, and then I'm going to open it up to public speaking. So far I have only eight public speakers. You can come up and --

Where are the speaker slips?

MR. JOHNSTON: They're in the back.

MS. ALMY: They're at the back table, so I encourage you to come in and have your speaker slips.

I'm taking you in the order that I receive the speaker slips, and I'll be giving you each three minutes.

My timer is set to a duck quacking at the end. I'm afraid I don't know how to change it so we will have a duck quacking every three minutes and I apologize for that. This is a very serious hearing and we are very seriously committed to improving this document to the extent that we possibly can.

So with that I'm going to hand it over to Mark Schleich for an introduction and then on to the questions.

MR. SCHLEICH: Can everybody hear me?
AUDIENCE MEMBERS: No.

MR. SCHLIECH: I'm not very good at karaoke; I have a phobia of microphones.

Again, if people would like to enter comments, if you could raise your hand. He'll help collect those so you don't have to walk all the way up. If you have comments, bring them up here or get his attention and he'll gather them for you.

At the front table with me tonight is Joddi Leipner to my left, who is the staff person to help coordinate this EIR, and to my right is Matt Ingamells of Padre Associates who actually compiled the EIR.

PROJECT OVERVIEW

MR. SCHLIECH: Again, I'm Mark Schleich with the Resource Recovery Waste Management Division, and we're going to have the hearing regarding this project.

Thank you all for attending tonight. This has been a long process and we've taken public comment throughout, and we appreciate you taking the time to provide us comments tonight.

But before we get into the project, I just kind of want to go through kind of what my division does and what we do, provide an overview of this Resource Recovery project, why this project, how did we get here, and then we'll talk about the effects that this project has on the community and receive your comments tonight.

The county operates the Tajiguas Landfill up on the Gaviota Coast. We have three transfer stations, one that's up the road from here, one in the Santa Ynez Valley, and one that's out in the Cuyama Valley.

We have a lot of kinds of -- we've developed reasonable programs and services that probably all have used or experienced over time.

Again, the landfill was started in -- began in 1967, and it was the preferred location for this project. It was used and serviced by the County of Santa Barbara unincorporated areas in the Santa Ynez Valley and on the South Coast as well as the cities of Santa Barbara, Goleta, Solvang, Buellton.

To our immediate east is the Baron Ranch. We have an 85-acre avocado and cherimoya orchard there. We put in a six-mile public trail that hopefully some of you have used and we're looking to enhance; and we've done 50 acres of native plant restoration as it relates to the impact of the previous landfill expansion.

Regarding your trash service, the three-can service, I'm sure you're all very familiar with it. The blue can goes to Ventura for processing and recyclables; the green can actually goes up to the landfill for mulching and return to market; and then the brown can is your trash can which currently is buried in the landfill.

I'd like to thank MarBorg Industries, who are here tonight, as well as Waste Management because they're the ones that provide those services under a franchise agreement with the County of Santa Barbara.

Again, organics, the green container, is mulched at the Tajiguas Landfill and then returned back to the community, whether it be ag operations, residence, public spaces, public garden, what have you.

We also have and coordinate the use of the Hazardous Household Waste Center out at UCSB. That's open to the community on Saturday and Sunday, and businesses on Friday. And in other areas of the community, we do collection, such as Santa Ynez and Cuyama Valley.

We work very closely with the sheriff's department on the proper disposal of medications. People either left them in their medicine cabinet, which became problematic, from a -- improper use, people experimenting with them, they ended up in the landfill that could end up creating water quality issues for us, or in wastewater treatment plants it's also created those problems.

We also have a sharps collection for those that have needs, have diabetic needs for sharps, and provide a way for those materials not to get into the landfill and become improperly disposed. Medical waste is processed at the appropriate facility typically where it's generated and then sent to recycling or disposal facilities in various locations.

Regarding education, we do a lot of school recycling. Pretty much every kid that goes to school who want to go to the landfill, we show them how their waste is managed and treated, and explain all the things that go on there.

We reach out to businesses to hopefully encourage greater recycling, and recently developed with other jurisdictions the green business program for those that have demonstrated reduction in waste water reduction as well as energy reduction.

We do a lot of education campaigns on changes to recycling materials. We have a very extensive website where a lot of this information can be found, which is called "LessIsMore.Org."

Our current effort, most current effort, is a way to recycle food waste. There's kind of a hierarchy of how the EPA looks at how we use our food waste. We are developing a program now where we can compost some of that food waste, again with help of our local haul-its.

Because of the efforts we've done, we've been working very closely with the sheriff's department and the county, and we appreciate you taking the time to review the EIR and the draft EIR, and we're going to get into the hearing tonight.
recognized locally, state, and nationally for these
efforts, and we work hard for you to make sure that
disposal of waste is done well and appropriately.

I'm going to turn my attention now to diversion
and disposal.

"Diversion" is how the State measures how well
we do in diverting waste from the landfill. A law was
passed in 1989 called "AB-939." It asks us to get to
50 percent. We're currently at 75 percent as of 2013.

But when we look at disposal numbers, we're actually not
decreasing that much. Most of the disposal occurred in
the late 1990s, early 2000s, and that was based on
programs we implemented.

Most of the change that has occurred since then
hasn't really been related to programs but more or less
related to the economy. When times were good, we were
throwing more away. As times became harder, less and
less was going to the landfill. And this wasn't just
locally. It was actually a national phenomenon.

Another way to look at how we perform, regarding
diversion, is this triangle the EPA uses, we most prefer:
Let's not create it; let's re-use it first, and the last
thing we want to do is dispose of it. And how we perform
on this will be seen on the left side. We're about 70,
75 percent, and 30 percent of what we totally generate in
our communities go to landfill. With this project, we
hope to get to 85 percent diversion, and we'll still have
a smaller amount that goes into the landfill, and one of
the benefits of this project.

Let's get into the project specific here.
How did we get here? After we expanded the
landfill in 2002 -- we got our last landfill expansion
permit in 2002 -- the Board of Supervisors were very
clear that they weren't interested in expanding that
landfill again, but that permitted capacity, once again,
and directed myself and my staff to look at alternatives.
And we looked at those, again, for the various cities on
the South Coast, in Solvang, Buellton, as well as the
County of Santa Barbara.

We are not looking at changing the blue bin
program. We're not looking at changing the green bin
program. What we're looking at is how do we get more
stuff out of our trash can?
Throughout this process, we've held about 125
various meetings over this timeframe. We've had a
project website that has had all this information on it,
and through that process of public outreach and
engagement with stakeholders, we've actually used that
information to help define project goals that we have for
this project.
leads to private property improvements, it generates about $800,000 or more annually in property taxes.  We believe that this project, as proposed, is comparable to the alternatives that we studied, and so therefore we believe it's economically sustainable.  It provides the state requirement of 15 years of disposal capacity for our jurisdiction, which is primarily Cal Recycle.  We've got a 20-year project as far as this thing goes.  It puts us in the lead position regarding AB-341, which is a goal of 75 percent diversion in the year 2020.  This project will get us to 85 percent.  It helps us with our renewable energy requirements that the State has imposed by adding one megawatt of energy.  It also provides the distributive energy, the local energy generation, so when it's hot and LA has all their air-conditioners on, we'll be less subject to brown-outs.  I'm not sure we'll solve the entire problem, but I think it will help in that regard.  Probably the biggest benefit is the reduction of greenhouse gases that have been -- or were approved in AB-32.  There's some other current legislation, I think, that's sitting on the governor's desk that we're welcome to move forward with this project.  The State is going to require that commercial businesses have organic recycling if the governor signs it, and this project will capture 98 percent of that waste.  Now, let's talk a little bit about CEQA, and then I'll turn the rest of the presentation over to Matt.  The definition significance is pretty much laid in planning development thresholds and guidelines or established by the local, state, and federal standards.  The purpose of CEQA is to identify waste and reduce the project impacts, and CEQA requires us to consider a range of reasonable alternatives to be studied.  I think I spoke at the beginning -- the Board of Supervisors said, "Don't ever expand the landfill," and one of our alternatives is to expand the landfill, which is a little confusing.  But also we heard during the Notice of Preparation from some folks that they thought that we should generate alternatives for the MRF component in the urban core of Santa Barbara.  And so we did so, and that led to the alternatives that were in here and probably why most of you are here today, and we have to rank those alternatives as required by CEQA, which led to Alternative C being the highest ranked alternative.  But I think you need to know that that doesn't compare to the proposed project.  The proposed project at Tajiguas.

DSEIR PRESENTATION

MR. INGAMELLS: Good afternoon.  My name is Mr. Matt Ingamells with Padre Associates.  I helped the County prepare the DEIR.  It's a very complex DEIR, as you know, posted on the County's website.  I'm going to run through it very quickly.  To start with, you'll notice it's called the "Subsequent DEIR," because it builds on the past expansion EIR certified in 2001, as all these proposed facilities would be at the landfill, integrated with existing waste management facilities and practices.  This slide kind of orients you to the landfill site, which is in the center of the slide, with Arroyo Hondo preserve to the west, and Baron Ranch to the east, and the nearest residential area is Arroyo Quemado community down at the bottom of the slide.

MR. INGAMELLS: Good afternoon.  My name is Mr. Matt Ingamells with Padre Associates.  I helped the County prepare the DEIR.  It's a very complex DEIR, as you know, posted on the County's website.  I'm going to run through it very quickly.  To start with, you'll notice it's called the "Subsequent DEIR," because it builds on the past expansion EIR certified in 2001, as all these proposed facilities would be at the landfill, integrated with existing waste management facilities and practices.  This slide kind of orients you to the landfill site, which is in the center of the slide, with Arroyo Hondo preserve to the west, and Baron Ranch to the east, and the nearest residential area is Arroyo Quemado community down at the bottom of the slide.
The building may be slightly larger to handle the blue bin fills we talked about called "Commingled Source Separated Recycling," CSSR, and that would include more staffing. Facility would include environmental controls for emissions and odors, including dust collectors and bio-filters, to control anything from escaping the buildings; a system internally for the workers; and additional truck trips to export the recycled materials. AD facility again would be in the middle building, as we saw in some of the slides, holding up to 16 digesters, which will process material not only from the MRF, but also source separated organic waste such as restaurant and food collection program. The digestion would occur in relatively high temperature with a steel digester, with two different phases up to 28 days each. The AD facility would also include state-of-the-art facilities for safety and emissions. To prevent bio-gas from being emitted while digester is open, it would be purged with engine exhaust, which would be directed to a flare for combustion. And again, this would also have a dust collection and bio-filters to process dust and odors from escaping the building. AD facility would also include other facilities, including offices and educational areas for students. And again, solar panels on the roof to produce green energy. It will also include two engines that would process the bio-gas combusted in the digesters, and the engines would provide up to over 13,000 megawatts per year electrical energy to the local community. It will also produce heat to keep the digesters that require temperature, and the engine exhaust would have state-of-the-art emission controls as required by APCD permits controlling NOx emissions, CO emissions, and OC emissions. The project also includes a composting area where the digestate is turned into marketable compost. The digestate coming out of the digesters would be trucked to the site to be located on the top deck of the landfill. Odors and emissions are also concerned with the compost piles, and the project has incorporated best management practices to reduce those, including putting finished compost on the new compost to act as a bio-filter. Storm run-off is a concern at the composting area, and we've decided to have a payment system to collect and store storm run-off where it will be filtered, stored in the tank, and reused to maintain moisture on the stock piles. As required by CEQA, we did prepare the Notice of Preparation and a comprehensive scoping document was prepared and distributed to the public trustee and responsible agencies, April of 2012, and a scoping hearing was conducted in the County Planning Commission hearing in May 2012. Testimony at that scoping hearing is up on this slide, primarily local organizations concerned with coastal issues as well as the adjacent property owner. The overall concern seemed to be that the increased diversion would extend the life of the landfill, which some people felt wasn't a great idea, as well as the possibility of looking at urban locations for the MRF closer to areas where the waste is generated, such as Santa Barbara or Goleta. This slide shows 12 issue areas addressed in the EIR. Special note is environmental justice. This is not currently required by CEQA, but it's becoming more and more of a concern at the state level, including Cal EPA and Cal Recycle. This is a listing of the impact classifications as noted in the county CEQA guidelines. Note that Class I means it's significant and can be mitigated, down to Class IV, which is beneficial, and the EIR includes both...
1. project specific and cumulative impacts.
2. Here's a real quick summary of the impact
3. analysis. The project would not result in any Class I
4. impacts, no impacts that can't be mitigated, except for
5. issues associated with continuing existing operations at
6. the landfill.
7. Class II impact areas are listed there.
8. Aesthetics, biology, hazards, geology, cultural, land
9. use, and water resources. I can try to go through a
10. little more in detail in the next slide.
11. First is a Class II aesthetics impact -- got
12. ahead of myself.
13. **MR. JOHNSTON:** I'll jump up to the Class II if
14. you want, but --
15. **MR. INGAMELLS:** That's fine.
16. Class II aesthetics is the view from U.S. 101.
17. That's considered to be significantly degraded, and here
18. we've got a photo simulation of that view. This is a
19. fleeting view of a motorist driving northbound.
20. On the left-hand slide, you'll see existing
21. operations building, a trailer, more or less; and to the
22. right, a view of the roof line of the AD facility.
23. And the next slide shows a -- that's kind of a
24. line-of-sight showing that the view at over 3,000 feet
25. away, you can only see the top of the AD facility.

- September 04, 2014
PUBLIC HEARING

1. landfill does not and will not accept hazardous waste.
2. This is more of a soil contamination issue which can
3. occur because of the extensive heavy equipment activity
4. at the site, and if any was discovered during
5. project-related construction, it would be assessed and
6. managed to avoid public exposure.
7. Another impact with hazards is fire hazard.
8. Again, there would be much more staffing at this site;
9. there would be new sources of fuel such as bio-gas and
10. propane, and new additions for us such as the engines for
11. the flare, but a project-specific fire protection plan
12. would be developed to manage those risks.
13. Moving on to geology. A comprehensive slope
14. study analysis was prepared for both manufactured slopes
15. and waste fill slopes at the landfill, and there were
16. found to be minimum engineering criteria. There is an
17. issue about storm run-off over these slopes with a
18. potential to cause landslides and instability, and
19. proposed mitigation is to prevent, as you can see,
20. concentrated overflow drainage and maintain vegetation,
21. among other issues.
22. There's also an issue of expansive soils and
23. differential settlement that could affect the facilities,
24. the AD facility and the MRF. A geologic study was
25. prepared and foundation systems recommended to deal with

1. This is a view from the landfill access road.
2. Upper left-hand corner, you'll see existing view. Upper
3. right-hand corner, you'll see what the future landfill
4. contours would look like. In the lower left, you'll see
5. with project scenario, and if you look very closely,
6. you'll see little bumps on top of the slope, which would
7. be the compost pile. It's kind of shown in the
8. line-of-sight profile.
9. Now I'd like to quickly go over the Class II
10. impacts, impacts that can be mitigated.
11. The first is biology. As you saw from the site
12. plan, first of all, project components to be located in
13. disturbed areas, the amount of habitat loss and
14. disturbance to these areas is minimal. But there still
15. would be construction impacts related to birds, raptors,
16. sensitive mammal species such as ringtail badger and
17. desert woodrat.
18. And also there's an issue of the classification
19. of the use at the site as 24-hour operations and much
20. more staffing and there's a potential for safe --
21. sensitive species as they tend to move around night. So
22. we've come up with a post mitigation. You can see there
23. it's basically to minimize nighttime activity and avoid
24. them when possible.
25. Concerning hazardous materials, again, the

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>project specific and cumulative impacts.</td>
</tr>
<tr>
<td>2.</td>
<td>Here's a real quick summary of the impact</td>
</tr>
<tr>
<td>3.</td>
<td>analysis. The project would not result in any Class I</td>
</tr>
<tr>
<td>4.</td>
<td>impacts, no impacts that can't be mitigated, except for</td>
</tr>
<tr>
<td>5.</td>
<td>issues associated with continuing existing operations at</td>
</tr>
<tr>
<td>6.</td>
<td>the landfill.</td>
</tr>
<tr>
<td>7.</td>
<td>Class II impact areas are listed there.</td>
</tr>
<tr>
<td>8.</td>
<td>Aesthetics, biology, hazards, geology, cultural, land</td>
</tr>
<tr>
<td>9.</td>
<td>use, and water resources. I can try to go through a</td>
</tr>
<tr>
<td>10.</td>
<td>little more in detail in the next slide.</td>
</tr>
<tr>
<td>11.</td>
<td>First is a Class II aesthetics impact -- got</td>
</tr>
<tr>
<td>12.</td>
<td>ahead of myself.</td>
</tr>
<tr>
<td>13.</td>
<td><strong>MR. JOHNSTON:</strong> I'll jump up to the Class II if</td>
</tr>
<tr>
<td>14.</td>
<td>you want, but --</td>
</tr>
<tr>
<td>15.</td>
<td><strong>MR. INGAMELLS:</strong> That's fine.</td>
</tr>
<tr>
<td>16.</td>
<td>Class II aesthetics is the view from U.S. 101.</td>
</tr>
<tr>
<td>17.</td>
<td>That's considered to be significantly degraded, and here</td>
</tr>
<tr>
<td>18.</td>
<td>we've got a photo simulation of that view. This is a</td>
</tr>
<tr>
<td>19.</td>
<td>fleeting view of a motorist driving northbound.</td>
</tr>
<tr>
<td>20.</td>
<td>On the left-hand slide, you'll see existing</td>
</tr>
<tr>
<td>21.</td>
<td>operations building, a trailer, more or less; and to the</td>
</tr>
<tr>
<td>22.</td>
<td>right, a view of the roof line of the AD facility.</td>
</tr>
<tr>
<td>23.</td>
<td>And the next slide shows a -- that's kind of a</td>
</tr>
<tr>
<td>24.</td>
<td>line-of-sight showing that the view at over 3,000 feet</td>
</tr>
<tr>
<td>25.</td>
<td>away, you can only see the top of the AD facility.</td>
</tr>
</tbody>
</table>
built-in features to minimize the surface water contamination, but the proposed mitigation would be standard construction BMPs and compliance with industrial storm water permit. There is an issue we spoke with, the composting area would collect and store run-off, but the tank has limited storage set up to be 25-year storm event; and events larger than that or back-to-back events could require discharge to the existing sanitation basin at the landfill and ultimately to Pila Creek. But our proposed mitigation is to test each and every discharge and manage the composting area to reduce the amount of discharge and address the quality. 

Here's a listing of Class III impacts. Aesthetics, geology, air quality, noise. I'll speak quickly about traffic because that seems to be an issue. It's important to note that the project trips when added to the existing landfill trips would still be below the limit set by the "salt lake fill decon."

These are the Class IV impacts, which is really the important impacts to talk about in this project: Greenhouse gas savings. I know Mark spoke about that, but you get greenhouse emission reduction because the organic waste will be diverted from the landfill, not

producing landfill gas, as well as the export of electricity, which would offset greenhouse gas generated by electricity generation. Another side benefit is the MRF would improve the amount of recycling recovery materials, which would reduce greenhouse emissions associated with producing those materials. The third beneficial impact is that the solid waste would be tipped within the MRF structure, which will prevent windblown litter, which currently occurs at the landfill at the space. Again, we'd like to talk about expansion -- extension of the landfill life that would occur as a part of increased diversion. These are impacts that are identified. As far as landfill expansion, this project would just merely extend those same impacts further in time, including air quality impacts such as NOx emissions, air quality standard features, as well as biological impacts by delaying the proposed habitat restoration and ongoing disturbance of adjacent habitat. These are just the Class II impacts. In fact, the County mitigated essentially extending the landfill life, including hazards, archeological, and public health.

I know a lot of people are here to talk about alternatives, and a lot of effort was put in early on into identifying a wide spectrum of alternatives, and some of them are in Appendix Q of the EIR. As required by CEQA, the selection of alternatives was driven by identifying feasible alternatives, alternatives that meet most of the basic project objectives, but more importantly, those that would reduce the impacts identified by the proposed project. Two of the alternatives, which include the putting the MRF at urban locations, based on public input, primarily to reduce the amount of travel of moving solid waste to the MRF -- you know, putting them in locations where the waste is generated, such as the Santa Barbara, Goleta areas. Based on our crust geo project level, in comparison to the proposed project, it can be these two urban area location alternatives, which require some engineering design to make a fair comparison. In the end, as required by CEQA, we had to identify which was the environmentally superior alternative, and we'll get to that at the end. Basically there are seven alternatives discussed in this SDEIR, including the no project alternative.

Urban Area Alternative 1, which places the MRF at the City of Santa Barbara at MarBorg site and all the facilities at the landfill; and Alternative C which would place the MRF at the County Transfer Station site with all of the facilities of the landfill; Alternative D, which would place the MRF at the landfill, and without an AD facility and composting area and the organic waste, covered, would go to Santa Maria for composting and sale. Alternative E is expansion of landfill which was an obvious requirement if the landfill becomes full. But if there's no project, that's a potential outcome. Alternatives F and G are waste export to the Simi Valley landfill, which was recently expanded, or the Santa Maria landfill, which is planned. I'll briefly look at the impacts of the alternatives, starting with no-project alternative: Basically the continuation of existing impacts from landfill operations, but in the end, the landfill reaches capacity somewhere around 2026. The waste needs to go somewhere, either through expansion of the landfill or waste export. This is what we call Alternative B, which places the MRF in Santa Barbara. Basically we'd still have the MRF -- I mean the AD facility -- and composting area, and the impacts to the landfill would be very similar, but because of urban locations of the MRF, you'd have eight
1 impacts that cannot be mitigated, including, as you see,
2 aesthetics; area quality, including health risks;
3 traffic -- congestion in downtown Santa Barbara would get
4 worse; and environmental justice as the area surrounding
5 the MRF site is considered a minority population.
6 Here's a good photo simulation of the MRF site
7 in Santa Barbara, a view from freeway. On the left,
8 center of the photograph, you might see a shrouded
9 conveyer. That's the site before. On the right-hand
10 side, you see the MRF building, which is still a view
11 from the highway. And if you look at the line-of-sight
12 profile, it's only 600 feet away and pretty much in full
13 view of all U.S. 101 traffic.
14 This is a quick listing of the Class II impacts
15 at the MRF site, ones that can be mitigated. Something
16 that's unique about this site is the Tsunami hazard as
17 the site is partially located in the designated Tsunami
18 inundation hazard zone.
19 The next one is Alternative C, which places the
20 MRF at the Transfer Station. It has similar impacts at
21 the landfill associated with other project components,
22 but no Class I impacts at the MRF site. Class I impacts
23 are listed here, including migratory birds.
24 Traffic is a concern. One thing, I know traffic
25 is a concern here as well. I wanted to make it clear

1 that a Class II traffic impact we're talking about here
2 is during the construction period. While the MRF is
3 being constructed at the Transfer Station, all the
4 consolidation of waste would have to happen at the
5 MarBorg site in Santa Barbara, which would cause
6 short-term congestion.
7 Here's a photo simulation. From U.S. 101,
8 looking at the MRF site, the County Transfer Station. In
9 the left-hand photo, you can see the solar panels that
10 are there now. And if you look in the right-hand photo,
11 if you look really closely, you'll possibly see the roof
12 line of the MRF building. But the view is very distant,
13 about three-quarters of a mile, as you can see by the
14 line-of-sight profile.
15 This is a view from Sherwood Drive, in El Sueno
16 area basically, showing you that the topography would
17 obscure the MRF site. More evidence from the
18 line-of-sight profile, showing the roadway in the
19 left-hand side would basically block views from that
20 location.
21 This is a summary of Alternative D which would
22 take the organic waste to Santa Maria for composting.
23 The MRF would still be at the landfill, which will
24 probably be less impact at the landfill site, but the
25 addition of all that material to the composting site at

1 Santa Maria would result in significant hydrocarbon
2 emissions and significant exhaust emissions, especially
3 with trucking all that material to Santa Maria.
4 Alternative E is the landfill expansion
5 alternative. It would primarily occur in the upper
6 canyon area, and would result in significant unavoidable
7 impacts associated with aesthetics, air quality, biology,
8 and land use, as well as some Class II impacts.
9 Alternative F would export solid waste to the
10 Simi Valley landfill. Based upon the EIR prepared for
11 that expansion project, the project would contribute to
12 Class I impacts and Class II impacts at the landfill
13 site.
14 But a side effect of this alternative is that
15 materials would have to be consolidated prior to sending
16 them to Simi Valley. It would have to be done at the
17 Transfer Station site and at the MarBorg site in Santa
18 Barbara, which would result in Class I traffic congestion
19 impacts at that identified intersection, as well as some
20 Class I impacts listed there.
21 Exporting to Santa Maria is the same situation.
22 They've identified impacts and issues with constructing
23 and operating the new landfill, and the project would
24 contribute to those Class I and Class II impacts.
25 Similar to the export to Simi Valley, the Santa

Page 30
All the comments that we receive today will be included and responded to within the final EIR. There were speaker slips set in the back so if you haven't filled one out and you do want to submit verbal comments today, please do that and turn them in to Anne here or one of our other staff members here.

You can speak tonight, you can e-mail me, you can fax me, you can write a letter, and any of those comments that we receive will be responded to in the EIR.

Again, the focus is on the environmental impacts of the project. When it comes to a decision-making hearing is when generally the decision-maker likes to hear whether you support or oppose the project, if you prefer it at one location or another. But right now the emphasis is on the adequacy of the environmental review and making this environmental document as good as it can be to inform the decision-makers as this project moves forward.

So we will be receiving comments. Today is not your last night to give us comments. The comment period is open until September 24th, 5:00 o'clock p.m., and again, all those various ways of contacting me are fine.

I did put copies of my card in the back, and I will be showing my -- my name and address is also on the original Notice of Availability, if you received that, and we'll be putting a slide up here with that information also.

And we hope to have the proposed final EIR available in late fall or early winter. Yes, we're in that transition, so fall 2014, winter. It would be this January, like, January. So just kind of spanning the new year.

The Planning Commission will probably be doing a 654 to the determination of consistency with the General Plan determination, and that date is to be determined.

And again, we are hoping to be at the Board of Supervisors. That is the decision-making body for this project, not the Planning Commission, again, in late fall or early winter.

The next slide shows again my information. My name is Joddi Leipner. My address is listed here. My e-mail is listed here. My phone number is listed here. And some of you have found a way to call me and you can give me a call. Again, if you can provide written comments or speak here tonight, we do have a formal transcriber here taking the comments and we will be responding directly to them.

On the last note, I do want to also mention that whether the project is approved at the Tajiguas Landfill or if an alternative location is selected -- if it is at the Tajiguas Landfill or the MRF is at an alternative location, there would need to be either a revised or a new solid waste facilities permit.

And that permit is issued by our local enforcement agency, and Lisa Sloane -- who is up in the front here and is turning around to wave to everyone -- is the person who would be processing that permit, and they do that on behalf of Cal Recycle, and Lisa's information, her contact information, is listed here.

Her cards are in the back.

And on the sign-in sheet, there is a little box that said if you wanted to be notified regarding this solid waste facility permit process, to check that box, and then that will get to Lisa. The names of people who check that box will get to Lisa for her permit process.

So on that note, I believe that concludes our staff presentation, and we look forward to receiving your comments.

PUBLIC COMMENTARY

MS. ALMY: So we're going to begin the public speaking portion of this where we're going to take your commentary. But first I want to let you know the norms of this hearing. And those are I want everyone to allow our speakers to finish without interruption. Now clapping, no cheering, no hissing, no booing. I need us to maintain civility. This is the most democratic you can get of any democratic process, which is practically your words straight to the decision-maker, and they will be your words straight to the decision-maker in the EIR.

So no arguments ad hominem. I'm very happy to be part of this exercise with you, and with that -- Again, the tone on this is a duck, so at the end of three minutes, a duck will quack, and that will be that.

Now, the Fire Marshal probably would not be happy with this room at this moment because we are very full. After you finish speaking, if you want to leave, you're perfectly welcome to leave and alleve the Fire Marshal's concerns; but if you want to stay and listen to your neighbors, that's perfectly acceptable too, and I can understand that completely.

So with that, I will call Connie Hannah to the podium to be followed by Lorraine Morey.

MS. HANNAH: I'm Connie Hannah speaking for the Santa Barbara League of Women Voters.

The League has been supporting the county plan to use Resource Recovery since 2002. We have a national policy calling for us to reduce the generation of and promote the reuse and recycling of solid and hazardous waste. And so we welcome this program.
1 However, even with the SEIR, we have several of
2 the same questions that we have raised earlier. We ought
3 to say that our questions arise because of the history of
4 this landfill and its unresolved water problems. The
5 threat of the landfill releasing leeching into the ocean
6 does not seem to be covered in this EIR very well, and
7 the Class I impacts noted earlier are not repeated here.
8 For that reason, we had planned to support the
9 environmentally superior choice, the Transfer Station,
10 for the saving of the MRF. The trucks already take waste
11 there, and we thought this would reduce the number of
12 truck trips making the 25-mile haul out to the Tajiguas
13 site.
14 However, we have since learned that the trucks
15 carrying unsorted trash already go out to Tajiguas. If
16 this is true, then there would not be much advantage to
17 the Transfer Station. We don't think the MRF should be
18 located at the landfill, but we don't see any other
19 acceptable choices.
20 It also appears that the anaerobic digestion
21 facility may have to be sited at the Tajiguas location.
22 If it is, we have a question about whether placing the
23 digestate on top of the landfill would be a good thing to
24 do. Will this put harmful stress on the landfill itself
25 by placing additional material on it and then having to

1 remove the digestate when it wants to be moved or
2 composted?
3 It's hard for the League to support the proposed
4 project if all of it is to be put at Tajiguas, thereby
5 increasing the industrialization of the Gaviota Coast and
6 the stress placed on this poorly sited landfill.
7 Thank you.
8 MS. ALMY: Next speaker is Lorraine Morey to be
9 followed by Kas Terhorst.
10 MS. MOREY: First of all, I would like to say
11 that none of us knew anything about this. Now, you all
12 have access to our parcel numbers, our names, and our
13 addresses. We were never informed. Had it not been for
14 Jim Marino in Rancho San Antonio where I reside -- for
15 50 years I've lived in my home. I moved there when I was
16 30, which makes me 80 years old. So -- and I'm an old
17 ranch gal, so I didn't fall off the turnip truck
18 yesterday. So I'd like to say that this whole process
19 has been kept very, very quiet; I find that very sneaky,
20 and I don't approve of it.
21 Secondly, this does not belong in our backyard.
22 Our homes are our biggest investment. They are where we
23 have raised our families and now have our grandchildren.
24 My grandchildren go to Bishop. I know the traffic; I've
25 gone that route.

1 This is a poor, poor plan, and I'm totally
2 against it, and I'm hoping that the majority of the
3 people here today are against it.
4 Thank you.
5 MS. ALMY: Again, Ma'am, please reiterate. I
6 really don't want any clapping, hissing, booing,
7 cheering. Thank you very much.
8 MR. TERHORST: My name is Kas Terhorst. I
9 represent 50 families at the Shadow Hills Homeowners
10 Association. This is located just north of Cathedral
11 Oaks.
12 I object strongly to Option C, which will bring
13 numerous large trucks in our residential neighborhoods
14 and industrializing it, and it would be a nightmare
15 having thousands of big trucks moving in and out. So why
16 that has to be located in the unincorporated area of
17 eastern Goleta Valley -- maybe it is convenient for the
18 planners, but I lodge my strong objection to it.
19 Thank you.
20 MS. ALMY: Thank you. Our next speaker will be
21 Bob Hart to be followed by Lauren Hanson.
22 MR. HART: Good evening. My name is Bob Hart.
23 My wife and I own the property immediately adjacent to
24 the landfill, and we're the only -- the actual
25 residential neighborhood they have. So we have some

1 concerns on that. But I'm going to address specifically
2 things that are in the EIR.
3 First off, page 4.1-1, the report states that
4 there are three industrial developments, the PXP Point
5 Arguello, Las Flores Canyon, and Tajiguas Landfill that
6 are on the Gaviota Coast. I'd just like to point out
7 that there are two industrial developments that are zoned
8 as such, PXP and Las Flores. But the landfill is Zone A2
9 3-20. It is not an industrial zone, and I think that's a
10 false, misleading statement in the document.
11 I also want to talk about the visual impacts.
12 The greatest visual impact of this project is from our
13 house site, and it's hard to fathom how a report of this
14 detail is just taking a photo from our site, what it
15 would like from our family room, from our pool deck, et
16 cetera. We have a beautiful mountain view across the
17 canyon right now that will be filled with this proposal.
18 Since we don't have a photo with the rendering
19 which I feel should have been there, I'd like to just
20 show what the size and scope of this project is. There's
21 currently about 2800 square feet, but if it was a square,
22 it would be in the size of that black box right there.
23 They're proposing over roughly 123,000 square feet of two
24 buildings, sixty thousand -- 63,000. By the way, it has
25 three acres under roof, which would, in same scale, be
1 this size. That's assuming if it was a square. It would
2 be that size each direction, relative to what's there now.
3 The other thing is that they're talking about it
4 being 61 feet high. That's taller than the County
5 Courthouse -- except for the clock tower, that's higher
6 than that. The City of Santa Barbara won't let any
7 building be built more than 60 feet high. So anything in
8 downtown Santa Barbara, other than the Granada, is less
9 than 60 feet. So that gives you perspective. We're
10 talking about a 60-foot building of that scale in my
11 backyard. Some of you are saying, "Well, it's your back
12 yard." Well, this would be in my backyard.
13 So we have a question as to how to come up with
14 a determination of -- that is a less than significant
15 impact. Once we had this proposal made, we immediately
16 stopped construction of our house. We said, "We don't
17 want to have that right there." We have tried to sell
18 our house and had many buyers say, "What a great value
19 for this 24 ocean view acres with house permits already
20 in place," but they immediately -- once we disclosed,
21 which we have to by law, that is proposed -- they
22 immediately back out.
23 So they have taken the value of our property,
24 and yet they say it's less than significant impact. I
25

1 don't understand how that could be, and I question how
2 are those determinations made? I see the words on the
3 paper, but they're subjective opinions, and frankly, I
4 think they need to be looked at.
5 I would have had more, but that's my time I'm
6 given. Thanks.
7 MS. ALMY: Thank you. Lauren Hanson to be
8 followed by Laina Mayfield-Condron.
9 MS. HANSON: Good evening. My name is Lauren
10 Hanson. I'm here as a resident of the El Sueno
11 neighborhood. My neighborhood is one of the many
12 surrounding the county campus, the local Transfer
13 Station, which, as we know, the EIR calls "Alternative
14 C."
15 I understand that the project, as described, is
16 at the Tajiguas Landfill, and that Alternative C is just
17 that, an alternative. But we have been told, the EIR
18 describes Alternative C as the "environmentally superior
19 alternative." Perhaps we should be flattered.
20 I'm not. I'm very worried. I appreciate the
21 soothing things that the presenters have said tonight,
22 but until the Board of Supervisors makes its vote on this
23 project, Alternative C is in play. There's no doubt of
24 that.
25 I think a lot of us here tonight share this

1 concern. In fact, who's here to express concern about
2 Alternative C? Perhaps the record can show that in this
3 packed room, most people's hands went up.
4 As most of us know, Alternative C is surrounded
5 on all sides by thousands of residents. The site is very
6 visible from the San Vicente and Rancho Santa Barbara
7 Mobile Home park, from the Foothill communities of La
8 Paloma Avenue and Meadowlark Lane, Rancho San Antonio,
9 from Oak Crest, Oak Road, from Hope Ranch.
10 The EIR implies that a 60-foot tall building,
11 bigger in mass than the Santa Barbara Airport Terminal,
12 would be an insignificant new presence in our midst, and
13 that its 24-hour-a-day activities and interesting new
14 sounds and smells would be less than significant to us.
15 I think the EIR is mistaken about that.
16 When the EIR looks at traffic effects, it
17 doesn't consider the hundreds of new housing units being
18 proposed in this immediate area by the community plan
19 being finalized. It doesn't consider Wake Center
20 improvements, including possible student housing.
21 I think current and new residents would be
22 significantly affected by hundreds of additional garbage
23 truck trips and long hauling truck trips daily on our
24 local surface streets, and using the Turnpike, El Sueno,
25 and 154 State Street freeway on and off ramps.
Environmental Impact on Schedule C was maybe what, one sheet, and we have this novel on Tajiguas. And I think that novel would apply to here. What about when it rains here and all that going down? This is as close to the sea as Tajiguas. Bob Hart mentioned land values. I bought my house on La Paloma Avenue in 1992. We've lived up here, and a lot of people don't understand the magnitude of houses up here. It's kind of hidden. But we're all going to see that. And when I bought my house in '92, one of the realtors said to me, "Well, aren't you going to smell the dump?" I said, "What dump?" And sometimes we smelled it. In fact, this morning I smelled it. I smelled it at the house right now, considering this project.

So I would request that you go back to the drawing board about the environmental review in regards to C.

And also, I think there's some huge legalities that county needs -- the supervisors need to really take into effect, huge legality issues here. I already know one issue with the environmental report was that -- you guys probably know about this much better than me -- but we can't have this many homeowners and this much property value impacted, and have an environmental report given to us, and we find out about it on Sunday, and we have what? 20 days to respond? I think there's some huge legalities here. Thank you.

MS. ALMY: Mary Jones to be followed by Judith Roberson. Mary Jones?

MS. JONES: Here.

MS. ALMY: Thank you.

MS. JONES: My name is Mary Jones. I am one of thousands of residents living within half mile of Transfer Station -- (Mic drops out.)

MS. JONES: My name is Mary Jones, and I am one of thousands of residents living within half mile of Transfer Station. The explosive nature of landfill gas and hazardous waste at this landfill, plus sorting, plus being adjacent to a high fire zone adds up to far too great a risk to impose on this community.

When listing the uses on the county campus, the EIR leaves out some really significant ones. Within a quarter mile of the Transfer Station, and not listed in the EIR, are the Alpha -- It's working now?

(Mic works.)

AUDIENCE MEMBER: Start over.

MS. ALMY: Are you ready? Thank you. Thank you very much.

MS. JONES: My name is Mary Jones, and I am one of thousands of residents within a half mile of the Transfer Station.

Here are two comments on the EIR's Alternative C analysis.

When listing the uses on the county campus, the EIR leaves out some really significant ones. Within a quarter mile of the Transfer Station, and not listed in the EIR, are the Alpha Resource Center, known as the Alpha School, the Veteran's Administration Medical Clinic, the cell tower, the affordable housing units of Oak Grove, and assisted living facility of Casa Omega. Omitting these places omits a large number of people, many low income and disabled, who live, work, school, and get medical treatment at the county campus.

A full listing of all the uses on the county campus must be included in the EIR to show the breadth of diverse activities within this relatively small piece of land.

A massive, highly industrialized MRF building complex is not compatible with the health and safety of everyone there.

For the fire danger alone, Alternative C is not a feasible location in an urban, densely populated area. For those who don't know it, there is a closed landfill next to the Transfer Station. The explosive nature of landfill gas and hazardous waste at this landfill, plus hazardous and flammable materials recoverable from trash sorting, plus being adjacent to a high fire zone adds up to far too great a risk to impose on this community.
Imagine having to evacuate the overcrowded county jail, which is only 650 feet away. Imagine evacuating thousands of community residents, including four mobile home parks only half a mile away. There is a long history of fire incidents at this landfill and the dump. One day in 1990, a transfer maintenance shop containing hazardous materials caught on fire and billowed toxic fumes. Nearby neighborhoods were evacuated by the police. Later that same day, the huge Painted Cave fire burned through parts of the county's campus, including the Alpha School, exploded through the landfill, and destroyed dozens of homes in the El Sueno neighborhood, including mine. The EIR did not describe this correctly, and significantly downplays risks of fire from hazardous materials and from wildfires.

There is so much to say about the many risks that homes, government agencies, and businesses in our community would face from a facility the size and scope of the proposed MRF. The EIR isn't even sure that all mitigation measures will actually work, yet still minimizes the impacts. I will submit further EIR comments in writing by the September 24th deadline.

Thank you very much. Judith Roberson to be followed by James Marino.

MS. ALMY: Thank you very much. Judith Roberson to be followed by James Marino.

Good evening, ladies and gentlemen.

A few years ago, there wasn't construction materials coming in. Well, that's now the base that they're saying, "We'll add to that so we're not adding so much." But the base has been raised. So if you start at the real base, you've got a Class I.

Some things like how far the sound goes or how far the smell goes, they've got these circles showing, "Well, it won't be too smelly over here. And here's the sound." Under circles drawn in the EIR chart, "It is not going to be too noisy over here."

But add the smell to the sound, to the traffic, to the visual, to the fact that it's completely surrounded by residents, and some -- El Sueno was there long before the County did anything. Of course, what they did is they filled the canyon right next to us with trash.

But I think that all these people are indicative of concern about choosing C. I don't see that C is environmentally better than Tajiguas. I think that is an opinion of the drafters of the EIR.

That's the end of me.

Thank you.

I'm Jim Marino. I live up in Rancho San Antonio. I've been up there 34 years.

I think that probably Solid Waste does a good job overall in this county, and I think this project is probably well thought out to the extent that Tajiguas appears to be the best possible alternative. But the problem, as many have pointed out already, is the selection of Alternative C as an alternative that is considered to be the environmentally superior alternative.

I read through the environmental report -- as quickly as I could because it's rather lengthy -- and it seems very clear to me that Alternative C is not even a viable alternative, never mind an environmentally superior alternative.

As many have pointed out, it's at the hub of...
<table>
<thead>
<tr>
<th>Page 53</th>
<th>Page 54</th>
</tr>
</thead>
</table>
| 1 this county campus. There’s a jail with people who are  
2 imprisoned and have no choice where they are and how much  
3 beping they hear from the backing up of vehicles and so  
4 on or any fumes they might smell.  
5 Someone mentioned Alpha. Alpha School is down  
6 in a hollow. Many of the gases produced in the facility  
7 like this are heavier than air gases, which would then  
8 tend to go down into the hollow and stay there in the  
9 hollow because the air doesn’t move there.  
10 There are so many problems with Site C, I can’t  
11 imagine how it was conceivably a viable alternative of  
12 any kind.  
13 As mentioned before, there are hundreds of  
14 homes, many very nice homes; people have invested money  
15 in the area. It’s certainly not a place to have this  
16 kind of a transfer facility, with digesters and  
17 everything else, as has been suggested.  
18 So let me just say in closing -- because I  
19 couldn’t possibly address the many, many things in the  
20 original environmental report --  
21 I agree with the speaker that said this was very  
22 poorly noticed to the neighborhood, the surrounding  
23 people; that we should have all known about this, not as  
24 the ”Tajiguas project,” but as the ”Tajiguas project with  
25 our neighborhood as being the next best alternative." |
| | 1 the big fire above you guys?” They had no clue. Our  
2 neighborhood got a three-minute notice to evacuate.  
3 I'm sorry, the Transfer Station is not a viable  
4 location. And I have 104, 105 homes that will all agree  
5 with that, in the neighborhood. Thank you.  
6 **MS. ALMY:** Our last speaker, unless there are  
7 more people who would like to speak and there are speaker  
8 slips in the back --  
9 **AUDIENCE MEMBER:** I'd like to speak --  
10 **MS. ALMY:** Fill out a speaker slip and then hand  
11 it in. Part of the reason why you fill out a speaker  
12 slip is that we get your address and you get on the  
13 noticing list.  
14 So Susan Riparetti to be followed by Barbara  
15 Kloos.  
16 **MS. RIPARETTI:** Saint Barbara -- I think of  
17 Saint Barbara because we live in Santa Barbara and we  
18 consider it such a special place.  
19 Who is Saint Barbara? And Saint Barbara was  
20 kept in a tower by her father because he wanted to keep  
21 her protected from the outside world. So she was  
22 imprisoned in a tower.  
23 And, in a way, I feel that that's Santa Barbara,  
24 really. We want to be protected from the outside world.  
25 And what do we love about this town is we love its |
| **Page 55** | **Page 56** |
| 1 And that notice should have gone out to  
2 everybody so we would have known when they had their  
3 initial hearings in this matter, and we could have  
4 attended and given this input perhaps much earlier than  
5 two days before the hearing date, because that’s when  
6 most of us, including me, found out about it, and that's  
7 when I told my neighbors about it, the minute I found out  
8 about it. That's not an appropriate notice. I think  
9 that constitutes perhaps some legal defects in terms of  
10 the notice of something as major and as important as this  
11 is to our neighborhood.  
12 Anyway, I beat the duck so that's all I have to  
13 say. Aflac.  
14 **MS. ALMY:** Cheri Bode followed by Susan  
15 Riparetti -- and I'm sure I got that wrong.  
16 **MS. BODE:** The spelling of my name is C-h-e-r-i,  
17 B-o-d-e.  
18 I am the president of the homeowners association  
19 of Rancho San Antonio. Jim is one of my neighbors and he  
20 notified me so that I could get the e-blast out.  
21 When the Painted Cave fire happened, my  
22 father-in-law was actually on the property and he was  
23 watching the fire that was going on at the station, the  
24 Transfer Station. And he got a phone call from a  
25 granddaughter that said, “Hey, Grandpa, do you know about
1 makes more sense to keep this place what it is for so
2 many people traveling through and living here and that is
3 a pristine, beautiful environment by the sea?
4 So let's always think of that whenever there's
5 some project on the table. It's nothing personal toward
6 the people working so hard to do this good thing with our
7 trash. You know, but each individual, try not to use so
8 much waste; try to compost; get rid of plastic bags.
9 You're doing all the right things. Try to ride a Vespa;
10 that's what I do, you know. Try to do everything you can
11 on an individual level, and support these projects, but
12 put them in the place where it's going to do the least
13 harm and it's going to preserve what raises the spirits,
14 which is this environment, the spirits of those who live
15 here and visit here.
16 And I am above this project, too, on Meadowlark
17 Lane, and I'll be really sad to see a big building go up.
18 You know, I got the notice just this morning.
19 And I'm done. Anyway, thank you.
20 MS. ALMY: Thank you very much. Barbara Kloos
21 to be followed by Pamela Poehler.
22 MS. KLOOS: I just want to comment on the visual
23 aspect of the EIR. And I think that you have taken a
24 view from only one area, one sighting, which is going up,
25 and then only seeing the roof line.

1 But there are so many neighborhoods that are
2 going to be looking down on the building, and I just feel
3 that it's not a complete visual report that only has
4 shown it from one angle, and it gives the perception that
5 you're trying to kind of hide something about, you know,
6 what it's going to really be like.
7 So I know that there's not going to be another
8 really public hearing until I think the Planning
9 Commission; but if there is, I think that it would really
10 be imperative that you look at the visual from all angles
11 so that we can really see a more complete effect that it
12 would have.
13 And the other thing is -- I brought this up at
14 an earlier meeting I think that was last year, but I know
15 that there's no section for home values in the
16 environmental report. But it's just something that I
17 feel in this situation -- I don't know where it could fit
18 in, but I just at least want to say that the home values
19 of all of the people that -- all the neighbors that
20 surround that is going to be greatly impacted.
21 And this is not the kind of project that you
22 kind of dump in the middle of an already established
23 neighborhood. This is something that you build
24 somewhere, and then you build around it so that when
25 people want to purchase a home there, they know what

1 their neighbors are going to be looking at and smelling
2 and the effects of it.
3 So anyway, thank you.
4 MS. ALMY: Thank you very much. So right now
5 the last speaker is Pamela Poehler, and I'm really sorry
6 if I got that wrong; I'm sure I did.
7 But there are more speaker slips in the back and
8 we're happy to stay here.
9 MS. POEHLER: Hi, my name is Pamela Mallen
10 Poehler, also known as Pam.
11 And first of all, I just want to empathize with
12 Bob Hart living next door to the Tajiguas plant because
13 that's a bad situation to be in, and it doesn't seem like
14 there's really a perfect solution here.
15 I am the closest neighborhood -- neighbor to
16 Alternative C. And the County knows me well because I've
17 made numerous phone calls regarding lots of problems, and
18 my big concern is -- I have to admit I did not read the
19 EIR in detail. I read the summary. So I don't know the
20 extent to which things were analyzed. I did notice that
21 things regarding noise were classified as Category III,
22 which was insignificant. But to me, they're very
23 significant.
24 And I don't know if anybody has ever done a
25 study on backup beepers and mental health, but I will
1 especially those of you who aren't affected by the sound
2 but are concerned about the traffic and visual effects as
3 well. Thank you.
4
5 MS. ALMY: Thank you. So the newest last
6 speaker is David Court. Right here, please. Thank you.
7
8 MR. COURT: I hate microphones. Can everybody
9 hear me? They make me nervous.
10 My name is Dave Court, and I live at 464 El
11 Sueño with wife and seven-year-old daughter, who could
12 not be here today.
13 One of the things that -- so we'll talk directly
14 about the EIR.
15 One of the things that I feel the EIR is not
16 addressing is an environmental review that was conducted
17 in 1995 which evaluated the cover of the current transfer
18 center, and it was found not to be suitable. And I just
19 wanted to make note to the crowd that this facility would
20 have been one acre and five stories high, which is not
21 significantly smaller than the proposed facility, but it
22 is smaller.
23 So a review of that site has been evaluated, and
24 in 1995 alone, it was found not to be an appropriate
25 thing to have at the Transfer Station in our residential
26 agreement. Thank you.
27 MS. ALMY: Number? Okay, we do have a copy of

1 this. Thank you very much.
2 All right. Sonja Cutner, please.
3 MS. CUTNER: Hi, I live at 360 Sherwood Drive,
4 and there's a couple things that I would like to talk
5 about.
6 The first is when I hear it say that it is the
7 most or the best available alternative, does that mean
8 that's really what they're going after and that this
9 Tajiguas option is really just putting, like, a facade on
10 it, and that really the Transfer Station is going to be
11 the home of this project? And that scares me.
12 Also, when I hear words like, "We're going to
13 manage the effects," or "If something bad happens, we're
14 going to manage it." Well, it's a lot easier to prevent
15 something from happening than managing an oil spill. And
16 this potentially has the same kind of negative effects on
17 our environment that an oil spill or some other similar
18 catastrophe would have.
19 And I think that the visuals that you guys
20 provided in the EIR that you showed on the screen today
21 were also very misleading because you provide one vantage
22 point, one viewpoint from the freeway. And you see
23 things from 360 degrees, and I understand that you can't
24 put every available viewpoint up here, but I'm sure that
25 you also picked the one that provided the least amount of

1 visibility. And so I feel it's very concerning that
2 these things are being done, and I don't think that
3 they're being done in a very open and clear manner, and
4 that bothers me as well.
5 Also, you say that the noise impact and smell
6 impact on these things aren't going to increase
7 substantially. Well, "substantial" is not something that
8 everybody can quantify in the same way. So maybe to you
9 it's not going to be substantial, but to us and the
10 community that surrounds it, it is substantial and it
11 does affect us, and we don't approve of it. And I think
12 that there are better alternatives out there; they just
13 need to be investigated. Thank you.
14 MS. ALMY: Thank you. So is there anyone else
15 who would like to make public presentations made?
16 Fantastic. Thank you. Tell me your name.
17 MS. MCGINNIS: Bobbi McGinnis.
19 MS. MCGINNIS: I live 4575 Camino Molinero in
20 Rancho San Antonio. I found out about the hearing two
21 days ago. But I think what we're all feeling is, number
22 one, a distrust of government.
23 Right now, our County -- when you're talking
24 about a County making decisions, putting a major
25 industrial complex surrounded in a residential area, it

1 makes you wonder about, "Who is this County?" I mean,
2 here we have artists who can't produce art in their
3 little barns. What has happened to our government?
4 And I wondered, is there a General Plan that --
5 I'm just wondering about the process of the General Plan,
6 but it appeared to me that -- because I'm not against
7 business. I'm all for improving our business enterprises
8 here in Santa Barbara and in the entire county. But what
9 I really feel is this is a displacement of industry in an
10 area that's primarily residential. Where in our General
11 Plan does it allow for this to happen? That's my
12 question.
13 MS. ALMY: Your name?
14 MR. MCKAIG: Bruce McKaig.
15 MS. ALMY: Bruce McKaig is our next speaker.
16 MR. MCKAIG: I am Bruce McKaig. I lived in the
17 same neighborhood as Bobbi.
18 And it has become disheartening over the last
19 five years to see the irresponsibility of the County.
20 Every time if I'm sleeping or something, I feel like
21 there's going to be a public restroom on my property.
22 They were going to put a cell tower, recently, on it.
23 They put four, I think, down in a playground that my wife
24 and I used to play at, Tuckers Grove.
25 The EOC right next door to us, Emergency
1 Operations Center, was never on the plan. There was
2 going to be one put up in Santa Ynez; all of a sudden, 
3 now, it's right in this same city, right across the 
4 street here. That's a big, huge facility and there's a 
5 lot of traffic and use for that. 
6 So it's like the County is constantly looking -- 
7 it used to be nice to live in the County and have open 
8 space, but it's like, "What are they going to do with 
9 this property next?"
10 And so I'm against this thing, regardless of 
11 what it's going to do, just because it's more. And I 
12 don't trust what the County's going to do with it and 
13 what is going to be done with it in the future.
14 With that, I have a couple ideas: 
15 I mean, the university would be a great place to 
16 have it; we could employ a bunch of students at the same 
17 time.
18 The County Bowl would make a nice dump. 
19 The County Courthouse. I'm willing to give 
20 that, one of the prettiest government buildings in our 
21 county here.
22 Anyway, just a couple of suggestions of "not in 
23 my backyard." Well, County, think about putting it in 
24 your backyard.
25 MS. ALMY: Thank you very much.

1 So is there anybody else who would like to make 
2 a presentation tonight? 
3 AUDIENCE MEMBER: Can I ask one question? When 
4 is the county meeting, the county board meeting? 
5 MS. ALMY: So the process typically runs like 
6 this: The environmental document is prepared and it's 
7 circulated for public review and comment. That's what 
8 we're doing right now. 
9 After the comment period is over, there are a 
10 lot of comments that need to be responded to, including, 
11 you know, "Move into the sunken garden." That will be 
12 responded to. 
13 But once the environmental document is prepared 
14 and complete and finaled -- and this has brought up a lot 
15 of alternatives and lot of thoughts, so thank you all 
16 very much -- but once that is finalized, then a staff 
17 report is written, and people will -- and you will 
18 receive notice of the Planning Commission hearing. The 
19 Planning Commission will make -- oh, there's no Planning 
20 Commission. It's going to go straight to the Board of 
21 Supervisors.
22 So you'll be noticed of the Board of Supervisors 
23 hearing. It will be on a Tuesday, and if you signed in 
24 the sign-up sheet and put your address on, you will 
25 definitely be noticed.

1 I heard very clearly that the notice needs to be 
2 wider, and so the notice will come -- it's probably 
3 within six months, four months? 
4 MR. SCHLEICH: Yeah.
5 MS. LEIPNER: So we don't have a specific date 
6 set for that yet because it does take time to move from 
7 the draft to the final, and again, we really do want to 
8 encourage you that there are the sign-in sheets back 
9 there. Please put your name down, put your address down, 
10 and please make it legible because a big problem is we 
11 try to reach out and we get a lot of bad addresses; we 
12 get things coming back. So --
13 AUDIENCE MEMBER: Well, is the public invited to 
14 this meeting? Because I'm sure a lot of us would like to 
15 go.
16 MS. ALMY: Absolutely. You are invited to this 
17 meeting, yes.
18 AUDIENCE MEMBER: And the only process of being 
19 noticed is to write our names on that sign-up sheet?
20 MS. ALMY: No, there are legal processes.
21 AUDIENCE MEMBER: People talk about not finding 
22 out. I'm one of them. I live in the Sierra Madre Oak 
23 Crest neighborhood, and I'm just curious as to what the 
24 noticing process is, the notification process is, because 
25 how is it that this has gone on for five years, and this

1 is a week before this hearing that we find out from 
2 neighbors?
3 MS. ALMY: Right. So the minimum legal notices 
4 really pertain to the area of impact around Tajiguas. So 
5 those are the people who have been noticed. But this 
6 neighborhood has made it very, very clear. And you also 
7 got notice -- some radius was also -- go over it -- 
8 AUDIENCE MEMBER: Well, I'm in the Oak Crest 
9 neighborhood and we never got notice, and the sounds come 
10 up to the Sierra Madre.
11 MS. LEIPNER: I can't hear you. Sorry.
12 MS. ALMY: I'm going to get the microphone.
13 MS. LEIPNER: Again, our main purpose here is to 
14 take your comments, but I do want to explain the 
15 explaining. And, you know, I do want to say that we always 
16 do our best, and no matter what project goes on, people 
17 feel that it's not adequately noticed.
18 As Anne mentioned, you typically notice around a 
19 proposed project, which is the Tajiguas Landfill. We 
20 went beyond that. We noticed around the Tajiguas 
21 Landfill. Around the outside boundary of the Transfer 
22 Station, the required notice is a thousand feet. We went 
23 that and we went a little beyond. We also published in 
24 two newspapers, and we actually noticed around the MRF 
25 site in the City of Santa Barbara.
We had the original Tajiguas Landfill notice list from back when we did work on that; we noticed there. We noticed any group that has participated in the 125 meetings and had asked to be noticed. So we had over about 1200 notices sent out.

Again, we do our best. Tonight, the notice is back there, please put it on, and when the public hearing is, we'll send out notice on that.

**AUDIENCE MEMBER:** I have a question.

**MS. ALMY:** Yes, Ma'am.

**AUDIENCE MEMBER:** To date, how much has this study cost the taxpayers? Does anyone have that answer?

**MS. ALMY:** Ma'am, this is not really the forum for that.

**AUDIENCE MEMBER:** I think it is.

**MS. ALMY:** This is really getting out of control. I know my faculties. I simply asked a question.

**MS. ALMY:** Let me put my comment in context. To put my comment in context, this is an environmental hearing. We came prepared to discuss the Environmental Impact Report and receive comments. That is the extent of this. Typically, there is no dialogue held in an environmental hearing. I'm allowing it to happen right now, but I'm thinking it's time to close this down.

One more comment and then we will go.

**AUDIENCE MEMBER:** As you've heard, there's a lot of neighborhoods that are surrounding that Alternative C, and it is possible that one of us who knows that area could get with the person who does the noticing so it's not just the people that are on the list? Because there's a lot of people that just couldn't show up, and then you'd know, like, okay, all of Rancho San Antonio or all of this area. And that could be helpful for all these people that just found out the last two days.

**MS. ALMY:** That could be really helpful. Joddi Leipner, right here, is the woman to contact to do that type of work.

**AUDIENCE MEMBER:** Okay, great.

**MS. LEIPNER:** I also just want to mention, we will be posting -- we do have our website, and information regarding future hearings will be posted there. So sometimes neighborhood communication is the best communication, and so if you can point people to our website, future notices will be posted there and documents will be posted there. But again --

**AUDIENCE MEMBER:** Can I call you about that?

**MS. LEIPNER:** (Nods.)
away (6)
9:17;21:25;29:12;
44:6;49:2,4

B

back (20)
3:18;4:11;12:7;8;
33:3;23;35:9;41:12;23;
44:8;45:16;50:7;
55:8;59:7;67:8;12;
69:2;7:1
backing (1)
53:1
back-to-back (1)
25:8
backup (6)
59:25;60:2,7,12,16;
16:23
backyard (5)
32:14;41:12;13;
65:23,24
bad (4)
3:23;59;13;62:13;
67:11
badger (1)
67:11

BARBARA (30)
3:1;6:12;14:7;6;
10:14;15:19;20:16;
27:16;28:1;22:29;3:7;
30:5;31:18;36:20;41:7;
9:43;6:11;55:14,16;17;
19:19,23;56:16;
57:20;64:8;68:25
bars (1)
57:8

Barnes (1)
64:3
Baron (2)
6:16;16:23
base (6)
50:24;25:1;3,5,7,8
based (5)
9:12;27:12;16;31:10;
32:9
basic (1)
27:7
basically (9)
22:23;24:16;22;
19:60:5
basin (1)
25:9
basis (1)
11:10
Batteries (2)
46:14,15
beat (1)
54:12
beautiful (3)
40:16;56:6;57:3
became (2)

7:19;9:17
become (3)
8:2;12:8;18;64:18
becomes (1)
28:9
becoming (1)
20:19
beepers (6)
59:25;60:2,7,12,16;
21
beeping (1)
21

biological (1)
26:19
biology (3)
21:8;22:11;31:7
birds (2)
22:15;29:23
Bishop (1)
38:24
bit (1)
15:4
black (1)
40:22
block (1)
30:19
blue (3)
6:24;10:15;18:2
BMPs (1)
25:3
Board (11)
4:11;10:8;11:23;
15:12;34:10;42:22;
44:11;45:17;66:4,20;
22
Bob (5)
39:21;22;45:6;59:12;
71:5
Bobbi (4)
63:17,18;18;64:17
Bode (3)
52:8;54:14,16
B-o-d-e (1)
52:8;54:14,16
Bode (3)
63:17,18;18;64:17


cabinet (1)
7:19
Cal (4)
14:8;20:20;21:35:7
CALIFORNIA (1)
3:1
call (7)
13:12;28:23;34:17;
18:36;17:54:24;70:24
called (5)
8:19;9:8;12:6;16:16;
18:2
calling (1)
36:23
calls (2)
53:15

CEQA (11)
15:4;9,10;22:20;2:19;
23:27;5:20;32:6,23
certainly (1)
53:15

Page 9-386
<table>
<thead>
<tr>
<th>Word</th>
<th>Page Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>efficient</td>
<td>13:3</td>
</tr>
<tr>
<td>effort</td>
<td>8:20,20;27:2</td>
</tr>
<tr>
<td>efforts</td>
<td>8:25:9:2</td>
</tr>
<tr>
<td>eighth</td>
<td>4:9;28:25</td>
</tr>
<tr>
<td>EIRs</td>
<td>50:16</td>
</tr>
<tr>
<td>EIR’s</td>
<td>47:10,24</td>
</tr>
<tr>
<td>either</td>
<td>7:19;28:19;35:1</td>
</tr>
<tr>
<td>El</td>
<td>30:15;42:10;43:24;49:12;50:2;51:17;60:6;61:8</td>
</tr>
<tr>
<td>elected</td>
<td>11:16</td>
</tr>
<tr>
<td>electrical</td>
<td>19:7</td>
</tr>
<tr>
<td>electricity</td>
<td>26:2,3</td>
</tr>
<tr>
<td>elements</td>
<td>17:14,24</td>
</tr>
<tr>
<td>elevation</td>
<td>17:19</td>
</tr>
<tr>
<td>elevations</td>
<td>17:15</td>
</tr>
<tr>
<td>else</td>
<td>53:17;63:14;66:1</td>
</tr>
<tr>
<td>e-mail</td>
<td>33:7:34:16</td>
</tr>
<tr>
<td>Emergency</td>
<td>64:25</td>
</tr>
<tr>
<td>emission</td>
<td>19:10;25:24</td>
</tr>
<tr>
<td>emissions</td>
<td>18:6,19;19:11,11,12,17:26;6,18:31:2,2</td>
</tr>
<tr>
<td>emitted</td>
<td>18:20</td>
</tr>
<tr>
<td>empathize</td>
<td>59:11</td>
</tr>
<tr>
<td>emphasis</td>
<td>12:24;33:15</td>
</tr>
<tr>
<td>employ</td>
<td>65:16</td>
</tr>
<tr>
<td>enclosed</td>
<td>13:16</td>
</tr>
<tr>
<td>encourage</td>
<td>(3)</td>
</tr>
<tr>
<td>4:13;8:12;67:8</td>
<td></td>
</tr>
<tr>
<td>end</td>
<td>8 (8)</td>
</tr>
<tr>
<td>energy</td>
<td>10 (10)</td>
</tr>
<tr>
<td>emphasis</td>
<td>3:54:17</td>
</tr>
<tr>
<td>empathize</td>
<td>18:20</td>
</tr>
<tr>
<td>emitted</td>
<td>18:6,19;11,11,12,17:26;6,18:31:2,2</td>
</tr>
<tr>
<td>31:21</td>
<td></td>
</tr>
<tr>
<td>exposure</td>
<td>23:6</td>
</tr>
<tr>
<td>express</td>
<td>43:1</td>
</tr>
<tr>
<td>extend</td>
<td>20:12;26:17</td>
</tr>
<tr>
<td>extending</td>
<td>26:23</td>
</tr>
<tr>
<td>extension</td>
<td>26:13</td>
</tr>
<tr>
<td>extent</td>
<td>8:17:23:3</td>
</tr>
<tr>
<td>event</td>
<td>25:7</td>
</tr>
<tr>
<td>events</td>
<td>25:8;8</td>
</tr>
<tr>
<td>everybody</td>
<td>4:25:54:2;61:6,63:8</td>
</tr>
<tr>
<td>everyone</td>
<td>35:5;23:48:17</td>
</tr>
<tr>
<td>evidence</td>
<td>30:17</td>
</tr>
<tr>
<td>except</td>
<td>17:21;21:4;41:6</td>
</tr>
<tr>
<td>excuse</td>
<td>46:23</td>
</tr>
<tr>
<td>exercise</td>
<td>36:6</td>
</tr>
<tr>
<td>exhaust</td>
<td>18:21:19:9;31:2</td>
</tr>
<tr>
<td>expand</td>
<td>15:13:14</td>
</tr>
<tr>
<td>expanding</td>
<td>10:6:28:12</td>
</tr>
<tr>
<td>expansion</td>
<td>10:9:44:12;56:23</td>
</tr>
<tr>
<td>fact</td>
<td>26:22;43:1;45:13;</td>
</tr>
<tr>
<td>facility</td>
<td>51:15</td>
</tr>
<tr>
<td>facilities</td>
<td>69:20</td>
</tr>
<tr>
<td>fair</td>
<td>27:19</td>
</tr>
<tr>
<td>fall</td>
<td>34:3,4,12;38:17</td>
</tr>
<tr>
<td>false</td>
<td>40:10</td>
</tr>
<tr>
<td>familiar</td>
<td>6:23</td>
</tr>
<tr>
<td>families</td>
<td>38:23;39:9</td>
</tr>
<tr>
<td>family</td>
<td>40:15</td>
</tr>
<tr>
<td>Fantastic</td>
<td>63:16</td>
</tr>
<tr>
<td>father</td>
<td>55:20</td>
</tr>
<tr>
<td>father-in-law</td>
<td>54:22</td>
</tr>
<tr>
<td>fathom</td>
<td>40:13</td>
</tr>
<tr>
<td>felt</td>
<td>20:13</td>
</tr>
<tr>
<td>few</td>
<td>51:3,4</td>
</tr>
<tr>
<td>fewer</td>
<td>32:15</td>
</tr>
<tr>
<td>field</td>
<td>50:12</td>
</tr>
<tr>
<td>filled</td>
<td>33:4:40:17:51:18</td>
</tr>
<tr>
<td>fills</td>
<td>18:2</td>
</tr>
<tr>
<td>filtered</td>
<td>19:25</td>
</tr>
<tr>
<td>final</td>
<td>3:16,13:11:24:4;33:2,34:2;67:7</td>
</tr>
<tr>
<td>finaled</td>
<td>66:14</td>
</tr>
<tr>
<td>finalized</td>
<td>43:19:66:16</td>
</tr>
<tr>
<td>Finally</td>
<td>16:4</td>
</tr>
<tr>
<td>find</td>
<td>11:7,14:38:19:46:1;68:1</td>
</tr>
<tr>
<td>finding</td>
<td>67:21</td>
</tr>
<tr>
<td>fine</td>
<td>21:15,33:22</td>
</tr>
<tr>
<td>finish</td>
<td>35:24:36:12:51:25</td>
</tr>
<tr>
<td>finished</td>
<td>19:20</td>
</tr>
<tr>
<td>first</td>
<td>(11)</td>
</tr>
</tbody>
</table>
- September 04, 2014
PUBLIC HEARING

9:22;12:22;13:22;
21:11;22:11,12,35:22;
38:10;40:3;59:11:62:6
fit (1)
58:17
five (4)
50:6;61:18;64:19;
67:25
flammable (1)
48:23
flare (2)
18:22;23:11
flattered (1)
42:19
fleeting (1)
21:19
Flores (2)
40:5,8
focus (1)
33:10
folks (1)
15:17
followed (10)
36:18;38:9;39:21;
42:8;46:4;49:25;52:7;
54:14;55:14;57:21
food (4)
8:21,22,24;18:14
foot (1)
50:13
football (2)
50:12,12
Foothill (1)
43:7
formal (1)
34:19
forum (1)
69:13
forward (3)
14:25;33:18;35:16
foster (1)
13:22
found (10)
8:18;23:16;34:17;
44:21;54:6,7;61:16,22;
63:20;70:12
foundation (1)
23:25
four (3)
49:3;64:23;67:3
fraction (2)
12:16;13:15
franchise (1)
7:5
frankly (1)
42:3
free (1)
12:16
freeway (3)
29:7;43:25;62:22
fresh (1)
56:12
Friday (1)
7:14
front (2)
5:9;35:5
frustrated (1)
56:21
fuel (1)
23:9
full (4)
28:9;29:12;36:12;
48:11
fumes (2)
49:8;53:4
funny (1)
50:23
further (2)
26:17;49:22
future (4)
22:3;65:13;70:19,22
G

gal (1)
38:17
garages (1)
13:15
garbage (1)
43:22
garden (2)
7:10;66:11
gas (6)
13:19;24:21;25:23;
26:1;2:48:22
gases (3)
14:21;53:6,7
gather (1)
5:8
gave (1)
12:22
Gaviota (5)
6:4;38:5;40:6;71:9;
12
General (4)
34:8;64:4,5,10
generally (1)
33:12
generate (2)
9:25;15:18
generated (4)
8:4;20:15;26:2;
27:15
generates (1)
14:1
generation (3)
14:16;26:3;36:23
gentlemen (1)
52:9
go (1)
27:16
goelogic (1)
23:24
geology (3)
21:8;23:13;25:15
given (3)
42:6;46:1;54:4
gives (2)
41:10;58:4
giving (1)
4:15
glass (2)
13:11
goal (1)
14:10
goals (2)
10:24;11:1
God (1)
56:8
goes (12)
6:24;25:8;7:10;3;
11:10;12:13;14:9;51:9;
10:56:18;60:11;68:16
Goleta (4)
6:15;20:16;27:16;
39:17
Good (16)
3:5;23;5:2;9:16;16:5;
11:29;6:3;16;37:23;
39:22;42:9;47:5;52:9;
12:56;15:57:6
Gotcha (1)
47:4
government (4)
49:17;63:22;64:3;
65:20
governor (1)
15:2
governor's (1)
14:24
Granada (1)
41:9
grandchildren (2)
38:23;24
granddaughter (1)
54:25
Grandpa (1)
54:25
graphic (1)
12:25
great (5)
20:13;41:19:48:25;
65:15;70:16
greater (2)
8:12;12:23
greatest (1)
40:12
greatly (1)
58:20
green (9)
6:25;7:8;13:10;16;
11:5;12:18;13;17:24;
19:2
greenhouse (5)
14:21;25:23;24:26:2;
6
ground (2)
24:18;21
group (2)
56:14;62:19
11:16;69:3
Grove (2)
48:7;64:24
guidelines (2)
15:7;20:23
guys (5)
56:14;62:19
H

habitat (3)
22:13;26:20;21
half (4)
46:9;47:9;22:49:4
hand (3)
4:22:5;5:55:10
handle (1)
18:1
hands (1)
43:3
Hannah (3)
36:17;19,19
Hanson (4)
39:21;42:7;9:10
happen (3)
30:4;64:11;70:1
happened (2)
54:21;64:3
happening (1)
62:15
happens (3)
16:2;60:9;62:13
happy (3)
36:5;11;59:8
hard (4)
9:2;38:3;40:13;57:6
harder (1)
9:17
harm (1)
57:13
harmful (1)
37:24
Hart (8)
39:21;22:22;45:6;
59:12;71:5,6,15
hate (1)
61:6
haul (1)
37:12
hauling (1)
43:23
haul-its (1)
8:24
hazard (3)
23:7;29:16;18
Hazardous (9)
7:12;22:25;23:1;
36:24;44:6;48:22,23;
49:7,15
hazards (3)
21:8;23:7;26:24
health (5)
26:25;29:2;48:16;
59:25;60:1
hear (11)
4:6;25:33;13:46;17;
47:3;7:53:3;61:7:62:6;
12:68:11
heard (3)
15:16;67:1;70:4
hearing (25)
3:6;7,8;10:4;19:5:17;
20:6;7,8;33:12:35:23;
47:2;2,3;54:5:58:8;
63:20;66:18;23:68:1;
69:7,23;70:1;71:4,17
hearings (2)
54:3;70:19
heart (1)
56:18
heat (1)
19:8
heavier (1)
53:7
heavy (1)
23:3
height (2)
17:16,20
held (2)
10:19;69:25
help (7)
5:5;10:8;24:10;24;
12:7;13:18;14:19
helped (1)
16:12
helpful (2)
70:11,13
helps (1)
14:12
Here's (6)
17:19;21:2;25:14;
29:6;30:7;51:11
Hey (1)
54:25
Hi (3)
44:18;59:9;62:3
hidden (1)
45:9
hide (1)
58:5
hierarchy (1)
8:21
high (5)
18:13;41:5;8;48:24;
61:18
higher (1)
41:6
highest (1)
15:23
highly (1)
48:15
highway (1)
29:11
Hills (1)
39:9
### PUBLIC HEARING

#### September 04, 2014

<table>
<thead>
<tr>
<th>word</th>
<th>occurrences</th>
</tr>
</thead>
<tbody>
<tr>
<td>hissing</td>
<td>2 (35:25;39:6)</td>
</tr>
<tr>
<td>history</td>
<td>2 (37:3;49:5)</td>
</tr>
<tr>
<td>holding</td>
<td>1 (18:11)</td>
</tr>
<tr>
<td>hollow</td>
<td>3 (53:6;8:4)</td>
</tr>
<tr>
<td>home</td>
<td>7 (38:15;43:7;49:4; 58:15;18;25;62:11)</td>
</tr>
<tr>
<td>Homeowners</td>
<td>3 (39:9;45:24;54:18)</td>
</tr>
<tr>
<td>houses</td>
<td>6 (38:22;49:12;17; 53:14;14;55:4)</td>
</tr>
<tr>
<td>hominem</td>
<td>1 (36:5)</td>
</tr>
<tr>
<td>Hondo</td>
<td>1 (16:23)</td>
</tr>
<tr>
<td>hope</td>
<td>5 (10:2;3;11:3;4;34:2; 43:9)</td>
</tr>
<tr>
<td>hopefully</td>
<td>4 (6:18;8:11;11:12; 50:5)</td>
</tr>
<tr>
<td>hoping</td>
<td>2 (34:10;39:2)</td>
</tr>
<tr>
<td>hot</td>
<td>1 (14:16)</td>
</tr>
<tr>
<td>hours</td>
<td>1 (44:7)</td>
</tr>
<tr>
<td>house</td>
<td>7 (40:13;41:17,19,20; 45:7;10,14)</td>
</tr>
<tr>
<td>Household</td>
<td>1 (7:12)</td>
</tr>
<tr>
<td>houses</td>
<td>1 (45:9)</td>
</tr>
<tr>
<td>housing</td>
<td>3 (43:17;20;48:6)</td>
</tr>
<tr>
<td>hub</td>
<td>1 (52:25)</td>
</tr>
<tr>
<td>huge</td>
<td>5 (45:19,21;46:3;49:9; 65:4)</td>
</tr>
<tr>
<td>humane</td>
<td>1 (11:7)</td>
</tr>
<tr>
<td>hundreds</td>
<td>3 (43:17;22;53:13)</td>
</tr>
<tr>
<td>hydrocarbon</td>
<td>1 (31:1)</td>
</tr>
<tr>
<td>identifying</td>
<td>3 (27:3;6;32:7)</td>
</tr>
<tr>
<td>III (3)</td>
<td>25:14;50:18;59:21</td>
</tr>
<tr>
<td>IVs (1)</td>
<td>52:4</td>
</tr>
<tr>
<td>Imagine</td>
<td>3 (49:1;2;53:11)</td>
</tr>
<tr>
<td>immediate</td>
<td>1 (6:16;43:18)</td>
</tr>
<tr>
<td>immediately</td>
<td>4 (39:23;41:16,21,23)</td>
</tr>
<tr>
<td>Impact (23)</td>
<td>3:9,13;4;6;21; 20:22;21:2;7,11;23:7; 26:8;30:1;24;32:16; 40:12;41:16,25,45:1; 50:25;52:5;63:5;6; 68:4;69:24</td>
</tr>
<tr>
<td>impacted</td>
<td>2 (45:25;58:20)</td>
</tr>
<tr>
<td>imperative</td>
<td>1 (58:10)</td>
</tr>
<tr>
<td>implemented</td>
<td>1 (9:13)</td>
</tr>
<tr>
<td>implies</td>
<td>1 (43:10)</td>
</tr>
<tr>
<td>important</td>
<td>4 (25:17;22;44:1;54:10)</td>
</tr>
<tr>
<td>importantly</td>
<td>1 (27:8)</td>
</tr>
<tr>
<td>impose</td>
<td>1 (48:25)</td>
</tr>
<tr>
<td>imposed</td>
<td>1 (14:13)</td>
</tr>
<tr>
<td>imprisoned</td>
<td>2 (53:2;53:22)</td>
</tr>
<tr>
<td>improper</td>
<td>1 (7:20)</td>
</tr>
<tr>
<td>improperly</td>
<td>1 (8:2)</td>
</tr>
<tr>
<td>improve</td>
<td>2 (3:25;26:4)</td>
</tr>
<tr>
<td>improvements</td>
<td>2 (14:1;43:20)</td>
</tr>
<tr>
<td>improving</td>
<td>3 (4:20;11;12:64:7)</td>
</tr>
<tr>
<td>incidents</td>
<td>1 (23:18)</td>
</tr>
<tr>
<td>included</td>
<td>6 (18:3,5;18,25;19;4; 27:11)</td>
</tr>
<tr>
<td>incorporated</td>
<td>1 (19:18)</td>
</tr>
<tr>
<td>increase</td>
<td>1 (63:6)</td>
</tr>
<tr>
<td>increased</td>
<td>2 (20:11;26:14)</td>
</tr>
<tr>
<td>increasing</td>
<td>1 (38:5)</td>
</tr>
<tr>
<td>indicative</td>
<td>1 (51:20)</td>
</tr>
<tr>
<td>individual</td>
<td>2 (57:7,11)</td>
</tr>
<tr>
<td>individually</td>
<td>1 (3:17)</td>
</tr>
<tr>
<td>industrial</td>
<td>6 (25:3;40:4,7;9;44:14; 63:25)</td>
</tr>
<tr>
<td>industrialization</td>
<td>1 (38:5)</td>
</tr>
<tr>
<td>industrialized</td>
<td>1 (48:15)</td>
</tr>
<tr>
<td>intuitively</td>
<td>1 (39:14)</td>
</tr>
<tr>
<td>Industries</td>
<td>2 (7:3;12:9)</td>
</tr>
<tr>
<td>industry</td>
<td>2 (56:6;64:9)</td>
</tr>
<tr>
<td>inform</td>
<td>1 (33:17)</td>
</tr>
<tr>
<td>information</td>
<td>9 (4:3;8;18,10,21;24; 34:1;14;35;8,8;70:19)</td>
</tr>
<tr>
<td>informed</td>
<td>1 (38:13)</td>
</tr>
<tr>
<td>informing</td>
<td>1 (16:5)</td>
</tr>
<tr>
<td>Ingamells</td>
<td>4 (5:11;16;11;12;21:15)</td>
</tr>
<tr>
<td>initial</td>
<td>1 (54:3)</td>
</tr>
<tr>
<td>input</td>
<td>3 (3:24;27:13;54:4)</td>
</tr>
<tr>
<td>inside</td>
<td>2 (60:18,19)</td>
</tr>
<tr>
<td>insignificant</td>
<td>2 (43:12;59:22)</td>
</tr>
<tr>
<td>instability</td>
<td>1 (23:18)</td>
</tr>
<tr>
<td>installed</td>
<td>3 (24;4;7;20)</td>
</tr>
<tr>
<td>instance</td>
<td>1 (50:24)</td>
</tr>
<tr>
<td>integrated</td>
<td>1 (16:19)</td>
</tr>
<tr>
<td>interested</td>
<td>1 (10:9)</td>
</tr>
<tr>
<td>interesting</td>
<td>1 (43:13)</td>
</tr>
<tr>
<td>internally</td>
<td>1 (18:8)</td>
</tr>
<tr>
<td>international</td>
<td>1 (12:4)</td>
</tr>
<tr>
<td>interpretation</td>
<td>2 (32:7,10)</td>
</tr>
<tr>
<td>interrupting</td>
<td>1 (46:24)</td>
</tr>
<tr>
<td>interruption</td>
<td>1 (35:24)</td>
</tr>
<tr>
<td>intersection</td>
<td>1 (31:19)</td>
</tr>
<tr>
<td>into</td>
<td>1 (5:22;8:1;10:3;5; 11:10;13;4;15;24; 19:14;24:21;27:3:37;5; 45:21;53:8;60:15; 66:11)</td>
</tr>
<tr>
<td>inundation</td>
<td>1 (29:18)</td>
</tr>
<tr>
<td>invested</td>
<td>1 (53:14)</td>
</tr>
<tr>
<td>investigated</td>
<td>1 (63:13)</td>
</tr>
<tr>
<td>investment</td>
<td>2 (13:23;38:22)</td>
</tr>
<tr>
<td>invited</td>
<td>2 (67:13,16)</td>
</tr>
<tr>
<td>involved</td>
<td>1 (50:2)</td>
</tr>
<tr>
<td>irresponsibility</td>
<td>1 (64:19)</td>
</tr>
<tr>
<td>issue</td>
<td>1 (20:17;22:18;23:2,17; 22,24;2,24;25,5;17; 32:1;45;22)</td>
</tr>
<tr>
<td>issued</td>
<td>1 (11:25;35:3)</td>
</tr>
<tr>
<td>issues</td>
<td>9 (7:22;20;10;21;5; 23,21,24;1;31;22; 45:21;50:3,8)</td>
</tr>
<tr>
<td>IV (2)</td>
<td>1 (20:25;25:21)</td>
</tr>
</tbody>
</table>

#### K

<table>
<thead>
<tr>
<th>word</th>
<th>occurrences</th>
</tr>
</thead>
<tbody>
<tr>
<td>karaoke</td>
<td>1 (5:2)</td>
</tr>
<tr>
<td>Kas</td>
<td>2 (38:9;39:8)</td>
</tr>
<tr>
<td>keep</td>
<td>10 (19:8;46:16;50:7; 55:20;56:1;5,11,12,12; 57:1)</td>
</tr>
<tr>
<td>keeping</td>
<td>3 (56:6,6,7)</td>
</tr>
<tr>
<td>kept</td>
<td>2 (38:19;55:20)</td>
</tr>
<tr>
<td>kid</td>
<td>1 (8:7)</td>
</tr>
<tr>
<td>kind</td>
<td>17 (5:22,23;8:1;21:12;25; 16:21,21;23;22:7;32:4; 34:5;44:5;45:9;53:12; 16:58;5,21;22;62:16)</td>
</tr>
<tr>
<td>kinds</td>
<td>1 (6:7)</td>
</tr>
<tr>
<td>Kloos</td>
<td>3 (55:19;57:20,22)</td>
</tr>
<tr>
<td>knew</td>
<td>2 (38:11;46:21)</td>
</tr>
<tr>
<td>known</td>
<td>5 (24:8;48:4;53:23; 54:2;59:10)</td>
</tr>
<tr>
<td>knows</td>
<td>3 (44:5;59:16;70:6)</td>
</tr>
<tr>
<td>Page 9-396</td>
<td></td>
</tr>
<tr>
<td>---</td>
<td></td>
</tr>
<tr>
<td><strong>Min-U-Script® TRI-COUNTY COURT REPORTERS   805.963.3900</strong></td>
<td></td>
</tr>
<tr>
<td>(12) realtors - seeing</td>
<td></td>
</tr>
<tr>
<td><strong>PUBLIC HEARING</strong></td>
<td></td>
</tr>
<tr>
<td>- September 04, 2014</td>
<td></td>
</tr>
</tbody>
</table>

| regional (1) | 44:12 |
| residents (7) | 43:5;21;46:9;47:9;22;49:3;51:16 |
| resolved (1) | 50:6 |
| Resource (6) | 3:9;5;16;24:24;12;36;22;48:4 |
| resources (2) | 21:9;24:8 |
| respond (1) | 46:2 |
| responded (5) | 3:17;33:2;9;66;10,12 |
| responding (1) | 34:21 |
| responsible (1) | 20:5 |
| restaurant (1) | 18:14 |
| restoration (2) | 6:20;26:20 |
| restroom (1) | 64:21 |
| result (5) | 21:3;24:15;31:1,16,18 |
| return (1) | 7:1 |
| returned (1) | 7:8 |
| review (8) | 3:12;32:21,24;33;15;45;17;61:14;21;66:7 |
| reviewed (1) | 11:22 |
| revised (1) | 35:1 |
| rid (2) | 36:15;57:8 |
| ride (1) | 57:9 |
| right-hand (3) | 22:3;29:9;30:10 |
| ringtail (1) | 22:16 |
| Riparetti (3) | 54:15;55:14,16 |
| risk (1) | 48:25 |
| risks (4) | 23:12;29:2;49:14,16 |
| road (4) | 6:5;22:1;43:9;50:2 |
| roadway (1) | 30:18 |
| Roberson (5) | 46:5;49:24;50:1,1;52:1 |
| roof (5) | 19:2;21:22;30:11;40:25;57:25 |
| room (3) | 36:11;40:15;43:3 |
| roughly (1) | 40:23 |
| route (1) | 38:25 |
| run (2) | 13:19;16:15 |
| running (1) | 3:7 |
| run-off (4) | 19:22;24:23;17:25;6 |
| runs (1) | 66:5 |

| S |

| sacrifice (1) | 56:4 |
| sacrificed (2) | 56:3;11 |
| sad (1) | 57:17 |
| safe (1) | 22:20 |
| safety (2) | 18:19;48:16 |
| Saint (5) | 55:16;17,19,19;56:16 |
| salary (1) | 69:18 |
| sale (1) | 28:7 |
| salt (1) | 25:19 |
| same (13) | 11:25;17:7;26:17;31:21;32:1;37:2;40:25;49:9;62:16;63:8;64:17;65:3;16 |
| San (7) | 38:14;43:6;8;52:10; |
| sanitary (1) | 24:23 |
| sanitation (1) | 25:9 |
| SANTA (35) | 3:1;6:5;12,13;14:7;15;10:14;15:19;20:16;27:15;28:1;17;13;22;29:3;7;30:5;22:31;1,3;17;21,25;36:20;41:7;9;43:6;11;44:5;55;17;23;64:8;65:2;68:25 |
| sat (1) | 44:24 |
| Saturday (1) | 7:13 |
| saving (1) | 37:10 |
| savings (1) | 25:23 |
| saw (2) | 18:11;22:11 |
| saying (3) | 41:12;51:6;60:10 |
| scale (2) | 40:25;41:11 |
| scares (1) | 62:11 |
| scenario (1) | 22:5 |
| schedule (2) | 32:19;45:1 |
| Schematic (1) | 12:14 |
| Schleich (7) | 4:23;25;5;2,15;16;67:4;71:14 |
| school (6) | 8:6;7;48:5;10;49:11;53:5 |
| scope (2) | 40:20;49:18 |
| scouring (3) | 20;3;5;8 |
| scrap (1) | 12:16 |
| screen (2) | 24:23;62:20 |
| SCRTS (1) | 32:17 |
| SDEIR (1) | 27:24 |
| sea (2) | 45:5;57:3 |
| seal (1) | 24:23 |
| Secondly (1) | 38:21 |
| section (1) | 58:15 |
| seeing (1) | 57:25 |
seem (2) 37:6,9:13
seemed (1) 20:11
seems (2) 25:17,52:22
SEIR (1) 37:1
selected (1) 34:24
selection (2) 27:5,52:17
sell (1) 41:18
send (1) 69:8
sending (1) 31:15
sense (2) 56:25,57:1
sensitive (2) 30:15,56:23
sensitive (2) 31:15
sighting (1) 20:17,21:23,34:14
shown (1) 29:8
side (7) 9:24,17:10,10:26:4;29:10:30:19,31:14
sides (1) 43:5
Sierra (2) 67:22,68:10
sight (1) 57:24
signed (1) 66:23
significance (1) 15:6
significant (11) 20:24,24:14,31:1,2;6:41,15:25,43:14;47:13,48:2,59:23
significantly (4) 21:17,43:2,22:49:14;61:19
sign-in (2) 35:10,67:8
signs (1) 15:2
sign-up (2) 66:24,67:19
Simi (4) 28:12,31:10,16:25
similar (4) 28:24,29:20:31:25;62:17
simply (1) 69:20
simulation (3) 21:18,29;60:7
sited (2) 37:21,38:6
sites (2) 24:9,56:22
sit (1) 14:24
situation (3) 31:21,58:17;59:13
six (2) 24:6,67:3
six-mile (1) 6:18
sixty (1) 67:22
size (6) 13:24,40,22:41:1;2:49:18
skip (1) 13:16
slides (1) 18:11
slightly (1) 18:1
slip (2) 55:10,12
slips (6) 4:10,13,15,33:3;55:8,59:7
Sloane (1) 35:4
slope (2) 22:6,23:13
slopes (3) 23:14,15,17
small (4) 48:13,56:5,6,12
smaller (3) 10:3,61,19,20
smell (5) 45:12,51:10,14,53:4;63:5
smelled (3) 45:13,13,14
smelling (1) 59:1
smells (1) 43:14
smelly (1) 51:11
smug (1) 46:25
sneaky (1) 38:19
soft (2) 46:20,47:5
soil (1) 23:2
soils (1) 23:22
solar (3) 17:25,19:2;30:9
solid (7) 26:8,27:14,31:9;35:2,12,36:24;52:12
solution (2) 11:8,59:14
Solvang (3) 6:15,10:13,44:4
solve (1) 14:18
somebody (2) 71:9,10
Someone (2) 53:5,71:9
sometimes (3) 45:12,56:22;70:20
somewhere (3) 28:18,19,58:24
Sonja (1) 62:2
soothing (1) 42:21
sorry (4) 47:5,55:3,59:5;68:11
sorting (3) 12:24,17:17,48:24
sound (5) 51:9,12,14,60:5,61:1
sounds (2) 43:14,68:9
Source (2) 18:3,13
sources (1) 23:9
South (6) 6:14,10:13,11:17;16:2,24,10:44
space (2) 26:11,65:8
spaces (1) 7:10
spanning (1) 34:5

- September 04, 2014
PUBLIC HEARING
<table>
<thead>
<tr>
<th></th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
<th>9</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>20-year (1)</td>
<td>24-hour (1)</td>
<td>24-hour-a-day (1)</td>
<td>24th (2)</td>
<td>25-mile (1)</td>
<td>25-year (1)</td>
<td>3 (1)</td>
<td>3-20 (1)</td>
<td>4 (1)</td>
</tr>
<tr>
<td>2</td>
<td>20 (1)</td>
<td>101 (3)</td>
<td>104 (1)</td>
<td>105 (1)</td>
<td>12 (1)</td>
<td>1200 (1)</td>
<td>123,000 (1)</td>
<td>125 (2)</td>
<td>13,000 (1)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>15 (1)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>14:6</td>
</tr>
<tr>
<td>3</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>70 (1)</td>
<td></td>
<td>80 (1)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>9:24</td>
<td></td>
<td>38:16</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>700 (1)</td>
<td></td>
<td>85 (2)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>50:11</td>
<td></td>
<td>10:2;14:12</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>70-yard (1)</td>
<td></td>
<td>85-acre (1)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>50:12</td>
<td></td>
<td>6:17</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>75 (3)</td>
<td></td>
<td>88,000 (1)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>9:9,25;14:10</td>
<td></td>
<td>50:13</td>
</tr>
<tr>
<td>4</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>4 (1)</td>
<td></td>
<td>92 (1)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>3:2</td>
<td></td>
<td>45:10</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>4.1-1 (1)</td>
<td></td>
<td>98 (1)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>40:3</td>
<td></td>
<td>15:3</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>40 (2)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>13:25:17:21</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>4575 (1)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>63:19</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>464 (1)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>61:8</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>5:00 (3)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>3:2,5;33:21</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>50 (4)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>6:19;9:9;38:15;39:9</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### 9.3 RESPONSES TO COMMENTS RECEIVED BY TELEPHONE

The RRWMD SEIR project manager (Ms. Joddi Leipner) maintained a log of all telephone calls (see attached) received regarding the Draft SEIR during the public comment period. The following is a summary of the log and responses provided to these telephone calls.

<table>
<thead>
<tr>
<th>Concerns/Questions</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Bill Poehler</strong> (resident near the South Coast Recycling and Transfer Station (SCRTS): 8/13/14)</td>
<td>The Tajiguas Landfill is the site of the proposed project, the Board policy is addressed in the Draft SEIR, the purpose of the public hearing is to take public testimony.</td>
</tr>
<tr>
<td>Asked if the SCRTS site is the proposed location of the project, if the RRWMD is aware of the 1998 Board of Supervisors policy regarding SCRTS expansion. Expressed confusion about the structure of the SEIR concerning alternatives, and the purpose of the public hearing.</td>
<td></td>
</tr>
<tr>
<td><strong>Brian Tetley</strong> (County Planning &amp; Development): 8/14/14</td>
<td>Corrected by the RRWMD on 8/14/14.</td>
</tr>
<tr>
<td>Link on website to Notice of Availability (NOA) of the Draft SEIR is incorrect.</td>
<td></td>
</tr>
<tr>
<td><strong>Matt Fore</strong> (City of Santa Barbara): 8/14/14</td>
<td>Barbara Shelton was provided a hard copy, additional copies were provided as electronic files on a CD.</td>
</tr>
<tr>
<td>Requested hard copies of the Draft SEIR for the City Planning Commission.</td>
<td></td>
</tr>
<tr>
<td><strong>Steve Johnson</strong>: 8/21/14</td>
<td>Three above-ground fuel tanks are used at the landfill; therefore, any leaks are easily detected and immediately resolved. Birds are currently controlled by noise-makers and a falconer, while dust is controlled by watering active areas. The proposed project includes unloading solid waste inside a building and reducing the amount of waste buried, which should reduce the number of birds attracted to the landfill, and the amount of dust generated. The proposed project would generate additional traffic, but would not exceed County standards or cause congestion. The proposed project is not located in the coastal zone. CNG-fueled trucks would be used to transport recyclables recovered at the Materials Recovery Facility (MRF) to market.</td>
</tr>
<tr>
<td>Expressed concerns about leaking tanks at the landfill, problems regarding birds and dust, increased traffic, illegal actions in the coastal zone, use of CNG-fueled trucks to export waste.</td>
<td></td>
</tr>
<tr>
<td><strong>David Villalobos</strong> (Santa Barbara County): 8/27/14</td>
<td>Joddi Leipner provided two copies for pick-up by Mr. Villalobos.</td>
</tr>
<tr>
<td>Requested two hardcopies of the Draft SEIR for Planning Commissioners Brown and Hartmann</td>
<td></td>
</tr>
</tbody>
</table>
**Concerns/Questions**

**Dan Gullett** (City of Santa Barbara): 8/28/14

Had questions about the traffic analysis of the proposed project as compared to the urban alternatives (SCRTS site, MarBorg site), and why odor impacts would be greater at the MarBorg site.

**Response**

Ms. Leipner informed Mr. Gullett that trip generation is different under the three alternatives since for the proposed project at Tajiguas and Alternative C some of the waste disposal trips are existing, but trips to the MarBorg site would be new since no facility is currently present at the site, and greater as compared to the SCRTS site because loads would not be consolidated before arriving at the Marborg MRF site under Alternative B. Odor impacts would be higher at the MarBorg site due to differing odor control methods (activated carbon) as compared to the other alternatives, closer receptors and less dispersion of the odors in the MRF building exhaust.

**Matt Fore** (City of Santa Barbara): 8/28/14

Question regarding the inclusion of extension of landfill life impacts in the NOA.

**Response**

Ms. Leipner informed Mr. Fore of where in the NOA extension of landfill life impacts were included.

**Pam Poehler** (584 El Sueno Road): 9/2/14

Concerned about selection of Alternative C (MRF at the SCRTS site), expansion of SCRTS, noise and dust from SCRTS operation, loss of property value, project economics, backup beeper noise, truck noise.

**Response**

These comments are reflected in written and oral comments and are addressed in Sections 9.1 (Letter nos. 20 and 21) and 9.2 (Oral Comment 14).

**Dana Penoff**: 9/3/14

Opposes project at SCRTS (Alternative C), will follow with written comments by e-mail.

**Response**

Written comments were received on September 4, 2014 and addressed in Section 9.1 (Letter no. 4).

**Carol Mino**: 9/3/14

Requested information concerning the public hearing on September 4, 2014.

**Response**

Ms. Leipner explained the purpose of the public hearing.

**Mary Jones**: 9/4/14

Asked when the transfer station began to be called the SCRTS and start receiving recyclables.

**Response**

Ms. Leipner answered these questions which were not relevant to the Draft SEIR.

**Valentin Shmidov** (353 Sherwood Drive): 9/5/14

Opposes project at SCRTS (Alternative C), concerned about increased diesel truck traffic on Calle Real, including the bike lanes and health effects of diesel exhaust.

**Response**

Very similar written comments were received on September 5, 2014 and addressed in Section 9.1 (Letter no. 13). Note that the traffic analysis indicates that increases in traffic on Calle Real associated with this alternative would not result in traffic congestion exceeding County standards (see Impact ALT C T-4 in the Draft SEIR).

**Steve Riparetti**: 9/9/14

Asked where to send comments on the Draft SEIR. Confused about which components would be located at the SCRTS site under Alternative C.

**Response**

Ms. Leipner informed Mr. Riparetti that comments should be directed to herself and only the MRF would be located at the SCRTS site under Alternative C.

**Carol Mino** (La Paloma Avenue): 9/15/14

Requested help in finding the Draft SEIR on the project website.

**Response**

Ms. Leipner provided directions as needed.
<table>
<thead>
<tr>
<th>Concerns/Questions</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Gerry Aspen</strong> (4677 Sierra Madre Road): 9/16/14</td>
<td>Ms. Leipner provided directions as needed.</td>
</tr>
<tr>
<td>Requested help in finding the Draft SEIR online, including the figures for Alternative C.</td>
<td>See the responses to Comments 2 and 7 in Letter no. 2 in Section 9.1. Ms. Leipner confirmed the Laports are on the mailing list as they received the revised NOA for extending the public comment period.</td>
</tr>
<tr>
<td><strong>Dan &amp; Carol Laport</strong> (4432 Meadowlark Lane): 9/19/14</td>
<td>Ms. Leipner directed Ms. Slaff to the Draft SEIR online. Seismic-related impacts and groundwater contamination issues were fully addressed in the Draft SEIR for Alternative C and found to be less than significant. There is a potential to expose contaminated soils during construction of the MRF and mitigation was provided to reduce this impact to a level of less than significant. Local traffic impacts near the SCRTS would be less than significant. However, traffic impacts would be significant in downtown Santa Barbara during the Alternative C construction period because waste transportation traffic would be temporarily directed to the existing MarBorg transfer station.</td>
</tr>
<tr>
<td>Stated they can look directly at the SCRTS from their home. Concerned about sound funneled up the canyon. Want to be included on the project mailing list.</td>
<td>Noise modeling conducted for the SCRTS site under Alternative C indicates operational noise (including back-up alarms) would not exceed the County’s noise standards (see Impact ALT C N-2 in the Draft SEIR).</td>
</tr>
<tr>
<td><strong>Sidonia Slaff</strong> (340 Old Mill Road): 9/22/14</td>
<td>Ms. Leipner provided a brief explanation of the format of the Draft SEIR, and confirmed that he received both NOAs.</td>
</tr>
<tr>
<td>Asked to be added to the project mailing list, supported the project, but not Alternative C. Concerned about earthquakes, hazardous materials, groundwater contamination and traffic.</td>
<td>Ms. Leipner directed Mr. Krock to the Draft SEIR online. These issues are fully addressed in the Draft SEIR, and no significant unavoidable impacts were identified (excluding extension of landfill life impacts).</td>
</tr>
<tr>
<td><strong>Dean Dussette</strong> (resident near SCRTS site): 10/1/14</td>
<td></td>
</tr>
<tr>
<td>Concerned that Alternative C would be selected over the proposed project, and nighttime noise at the SCRTS site, in particular back-up alarms on trucks.</td>
<td></td>
</tr>
<tr>
<td><strong>Byron Eckerson</strong>: 10/8/14</td>
<td></td>
</tr>
<tr>
<td>Asked which alternative is recommended for adoption, and how impacts are classified and compared between the alternatives in the Draft SEIR.</td>
<td></td>
</tr>
<tr>
<td><strong>Bill Krock</strong> (Arroyo Quemada resident): 10/8/14</td>
<td></td>
</tr>
<tr>
<td>Concerned about traffic, large trucks and traffic safety, odors, existing landfill impacts on water quality. Asked about the dimensions of proposed facilities.</td>
<td></td>
</tr>
<tr>
<td>Date: 8/13/14</td>
<td>Name: BILL POCHER (SCRTS NEIGHBOR)</td>
</tr>
<tr>
<td>--------------</td>
<td>-----------------------------------</td>
</tr>
<tr>
<td>- EIR Questions/confused if there is a preferred location, TJ or SCRTS (TJ).</td>
<td></td>
</tr>
<tr>
<td>- Are we aware of the BOS policy statement re: SCRTS (Yes in Questions regarding the structure of EIR + new EIR).</td>
<td></td>
</tr>
<tr>
<td>- Questions regarding purpose of EIR + Public mtq (take comments on EIR adequacy).</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date: 8/14/14</th>
<th>Name: BRIAN TETLEY (COMP PLANNING)</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Line to NOA on main phone incorrect. Line to old NOA.</td>
<td></td>
</tr>
<tr>
<td>(Corrected 8/14/14 2:01 pm by Leslie Wells).</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date: 8/14/14</th>
<th>Name: MATT FORD (CITY OF RB)</th>
</tr>
</thead>
<tbody>
<tr>
<td>WONTING ABOUT HARD COPIES OF THE EIR (only available for their PC). I told him Barbara Shelfer received hard copy, but the rest received CD, tried to limit printing costs.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date: 8/21/14</th>
<th>Name: STEVE JOHNSON 571-262-1470</th>
</tr>
</thead>
<tbody>
<tr>
<td>See attached notes</td>
<td></td>
</tr>
<tr>
<td>(Returned cell on behalf of Scott).</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date: 8/27/14</th>
<th>Name: DAVID VIALOBOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Commissioner Brown and Hardman went EIR HARD COPIER</td>
<td></td>
</tr>
<tr>
<td>- LEFT 2 HARD COPIES for Devin to pick up.</td>
<td></td>
</tr>
</tbody>
</table>
### Tajiguas Resource Recovery Project DEIR Phone Log

<table>
<thead>
<tr>
<th>Date: 8/28/14</th>
<th>Name: DAN Builett - City of LA</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Questions about traffic (why different) between Tajiguas, S Santa, and Marbore. Why are odor impacts worse at Marbore?</strong></td>
<td></td>
</tr>
<tr>
<td>- TD trips directly from S Santa, Marbore (no consolidation)</td>
<td></td>
</tr>
<tr>
<td>- Waste (consolidation at Marbore MRF) - Biofilter or treated carbon</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date: 8/28/14</th>
<th>Name: MART FOSTE, City of CA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Question regarding extension of the impact. We did not see them listed in the DPA. I pointed out where they were listed.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date: 9/1/14</th>
<th>Name: Pam Poehler, SCATS neighbor 967-0017</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Reviewing the report, how real is the project at SCATS</td>
<td></td>
</tr>
<tr>
<td>- County promised not to intensity use of the SCATS</td>
<td></td>
</tr>
<tr>
<td>- They are already impacted by noise and dust from county operations</td>
<td></td>
</tr>
<tr>
<td>- Destroying their property value, economic of the project</td>
<td></td>
</tr>
<tr>
<td>- They will cease 50 miles for 10 years of landfill life</td>
<td></td>
</tr>
<tr>
<td>- Back up breeper sound complaining towards them because facilities</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date: 9/1/14</th>
<th>Name:</th>
</tr>
</thead>
<tbody>
<tr>
<td>are in a bowl. Bora doesn't eat. They live with constant hum of trucker.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date: 9/3/14</th>
<th>Name: Dana Peddle - SCATS Neighboor</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Opposes project at SCATS. Will follow with email.</td>
<td></td>
</tr>
</tbody>
</table>
### Tajiguas Resource Recovery Project DEIR Phone Log

<table>
<thead>
<tr>
<th>Date:</th>
<th>9/3/14</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name:</td>
<td>Carol Mino 986-9284 La Paloma Ave</td>
</tr>
<tr>
<td></td>
<td>called for additional information regarding tomorrow's hearing/meeting on the EIR document.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date:</th>
<th>9/4/14</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name:</td>
<td>Mary Jones 683-1942</td>
</tr>
<tr>
<td></td>
<td>When did the transfer station start being called SERR and when did it start accepting Recyclables?</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date:</th>
<th>9/5/14</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name:</td>
<td>Valentine Sardou 358 Sherwood Drive 280-6988</td>
</tr>
<tr>
<td></td>
<td>Called to voice opposition to the SERR Alt MRF site. Concerned about the addition of more diesel transfer trucks on Belcourt (diesel emissions on people including kids) using the bike path. Also concerned about traffic impacts to the bike lane on Belcourt from increased traffic.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date:</th>
<th>9/9/14</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name:</td>
<td>Steve Ripteretti <a href="mailto:steve@ripteretti.com">steve@ripteretti.com</a></td>
</tr>
<tr>
<td></td>
<td>Had questions about who he should send his comments to. Also wanted to know what project components would be at SERR.</td>
</tr>
<tr>
<td></td>
<td>Told him comments should come to me, explained the project (MRF only at SERR under Alt 2) and sent follow-up email.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date:</th>
<th>9/15/14</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name:</td>
<td>Carol Mino</td>
</tr>
<tr>
<td></td>
<td>called for help in navigating to the EIR on the website.</td>
</tr>
<tr>
<td>Date: 9/16/14</td>
<td>Name: Gerry Arpen - SCRS Neighbor</td>
</tr>
<tr>
<td>--------------</td>
<td>----------------------------------</td>
</tr>
<tr>
<td></td>
<td>Called to find out where the GIS was posted, I revisited him to the site and let him know where he could find figures for the SCRS Act.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date: 9/19/14</th>
<th>Name: Dan + Carol Laport 967-9057 4412 Meadow Lane In</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>This looks directly onto the SCRS site (can come take pictures if we need). Sounds funnel up the canyon. Want to make sure they are on the mailing list. Confirmed they received the notice &amp; extension.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date: 9/22/14</th>
<th>Name: Sidonia Staff 240 Old Mill Road #101 93110 505-995-5005</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Would like to be added to the mailing list, like the TARP idea but not at Celle reel. Concerned about earthmoving, materials, GW contamination, traffic.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date: 10/1/14</th>
<th>Name: Dean Duquette - SCRS Neighbor</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Called with questions regarding the project and potential for it to be selected as the project. Concerned primarily about noise impacts, particularly noise at night such as back up alarm on tractors.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date: 10/9/2014</th>
<th>Name: Byron Ekerson 805-967-9665</th>
</tr>
</thead>
<tbody>
<tr>
<td>LEFT MESSAGE: 1. Is there a preferred or rejected Alt. that will be recommended for adoption. 2. Question about impact levels - brainstorm different.</td>
<td></td>
</tr>
</tbody>
</table>

10/9/14 - returned call - left message. Site 10/9/14 - spoke to him about the project. How impacts are clarified, comparison between alternatives, etc. Confirmed he received all of our notices.
<table>
<thead>
<tr>
<th>Date: 10/8/14</th>
<th>Name: Bill Krock</th>
<th>Email: <a href="mailto:Bill.Krock@gmail.com">Bill.Krock@gmail.com</a></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Concerned about traffic, large trucks &amp; traffic safety, odors, existing landfill impacts on water quality. Asked about dimensions and height of facility. I emailed him the link to the DEIR.</td>
<td></td>
</tr>
<tr>
<td>Date:</td>
<td>Name:</td>
<td></td>
</tr>
<tr>
<td>Date:</td>
<td>Name:</td>
<td></td>
</tr>
<tr>
<td>Date:</td>
<td>Name:</td>
<td></td>
</tr>
<tr>
<td>Date:</td>
<td>Name:</td>
<td></td>
</tr>
</tbody>
</table>
Hi Leslie:

The person who called is a neighboring landowner. He basically was upset about the TRRP proposal and was claiming that there was a prior commitment not to expand the landfill and that the landfill was going to be closed in 2020. He claims there are unlined tanks leaking at the landfill, the landfill is contaminating the groundwater and that the landfill is causing all sorts of problems on his property (birds, dust, etc.) and that he is not allowed to do on his property what the county is proposing. He expressed concerns over increased traffic, the power plant and other impacts of the project that will further harm him and that we are doing things illegally in the coastal zone. I explained that the project components were outside of the coastal zone. He wanted to know why we don't export the waste using CNG vehicles. I explained the environmental review and approval process to him but he was not satisfied speaking to me and said he didn't ask to be transferred to me and wants to speak directly to Scott. He does not trust the environmental process and will not attend the env hearing.

Joddi

Joddi Leipner
Senior Engineering Environmental Planner Resource Recovery and Waste Management
130 E. Victoria Street, Suite 100
Santa Barbara, CA 93101
(805) 882-3614

-----Original Message-----
From: Wells, Leslie
Sent: Thursday, August 21, 2014 3:09 PM
To: Leipner, Joddi
Subject: FW:

Can you please respond - the message is attached and was forwarded from Scott.

130 E. Victoria Street, Suite 100
Santa Barbara, CA 93101
Tel: (805)882-3611
Fax: (805)882-3601
For a comprehensive resource on waste management in Santa Barbara County, visit www.lessismore.org

-----Original Message-----
From: Brown, Anna
Sent: Thursday, August 21, 2014 3:07 PM
To: Wells, Leslie
Subject: FW:
Hi Leslie- this came in to Scott

Thank you

-----Original Message-----
From: PWServ
Sent: Thursday, August 21, 2014 3:09 PM
To: Brown, Anna
Subject:

-----------------------
Public Works Administration
TASKalfa 6550ci
-----------------------
<table>
<thead>
<tr>
<th>FOR:</th>
<th>DATE: 8/21/94</th>
<th>TIME: 2:15 P.M.</th>
</tr>
</thead>
<tbody>
<tr>
<td>FROM: Steven Johnson</td>
<td></td>
<td></td>
</tr>
<tr>
<td>OF: FAX</td>
<td>PHONE: 511.242.1470</td>
<td></td>
</tr>
<tr>
<td>MESSAGE: Want to discuss expansion at Taqugas. Say last expansion was the last per previous commitment. Want copy of docs we sent &amp; that we were breaking the rules.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SIGNED:</td>
<td>ремик</td>
<td></td>
</tr>
</tbody>
</table>

RETURNED YOUR CALL: PLEASE CALL | WILL CALL AGAIN | CAME TO SEE YOU | WANTS TO SEE YOU |

**Form 40003**
9.4 ADDITIONAL PHOTO-SIMULATIONS

Two additional photo-simulations from private viewing locations were prepared in response to comments received on the Draft Subsequent EIR. As noted on page 4.1-14 of the Draft SEIR, both the State CEQA Guidelines and County significance thresholds focus on impacts to public views. Both the photo-simulations and view location maps are attached.

- A view of the proposed MRF/AD Facility site at the Tajiguas Landfill operations deck from the planned Hart residence, which represents the ninth view (Viewpoint 9, see location map and Figure 9-1) modeled in the vicinity of the proposed project site (Tajiguas Landfill). The view selected for analysis is from the southwest corner of the partially constructed pool deck, which provides the best view of the proposed MRF/AD Facility site. As indicated by the photo-simulation, the south and east sides of the AD Facility would be partially visible, with the MRF building behind (see center of the Permitted + Project Conditions simulation). Note that landscape screening provided as mitigation for significant impacts to public views (see MM TRRP VIS-1b) is not modeled, and would break up the massing and help screen views of the AD Facility from the planned Hart residence. While the proposed facilities would be visible, this photo-simulation supports the finding of Impact TRRP VIS-3 of the Draft SEIR, that the proposed project would not obstruct views, would not be incompatible with the landfill vicinity, would not significantly degrade visual quality of the existing landfill site (which currently consists of operations trailers, tanks, vegetated and unvegetated waste fill and cut slopes), would not result in the removal of substantial amounts of vegetation or loss of important open space, and therefore would not significantly impact this private view.

- A view of the Alternative C MRF site from a private viewing location above and north of the SCRTS site, which represents the fifth view (Viewpoint 5, see location map and Figure 9-2) modeled in the vicinity of the MRF site (SCRTS). The view selected for analysis is from 4444 Meadowlark Lane (a private residence located on a private street) because it is relatively close (~3,000 feet), and lies at a higher elevation overlooking the SCRTS site. As indicated by the photo-simulation, only the rooftop of the MRF (see center of the Project Conditions simulation) would be visible. This photo-simulation indicates the MRF would be visible, but would not obstruct public views, would not be incompatible with surrounding public facility uses/structures, would not significantly degrade the visual quality of the existing SCRTS site (which currently consists of an open air solid waste transfer station), would not result in the removal of substantial amounts of vegetation or loss of open space. Therefore, this photo-simulation supports the finding of Impact ALT C VIS-2 of the Draft SEIR, that visual impacts to surrounding private properties would be less than significant.
Approximate Distance to Buildings = 2,600 feet

Line of Sight Profile

PHOTO-SIMULATION VIEW 9
FIGURE 9-1
Approximate Distance to Buildings = 3,150 feet

EXISTING CONDITIONS

PROJECT CONDITIONS

Line of Sight Profile

View from 4444 Meadowlark Lane

Alternative C MRF Site (SCRTS)

PHOTO-SIMULATION VIEW 5
FIGURE 9-2
9.5 OTHER CHANGES TO THE DRAFT SUBSEQUENT EIR

This Final Subsequent EIR comprises the Subsequent EIR in its entirety, including responses to comments and any associated changes to the text of the Draft Subsequent EIR. In addition to and in association with changes to the Draft SEIR resulting from public comments, further refinements have been made to the project description/technical design (such as changes to the MRF building area, flare height and location, addition of a rolling bed dryer, the number and volume of percolate storage tanks, and permanent relocation of the landfill fuel tanks to an area near the proposed maintenance facility) which is reflected in the text and figures in Section 3, changes were made in the policy consistency discussion in Section 4.8.2.5 to be consistent with the Government Code 65402(a) and conformity determination process and to the project objectives in Section 5.1 (Alternatives) to improve readability of this section. In addition, the potential for public financing of the project was discussed as an option in Section 3.5.12.

A summary of minor technical changes to the Draft SEIR is provided below. Note that all changes to the Draft SEIR (excluding minor formatting changes) are shown in strike-out/underline format in the Final SEIR.

- The photo-simulation from U.S. Highway 101 (Figure 4.1-7) was updated to reflect changes in the location of project components.
- Changes were made in the Air Quality and Greenhouse Gas Technical Report to reflect refinements of the project design and revisions to air pollutant and greenhouse gas emissions calculations and modeling in response to SBCAPCD comments on the Draft SEIR and as part of their permit review process. These changes are shown in Tables 4.2-6, 4.2-8, 4.2-9, 4.2-10, 4.2-11, 4.2-12, 4.2-14, 4.2-15, 4.2-16 and 5-23, and have no effect on the impact classifications and findings of the SEIR. Appendix C of the SEIR has been updated to reflect all changes made since the Draft SEIR was distributed.
- The GHG threshold of significance was revised to reflect the recent adoption of a bright-line threshold of 1,000 MTCO₂e for industrial stationary sources (see page 4.2-20).
- Minor changes were made to the odor impact mitigation for Alternative B (see page 5-72 in the Final SEIR).
- Implementation of standard construction air quality mitigation measures was included as part of the project. However, in response to the Santa Barbara County APCD’s comment letter, two lists of construction mitigation measures (addressing fugitive dust, diesel particulate, NOₓ emissions) developed by the APCD have been included in Section 4.2.2.4 of the Final SEIR.
- The slope stability analysis (see Table 4.5-1) was updated to reflect the proposed steepened cut slope (from 2.5:1 to 2:1) west of the MRF/AD Facility site.
- Operational noise impacts (see Tables 4.7-2, 4.7-3 and 4.7-7) were revised to reflect minor changes to mobile equipment and the addition of the rolling bed dryer.

- The water resources section (4.10) was updated to reflect the adoption of new construction storm water and industrial storm water general permits.

- The impacts associated with decommissioning of the proposed facilities was added to each relevant issue area.

In addition, the comment letter from the Santa Barbara County Public Health Department Environmental Health Services on the Notice of Preparation has been added to Appendix B. These comments were considered in preparation of the Draft SEIR, but the letter was inadvertently omitted from Volume 2, Appendix B of the Draft SEIR.

These changes merely make minor corrections to the text, and do not introduce significant new information, change the analyses or impact levels, or identify new significant impacts.