

C. Groundwater Regulations

Landfills must comply with federal and state regulations enacted to protect groundwater. On the federal level, Subtitle D of the Resource Conservation and Recovery Act (RCRA), 40 CFR Part 258, regulates the location, design, operation and monitoring of landfills. Included in the regulations are requirements for subsurface liners, leachate and landfill gas collection systems and final cover. All of these requirements are designed to eliminate discharge of contaminants from the landfill into groundwater. Subtitle D also requires that groundwater monitoring wells be installed before a landfill facility can begin receiving waste. In addition, the monitoring wells are required to be sampled, analyzed and reviewed by a qualified professional, with results submitted to the regulatory agency at least semi-annually for the life of the landfill and for at least 30 years after the landfill ceases to receive waste. If statistically significant increases in any monitored compound are seen in down gradient groundwater monitoring wells, the facility is required to carry out Assessment Monitoring to determine if contaminants from the landfill are causing the increase, and if so the area and extent of the contamination. If it is determined that the landfill is indeed the source of the monitored contaminant(s), the facility must develop a formal Corrective Action Program to remediate the source.

Subtitle D allows states to apply for and to be approved to implement these provisions of RCRA. California has applied and has been approved to implement the program. In California, both the California Integrated Waste Management Board (CIWMB), through the Local Enforcement Agencies (LEAs) and the SWRCB jointly carry out the program. The SWRCB, through the Regional Water Quality Control Boards implement the groundwater and surface water protection provisions of RCRA Subtitle D. The provisions of Subtitle D for groundwater control at landfills are found in 27 CCR. Sycamore Landfill Inc. operates under a current Waste Discharge Requirement #99-74 from the RWQCB, which requires it to comply with these provisions of 40 CFR Part 258 (Subtitle D) and 27 CCR.

The groundwater constituents or parameters that Sycamore Landfill is required by RWQCB Order 99-74 to monitor on a semi-annual basis are listed in the Water Quality Monitoring Report, Appendix K of this EIR. These constituents or parameters include pH, total dissolved solids (TDS), chloride, sulfate, nitrate as nitrogen, and volatile organic compounds (VOCs).

4.10.2 Issues 1 and 2

The City of San Diego has raised the following two issues:

ISSUE 1 - Would the proposed project result in an increase in impervious surfaces and associated increased run-off? Would the project result in an increase in pollutant discharges including downstream sedimentation?

ISSUE 2 - Would the project result in discharge into surface or ground water, or in any alteration of surface or ground water quality, including, but not limited to temperature, dissolved oxygen or turbidity?

For clarity, the analysis of Issues 1 and 2 in this EIR is presented as follows:

SURFACE WATER QUANTITY: Would the proposed project result in an increase in impervious surfaces and associated increased run-off?

SURFACE WATER QUALITY: Would the project result in an increase in pollutant discharges including downstream sedimentation? Would the project result in discharge into surface water, or in any alteration of surface water quality, including, but not limited to temperature, dissolved oxygen or turbidity?

GROUNDWATER QUALITY: Would the project result in discharge into ground water, or in any alteration of ground water quality, including, but not limited to temperature, dissolved oxygen or turbidity?

4.10.2.1 Impact Thresholds

According to the City's Significance Determinations Thresholds, a significant impact may be considered to result if the following are proposed:

For Surface Water Quantity:

- The project would develop wholly or partially within the 100-year floodplain identified in FEMA maps.
- The project would grade, brush or grub more than 1 acre of land, especially into slopes over a 25 percent grade, and would drain [uncontrolled] into a sensitive water body or stream.
- The project would result in substantial changes to stream-flow velocities or quantities.
- The project would impose flood hazards on other properties.

For Surface Water Quality:

- The project would discharge surface water into receiving waters within Environmentally Sensitive Lands or to waterbodies listed on the Regional Water Quality Control Board 303(d) Impaired Water Body List.
- Project discharge of surface water would exceed City storm water standards.

For Ground Water Quality:

- The project would utilize a private sewage disposal system.

For impacts related to any potential for landfill-related groundwater contamination, appropriate significance thresholds are found in Appendix G of the State CEQA Guidelines, as follows:

- The project would violate any water quality standards or waste discharge requirements
- The project would otherwise substantially degrade water quality

4.10.2.2 Impacts

A. Surface Water Quantity Impacts

Landfill Expansion

The project is not located within the 100-year floodplain identified on FEMA maps (06073, C1632F, FEMA, 1997). Impacts associated with this consideration would be less than significant.

The project would grade, brush or grub more than one acre of land, resulting in potentially substantial increases in runoff. The peak storm water discharge for the existing landfill site under the 100-year, 24-hour storm has been calculated to be 1,163 cfs at the culvert under SR-52 (see Appendix P of this EIR in Appendix C, p. 5). The post development storm water flows from the landfill, perimeter access roads, maintenance facility, and flare/energy plants would be routed to new, larger sedimentation basins located at the southern perimeter of the landfill. The basins have been designed to collect the storm water from the 100 year, 24-hour storm event, and detain all but 565 cfs of the run-off.

A small area, approximately 26 acres, north of the landfill property on MCAS Miramar drains south to the north property line of the Sycamore facility and currently drains through the landfill property. Storm water from this area discharges with the other landfill storm water into the culvert under SR-52. Under the Master Plan, once the landfill filling operation has moved across the bottom of the canyon at the north end, an earthen berm and holding basin will be developed to retain the water from MCAS Miramar and a duplex pump station will be constructed and operated to carry the water around the waste and allow it to discharge to the proposed new sedimentation basins. This runoff is included in 100-year, 24-hour storm event used for the sedimentation basin design.

Below the sedimentation basins, the with-project run-off has been estimated at 304 cfs. This runoff would derive from the scales/citizen's drop-off facility and the entrance road, along with the existing native hillsides and Little Sycamore Canyon bottom. The vast majority of this 304 cfs of runoff would be unrelated to the proposed landfill development. For example, the scale area includes approximately 2.6 acres of new paving. This would increase flow into the nearby Little Sycamore Creek by approximately 7 cfs under 100-year, 24-hour storm conditions. (Shaw Emcon/OWT, 2004). The proposed Master Plan development would have a total estimated discharge rate of 869 (565 + 304) cfs, at the SR-52 culvert downstream from the sedimentation basins. This storm water run-off rate does not exceed the 1,163 cfs of peak storm water that currently flows from the site to the SR-52 culvert as a result of a 100-year, 24-hour storm event.

The proposed administrative buildings and the portion of the landfill entrance road near Mast Boulevard would not drain to the sedimentation basins or Little Sycamore Canyon Creek. These areas are already paved or developed. Runoff from those areas flows towards a storm drain at the northwest corner of Mast Boulevard and the SR-52

westbound ramp. With the planned removal of the existing recycling center and most of its associated paving, the proposed Master Plan would not result in any substantial run-off changes at those locations because the amount of paved area would not change substantially (.037 acres currently versus 0.56 acres proposed Emcon/OWT, 2006).

As described above, runoff from most of the landfill project would flow into two sedimentation basins. These basins would provide detention of storm water flows. Overall, with-project runoff to the Little Sycamore Canyon culvert under SR-52 would be reduced, and runoff toward Mast Boulevard would remain essentially unchanged; therefore, impacts from the grading, brushing or grubbing of more than one acre of land would be less than significant.

Since runoff would be reduced at the SR-52 culvert, and essentially unchanged at Mast Boulevard, stream-flow velocities and quantities downstream of these areas would not be increased and the peak velocities would be reduced. The total quantity would remain approximately the same, but it would be released over a longer period of time. For this reason, impacts would be less than significant.

Since peak flows and velocities would be reduced, the potential for downstream flooding would also be reduced and the project would not pose a flood hazard on other properties. Landfill project flooding impacts would be less than significant. Transmission line relocation flooding impacts would be less than significant, as described in the following section.

The proposed widening of Mast Boulevard would not exceed any of the City's significance criteria listed on EIR p. 4.10-14. The project area is not within a 100-year floodplain; the project area is less than one acre, and less than 25% slope; the project would not discharge uncontrolled into a sensitive water body or stream; the project would not result in substantial changes to stream-flow velocities or quantities; and the project would not impose flood hazards on other properties. Therefore there would be no significant surface water quantity impacts associated with the road widening.

Transmission Line Relocation

The transmission line relocation areas are not within a mapped floodplain. The transmission line relocation would require the clearing of vegetation for transmission structures, temporary assembly areas (laydown areas) and access roads. Each individual grouping of three structures would disturb approximately two acres of native habitat on the average, for a total disturbance of 22.0 acres. Most of this area would be restored; however, structures and access roads would permanently impact approximately 2.8 acres. Potential impacts would be minimized through implementation of SDG&E Project Protocols 1, 4, 5, 6, 7, 37, 38 and 55 (See Appendix B). These protocols include measures to reduce storm water velocity, and detain storm water flows. Once construction is completed, all but 2.8 acres of the disturbed areas would be revegetated and would revert to pre-construction run-off conditions over a period of years. The permanent impact areas would be maintained by SDG&E, resulting in no long-term increased quantity of storm water from these areas. Existing access road and towers that are no longer needed would be removed and restored with native vegetation, reducing any existing storm water quantities from the existing

transmission line facilities. Since measures would be installed to reduce storm water velocity and detain storm water flows and existing unneeded facilities would be removed and their footprints restored, it is not expected that downstream stream-flow velocities or quantities would be substantially changed. Therefore, flood hazards would not be imposed on other properties. Transmission line relocating flooding impacts would be less than significant.

B. Surface Water Quality Impacts

Landfill Expansion

As described previously, the proposal would not increase storm water velocity or quantity downstream of the project. The project would discharge surface water into receiving waters within Environmentally Sensitive Lands (the MHPA south of the landfill). And although its surface water discharges would not flow directly into a waterbody listed as impaired on the RWQCB's 303(d) list, Little Sycamore Creek flows into the San Diego River only a mile south of the landfill. The last twelve miles of the San Diego River (watershed 90711), west of Mission Trails Regional Park, are on the 303(d) list, and the list indicates that "impairment transcends adjacent Calwater watershed 90712" as well. These water bodies are listed as impaired for low levels of dissolved oxygen, the presence of phosphorus and total dissolved solids. None of these impairments are associated with typical run-off from landfills. The following discussion describes how surface water run-off from the landfill and from other areas are managed and regulated to avoid significant impacts to surface waters. This is a potentially significant impact of the proposed project in the event the discharge exceeds City storm water standards.

The City's storm water standards are contained in the City of San Diego Land Development Manual, Storm Water Standards, A Manual for Construction and Permanent Storm Water Best Management Practices Requirements revised May 30, 2003; herein, Storm Water Manual). The Municipal Storm Water National Pollutant Discharge Elimination System (NPDES) Permit (Municipal Permit), issued on February 21, 2001 to the City of San Diego, the County of San Diego, the Port of San Diego, and 17 other cities in the region by the San Diego Regional Water Quality Control Board (Regional Board), requires the development and implementation of storm water regulations addressing storm water pollution issues in development planning and construction associated with private and public development projects. Specifically, development projects are required to include storm water best management practices (BMPs) both during construction, and in the projects permanent design, to reduce pollutants discharged from the project site, to the maximum extent practicable. The primary objectives of the Storm Water Standards manual requirements are to: (1) Effectively prohibit non-storm water discharges; and (2) Reduce the discharge of pollutants from storm water conveyance systems to the Maximum Extent Practicable (MEP statutory standard) both during construction and throughout the use of a developed site. To address pollutants that may be generated from new development once the site is in use, the Municipal Permit further requires that the City to implement a series of permanent BMPs described in a document called the Model Standard Urban Storm Water Mitigation Plan, or SUSMP (pronounced "sue-sump"), which was approved by the Regional Board on June 12, 2002. The City's Storm Water Standards manual provides information on how to comply with all of the City's permanent and construction storm

water BMP requirements, including the Model SUSMP, for new development projects in the City of San Diego (City of San Diego 2003).

As described in the Storm Water Manual, City storm water standards were developed for compliance with the Municipal Storm Water National Pollutant Discharge Elimination System (NPDES) Permit (Municipal Permit), issued on February 21, 2001 to the City of San Diego and others. As described in Section 4.10.1.1 BC. above, management of surface water and prevention of pollution of surface water is mandated under state and federal law, and enforced by the RWQCB and City of San Diego. Sycamore Landfill currently implements a Storm Water Pollution Prevention Plan (SWPPP) prepared pursuant to the federal National Pollutant Discharge Elimination System (NPDES), and submitted to the RWQCB under the statewide Industrial Activities Storm Water General Permit adopted by the State Water Resources Control Board on April 17, 1997. The existing Sycamore Landfill SWPPP and its associated Monitoring Program would be updated and resubmitted to the RWQCB periodically as conditions change during implementation of the Master Plan landfill development. A copy of the current SWPPP is provided in Appendix L of this EIR. The facility has also filed an "Industrial Self-Certification Form" with the City of San Diego Storm Water Pollution Prevention Program, stating that SLI has implemented their SWPPP under their NPDES General Permit. This allows the City to reduce the State required MS4 permit inspection frequency to once every two years instead of annually.

Like the existing document, the SWPPP implemented during future landfill development would continue to specify Best Management Practices (BMPs) for preventing pollution of surface water. BMPs would include structural measures such as retention/sedimentation basins, sediment traps and filters, and vegetated drainage swales or buffer areas; and non-structural measures including effective housekeeping and maintenance, material and waste handling procedures, and erosion control practices.

Sycamore Landfill stores and uses fuel and other petroleum products on the site. Potential impacts due to spills of these materials are prevented by implementation of a Spill Prevention Control and Countermeasure (SPCC) Plan prepared pursuant to federal regulations contained in 40 CFR 112.7. The City of San Diego LEA monitors compliance with these federal regulations.

In addition to managing storm water under NPDES requirements, SLI is also obligated to manage surface water in conformance with requirements of CCR Title 27, also enforced by the RWQCB. Among the key elements of 27 CCR 20365 are the following:

- Surface water management systems must be designed to manage the 100-year return storm event "to limit, to the greatest extent possible, ponding, infiltration, inundation, erosion, slope failure, washout and overtopping". (This also reduces leachate production and prevents groundwater contamination).
- Diversion and drainage facilities must prevent surface erosion through judicious use of energy dissipaters to decrease the velocity of run-off, slope protection and other erosion control measures.

- Systems must manage and control the volume of water released from the site such that the peak flow rate at the point of discharge does not exceed the peak flow that would occur if there were no waste management facility on the site (This also affects the quantity of storm water discharged)
- Any surface water contacting waste must be collected and managed as leachate.

The RWQCB enforces the above requirements, in part, by incorporating in the Waste Discharge Requirements (WDRs) for the landfill operation numerous specifications for the management of surface water. The WDRs also include a requirement for annual erosion control and drainage system maintenance and upgrades. SLI must submit an annual report to the RWQCB by November 15 of each year describing measures taken to maintain drainage and erosion control systems in preparation for the coming rainy season. The RWQCB periodically inspects the site to verify implementation throughout the year. In addition, the City of San Diego documents compliance with the general permit for industrial activities for storm water by conducting their own inspections.

Finally, SLI implements a RWQCB-approved Storm Water Monitoring and Reporting Program which includes quarterly inspections, and collection and analysis of storm water discharges during at least two storm events during the year. ~~The most~~A recent annual report, from June 2006, is included in this EIR as Appendix M.

No change to the types of wastes that may be accepted at the landfill is proposed. As discussed above, regulations contained in CCR Title 27 and enforced by the LEA ensure that refuse is covered daily and that drainage is controlled to minimize surface water contact with refuse. These operational measures minimize the potential for pollution of surface water with constituents present in the solid waste.

All the above-described surface water control measures and mechanisms would be updated as needed and applied to the landfill throughout the implementation of the Master Plan. Since the Landfill's existing SWPPP and WDR's are in conformance with the storm water NPDES permit, implementation and effectiveness of the Landfill's SWPPP are monitored by both the City and RWQCB, and the SWPPP will have to be updated in the future to remain in compliance with the state general permit and the WDR's for construction of all future landfill cells; the storm water discharges from the landfill would be in conformance with the City's storm water standards, and impacts would be below a level of significance.

No significant hydrology/water quality impacts are anticipated relative to potential future composting activities. As described in Chapter 3, the composting operation, if proposed, and approved by applicable agencies (SD APCD, SD LEA, CIWMB), would be located on an area of the landfill site where MSW had previously been disposed, screened from outside view by existing topography or 15-20-foot high berms. The proposed composting operation would be established on a portion of the top deck of the landfill that has been stabilized by the application and compaction of additional cover soil to minimize settlement and ponding of surface water, as required by 14 CCR 17865. Precipitation falling higher than the composting area would be intercepted by berms, and diverted to sedimentation

basins. Precipitation falling on the composting area would be intercepted by berms downhill from the working area. Any water ponding in that area would be used in the composting process. Non-hazardous residue from the compostable materials received would be disposed in the landfill. An SLI refuse container would be maintained at the composting area for disposal of non-hazardous residue. It would be emptied as necessary to maintain a clean facility. Any hazardous residue would be taken to the hazardous materials locker elsewhere on site and later disposed in accordance with applicable laws and regulations. Therefore, there would be no significant hydrology/water quality impact if composting were implemented.

Regarding potential impacts to surface water quality as a result of use of ADC, as with use of the current alternate daily cover or soils, run off from the active disposal area is contained by diversion berms, which direct it into the active face and not allowed to leave the active area. As stated elsewhere in this EIR, run-on to the active disposal area is minimized by the use of berms upgradient from the active disposal area. If storm water were to leave the active disposal area, it would be directed to the proposed on-site sedimentation basins where it would be collected. Routine sampling and reporting of the water quality in the basins is a requirement of the state General Permit for Industrial Storm Water Discharges and the facility's Storm Water Pollution Prevention Plan and the Waste Discharge Requirements issued by the Regional Water Quality Control Board. The impacts of use of ADC on storm water quality are therefore less than significant.

While runoff from the proposed widening of Mast Boulevard would be discharged into the lower San Diego River, which would eventually flow into an impaired water body section of that river farther south, it would represent an incremental increase in such flows from the existing roadway, and which are already required to meet applicable City surface water standards. Therefore, there would be no significant hydrology/water quality impact associated with the proposed roadway widening. Standard Best Management Practices (BMPs) would be utilized to minimize potential surface water quality impacts, according to the most current City of San Diego Storm Water Standards and/or Caltrans Division of Construction Stormwater Quality Handbooks - Construction Site Best Management Practices (BMPs) Manual. Disturbed soil areas that were not paved would receive appropriate vegetative ground cover according to City of San Diego Landscape Standards and/or Caltrans specifications upon completion of construction.

Potential transmission line relocation impacts to surface water quality would be less than significant, as described in the following section.

Transmission Line Relocation

As described previously, the proposed transmission line relocation would not increase storm water velocity or quantity downstream of the project. The project would discharge surface water into receiving waters within Environmentally Sensitive Lands (the MHPA west of the landfill). Any surface water discharges would flow ultimately into a waterbody listed as impaired on the RWQCB's 303(d) list. This is a potentially significant impact of the proposed project in the event the discharge exceeds City storm water standards.

The relocated transmission lines would contain no hazardous materials and no source of potential pollution of surface water, other than sediment. Measures for preventing potential significant impacts due to sediments resulting from soil erosion during and after construction are discussed in Section 4.10.2.2 above. SDG&E Project Protocols 3, 4, 5, 6, 7, 37, 38 and 55 (see Appendix B) describe BMPs SDG&E incorporates to control discharges of storm water pollutants. Protocol 38 requires SDG&E to "Secure any required General Permit for Storm Water Discharges Associated with Construction Activity (NPDES permit)." For this reason SDG&E's protocols are in general conformance with the City's Storm Water Manual. Compliance with these protocols would ensure that relocation of the transmission line would result in no significant adverse effect to surface water quality because any storm water discharges would be in conformance with the City's storm water standards, and impacts would be below a level of significance.

C. Ground Water Quality Impacts

Landfill Expansion

General

In the early 1980's, recognition that the degradation of groundwater quality is the most significant potential impact of a landfill project on the environment led to the implementation of laws requiring low-permeability liners and leachate collection and recovery systems on all new landfills. Monitoring and management of landfill gas was also instituted as an element of groundwater protection programs.

Leachate is contaminated liquid produced in landfills as a result of precipitation that infiltrates into the waste, or as the result of physical-chemical processes associated with the compaction and degradation of waste. The quantity of leachate produced and the chemical composition of potential pollutants in it depend on many factors, including primarily the type of waste, its original moisture content and the amount of rainfall that infiltrates the waste. Leachate constituents include a wide variety of potential pollutants including both organic and inorganic compounds.

Landfill gas is the other medium by which landfills may impact groundwater. Although landfill gas is composed primarily of carbon dioxide and methane, trace organic gases are also present. Uncontrolled landfill gas may migrate into the subgrade below the landfill and contact shallow groundwater, which may absorb or otherwise be contaminated by the organic compounds contained in the gas. Particularly in the arid climate of southern California, landfill gas has historically been the most common documented source of groundwater contamination associated with municipal solid waste landfills.

Existing Impacts

Section 4.10.1.2 above describes the existing contamination of the shallow groundwater at Sycamore Landfill. As discussed, the contamination is limited in extent, and has been determined to be primarily the result of landfill gas

migration. The corrective action program implemented since 1996 has prevented further migration of contaminated groundwater and has reduced volatile organic compounds concentrations to levels below the applicable Maximum Contaminant Levels (MCLs).

Potential Master Plan Impacts

Potentially significant impacts to groundwater could occur if there were a release of landfill leachate or significant migration of landfill gas to groundwater that would violate any water quality standards or waste discharge requirements or would otherwise substantially degrade water quality. Water Quality standards exist on the state and federal level. At the federal level, EPA's primary and secondary drinking water standards (<http://www.epa.gov/safewater/mcl.html>) are typically cited water quality standards for environmental analysis of groundwater quality impacts. At the State level, California's drinking water standards (www.cdph.ca.gov/certlic/drinkingwater/documents/dwdocuments/epaandcdph.pdf) are also cited as water quality standards for environmental analysis of groundwater quality impacts in the State of California. The San Diego Basin Plan (<http://www.waterboards.ca.gov/sandiego/programs/basinplan.html>) provides specific water quality objectives for groundwater within the Basin and also serves as water quality standards for environmental analysis of groundwater quality impacts in the San Diego County. The existing landfill operates under Waste Discharge Requirements (WDR 99-74). The proposed Master Plan would require amendments to WDR 99-74 or issuance of a new WDR. EPA's Antidegradation Policy [40 CFR 131.6(d)] and California's Antidegradation Policy (SWRCB Resolution 68-16) establish the framework for determining ~~in~~if a project would otherwise substantially degrade water quality.

Groundwater impacts due to landfill activities in areas of the site developed since 1993, including all new areas to be developed under the Master Plan, would be limited by construction of liner systems, leachate collection systems, landfill gas management systems, landfill monitoring systems, run-on and run-off controls, landfill cover, and ultimately by landfill closure requirements. The principal features of these systems are described below:

Liner systems are designed to meet specific state and federal requirements. They are a composite structure containing a minimum of two layers of impermeable materials that prevent the movement of either leachate or landfill gas beyond the liner. Liner systems approved and installed at Sycamore Landfill to date consist of a high density polyethylene (HDPE) geomembrane in combination with a geosynthetic clay liner (GCL), also known as a composite liner system. Future areas developed under the Master Plan may have similar or alternative designs as approved by the Regional Water Quality Control Board (RWQCB). Project-specific design plans and analyses for liner systems are required to be reviewed and approved by the RWQCB prior to construction. Construction must be accomplished under rigid Construction Quality Assurance (CQA) protocols implemented by a certified third-party certifying engineer. The RWQCB must review and approve the final CQA report for each phase of construction before waste disposal operations may begin.

Leachate collection systems are designed, together with the liner systems, to remove leachate that may be generated within the lined landfill. By regulation, the leachate collection system must be designed, to handle twice the maximum anticipated leachate flow and built and operated to maintain the depth of leachate above the liner system under a maximum allowable level of 12 inches. The typical components of the leachate collection system are a drainage layer of gravel or synthetic material to collect liquid, a perforated pipe in a trench at the lowest point of the liner, and a sump and riser pipe from which the leachate is pumped from the base of the landfill. The landfill liner is designed with a minimum slope gradient of 2 percent to 3 percent in order to promote the movement of leachate by gravity toward the collection point without exceeding the 12-inch depth criterion at any time. Additionally, as the landfill reaches final grade, final cover would be placed over the landfill surface. This cover system would be designed to prohibit future infiltration of rainfall into the waste that creates leachate.

Landfill gas management systems operate in concert with the liner systems to prevent the migration of landfill gas into soil or groundwater outside the landfill limits. Vertical and horizontal collection pipes or wells are constructed in the waste fill, and operated under a vacuum to withdraw the gas as it is generated by decomposition of the waste. The collection system is part of the overall gas management system, which also includes flares or energy recovery facilities to control landfill gas air emissions.

Landfill monitoring systems are required by the WDRs and are intended to allow for the early detection of any landfill-related contamination of local groundwater. In addition to the structural and operational methods described above, prevention of groundwater contamination at Sycamore Landfill would continue to be affected by ongoing operation of the groundwater monitoring program. In conformance with state and federal requirements, SLI implements a rigid program of groundwater sampling and laboratory analyses to identify impacts to groundwater immediately down-gradient from the disposal area. Samples must be collected, transported, and analyzed in conformance with EPA standards with reporting to the Regional Water Quality Control Board required by the WDRs. As with the existing condition, the monitoring program enables the early identification of a release, allowing remedial measures to be taken before contamination reaches groundwater beyond the immediate area.

Run-on and run-off controls are installed to preclude most storm water from coming into contact with the waste or lined areas of the landfill (run-on) and to prevent storm water that has come in contact with the waste or lined portions of the landfill from escaping into the environment (run-off). Storm water that has come into contact with the waste or lined portions of the landfill would be absorbed by the waste or collected by the LCRS as leachate. Storm water that falls away from the active landfill area would be diverted from the working face and exposed liner through the use of berms and drainage systems sized to convey the storm water associated with a 100-year storm event. Storm water contamination will be prevented through implementation of the required SWPPP, and its associated BMPs. Potential contamination of storm water sent to the detention basins is minimized through restricting such flows to water having no contact with solid waste. Furthermore, potential contamination of discharges to groundwater from the detention basins are monitored as described below. No groundwater contamination from that source has

been identified in the groundwater monitoring results to date. Therefore, no contamination of groundwater from Master Plan detention basin percolation is anticipated.

Landfill cover helps to protect the in-place waste from wind, water, and vectors. This helps to protect groundwater by keeping the waste in-place where the liner, landfill gas management systems and other environmental controls can effectively limit any potential for landfill-related surface or groundwater contamination.

Landfill closure requirements ensure the landfill is left in stable configuration that continues to protect groundwater indefinitely from landfill contamination. Landfill closure requires for the provision of long-term drainage facilities, and continued maintenance, landfill gas management, and groundwater monitoring for a period described in the WDRs and Final Closure Plan.

With the installation of liners, leachate collection and gas collection systems, as well as the implementation of cover, run-on/run-off controls, monitoring, and landfill closure; the potential for groundwater contamination due to operations in new areas of Sycamore Landfill is remote. These features provide overlapping protection such that if one aspect fails, the other aspects continue to provide adequate levels of protection. This system of overlapping protections has been mandated by state and federal regulations to ensure the protection of groundwater, and conformance with the state and federal antidegradation policies and drinking water standards. These regulations are implemented by the RWQCB through preparation of the Basin Plan and through the issuance of the landfill's WDRs. By employing these overlapping protections as required by the landfill's current and future WDR's, the potential for contamination of groundwater is considered to be below a level of significance.

Existing older unlined areas of the site would continue to exist, and additional waste would be placed above the existing waste in these areas. Potential impacts due to continuing operations in older unlined areas would be minimized due to:

- The ongoing operation of a gas collection system, to prevent the migration of landfill gas from the bottom of the landfill;
- Surface water management to minimize absorption of precipitation by the waste (run-on and run-off control);
- Use of landfill cover;
- Landfill closure requirements; and,
- The dry San Diego climate.

These factors would ensure that the existing limited impacts to shallow groundwater from the unlined areas of the site, presently controlled by the corrective action program, would not be exacerbated by the placement of additional

waste in these areas. The deeper groundwater would be similarly protected. Impacts within the unlined areas of the landfill would likewise be below a level of significance.

No sewer connection or private sewage disposal system is being proposed as part of the Master Plan. The limited amount of wastewater generated will be disposed as it is currently, using regularly-pumped septic holding tanks, in accordance with requirements of the County of San Diego, Department of Environmental Health. Impacts would be below a level of significance.

Potential transmission line relocation impacts to groundwater quality were found to be less than significant, as discussed in the section below.

With the exception of geo-synthetic fabric products and foam products, the alternate daily covers (ADC) proposed to be used are non-hazardous waste/materials that could theoretically have the potential to impact the groundwater and surface water of the facility. However, the use of ADC would be limited to use within proposed disposal areas only. Their use, therefore, would have no greater impact than disposing of other non-hazardous wastes, as occurs every day at Class III landfills such as Sycamore. The impacts of use of ADC on groundwater would therefore be less than significant.

Transmission Line Relocation

The relocated transmission lines would contain no noxious or cumulatively hazardous materials, and no source of potential pollution of groundwater, other than sediment. Measures for preventing potential significant impacts due to sediments resulting from soil erosion during and after construction are discussed in Section 4.10.2 above. With implementation of SDG&E Project Protocols 3, 4, 5, 6, 7, 37, 38 and 55 (see Appendix B) as part of the project description (see Appendix B), relocation of the transmission line would result in no significant adverse effect to groundwater quality.

4.10.2.3 Significance of Impact

A. Surface Water Quantity

Landfill Expansion

Since runoff would be reduced at the SR-52 culvert, and essentially unchanged at Mast Boulevard, stream-flow velocities and quantities downstream of these areas would not be increased and the peak velocities would be reduced. The total quantity would remain approximately the same, but it would be released over a longer period of time. For this reason, impacts would be less than significant.

Since peak flows and velocities would be reduced, the potential for downstream flooding would also be reduced and the project would not pose a flood hazard on other properties. Impacts would be less than significant.

Transmission Line Relocation

Since measures would be installed to reduce storm water velocity and to detain storm water flows, and since existing unneeded facilities would be removed and their footprints restored, it is not expected that downstream stream-flow velocities or quantities would be substantially changed. Therefore, flood hazards would not be imposed on other properties. Impacts would be less than significant.

B. Surface Water Quality

Landfill Expansion

Since the Landfill's existing SWPPP and WDR's are in conformance with the storm water NPDES permit, implementation and effectiveness of the Landfill's SWPPP are monitored by both the City and RWQCB, and the SWPPP will have to be updated in the future to remain in compliance with the State general permit and the WDR's for construction of all future landfill cells; the storm water discharges from the landfill would be in conformance with the City's storm water standards, and impacts would be below a level of significance.

Transmission Line Relocation

SDG&E Project Protocols 3, 4, 5, 6, 7, 37, 38 and 55 (see Appendix B) describe BMPs SDG&E incorporates to control discharges of storm water pollutants. Protocol 38 requires SDG&E to "Secure any required General Permit for Storm Water Discharges Associated with Construction Activity (NPDES permit)." For this reason SDG&E's protocols are in general conformance with the City's Storm Water Manual. Compliance with these protocols would ensure that relocation of the transmission line would result in no significant adverse effect to surface water quality because any storm water discharges would be in conformance with the City's Storm Water Standards, and impacts would be below a level of significance.

C. Ground Water Quality

Landfill Expansion

With the installation of liners, leachate collection and gas collection systems, as well as the implementation of cover, run-on/run-off controls, monitoring, and landfill closure; the potential for groundwater contamination due to operations in new areas of Sycamore Landfill is remote. These features provide overlapping protection such that if one aspect fails, the other aspects continue to provide adequate levels of protection. This system of overlapping protections has been mandated by state and federal regulations to ensure the protection of groundwater, and conformance with the state and federal antidegradation policies and drinking water standards. These regulations are implemented by the RWQCB through preparation of the Basin Plan and through the issuance of the landfill's WDRs. By employing these

overlapping protections as required by the landfill's current and future WDR's, the potential for contamination of groundwater is considered to be below a level of significance.

With the expansion of gas collection systems, as well as the implementation of cover, run-on/run-off controls, monitoring, and landfill closure the existing limited impacts to shallow groundwater from the unlined areas of the site, presently controlled by the corrective action program, would not be exacerbated by the placement of additional waste in these areas. The deeper groundwater would be similarly protected. Impacts within the unlined areas of the landfill would likewise be below a level of significance.

No sewer connection or private sewage disposal system is being proposed as part of the Master Plan. The limited amount of wastewater generated on-site will be disposed as it is currently, using regularly-pumped septic holding tanks, in accordance with requirements of the County of San Diego, Department of Environmental Health. Impacts would be below a level of significance.

Transmission Line Relocation

The relocated transmission lines would contain no noxious or cumulatively hazardous materials, and no source of potential pollution of groundwater, other than sediment. With implementation of SDG&E Project Protocols 3, 4, 5, 6, 7, 37, 38 and 55 (see Appendix B), the impact of transmission line relocation construction to surface water quality would be below a level of significance.

4.10.2.4 Mitigation - Surface Water Quantity and Quality; Ground Water Quality

A. Landfill Expansion

The project and the above-described project features have been designed in accordance with RWQCB, LEA and City's Storm Water Standards. Compliance with the standards through the above project elements would preclude direct and cumulatively considerable hydrologic water quality impacts.

B. Transmission Line Relocation

The project and the above-described project features have been designed in accordance with SDG&E's Project Protocols 3, 4, 5, 6, 7, 37, 38, and 55, and the City's Storm Water Standards. Compliance with the standards through the above-project elements would preclude direct and cumulatively considerable hydrologic or water quality impacts.

4.10.3 Issue 3

Would the project, when considered in combination with past, current, and future projects in the San Diego River watershed, result in cumulative significant impacts on the hydrology and water quality of the San Diego River?

4.10.3.1

Issue 3 is addressed in Chapter 5.0 of this EIR, "Cumulative Impacts."

4.10.4 Summary of Transmission Line Relocation Impacts

Construction of the transmission line relocation component of this project would be done in accordance with SDG&E's NCCP Project Protocols 3, 4, 5, 6, 7, 37, 38, and 55, as well as City of San Diego Storm Water Standards. As a result of planned project compliance with those protocols and standards, no significant direct or cumulative transmission line construction impacts to hydrology or water quality would occur.

5.0 CUMULATIVE IMPACTS

5.1 INTRODUCTION

CEQA Guidelines, Section 15130 requires that an EIR address the cumulative impacts of a project, when the project's incremental effects would be cumulatively considerable. The Guidelines go on to say that "cumulatively considerable" means the incremental effects of an individual project would be considerable, when viewed in connection with the effects of past, current or probable projects. However, Section 15064(i)(5) of the Guidelines notes that "the mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable."

Section 15130 (b) of the Guidelines states that "the discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute, rather than the attributes of other projects which do not contribute to the cumulative impact."

According to the Guidelines, the following elements are necessary for an adequate discussion of significant cumulative impacts. It must discuss either: 1) "a list of past, present and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or 2) a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated area-wide conditions contributing to the cumulative impact." According to the 1984 case "San Franciscans for Reasonable Growth" the list of projects to consider includes: 1) projects that have been approved, but are not yet constructed; 2) projects under construction; 3) projects under environmental review; 4) projects formally announced by developers; and 5) projects outside the control of the lead agency. Lead agencies are directed to define the geographic scope of the area affected by the cumulative effect, and to provide a reasonable explanation for the geographic limitation used (CEQA Guidelines, Section 15130 (b)(1)(B)(3)).

The cumulative impact analysis for this EIR has been prepared based on the "summary of projections" approach, and referencing the City of Santee's General Plan Update and its associated EIR. This approach has been taken because during the scoping phase of this EIR, the cities of San Diego and Santee were requested to provide information regarding potential cumulative projects in the project vicinity. The City of Santee listed 75 projects that had recently undergone or were now undergoing City review. The City of San Diego, whose jurisdiction near the project includes the undeveloped lands of Mission Trails Regional Park (MTRP), MCAS/Miramar, and open space lands in the Elliott Community Plan area, identified only the proposed MTRP equestrian center as a potential

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cumulative project, other than the existing approved landfill. Subsequently, an application for development was filed at the City of San Diego Development Services Department for the proposed Castlerock project, located southeast of the landfill site.

Subsequent to the scoping discussions, in June 2003 the U.S. Navy released an EIS addressing proposed military family housing to be located in MCAS/Miramar, with the nearest potential site located less than two miles west of the landfill site. Instead of addressing each of the 75 individual projects identified by the City of Santee, it was decided that a more efficient approach would utilize the cumulative impact analyses found in the Draft EIR for the Santee General Plan Update, supplemented by discussions of the existing approved landfill, the equestrian center, Fanita Ranch, Castlerock and military housing projects. The locations of the proposed project, the City of Santee, the equestrian center, Fanita Ranch, Castlerock and the military housing proposals are shown in Figure 5-1.

Environmental topics having relatively localized impacts include land use, visual quality, biology, traffic (some aspects), paleontology, hydrology, geology/soils, and air quality (some aspects). For these topics, the cumulative impacts study area is depicted in Figure 5-1. Environmental topics having regional impacts that may extend beyond the boundaries of Figure 5-1 include air quality (some aspects), and traffic (some aspects).

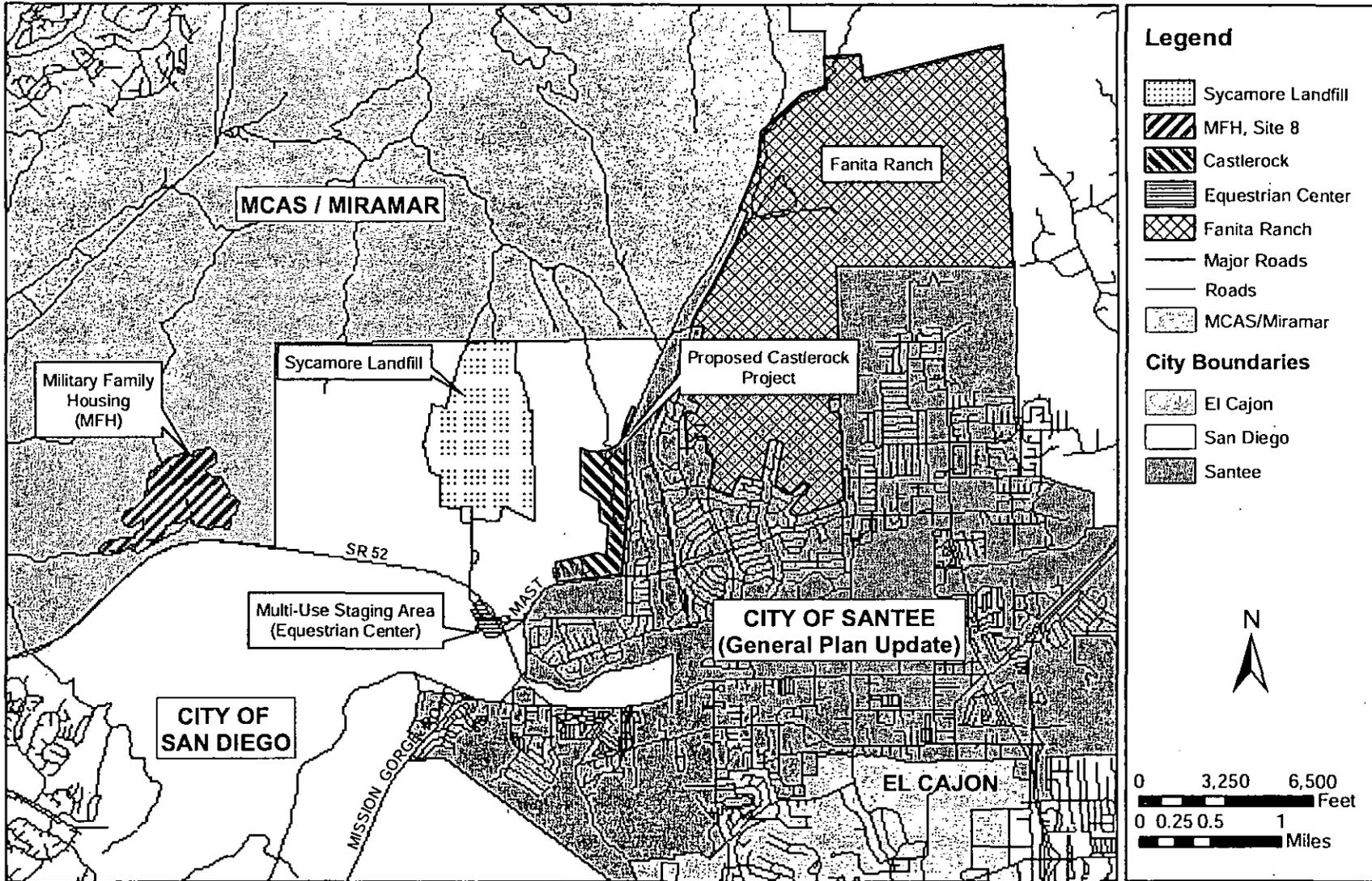
5.2 Cumulative Projects

5.2.1 Introduction

The Master Plan represents an expansion of an existing, already permitted landfill, dating back to 1963. The most recent land use permits for the facility were granted by the City of San Diego in 2002 (PDP/SDP 40-0765). The approval was based on environmental analysis and documentation contained in MND 40-0765. Potentially significant impacts were identified to air quality, noise, and biological resources, but revisions to the proposed project and the mitigation measures listed in MND 40-0765 were found to avoid or mitigate those potential significant impacts. Mitigation measures adopted included studies to demonstrate no noise impacts to nesting gnatcatchers in adjacent MHPA lands; minimization of ancillary facility biological impacts within Spring Canyon; protection of populations of variegated dudleya and barrel cactus; translocation of variegated dudleya that otherwise would be taken; creation of wetlands south of the landfill; and conveyance of mitigation lands to the City for loss of upland habitats.

The relationship of approved plan areas to areas of expansion proposed in the Master Plan is shown in Figure 5-2. In that figure, Stage I area of existing landfill, started in 1963, predated recent requirements for biological impact analysis and mitigation. The areas labeled 'M' represent areas for which biological mitigation has been provided per grading permits issued under PDP/SDP 40-0765, and prior County Habitat Loss Permit (HLP) 95-008. A copy of the first 12 pages of MND 40-0765, including all adopted mitigation measures, has been provided in EIR Appendix C5.

In general, impacts associated with continued development of the approved Staged Development Plan were identified as: 1) potential impacts to nesting California gnatcatchers from changes in noise levels in the adjacent



SOURCE: BRG Consulting, Inc., City of San Diego, and SANDAG, 2003

10/20/05

Sycamore Landfill Master Plan
**Potential Cumulative
 Projects and Plans**

**FIGURE
 5-1**

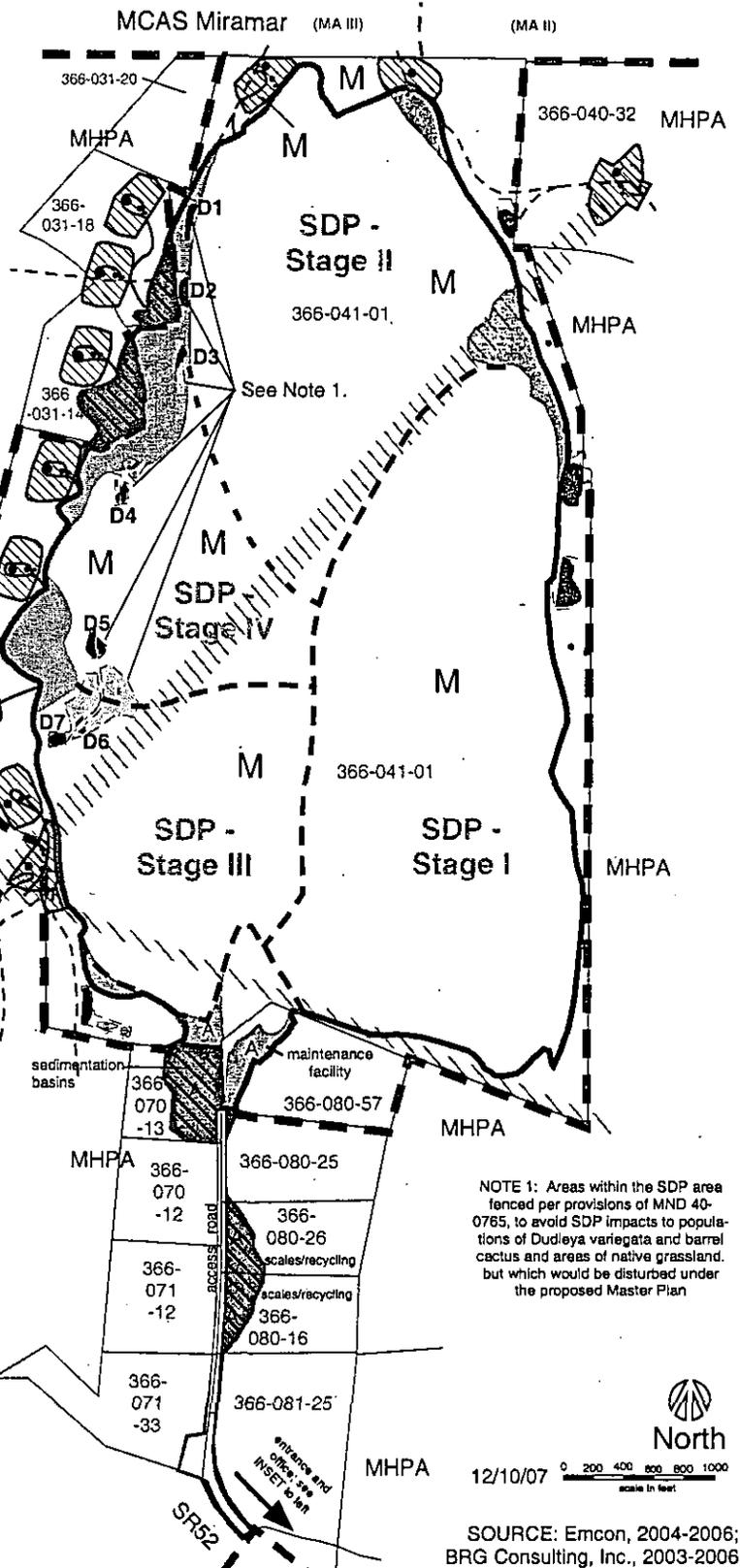
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5-3

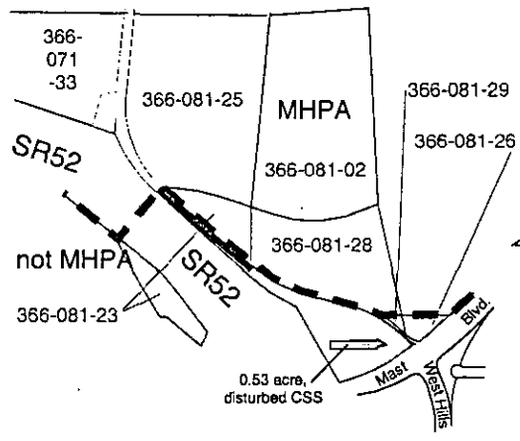
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LEGEND

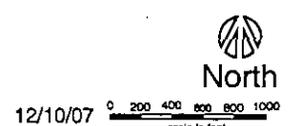
- 366-031-18 Assessor's Parcel boundaries and numbers
- Proposed Master Plan disturbance boundary
- MHPA boundary
- Proposed additional areas in the MHPA to be designated "landfill" and disturbed.
- Proposed new areas of disturbance under proposed Master Plan that are outside of boundaries of the 1994 Staged Development Plan and outside of the MHPA
- A** Locations of proposed landfill Ancillary facilities
- Areas within the SDP area fenced per provisions of MND 40-0765, to avoid SDP impacts to populations of *Dudleya variegata* and barrel cactus and areas of native grassland, but which would be disturbed under the proposed Master Plan
- Locations of *Dudleya* avoided under PDP/SDP 40-0765.
- D4** *Dudleya variegata* population ID #, avoided under MND 40-0765, proposed to be taken under Master Plan
- Existing dirt roads and trails
- Areas of temporary disturbance by proposed T/L relocation (Alt. A)
- Proposed transmission line structure locations - long-term disturbance
- Proposed long-term 12-ft. wide spur roads to transmission line structures.
- M** Area for which biological mitigation has been provided under MND 40-0765 and HLP 95-008
- Existing electric transmission line corridor



INSET LANDFILL ENTRANCE AND ACCESS ROAD



NOTE 1: Areas within the SDP area fenced per provisions of MND 40-0765, to avoid SDP impacts to populations of *Dudleya variegata* and barrel cactus and areas of native grassland, but which would be disturbed under the proposed Master Plan



SOURCE: Emcon, 2004-2006; BRG Consulting, Inc., 2003-2006

Sycamore Landfill Master Plan EIR

Relationships of Proposed Master Plan Changes to Existing Approved Plans and Mitigation for Biological Impacts

FIGURE 5-2

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MHPA resulting from nearby landfill development; 2) potential habitat disturbance west of the Spring Canyon/Little Sycamore Canyon ridgeline from construction of ancillary groundwater or gas monitoring wells or probes; 3) potential disturbance of sensitive plants such as barrel cactus and *Dudleya variegata* along the Spring Canyon/Little Sycamore ridgeline; 4) habitat disturbance within vegetated stream channels; and, 5) impacts to 8,570 *Dudleya variegata* from continued landfill development.

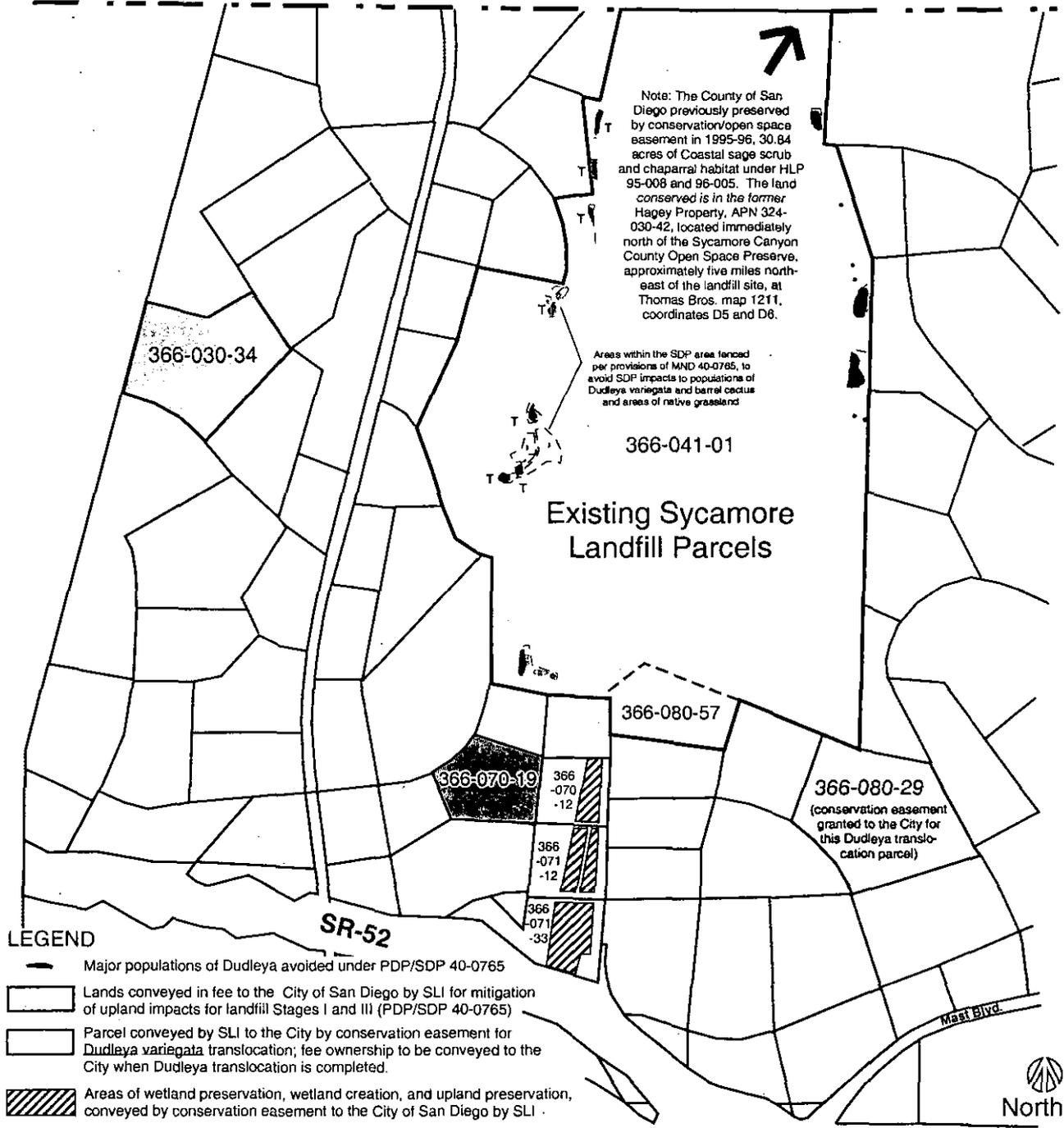
The location of mitigation lands conveyed to the City of San Diego by SLI under PDP/SDP 40-0765 permit process are shown in Figure 5.3. The lands shown mitigated for loss of 57.66 acres of native habitat within landfill Stages I and III, and for loss of 1.62 acres of wetlands in Stage III. In December 2003, initial work was completed on creation of 3.75 acres of wetlands in the hatched wetlands easement parcels south of the landfill. More wetlands were created than required for just Stage III impacts, allowing for mitigation of future impacts to wetlands in Stage II and IV, and for possible future wetlands impacts associated with the Master Plan. Figure 5.3 also provides a general direction to the location of 30.84 acres of mitigation lands previously set aside by the former land owner, the County of San Diego, for impacts associated with HLP permits 95-008 and 96-005. All major populations of *Dudleya* plants anticipated to be disturbed by work under PDP/SDP 40-0765 have been removed from the landfill site to a plant nursery, but were not translocated to APN 366-080-29 immediately due to loss of area vegetation in the October 2003 Cedar Fire, and to a subsequent dry spring in 2004. Translocation under those conditions would have resulted in the loss of the translocated plants as a result of herbivory (RECON, 2004). Approximately twelve thousand *Dudleya* were translocated to APN 366-080-29 in January 2005. Additional plants were added to the translocation site in 2006/2007, and the total number of *Dudleya* plants estimated there in September 2007 was 13,678 (DEIR Appendix 8A). Other *Dudleya* populations along the western ridgeline have been preserved onsite per provisions of MND 40-0765. The locations of these populations are shown in Figure 5-3.

5.2.2 Military Family Housing, MCAS/Miramar

The Department of Navy is planning construction of up to 1,600 affordable military housing units and supporting infrastructure within the San Diego region. A Draft Environmental Impact Statement was prepared for the project in June 2003 and a Record of Decision (ROD) was issued August 20, 2004 in the Federal Register. The EIS analyzed three military family housing alternative sites. The preferred project site is Site 8, which is located closest to the proposed landfill Master Plan site, approximately 1.25 miles to the west. Site 8 includes 299 acres and would include development of up to 1,600 units. The development would also include an elementary school site and other recreational amenities such as tot lots, basketball courts, tennis courts, etc. A mini mart and childcare facility would also be constructed. See Figure 5-1.

As discussed in the EIS, implementation of the project would result in potentially significant impacts for the following issue, topics: utilities (sewer), public services (police service and schools), visual resources, cultural resources, biological resources, traffic/circulation, and public safety. Implementation of the mitigation measures described in the EIS would reduce all impacts to below a level of significance. Potential significant cumulative impacts could occur

MCAS Miramar

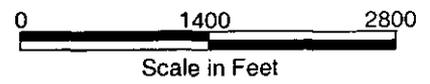


Note: The County of San Diego previously preserved by conservation/open space easement in 1995-96, 30.84 acres of Coastal sage scrub and chaparral habitat under HLP 95-008 and 96-005. The land conserved is in the former Hagey Property, APN 324-030-42, located immediately north of the Sycamore Canyon County Open Space Preserve, approximately five miles northeast of the landfill site, at Thomas Bros. map 1211, coordinates D5 and D8.

Areas within the SDP area fenced per provisions of MND 40-0765, to avoid SDP impacts to populations of *Dudleya variegata* and barrel cactus and areas of native grassland

LEGEND

- Major populations of *Dudleya* avoided under PDP/SDP 40-0765
- Lands conveyed in fee to the City of San Diego by SLI for mitigation of upland impacts for landfill Stages I and III (PDP/SDP 40-0765)
- Parcel conveyed by SLI to the City by conservation easement for *Dudleya variegata* translocation; fee ownership to be conveyed to the City when *Dudleya* translocation is completed.
- Areas of wetland preservation, wetland creation, and upland preservation, conveyed by conservation easement to the City of San Diego by SLI
- Areas of non-MHPA *Dudleya variegata* populations fenced and avoided under MND 40-0765 (2002), proposed to be taken under development of the Master Plan.



SOURCE: BRG Consulting, Inc., 2002-2005.

10/11/05

Sycamore Landfill Master Plan EIR

Mitigation Lands Conveyed to the City of San Diego by SLI Under Special Grading Permit of November 27, 2002 (Implementation of City of San Diego PDP/SDP 40-0765)

FIGURE

5-3

001011

with regard to public services (police services and schools), visual resources, traffic/circulation, air quality, and noise. The EIS states that these potential impacts would be mitigated to below a level of significance.

5.2.3 MTRP Multi-Use Staging Area Project

The project is the development of a twelve-acre, multi-use staging area to improve access to the City's Mission Trails Regional Park by horse riders, hikers, and bicyclists to the existing park trail system. The improvements include a 5,000-square-foot (SF), main structure containing park maintenance facility, park ranger offices, conference room, display room with information center, park staff restroom with shower, garage, group kitchen, public restrooms, and storage room, a 2,300 SF covered picnic shelter attached to the west side, and a screened storage yard attached to the east side. The maximum height of the main structure would be 26 feet, 10 inches; the height of the roof over the group picnic area would be a maximum of 18 feet, 9 inches. There would be a separate 425 SF service building containing public restrooms, 15-space parking lot for horse trailers, 49-space parking lot for vehicles, horse corrals, two multi-purpose rings, open BBQ area, picnic tables, horse manure storage bins, minimal security lighting, and internal loop access road.

A final MND was prepared for the project in October 2001. According to the MND, implementation of the project would result in potentially significant impacts for the following issue topics: biological resources, hydrology, and historical resources. Implementation of the mitigation measures described in the MND would reduce all impacts to below a level of significance. The MND found that the project would not have a considerable cumulative impact. Initial development of the site has been completed as of December 2004 [?].

5.2.4 Castlerock Project

The Castlerock project site is located in the southeastern portion of the East Elliott Community Plan area of the City of San Diego, approximately 1,700 feet east of Sycamore Landfill. The Castlerock site is north of Mast Boulevard and west of Medina Drive. The project abuts the municipal boundary between the City of San Diego and the City of Santee. Those portions of the City of Santee abutting the site include West Hills High School, West Hills Park, and single-family homes along Medina Drive. The Castlerock project proposal is to develop a total of 498 dwelling units on a 106-acre graded footprint of a 191.8-acre subdivision. The development is generally along the eastern portion of the site in a north-south orientation and includes a recreation area near the center of the site area.

A draft EIR is presently being prepared for this project. A first-screencheck EIR has been submitted to the City for review. This document indicates that the Castlerock project would result in cumulative impacts to traffic, air quality, and landform alteration/visual quality.

5.2.5 City of Santee General Plan Update

The plan is an update of the City of Santee's prior General Plan. The primary objective of the General Plan update process was to revise the existing general plan to enable it to serve as a guide through the year 2020. The overall goal of the update was to establish strategies that will ensure an appropriate balance between housing, employment, retail, circulation, recreation and open space with the City.

A Master Plan Update Environmental Impact Report (EIR) for the project was prepared in 2003. Implementation of the project would result in the potentially significant impacts for the following issue topics: land use, traffic, and circulation, population and housing, public facilities, services, and utilities, parks and recreation, biological resources, noise, geology/soils, hydrology/water quality, cultural resources, paleontological resources, and public health and safety. Based on the analysis contained in this EIR, the General Plan update would result in significant unmitigated land use, public safety, and noise impacts in the vicinity of Gillespie Field; all other impacts would be mitigated to below a level of significance. The plan would result in significant cumulative impacts for traffic/circulation and noise. As stated in the EIR, these significant impacts would be mitigated to less than significant levels.

The City of Santee has also prepared a draft MSCP Subarea Plan which is currently under review by the Resource Agencies.

5.2.6 Fanita Ranch

In the northern portion of the City of Santee lies an undeveloped area of 2,589 acres known as Fanita Ranch. The property has a Planned Development (PD) designation. The PD designation provides for mixed-use development potential, consistent with the goals and policies set forth in the Santee General Plan.

The Fanita Ranch project was approved by the Santee City Council on December 5, 2007. The Fan trail system, a new fire station, and necessary public improvements associated with the proposed development ita Ranch project includes 1,380 single-family residential units, 1,400 acres of dedicated open space, a multiuse (water, recycled water, sewer, and road facilities. The project also includes a community center, including an aquatic center, fitness area, banquet facility, outdoor event facility; approximately 13 acres of commercial area; and a 10-acre lake.

A Final EIR (FEIR) was prepared for the Fanita Ranch project in November of 2007. According to the FEIR, implementation of the proposed project would result in potentially significant impacts for the following issue topics: aesthetics, air quality, biology, climate change, cultural resources, energy conservation, geology and soils, hydrology and water quality, land use, paleontological resources, public facilities and services, public safety, and traffic/circulation. Implementation of the mitigation measures described in the FEIR would reduce most impacts to below a level of significance. However, according to the FEIR, the project would have significant, unmitigable impacts for air quality and traffic/circulation. Furthermore, the project would have significant cumulative impacts for climate change.

5.2.7 Treviso

The proposed Treviso project involves the construction of a 186-unit condominium development on an 8.56 acre site located at 7908 Mission Gorge Road. The 3-story William Lyon Homes residential complex site is bordered on the north by the existing SR-52 right-of-way and bridgework within the San Diego River corridor. To the west, across West Hills Parkway is vacant land and to the south and east are existing residential and commercial uses. This project would replace an abandoned K-Mart store. The site is located approximately one-half mile south of the landfill entrance, and 1.25 miles south of the landfilling portion of the landfill site.

The initial study prepared for the Treviso development concluded that no significant environmental impacts would result from the implementation of this residential complex. A Negative Declaration was approved by the Santee City Council on November 19, 2003, which found that this project would not have a significant cumulative impact.

5.3 CUMULATIVE IMPACTS ANALYSIS

5.3.1 Land Use

As discussed in Section 4.1, development of the landfill would not conflict with other existing or proposed land uses, and with approval of the appropriate amendments, would conform to land use policies of the City of San Diego. No land use impacts were identified for the current landfill development plan (SDP) in MND 40-0765 (2002). Proposed developments to be constructed in the surrounding vicinity of the landfill (Figure 5-1), for which environmental documentation has been completed, were identified not to have significant unmitigated land use impacts and therefore, no cumulative land use impacts would occur. Although land use policies or regulations would incur no cumulatively significant impacts from implementation of the proposed developments, future residents of the proposed Castlerock project could potentially be affected by occasional odor episodes associated with operations of the existing and proposed landfill, particularly as related to processing of greens materials and compost.

5.3.2 Landform Alteration/Visual Resources

Development of the proposed landfill project in conjunction with cumulative projects would contribute to the cumulative urbanization of the area ~~during the~~ both on a short-term and long-term basis but would not result in permanent cumulative visual impacts when combined with the surrounding proposed developments.

Impact	The development of the landfill expansion could take 20-25 years or more to reach the maximum capacity and for the final revegetation plan to be implemented. In the interim period, some areas of bare soil are likely to be visible, while other visible landfill areas would receive interim revegetation, to minimize visual contrast. The cumulative projects identified in Section 5.1 are likely to be constructed at the same time that the proposed landfill would be in operation and their construction could contribute to visual impacts to the region. Impacts to scenic resources and vistas and visual character
5.1	

would be most affected in the outskirts of the urbanized area where natural vacant land would be lost to urban development. Therefore, short-term cumulative visual impacts would occur.

No effective mitigation is known that would reduce the short-term visual impacts to less than significant.

Once the proposed landfill reaches full capacity, a final revegetation plan would be implemented to restore the graded areas and to match as closely as possible the color, texture and contrast of the surrounding landscape. However, as identified in Section 4.2, long-term direct visual impacts associated with landform alteration would result from the completion of the landfill. According to the Santee General Plan, implementation of Santee design guidelines in conjunction with the proposed cumulative projects in accordance with the proposed Conservation and Community Enhancement Elements on a project-by-project level would ensure that no significant cumulative visual quality/aesthetics would occur in Santee. According to the DEIS, no significant unmitigable visual impacts would result from the development of the military family housing at Site 8, and no cumulative visual impacts would occur. The Castlerock development, if approved by the City of San Diego, would need to comply with design guidelines of the Mission Trails Design District. However, City of San Diego EAS personnel expect that the Castlerock development would result in long-term cumulative impacts (Schlitt, pers. conv., 8/31/05), and that conclusion has been incorporated into Impact 5.2.

Impact 5.2 Significant long-term cumulative visual impacts are expected to occur from implementation of the landfill expansion and nearby residential development projects.

No effective mitigation is known that would reduce these long-term cumulative visual impacts to a level less than significant.

5.3.3 Biological Resources

Any project biological impacts within the City of San Diego would have to be mitigated in conformance with City of San Diego biological guidelines, and the MSCP program. Full project mitigation of biological impacts is discussed in Section 4.3 of this EIR. The City of Santee also is committed to completion of its complementary MSCP Subarea Plan. Biological impacts associated with the current landfill plan are being mitigated per provisions of MND 40-0765 (2002). All significant direct and indirect biological impacts would be required to be fully mitigated on a project level, consistent with the appropriate Subarea Plans, and therefore, for most biological resources, there would be no significant cumulative biological impacts. As discussed in Chapter 4.3, there would be project impacts to 4.72 acres of Native Grassland, or mixed habitats that include Native Grassland. Although these would be mitigated through applicant conveyance of 6.71 acres of in-kind habitats from nearby MHPA parcels owned by SLI, at applicable mitigation ratios, there would be a "net loss" of Native Grassland habitat as a result of the project. This is considered to be a significant cumulative impact by the City, due to the rarity of the habitat.

Impact 5.2a A significant long-term cumulative biological impact would result from project-related losses of approximately 4.72 acres of Native Grassland habitat, or mixed habitats containing Native Grassland components.

Although the loss of such Native Grassland habitats is not proposed to be mitigated per se, it is addressed in the landfill revegetation plans shown in Figure 4.1-5. As portions of the landfill receive final cover, most of the landfill surface, totaling approximately 300 acres, would be planted for erosion control purposes with Native Grassland species listed in Figure 4.1-5. Some areas of fill slopes located west of the project perimeter road (approximately 12 acres) would be planted with Native Grassland species soon after completion of the road, anticipated in the early years of the expansion. Thus, the anticipated project-related net loss of Native Grassland would be offset by initial revegetation of the road fill slopes, and ultimately by revegetation of the entire landfill surface. This is not proposed as a mitigation measure because the primary purpose of the plantings is for environmental control, and not habitat.

From a potential cumulative impact perspective, the existing towers would not be removed until the new towers have been constructed so there would not be a loss of raptor roosting or nesting habitat. There would be a greater number of towers present, post-realignment. Fifteen structures would be removed and 27 would be added, which would maintain the pre-existing level of roosting and nesting locations.

5.3.4 Transportation/Circulation

Cumulative traffic impacts are defined in the traffic report as impacts where the proposed landfill project would add traffic to locations operating at LOS E or F after initial implementation of the project (2008), in excess of the allowable increases. A detailed discussion on the study area, thresholds, methodology, and all traffic impacts is provided in Section 4.4 of this document. The cumulative traffic analysis is based on regional traffic models approved by SANDAG. Only cumulative impacts would occur at and after the year 2010 scenario, and would be associated with both surface and freeway traffic. Recommended traffic impact mitigation would involve physical roadway or intersection improvements to achieve less-than-significant cumulative impacts, fair-share contributions by SLI to Caltrans for mitigation of significant impacts to SR-52 and associated ramps, and coordination with the City of San Diego and other landfill stakeholder groups to try to reduce waste hauling at roadway peak hours. Table 5.3-1 provides a summary and recommended mitigation measures for all cumulative traffic impacts. After implementation of the mitigation measures, and completion of fair-share funded improvements, the peak-hour impacts would be below a level of significance for all scenarios until a maximum intake of 10,700 tpd is implemented (proposed for 2015). However, after that time, project impacts to SR-52 traffic are considered significant and unmitigable.

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V. J. Johnson

**TABLE 5.3-1
Summary Of Cumulative Traffic Impacts And Mitigation**

Significant Cumulative Impact	Proposed Physical Improvement Mitigation	Proposed Fair-Share Contribution	Other Mitigation	Significance After Mitigation
2010				
<ul style="list-style-type: none"> Impact to Mast Blvd./West Hills Parkway/ Project Driveway (AM, PM) 	<p>See MM 4.4.1; the Applicant shall widen the intersection of Mast Boulevard and the project's access point/West Hills Parkway to include dual left turn lanes.</p> <p>Prior to intake of 1,900 tickets per day, Applicant to widen the intersection to include a westbound right turn lane, a northbound through lane, a southbound left turn lane, southbound dual right turn lanes, a westbound through lane and an eastbound through lane (MM 4.4.3)</p>			Not significant
<ul style="list-style-type: none"> Impact to Mast Blvd. from SR 52 to West Hills Parkway/ Project Driveway 	<p>If Mast Blvd. has not been widened to 6 lanes by others, Applicant to widen Mast Blvd. to six lanes from the SR-52 interchange to east of West Hills Parkway, prior to intake of 1,900 tickets per day (MM 4.4.4)</p>			Not significant
<ul style="list-style-type: none"> Impact to SR 52 east and west of Mast Blvd. (WB in AM, EB in PM) 		<p>Prior to increasing landfill tickets above the 620 MSW tickets now allowed, applicant shall make a fair share contribution to the Caltrans project to widen SR-52 (MM 4.4.2)</p>	<p>SLI shall monitor project tickets, trips, etc. and report them regularly (quarterly, annually) to the City (MM 4.4.5b); SLI shall attempt to stay below listed ticket/trip limits for specific daily peak time periods (MM 4.4.5.c); SLI shall implement specific steps to reduce tickets/trips if the target levels are exceeded more than five percent of the time over a one-month period (MM 4.4.5d)</p>	<p>Significant until the Caltrans work is completed.</p> <p>Not significant if the target tickets/trips are met.</p>

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**TABLE 5.3-1
Summary Of Cumulative Traffic Impacts And Mitigation (cont'd.)**

Significant Cumulative Impact	Proposed Physical Improvement Mitigation	Proposed Fair-Share Contribution	Other Mitigation	Significance After Mitigation
			Prior to exceeding 2,150 tickets per day, the Caltrans Managed Lanes project must be assured to the satisfaction of the City Engineer between I-15 and SR-125 (MM 4.4.5a)	
<ul style="list-style-type: none"> Impact to Mast Blvd./SR 52 WB ramps (AM) 	None feasible when landfill intake is 2,600 tickets per day (proposed maximum).		<p>Implement the proposed <u>Transportation Demand Management Program (TDMP); MMs 4.4-5b to -5d</u></p> <p><u>Prior to implementing the increased tickets and trips, establish a mitigation monitoring program, and report project traffic information to the City of San Diego, City of Santee and Caltrans, on an annual and quarterly basis (MM 4.4-5b).</u></p>	Significant unless proposed TDM measures are effective, or until Caltrans redesigns/reconstructs the interchange.
<ul style="list-style-type: none"> Impact to SR 52 west of Mast Blvd. (WB in AM, EB in PM) 	None feasible after landfill intake reaches 2,100 tickets per day.	None possible; Caltrans has no plans to increase the capacity of SR52 beyond that allowed by the Managed Lanes Project	<p><u>The project targets for maximum hourly operation for any expansion are 104 tickets and 132 trips per hour (AM peak period) and 44 tickets/56 trips per hour (PM peak period) (MM 4.4-5c).</u></p> <p><u>Implement the TDMP; if peak period tickets exceed the limits in MM 4.4-5c more than five percent of the time in a given month, SLI shall implement listed steps in subsequent months (MM 4.4-5d).</u></p>	Significant unless proposed TDM measures are effective, or until Caltrans increases SR52 capacity.

Source: LLG Engineers, BRG Consulting, 2007.

5.3.5 Paleontological Resources

As, discussed in Section 4.5, project impacts to paleontological resources are anticipated as a result of excavation of the fossil-bearing Friars and Stadium Conglomerate formations. This would be mitigated through paleontological monitoring of excavation in those strata. Since such monitoring would also be required for other San Diego and Santee development projects affecting those strata, no cumulative paleontological impacts are anticipated.

5.3.6 Noise

Section 4.6.2.2 of this EIR discusses potential direct construction-related noise impacts. While construction-related noise may, at times, exceed City Noise Ordinance provisions, no significant noise impacts were identified, since no residents or other occupants are anticipated to be nearby to hear such construction noise, expected to be completed

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by 2008. From a cumulative perspective, no other nearby projects are expected to be under construction at that time. Therefore, no cumulative noise impacts associated with project construction would occur.

As discussed in Section 4.6.2.2 and Table 4.6-4, the landfill expansion would result in increases in ambient noise levels at the landfill property line of between 6.7 to 25 dB(A) Leq, depending on the time of day or night, and the proximity of the landfill operations to the property line. However, the expansion would result in a reduction in noise levels at the property line compared to the approved landfill plan (1994 Staged Development Plan), due to the incorporation of noise barrier berms mitigation measures. These berms would be installed to block noise dissemination from the landfill "working face," as well as for any C&D processing operation. Given this situation, and since there are no other proposed or planned land uses located closer than 1,650 feet to the landfill property line (see Figure 5-1), no cumulative noise impacts are anticipated relative to landfill operations.

Section 4.6.3.2 discusses anticipated direct project noise impacts near the internal landfill access and haul road associated with increasing numbers of solid waste haul trucks. However, no other projects are anticipated to occur in the vicinity of the new haul road, so no cumulative impact would occur in these locations.

Potential direct noise impacts to residents of an existing residential tract located southeast of Mast Boulevard and West Hills Parkway were addressed in Section 4.6.4.2. The analysis found that estimated increases in exterior noise levels at the nearest homes as a result of the proposed Master Plan was a maximum of 2.5 dB(A) Leq,. Since these estimated increases were less than 3 dB(A), would take place over a 20-year period, and would not be perceptible to an average person, no significant direct or cumulative impact was identified. Projected noise levels at the nearest residential properties in that tract would not exceed the City of Santee noise criterion of 60 dB(A) CNEL.

5.3.7 Air Quality

Table 7-12 in the air quality technical report, Appendix F1, provides information on dispersion model results of the proposed project for criteria pollutants CO, SO_x, NO₂, PM_{2.5} and PM₁₀. The results discussed in Appendix F are for air dispersion modeling for the emissions associated with the 1,050 ft AMSL landfill design. The results in Table 7-12 indicate that projected pollutant concentrations at sensitive receptors would be less than significant for all pollutants. Table 7-12 also presents the modeled incremental concentrations that would result from the Master Plan development and the maximum background concentration measured at either of the two nearest monitoring stations. The maximum measured background concentrations for 2003 to 2005 exceeded the CAAQS for PM_{2.5}, and for PM₁₀. Therefore, the project plus background pollutant concentration would exceed the CAAQS for PM_{2.5}, and PM₁₀. Table 7-12 also indicated that one-hour CAAQS standard for NO_x could be exceeded as well. Since the project plus background pollutant levels would not exceed the applicable NAAQS or CAAQS for CO, NO_x and SO_x pollutants, no significant cumulative impact for CO, NO_x or SO_x would occur as a result of the project.

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In order to further analyze the potential for the landfill Master Plan development to result in cumulative impacts for ~~PM₁₀ and PM_{2.5}~~, a more detailed day-by-day analysis for PM₁₀ was conducted, using 1993 to 1995 data. Due to the fact that ambient measured PM concentrations have been trending down in recent years, and 1995 is likely the most representative of current conditions, all three years were analyzed. However, APCD did not have PM_{2.5} data for 1993-1995 from the El Cajon and Kearny Mesa monitoring stations. Data available in the future that would allow for a more refined analysis of this situation may show the cumulative PM_{2.5} impact to be insignificant. Given the uncertainty, however, we have shown the cumulative PM_{2.5} impact to be significant.

~~The maximum modeled incremental PM₁₀ and PM_{2.5} 24-hour average impacts for the sensitive receptors and the current and future residential receptors were added to the average of the 24-hour average monitored concentrations for 1995 for the El Cajon and Overland monitoring stations. For those days on which these calculated values exceeded the CAAQS or NAAQS, additional air dispersion modeling was conducted to estimate the incremental concentrations due to the proposed landfill Master Plan Development on the specific monitoring days. It should be noted that for PM_{2.5} there were no days for which the maximum modeled incremental 24-hour average impacts plus the estimated monitored concentrations for 1993 to 1995 exceeded the CAAQS or NAAQS for the maximum sensitive receptor or the maximum current and future residential receptors; therefore, there was no further evaluation conducted for PM_{2.5}.~~

The PM₁₀ day-by-day 24-hour average incremental concentrations were added to the average monitored concentrations for the corresponding days to determine the predicted total concentration.

The results of the PM₁₀ day-by-day analysis for the maximum sensitive receptor and the maximum current and future residential receptors are presented in Table 7-13 of EIR Appendix F1. There are some instances where the project would have caused an exceedance of the CAAQS when using 1993 or 1994 data, but there are no instances of this when using 1995 data. Because 1995 is the year that is likely most representative of the current PM₁₀ concentrations, it is likely that there is not a cumulative impact for PM₁₀ as a result of the proposed landfill expansion. However, based on the exceedances projected using 1993 and 1994 data, the landfill could potentially result in a cumulative impact for PM₁₀.

Impact Based on 1993-95 air quality monitoring data (the most recent available), and detailed air quality modeling, the proposed project may result in cumulative exceedances of the 24-hour and annual CAAQS for PM₁₀ and PM_{2.5} concentrations at sensitive receptors. In addition, the one-hour CAAQS standard for NO_x could be exceeded as well.

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Mitigation measures discussed in Section 4.7 of the EIR would help to reduce the impact, but not to below a level of significance. The cumulative PM₁₀, PM_{2.5}, and NO_x impacts would be significant and unmitigable.

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In the odor analysis described in Section 4.7.4, odors from decomposition of greens material being recycled and MSW being received at the scales were found to represent a potentially significant direct impact. While it is anticipated that most of the time no landfill or greens odors would be detected, it is possible that during periods of very low wind speed, odors would be detected nearby.

Impact Occasional odors from the landfill scale area and from greens recycling operations may be detected in specific and localized residential areas near the landfill, and may add to odors from other sources in the area. Although such odors are unlikely to be widespread or long-term, this is considered to be a significant cumulative impact.

As discussed in Section 4.7.4, although numerous measures are planned to minimize potential odor emissions, there is no guarantee that they would be effective at all times. The cumulative impact would be significant and unmitigable.

5.3.7.1 Greenhouse Gas (GHG) Emissions/Global Climate Change

A. Introduction

~~The~~ In 2006, the California State Legislature expressed its view, through passage of adopted AB 32, *The California Climate Change Global Warming Solutions Act of 2006*, that global warming poses significant adverse effects to the environment of the state of California (and the world). AB 32 requires that the state's global warming emissions be reduced to 1990 levels by the year 2020, through regulations to be developed by the California Air Resources Board (CARB). In addition, as explained in the Final Program Environmental Impact Report for the City of San Diego Draft General Plan ("General Plan Update EIR"), the global scientific community has expressed confidence that global warming is caused by humans, and will lead to adverse climate change impacts around the globe (Intergovernmental Panel on Climate Change (IPCC) 2007). In February 2007, the IPCC provided a comprehensive assessment of climate change science in its Working Group I Report, finding a scientific consensus that the global increases in greenhouse gases since 1750 are mainly due to human activities such as fossil fuel use, land use change (e.g. deforestation), and agriculture. ~~In addition, the~~ The IPCC report also stated that it is likely that these changes in greenhouse gas concentrations have contributed to global warming. There also is an international agreement to reduce world-wide increases of greenhouse gases (GHG), the Kyoto Protocol, although the United States has not ratified it.

Overview

GHGs and clouds within the earth's atmosphere influence the earth's temperature by absorbing most of the infrared radiation rising from the earth's sun-warmed surface that otherwise would escape into space. Human-produced GHGs emitted into the atmosphere enhance this "Greenhouse Effect" by absorbing the radiation from other atmospheric GHGs that otherwise would escape to space, thus trapping more radiation in the atmosphere and increasing the temperature. Human-produced GHGs responsible for increasing the Greenhouse Effect and their relative contribution to global warming are: carbon dioxide (53%) (84% of all GHG emissions in California are carbon

dioxide); methane (17%); near-surface ozone (13%); nitrous oxide (12%); and chlorofluorocarbons (5%) (collectively, the "GHGs").

The increasing emissions of these GHGs, including from decomposition of solid waste, lead to increased temperature, known as global warming, which results in climate change. The State Legislature adopted the public policy position that global warming is "a serious threat to the economic well-being, public health, natural resources, and the environment of California." Health & Safety Code § 38501.

State Legislation

In September 2006, Governor Schwarzenegger signed Assembly Bill (AB) 32, the California ~~Climate~~ Global Warming Solutions Act of 2006. In general, AB 32 directs the California Air Resources Board (CARB) to regulate GHGs and to:

- * Publicly make available a list of discrete early action GHG emission reduction measures that can be implemented prior to the adoption of the statewide GHG limit and the measures required to achieve compliance with the statewide limit;
- * Determine the statewide levels of GHG emissions in 1990 and adopt a statewide GHG emissions limit that is equal to the 1990 level (approximately a 25% reduction in existing statewide GHG emissions);
- * Adopt regulations to implement the early action GHG emission reduction measures;
- * Adopt quantifiable, verifiable and enforceable emission reduction measures by regulation that will achieve the statewide GHG emissions limit by 2020, to become operative no later than January 1, 2012;
- * Monitor compliance with and enforce emission reduction measures adopted pursuant to AB 32; and.
- * Recommend a de minimis threshold of GHG emissions below which emissions reduction requirements would not apply.

Under AB 32's 'early action measures' CARB approved the Landfill Methane Capture Strategy for landfills that – unlike the Sycamore Landfill -- are so small they are not currently captured by the volume threshold of the Clean Air Act. ~~(This does not impact larger landfills such as Sycamore Landfill because such landfills already are required to control their landfill gas emissions by already existing rules and regulations.)~~ CARB, in collaboration with California Integrated Waste Management Board (CIWMB), is developing a control measure to provide enhanced control of methane emissions from these smaller municipal solid waste landfills that are not currently controlled by requiring gas collection and control systems and establishing statewide performance standards to maximize methane capture efficiencies. Since Sycamore Landfill already uses landfill gas collection and control systems, it only will be impacted by the early action measure if the measure is revised to also require additional collection efficiency for larger, already controlled landfills.

The CARB's final proposed reporting rule requires that any combustion source of emissions greater than 25,000 tons per year GHG on a carbon dioxide equivalent (CO₂e) basis must report emissions annually. Sycamore Landfill's

flares and turbines emit more than 25,000 tons per year of CO₂e annually, and will be reporting for calendar year 2008 in 2009. Under the reporting rule, fugitive emissions from landfills are not included due to the uncertainty of emissions from the landfill.

City Plans and Programs

The City of San Diego's Climate Protection Action Plan (formerly the GHG Emission Reduction Program) sets a reduction target of 15% by 2010, using 1990 as a baseline. For the City's municipal operations, which are responsible for only 2% of the GHG emissions in the City, solid waste landfills represents a plurality (25%) of GHG emissions, followed by employee commutes (23%).

The City's General Plan recognizes that local action is required to reduce impacts of global warming. Baseline (1990) GHG emissions for the City were estimated at 15.5 million tons of carbon dioxide equivalent. With no action before 2010, the City is forecasted to emit 22.5 million tons of carbon dioxide equivalent in 2010. The goal of a 15% reduction in GHG emissions equals a total of 13.2 million tons of carbon dioxide equivalent in 2010, so achieving the 15% reduction would require the City to reduce total GHG emissions by 9.3 million tons of carbon dioxide equivalent. To achieve this goal, the GHG emission reduction measures of the action plan target emissions from transportation, energy and waste sectors. One of the main emission reduction strategies set forth in the City's plan is to increase recycling and recovery of landfill gas. Approximately 3.6 million tons (95%) of the emissions reductions in Phase One of the City's strategy were associated with capture of methane gas from solid waste landfills and sewage treatment plants, as well as recycling. During the next phase, the City will continue to implement the Construction and Demolition Debris (C&D) Diversion Deposit Ordinance to reduce the amount of GHG emissions associated with the disposal of solid waste into landfills, and will consider ~~bolder~~ other incentives to expand waste minimization efforts, including developing and adopting a construction and demolition recycling ordinance, a commercial paper recycling ordinance and a multifamily recycling ordinance.

B. Landfill Master Plan Effects

Municipal solid waste landfills are recognized as a substantial source of GHGs, as decomposing waste emits both carbon dioxide and methane. California's Climate Action Plan states that, as of 2002, approximately 2% of California's GHG emissions were from landfills. Some of that is from landfill gas that evades the gas collection system at landfills with gas collection systems, and the balance is from landfills that previously have been considered too small for landfill gas collection (although that will change with implementation of the early action measure CARB has proposed which will require those smaller landfills to also collect and control their landfill gas).

In San Diego, according to the draft General Plan PEIR, Waste accounts for 20% of the 1990 baseline, equating to slightly more than 3 million tons per year of GHGs, and should be no more than 3.8 million tons/year of carbon dioxide equivalent GHGs by 2010 under City projections. As stated on page 5-26 of the draft General Plan PEIR, The City already has reduced a sizeable portion of solid waste-related GHG emissions through the capture of methane gas from landfills and sewage treatment plants, and such future solid-waste emissions are anticipated to be

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a considerably lower percentage of the City's total future GHG emissions given the recent recycling requirements and other measures being implemented to lessen solid waste emissions city-wide.

As a result of regulation of Reactive Organic Gas (ROG) by state and federal authorities, large municipal solid waste landfills such as Sycamore Landfill have for some time been required to have landfill gas collection systems. These landfill gas collection systems reduce the emissions of landfill gas, which consists mostly of carbon dioxide and methane, by about 90%. Current state and federal law requires landfills with more than 1,000,000 metric tons of waste in place, such as Sycamore Landfill, to collect and destroy the landfill gas.

Municipal solid waste consists of both organic and inorganic wastes. A fraction of the organic materials in municipal solid waste can be biodegraded to methane and carbon dioxide (both GHGs which are emitted from landfills) under landfill conditions, and this is further discussed below. The remainder of the organic materials placed in municipal solid waste landfills is not degraded substantially. This remaining organic carbon becomes sequestered in the landfill, and therefore does not result in greenhouse gas emissions.

Although large landfills are required to have landfill gas collection systems, they are not required to convert the landfill gas into energy, and instead may simply flare the gas. Landfills like Sycamore Landfill, which produce renewable energy from landfill gas, replace the energy that would have been produced by burning fossil fuels, thus further lowering net GHG emissions.

ENVIRON prepared an analysis of incremental GHG emissions from the Sycamore Landfill that would result from the expansion, which is contained in Appendix F-4. Incremental GHG emissions are estimated in two ways: peak year increase, and cumulative increase. Included in the calculations are emissions from the heavy equipment operating on the landfills, electricity used to operate the landfill (including blowers and administration building), fugitive emissions of methane and carbon dioxide released from the landfill, and carbon dioxide released from combustion of landfill gas, whether for energy or from flaring low-value gas. The GHG emissions that are replaced from the production of electricity are also quantified. No additional vehicle miles for transporting waste to the landfill are included, as Sycamore Landfill is closest to the center of population, which is assumed to be the center of waste generation. ENVIRON also reduced the GHG emissions by accounting for the sequestration of carbonaceous materials in the landfills. Because of the sequestration of organic carbon material, as described in Appendix F4, particularly the organic material that is used as alternative daily cover, the GHG emissions from the Sycamore Landfill, on peak year basis, and during the expansion operating period, are less than zero. On a cumulative basis, the GHG emissions are positive.

Sycamore Landfill currently converts 70% of its collected landfill gas into electricity. The balance of the gas is processed in flares. While the current landfill gas contractor at Sycamore Landfill owns the rights to develop the landfill gas for energy production, SLI has committed to assuring that all feasible landfill gas is used for energy production if the current contractor does not opt to do so. As a result, the GHG emissions from Sycamore Landfill would be lower than GHG emissions from a comparable landfill where energy conversion does not occur.

GHGs are also produced by transporting the waste to the landfill. A landfill that is closer to the center of waste generation will result in lower GHG emissions compared to a landfill that is further from the waste centroid, assuming that the waste is transported to the landfill in the same types of vehicles. With the anticipated closure of Miramar Landfill, Sycamore Landfill will be closer to San Diego's waste producing areas than ~~are alternative landfill sites~~. As a result, the GHG emissions produced would be lower than that which will result from using more distant landfills.

The GHG Inventory report, contained in Appendix F-4, also describes a comparison of GHG emissions from alternatives to land filling, specifically, source reduction, aggressive recycling, composting and waste combustion. Source reduction and aggressive recycling result in lower lifetime GHG emissions. However, recycling is required by California ~~statute~~ statute, and source reduction will likely be evaluated under AB 32. Compared to the other two options for waste management, composting and incineration, land filling has similar GHG emissions, within the range of uncertainty of the analysis.

The overall incremental GHG inventory is shown in Appendix F4, and includes a breakdown for each category of emissions mentioned above. As described above, both peak incremental emissions (peak year after expansion less the peak year before expansion) and incremental cumulative emissions are presented.

Sycamore Landfill minimizes generation of GHGs in three ways:

- 1) Sycamore Landfill currently collects and burns off approximately 90% of landfill gas generated by the facility. This converts more damaging GHGs to CO₂ substantially reducing GHG-related effects. The landfill converts 70% of its burned landfill gas into electricity, and this will continue with the project. As a result of the power generated at the landfill, less power production from fossil fuels is required, resulting in fewer GHG emissions;
- 2) Sycamore Landfill uses processed greens materials as alternative daily cover and accepts other organic materials for disposal. Biodegradable organics do not decompose completely under the anaerobic conditions in a landfill as they would under natural conditions. This has the effect of sequestering carbon that otherwise would be emitted as CO₂ or other GHGs; and,
- 3) Following anticipated closure of Miramar Landfill, Sycamore will be the landfill closest to the center of the waste generation of San Diego County, minimizing emissions associated with waste hauling.

In addition, the Project helps implement the City of San Diego's mitigation measures for minimizing GHG emissions from solid waste, by providing a site for recycling of materials, and through accommodating construction and demolition recycling.

These measures to reduce project-related GHG emissions exceed the measures identified as reasonable by the State of California (Cal EPA Climate Action Team Proposed Early Actions To Mitigate Climate Change In California) and go above and beyond what is required by statute or regulation. Nonetheless, CARB has not developed a "de minimis" criteria establishing the level of GHG emissions that would not be subject to emission reduction measures. Moreover, the State has not yet developed a "significance threshold" by which an agency can determine whether or not impacts from GHG emissions from a particular proposed project are significant. A threshold of significance is an

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identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect normally would be determined to be "significant" and compliance with which normally would mean the effect would be determined to be less than significant. In fact, given that GHG emissions are global in nature, a statewide or national framework for consideration of environmental impacts may be most appropriate. Because there is no established significance threshold standard for emissions of GHGs, the most conservative approach is to conclude that any incremental contribution to the emissions of GHGs is considered cumulatively significant in inducing climate change.

Impact 5.5 GHG emissions from project-related waste haul vehicles, landfill vehicles, "fugitive" gases that escape from the landfill surface, and emissions from landfill flare and power generation equipment will occur. Since no definitive threshold criterion has been promulgated by the State of California impacts are deemed cumulatively significant.

Mitigation

Climate change is a global effect not susceptible to full mitigation by any proposed project. There is no *de minimis* threshold established for reduction of GHG on a project level. However, implementation of the project features noted above, combined with the City of San Diego's recycling efforts and the Master Plan's provision of recycling services at the site, will reduce the project's contribution of GHG emissions and its contribution to the globally significant cumulative impact to climate change. Programs being undertaken to implement solid waste reduction measures throughout the City will result in less GHGs from solid waste at Sycamore Landfill as well as the other municipal solid waste disposal facilities. Moreover, Sycamore Landfill already is implementing measures that exceed those promulgated by the State of California as reasonable for solid waste landfills, and will continue to do so as part of the Master Plan. But, because there is no threshold, it is not possible to determine whether measures that reduce emissions are sufficient to reduce the cumulative impact to below a level of significance. Cumulative impacts are deemed significant and unmitigable.

5.3.8 Hydrology/Water Quality

5.3.8.1 Surface Water Quality

Existing conditions for cumulative impacts to surface water quality are similar to those described for direct impacts from the project described in Section 4.10 of this EIR. The Master Plan of the Sycamore Landfill would not change regional storm water flow patterns. The storm water collection system has been designed to convey run-off along benches and access roads and ultimately discharge the flows into sedimentation/detention basins. The post development landfill storm water peak flow offsite has been designed to match the predevelopment storm water flow offsite. As storm water is conveyed to the basins it will pass through a series of Best Management Practices (BMPs) to reduce the potential for contaminants to be released from the site. The BMPs are identified within the site's Storm Water Pollution Prevention Plan (SWPPP) and are updated yearly to respond to changing site conditions and

technological advances. Current BMPs utilized at Sycamore Landfill are listed in the facility's SWPPP, found in Appendix L of this EIR.

The storm water monitoring program for the landfill that is included within the SWPPP has been prepared as required by the General Permit. All landfill facility operators are required to perform visual observations of storm water discharges, and to collect and analyze samples twice yearly for the following constituents within the storm water:

- Specific Conductance
- pH
- Oil and Grease
- Iron (Fe)
- Total Suspended Solids (TSS)

Sample collection and visual observations are only required during the normal operating hours of the facility. The SWPPP requires that storm water is sampled from the site during the first hour of the first recordable storm event during the year and at least one other storm event during the year. The samples are taken from areas that represent the quality and quantity of the facility's storm water discharges. These locations are shown within the SWPPP.

This plan is reviewed yearly and revised to address the current operational conditions at the landfill and to identify the best management practices (BMPs) that are to be implemented prior to the rainy season to control stormwater discharge from the site. The General Permit identifies the implementation of BMPs for compliance.

As indicated in the Basin Plan, the San Diego Regional Water Quality Control Board (SDRWQCB) has not established numerical effluent limitations for storm water discharges due to the complex and ephemeral nature of storm water discharges. This is consistent with the EPA's August 1996 "Interim Permitting Approach for Water Quality Based Effluent Limitations in Storm Water Permits." However, the General Permit does provide non-numeric (narrative) effluent limitations. The General Permit specifically states that the effluent limitations shall:

1. Not exceed any numerical limitation imposed (where they have been set for a particular type of discharge); note that no numerical limitation has been set for landfills.
2. Not contain a hazardous substance equal to or in excess of a reportable quantity listed in 40 CFR Part 117 and/or 40 CFR Part 302.
3. Reduce or prevent pollutants associated with industrial activity in stormwater discharge and authorized non-storm through implementation of BMPs.

Sycamore Landfill is currently permitted for the disposal of municipal waste and is in compliance with the storm water General Permit issued by the State of California. The continued control of the discharge of storm water flows to match predevelopment conditions, the yearly implementation of BMPs, and the yearly sampling and analysis of storm

water (2 events per year) are designed to limit the potential for contamination that may leave the landfill site within the storm water.

The U.S. EPA requires that landfills monitor stormwater runoff for Total Suspended Solids (TSS) and iron (U.S. EPA, 1999). In addition, the San Diego RWQCB requires testing for oil and grease, pH and specific conductance. The storm water discharged from the Sycamore Landfill ultimately flows to the Lower San Diego River. The San Diego River is the second largest hydrologic unit in San Diego County, with a land area of approximately 440 square miles. The proposed Master Plan of the Sycamore Landfill includes approximately 340 acres of waste filling area, which is approximately one tenth of one percent of the hydrologic unit.

The mouth of the San Diego River discharges into the Pacific Ocean at the community of Ocean Beach. Beach postings and closures from elevated levels of coliform bacteria more than doubled between 1996 and 1999 due to urban runoff and sewage spills. In addition to the elevated levels of fecal coliform the river has also had high levels of Biological Oxygen Demand (BOD), phosphorous from fertilizers, and total dissolved solids (TDS). These pollutants (fecal coliform, BOD and TDS) are identified as the ones causing impairment of the Lower San Diego River in the most recent CWA Sec. 303(d) listing (EPA, 2002).

As stated above, the landfill currently monitors the concentrations of iron, oil and grease and total suspended solids (TSS) and monitors the index water quality standards for specific conductance and pH as required by the General Permit, since these are the parameters expected to be of concern at solid waste landfill facilities. None of these constituents or indices has been identified as causing water quality impairment within the Lower San Diego River. In their guidance manual for monitoring and reporting requirements for the NPDES stormwater permit (U.S. EPA, 1999), the EPA identified a broad array of potential compounds of concern for a wide spectrum of industrial activities. In Exhibit 2 of that document, BOD was identified as a parameter to be monitored for manufacturing operations for fats and oils, and for airports that have deicing activities, but not for landfills. Phosphorus was identified as a parameter for operations producing agricultural chemicals, but not for landfills. No industrial activity was identified as a source of fecal coliform or TDS contamination. Based on this discussion, the Master Plan for the site would not contribute to the cumulative impairment of water quality within the Lower San Diego River. Therefore, cumulative impacts to surface water quality would be below a level of significance.

5.3.8.2 Surface Water Quantity

As discussed in Section 4.10.1.1 of this EIR, the existing and proposed landfill surface water management system, in conformance with requirements of 27 CCR 20365, is designed to capture the 100-year return storm event in sedimentation basins. Discharge of peak storm flows from the basins and at the culvert under SR-52 would be 565 and 876 cfs, respectively, less than current peak flow levels. See EIR Section 4.10.2.2 and Appendix P. As a result, there would be no increase in storm water flows from Little Sycamore Canyon from implementation of the proposed Master Plan, and therefore no additional contribution to stormwater flow downstream.

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5.3.8.3 Ground Water Quality

Information regarding current landfill effects on local groundwater quality are presented in Section 4.10 of this EIR, and in EIR Appendix K. In general, the existing landfill has had low to no impacts upon inorganic compound concentrations or characteristics of the local groundwater, compared to measurements from an upgradient control well. The only significant groundwater quality impact associated with the existing landfill was the detection of volatile organic compounds (VOCs) in the early 1990s in monitoring wells southwest of the landfill. This impact is considered to be the result of the migration of landfill gas below the unlined portions of the existing landfill. Levels of VOCs in downgradient wells have since been generally reduced to less than MCL through implementation of a landfill gas extraction system, and through removal of contaminated groundwater from the area where VOC contamination was detected.

Future contamination of groundwater as a result of proposed Master Plan activities would be minimized through multiple design and operational measures, as identified in Section 4.10.3.2 of this EIR. These include continued lining of the bottom and sides of the landfill to preclude infiltration of leachate or landfill gas; continued installation and operation of leachate collection systems and proper management of the leachate collected; continued installation and operation of landfill gas collection systems; continued prohibition of disposal of hazardous wastes; continued monitoring and reporting of water quality; and continued oversight of landfill operations relative to water quality by the RWQCB and the San Diego LEA.

No other existing, approved, planned or proposed source of VOCs is known to be located within one mile of the proposed landfill expansion. The Santee Lakes wastewater treatment lakes are located approximately 3/4 mile east of the landfill, outside of the Little Sycamore Canyon drainage. In addition, Mission Trails Equestrian Center is now open approximately 3/4 miles south of the landfill, south of SR52. The proposed Castlerock residential development is approximately one-half mile east and southeast of the landfill. However, none of these facilities are known or expected to result in discharges of VOCs into the local groundwater. Therefore, the landfill expansion has been designed in accordance with all applicable RWQCB regulations and standards. Compliance with these standards by the discussed project elements would preclude direct and cumulatively considerable hydrology/water quality impacts.

5.3.8.4 Transmission Line Relocation

As described in Section 4.3 of this EIR (Impact 4.3.13), the transmission line relocation would permanently disturb 0.39 acre of land containing sensitive habitats, to be used for structure sites and short spur roads to those sites. Of that area, 0.22 acre are within the MHPA while 0.17 acre are outside. In addition, the construction process would temporarily disturb up to 17.35 acres of sensitive habitats, of which 8.75 acres are within the MHPA, and 8.6 acres are outside it. Any portions of the area of temporary disturbance in which soil may be laid bare would be revegetated using the seeds of native plants present in the area. Measures to minimize erosion effects of the construction process are detailed in SDG&E Project Protocols 3, 4, 5, 6, 7, 37, 38, 55, 56 and 65, provided in Appendix B of this EIR. However, a summary of these protocols is provided below.

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3. States that project construction shall be designed and implemented to avoid or minimize erosion, and describes anticipated erosion repair and revegetation activities.
4. States that existing vegetation shall be left in place, and original ground contour maintained wherever feasible.
5. Where site recontouring is required, there would be restoration of the original contours, reseeding if required, installation of cross drains, placement of water bars on roads to remain open, and filling of ditches. Appropriately sized equipment would be used to minimize ground disturbance.
6. Potential hydrologic impacts would be minimized through use of BMPs such as water bars, silt fences, staked straw bales, and mulching/seeding of disturbed areas.
7. Prior to construction, all project personnel would receive training regarding appropriate work practices to implement the Protocols and to comply with applicable environmental laws and regulations, including erosion control and BMPs.
37. All new access roads not required as permanent access for project maintenance or operation would be permanently closed, unless the City of San Diego requests that it remain open as a potential recreational trail connection.
38. SLI, with input from SDG&E, would obtain any required General Permit for Storm Water Discharges With Construction Activity (NPDES permit) authorization from the SWRCB and/or RWQCB to build the project and implement SWPPP erosion control.
55. An "Erosion Control and Sediment Transport Control Plan" for the transmission line relocation would be included with project grading plans submitted by SLI to the City of San Diego for review and comment. The Plan would designate BMPs to be implemented during construction.
56. In order to minimize release of PM₁₀ particulates, project personnel would apply soil stabilizers to inactive construction areas as needed, and would place perimeter silt fencing around any stockpiles of soil or other excavated materials.
65. In disturbed areas where construction has caused soil compaction, soils would be decompacted as necessary prior to seeding and reclamation.

As a result of the nature, location, and limited extent of the proposed construction work, and the protocols to be used to minimize erosion and potential water quality impacts, no significant impacts to surface water or ground water quality are anticipated as a result of the transmission line relocation. No other construction work is proposed to occur in the vicinity of the proposed transmission line corridor during the same period. Any landfill construction or excavation associated with the Master Plan would occur years later.

5.3.9 Geology/Soils

No significant direct geologic impacts associated with the proposed landfill Master Plan were identified in Section 4.9 of this EIR. Potential seismic hazards must be addressed by every project to the satisfaction of reviewing agencies.

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Seismic stability of the landfill and of excavation or filling associated with landfill ancillary facilities will comply with all applicable stability standards enforced by the California Integrated Waste Management Board, the City of San Diego LEA, the San Diego Regional Water Quality Control Board, and the City of San Diego Development Services Department (ancillary facilities). Similarly, transmission line design and construction must comply with seismic and stability standards set by the California Public Utilities Commission. The landfill site is not adjacent to or within one-quarter mile of any other existing, planned or proposed development. Potential geologic impacts associated with the landfill or its associated transmission line relocation could not combine with those of adjacent projects or other projects nearby to result in a cumulative geologic impact.

The surface water management system of the landfill Master Plan has been described in Section 3.2.1.1 of this EIR. It minimizes the amount of water reaching the waste by diverting water flows away from the landfill working face. In this system, perimeter roads and drainage channels intercept runoff from upland areas outside the waste disposal footprint, temporary diversion ditches within the future footprint that divert water from the active areas, and temporary retention ponds and drainage channels associated with each new disposal area or cell. All surface water from the landfill, except for that at the working face, is to be routed to two new sedimentation basins south of the landfill. Erosion control measures at the landfill are defined in the BMPs found in the SWPPP (Appendix L of this EIR). The following BMPs are currently utilized at Sycamore Landfill for erosion control, and, it is anticipated, will be continued under the new SWPPP for the Master Plan.

<u>BMP ID</u>	<u>Description</u>	<u>Location</u>
ESC10	Seeding and Planting	Site wide
ESC11	Mulching	Site wide
ESC32	Slope Drain	At slope faces to direct water to channels
ESC40	Outlet Protection	Riprap at base of slope drain outlets
ESC41	Check Dams	In drainage ditches and inlets to down drain pipes
ESC42	Slope Roughening/Terracing	Site wide
ESC50	Silt Fence	Site wide
ESC52	Sandbag Barrier	Site wide
ESC54	Storm Drain Inlet Protection	Rock filter at all inlets, and filter fabric around inlet risers
SC76	Storm Channel/Creek Maintenance	Site wide

As discussed in Section 4.9 of this EIR, potential erosion impacts would be precluded through the phasing of soil disturbance associated with the project, and through implementation of the BMPs listed above. Since no other development projects are anticipated in the project area at the same time, no cumulative erosion impacts would occur.

5.3.10 Other Environmental Topics For Which the Proposed Project Has No Significant Cumulative Impacts

EIR Sections 7.1, 7.2, 7.3, 7.5, 7.6, 7.7, and 4.8, respectively, discuss that no direct project impacts were identified regarding population/housing, water conservation, recreation, public services, public utilities, public health/safety/hazardous materials, or historical resources. Therefore, the project would not contribute to any potential cumulative impact associated with these topics because the combined impact of the project and the cumulative projects are not significant and the project's incremental effect is not cumulatively considerable. The Section 7.4 discussion of potential energy issues found that, while continued landfill excavation, filling and operation would require the use of additional energy over the anticipated 30+ years of operation, no alternative landfill would be expected to use less energy, as a result of the project site's location relative to population served, and the efficiencies of continued development on an existing site. In addition, the air quality analysis found that up to 45 MW of electrical power could be generated from landfill gas collected at the site, thus requiring less reliance on other, new additional power sources. Use of this resource would support the City's effort to promote local "energy independence." Therefore, no cumulative adverse energy impact is anticipated as a result of implementation of the project.

6.0 OTHER ENVIRONMENTAL CONSEQUENCES

6.1 GROWTH INDUCEMENT

A project is regarded as growth-inducing if it can foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment (CEQA Guidelines Section 15126.2(d)). Included in this definition are projects that would remove obstacles to population growth, such as extending public services into previously unserved areas. Growth inducement can also be defined as an action that would encourage an increase in density of development in surrounding areas or encourage adjacent development. The Guidelines state that growth should not be assumed to be beneficial, detrimental, or of little consequence of the environment. [Guidelines Section 15126.2(d)].

Because of the nature of landfills, they are often located in less intensely developed areas. Landfills generally do not introduce features that immediately draw new development toward their boundaries. The proposed project would not expand infrastructure into an undeveloped area thereby providing the opportunity for growth. The proposed landfill would not open or add new roads, except for internal roads within the landfill site, and for the access to the relocated transmission lines. The project does not require any substantive expansion of sewer services or other infrastructure, which would normally be associated with residential or commercial developments entering into undeveloped areas. Reclaimed water for landfill expansion dust control and landscape use would continue to be provided by the Padre Dam Municipal Water District. That District would also provide potable water and sewer services for the landfill administration offices.

While the landfill operations are generally not considered to be an inducement for immediate new development on adjacent properties, neither have landfill operations significantly discouraged development. Development has occurred near Otay Landfill and the former San Marcos Landfill in San Diego County, and at other locations in Southern California. The proposed Castlerock residential development is located within one-third mile of Sycamore Landfill.

Construction, operation and closure of the landfill expansion would modestly contribute to area economic activity by increasing personal income through payroll, and through local purchases of equipment, materials, and supplies. Because no more than 45 or 50 new workers would be needed at the landfill, even at peak operation, the construction, operation, and closure of the landfill would tend to sustain rather than induce additional population growth (SLI, 2004).

An increase in regional landfill capacity does not directly restrict or promote new development. Waste disposal is not restricted by the availability of local landfills in the same way that sewage disposal and water supply needs must be

accommodated by the local systems. Solid waste can be hauled to other distant areas by long haul trucks or rail haul, although at increased costs. Therefore, the project would not directly contribute to an increase in growth in the City of San Diego or the City of Santee. Also, relocation of the existing transmission lines would not induce growth since it only accommodates landfill expansion and would not result in increased electrical transmission capacity.

In summary, the proposed landfill expansion would not result in substantial or unplanned economic or population growth. The project is a part of the total solid waste disposal system which serves both existing and anticipated future development in the region of the City of San Diego. Thus, the Sycamore Landfill Master Plan project should not be considered growth inducing to the area, but as a project that would meet the continuing need for refuse and municipal solid waste disposal sources in the City of San Diego region. The proposed landfill expansion would serve to accommodate the projected growth of the region.

6.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

The construction and implementation of the project would require the commitment of energy, materials and human resources. This commitment of energy, personnel and building materials would be commensurate with that of other landfill projects of similar magnitude.

Existing on-site natural resources would be eliminated within the area of the landfill footprint. Primary resources that would be eliminated include the incremental loss of soil resources, undeveloped land/open space, and the long-term displacement of native habitats and species on approximately ~~44.64~~ 43.72 acres of sensitive habitat (~~44.27~~ 38.66 acres due to the landfill; and new ancillary facilities; ~~and~~ 4.69 acres of construction buffer zone; and 0.37 acre due to the transmission line).

The undeveloped Sycamore Landfill site possesses aesthetic value since it serves as an undeveloped open space adjacent to the Mission Trails Regional Park. Additionally, portions of the project site are visible to existing residents and drivers along SR-52 and in the City of Santee.

On-going maintenance and closure of the project site by the applicant would entail a further commitment of energy resources in the form of fuel and electricity. This commitment would be a long-term obligation in view of the fact that, practically speaking, it is impossible to return the land to its original condition once it has been developed. However, as discussed in Chapter 7, the impacts of increased energy and electricity usage would not be considered significant adverse impacts. Similar commitments of energy would be required to provide landfill capacity at any alternative site.

In summary, implementation of the Sycamore Landfill Master Plan would involve the following irreversible environmental changes to the existing on-site resources:

- The commitment of approximately ~~43.44~~ 38.66 acres of additional native habitat to landfill, ancillary uses, and to transmission line relocation. Biological impacts associated with such development would be mitigated

through preservations of nearby similar lands, per City of San Diego Biological Guidelines. Upon closure, the entire landfill site would be revegetated with native plants, including native grassland, and would remain as open space.

- Commitment of energy and water resources as a result of the construction, operation and maintenance of the proposed landfill facility.
- Alteration of the existing topography and the character of the site.
- Alteration of visual quality viewed from neighboring areas.
- Consumption of soil resources.
- Use of fossil fuels to operate fixed and mobile construction equipment including bulldozers, graders, trucks, dump trucks and generators.
- Direct and indirect impacts on biological resources on the site, including native plant communities, birds and mammals.
- Removal of, or potential destruction of paleontological resources on the site.

7.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

The City of San Diego Environmental Analysis Section of the Land Development Review Division determined that an EIR was required to be prepared for the Project, and to address the following significant issues: land use, aesthetics/neighborhood character, landform alteration/visual quality, biological resources, historical resources, paleontological resources, hydrology/water quality, geology/soils, traffic/parking, noise, air quality, public safety/hazardous materials/brush management, and utilities. State CEQA Guidelines, Section 15128, requires that a draft Environmental Impact Report (EIR) contain a brief statement disclosing the reasons why various possible significant effects of a proposed project were found not to be significant and, therefore, would not be discussed in detail in the draft EIR. Impacts associated with the following environmental issues are not considered significant. The reasons for the conclusions of non-significance for each of these issues are provided below.

7.1 POPULATION/HOUSING

7.1.1 Landfill Expansion

State CEQA Guidelines, Appendix G, Items XII (b) and (c), state that a project may normally be considered to have a significant effect on the environment if it would displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere. No housing or people would be displaced, as none are now present on or adjacent to the project site. It is not anticipated that the landfill expansion would significantly alter the characteristics of population within the area. Therefore, no direct or cumulative impacts to population or housing would result from the landfill expansion.

7.1.2 Transmission Line Relocation

The relocation of the transmission line would not result in the displacement of housing or people, since no housing or people are located along or adjacent to the transmission line relocation route. Therefore, no direct or cumulative impacts would result from the transmission line relocation.

7.2 WATER CONSERVATION

7.2.1 Landfill Expansion

In 2003, the landfill operation used an estimated 20,000 gallons/day of reclaimed water for dust control measures including road rewetting (personal comm., Nate Lawrence, Padre Dam Municipal Water District (PDMWD), 6/13/03). This equals approximately 22 acre-feet of water per year. PDMWD signed an agreement with Sycamore Landfill, Inc. (SLI) on July 1, 2001 to provide recycled water to the landfill. This water is used for site dust control, for irrigation of landscaped areas, and for temporary irrigation of biological restoration areas. By the summer of 2006, reclaimed water use had increased to approximately 105,000 gallons per day, as a result of additional water use for the

aggregate processing operation, and temporary irrigation of the wetlands restoration south of the landfill (Carollo, 2006). Since the wetlands irrigation has since been terminated, reclaimed water use has decreased to approximately 50,650 gallons per day (SLI, Oct. 5, 2007; BRG Consulting spreadsheet). Based on that value, calculations in the Carollo report, and BRG projections, the landfill expansion is expected to require no more than 90,750 gallons of reclaimed water per day (2010), declining to 68,250 gallons per day in 2028. These calculations assume that irrigation required for landfill closure/revegetation would take place over a period of eight years (48 acres per year), and include dust control water required for transmission line relocation discussed below. Padre Dam Municipal Water District has indicated that it is willing to continue to provide reclaimed water as required by the landfill expansion for the foreseeable future (PDMWD meeting of November 12, 2003). Projected quantities of water required for the landfill expansion are less than quantities provided by PDMWD in 2006, and are would decline over time to a level no more than 35 percent above current usage. Potable water usage for the new administration, maintenance and scale house facility would not increase more than 1,000 gpd. Reclaimed water usage for these structures for uses such as vehicle wash, fire suppression, etc. would be less than 1% of the total for other reclaimed uses onsite. Therefore, since no new supply of potable water would be required for landfill expansion operation, and an adequate supply of reclaimed water is available from PDMWD, no significant impact to water conservation is anticipated.

7.2.2 Transmission Line Relocation

The relocation of the transmission line would require a temporary increase in reclaimed water for dust control during construction. This is estimated at approximately 5,000 gallons per day or approximately four acre-feet if annualized over one year, and is included in the additional water requested for landfill operation and development. However, after the construction period, no water would be required for the operation of the transmission line. Because this amount of reclaimed water would be provided by SLI out of the Padre Dam MWD water delivered to the site, and the use would be temporary,, no direct or cumulative impacts to water conservation would result from the project.

7.3 RECREATION

7.3.1 Landfill Expansion

The project would continue the development of an existing landfill, increasing the solid waste disposal "footprint" by approximately 35 acres, compared to the existing permitted area of landfill disturbance [Table 3.2-21]. No existing or planned recreational facilities are located within or adjacent to the proposed project location. The project would not increase the demand for use of such facilities. The only identified trail under consideration for connection to the County's Goodan Ranch would follow Sycamore Canyon, located approximately one mile east of the landfill site. However, there are existing informal trail connections between the existing Spring Canyon trail and the west side of the landfill property. SLI is committed to working with the City Department of Parks and Recreation and SDG&E to identify potential trail opportunities. However, no specific trail opportunities have yet been identified. Of course, if developed during landfill operation, any such trails would need to be sited and operated to maintain public safety, and

potential trail impacts to biological resources that may be present would need to be addressed and mitigated in accordance with the City's MHPA adjacency guidelines. Such impacts are unknown at this time since no specific trails have been proposed. After landfill closure, additional trail connections through and around the site would be possible but are not part of the current Master Plan. Therefore, no direct or cumulative impacts to recreation facilities would result from the landfill expansion.

7.3.2 Transmission Line Relocation

Since no existing or proposed recreation facility is located in or adjacent to the route proposed for relocation of the transmission line, and the project would not generate any demand for recreational use, there would be no loss of or impact to any recreational land or facilities. In addition, SDG&E would work with SLI and the City to explore potential trail connections with MTRP that follow existing transmission line access roads/trails. Therefore, no direct or cumulative impacts to recreation facilities would result from the project.

7.4 ENERGY

7.4.1 Landfill Expansion

As discussed in Section 6.2, development, operation and closure of the landfill would require energy, which consumption is irreversible should the project be implemented. The major energy issue under CEQA, however, is whether the amount of energy used is considered "excessive." This issue must be addressed relative to feasible alternatives, and is addressed in the following discussion.

Sycamore Landfill, like any modern landfill, utilizes energy in four activities: site excavation, waste haul, waste filling/compacting, and final cover/closure.

Approval of the Master Plan's approximately 35-40 million cubic yards (mcy) of excavation at the landfill site could accommodate an additional 86 mcy of municipal solid waste (Table 3.2-12). Each cubic yard of excavation would accommodate more than two cubic yards of disposal capacity. Therefore, the Master Plan is efficient relative to excavation energy use, and thus would not result in excessive energy use for this purpose.

The current population centroid of San Diego County is located near I-15 and Miramar Road (~~pers. prev. comm.~~ Ed Schaefer Schaefer, SANDAG, 2003/2004). Sycamore Landfill is located approximately 10 miles from that centroid, and is the closest landfill to the County population centroid. Miramar Landfill is located a similar distance, while Otay Landfill and the as-yet unapproved landfill site at Gregory Canyon are each located approximately 25 miles from the centroid. Because Sycamore Landfill is the closest landfill to the San Diego County population centroid, waste haul truck trips would use less fuel for a given quantity of waste to be disposed there than at any other approved or possible landfill site in the County of San Diego. Therefore, the Master Plan would not result in excessive energy use for this purpose.

Waste compaction and final cover/closure utilizing trucks, compactors, and bulldozers are standard procedures that are required to be done at every landfill. Sycamore Landfill would utilize no more or no less energy for this procedure than any other landfill. Therefore, the Master Plan would not result in excessive energy use for waste compaction nor for final closure.

In addition to energy use for site excavation, waste haul, waste fill/compaction, and final closure, Sycamore Landfill also provides for energy production from landfill gas. This landfill gas, composed of methane and carbon dioxide, is a byproduct of solid waste decomposition. The gas is collected in a system of perforated collection pipes within the landfill, and is either used to generate electrical power or is burned in a flare system. Approximately 1600-1800 cubic feet per minute (CFM) of the gas is utilized in a cogeneration power plant, accounting for approximately two-thirds of the current landfill gas production. The cogeneration power plant operated by a third party firm, Gas Recovery Systems, Inc., is located immediately south of the landfill, and now generates approximately 4.2 megawatts (MW) of electric power, enough for approximately 4,000 homes (personal comm., Thomas Harken, GRSI, 6/26/03), as a result of the addition of a new unit, approved by the City of San Diego on November 21, 2003. Power production from the landfill gas is a net benefit to local power supplies, taking a resource that would otherwise be lost, and producing power that would otherwise need to be provided by an additional power plant. Landfill gas not utilized for electric power production is burned in a flare system located near the cogeneration plant.

7.4.2 Transmission Line Relocation

The relocation would use energy in hauling materials and erecting structures. Such energy use has been estimated by Emcon/OWT at approximately 94,600 gallons of fuel (diesel and gasoline) (Emcon/OWT, 2004 and SDG&E). However, if the transmission line were not relocated, then the landfill would not be able to expand to meet the County waste disposal needs. Not relocating the line would eventually result in the need for a new landfill that would require more energy to develop and operate than what is needed to expand the existing Sycamore Landfill, including the energy to relocate the transmission lines. Therefore, no direct or cumulative excessive energy impacts would result from the proposed transmission line relocation.

7.5 PUBLIC UTILITIES

7.5.1 Landfill Expansion

Reclaimed water for use in landfill operations is provided by Padre Dam Municipal Water District (PDMWD) to a valve located in the landfill entry area near Mast Boulevard and West Hills Parkway. Potable water is provided to the entry area landfill offices from Padre Dam Municipal Water District potable water lines. Currently the landfill utilizes approximately 56,650 gallons/day of reclaimed water and 6,500 gallons/day of potable water. The potable water supply serves the existing modular offices, which contain five standard toilets and wash basins. These currently drain into a septic holding tank system. Bottled water is provided for drinking at the scale house and administration

buildings, and would be provided to the maintenance facility. Sanitary facilities elsewhere in the landfill site consist of portable toilet facilities located near active areas of the landfill.

No sewer connection is being proposed. The limited amount of wastewater generated at the administrative offices, scales and maintenance facility would be disposed as it is currently, using regularly-pumped septic holding tanks, in accordance with requirements of the County of San Diego, Department of Environmental Health (DEH). Project personnel have met with DEH personnel, and obtained conceptual agreement that a system of septic holding tanks are appropriate to the site. Specific design details of the tank system would be overseen by DEH. The holding tanks would be pumped regularly and the contents disposed at an authorized wastewater treatment plant, as is done for wastewater at the site now.

Electric power is provided to the existing entry area landfill offices, and to the cogeneration plant, by SDG&E via a 12kV wood-pole power line that passes through the entry area, and which follows the landfill access road. SBC Communications provides telephone landline connections for landfill offices and the cogeneration plant from telephone lines that are attached to the power line poles.

The project would not significantly affect existing utilities. Landfill administrative offices would be developed in the portion of the site currently used for the scale house and for the existing modular offices. The scales area would be moved to a location approximately 0.6 mile closer to the landfill. Utility companies serving the site would continue to provide service levels necessary to ensure continued site operation. No disruption in service would occur to adjacent properties during construction of the project. Therefore, no direct or cumulative impacts to public utilities would result from the landfill expansion.

7.5.2 Transmission Line Relocation

Relocation of the transmission line would be done by SDG&E, utilizing procedures approved by the California Public Utilities Commission. Accordingly, the relocation would be done in a manner that would avoid any significant impacts to public utilities.

7.6 HUMAN HEALTH/PUBLIC SAFETY

7.6.1 Landfill Expansion

Sycamore Landfill, Inc. (SLI) operates as a conventional Class III landfill in conformance with Title 27 of the California Code of Regulations (CCR). It is designed and regulated to protect human health and public safety. The landfill does not accept liquid, designated, or hazardous wastes as defined in CCR 27. "Designated waste" is defined as: *"Nonhazardous waste that consists of, or contains, pollutants that, under ambient environmental conditions at a waste management unit, could be released in concentrations exceeding applicable water quality objectives or that*

could reasonably be expected to affect beneficial uses of the waters of the state as contained in the appropriate state water quality control plan." Current operations include load checking, and daily compacting and covering of refuse with soil. The load checking ensures that incoming loads are screened for hazardous substances not accepted by the landfill, and that any inadvertent "hot loads" are directed to an appropriate area for fire control. Landfill load-checking and other hazardous materials procedures are documented in the current RDSI document (A-Mehr, Inc. October 2000), particularly in EIR Appendix O, the Hazardous Waste Exclusion Program. The landfill also prepares and regularly updates their Hazardous Waste Business Plan, prepared in compliance with the California Health and Safety Code, Division 20, Chapter 6.95. The purpose of this Plan is to provide hazardous materials information to local emergency services organizations who may need to respond to situations at the landfill site. The Plan is available for review at the landfill office, and also at the San Diego County Department of Environmental Health, Hazardous Materials Division. The daily cover eliminates the potential of a fire spreading to the landfill/refuse area, and serves as a deterrent for vectors such as birds, rodents, and flies. Methods to deter vectors would not change from the current practice, and are in accordance with federal and state requirements for controlling vectors (personal comm., Jim Christy, City of San Diego LEA, 6/9/03).

Because the project seeks less than 35-acre change in the landfill's "footprint" area, and an increase in the height of the landfill, there would be no change from current operational practices regarding known health hazards such as fire and vectors, or with hazardous materials. These procedures comply with all applicable laws and regulations. Therefore, the landfill expansion would not result in any significant impact to human health, public safety, or hazardous substance releases.

Potential health risks associated with air pollutants resulting from the proposed project were addressed in EIR Section 4.7.2.2 A, and in EIR Appendix F1. Maximum health risks were found to be below the applicable thresholds for each potential risk.

A methane recovery system (cogeneration power plant) was installed at Sycamore Landfill in 1989, pursuant to terms of a methane recovery agreement with Gas Recovery Systems, Inc. Gas Recovery Systems continues to operate the facility under contract with SLI. This power plant operates under a permit issued by the San Diego County APCD. A new landfill gas flare system was constructed in 2000 to manage landfill gas generated in excess of the capacity of the electrical generating system. It also operates under an APCD permit. Any changes to either of these facilities would have to be reviewed and approved by APCD prior to implementation. However, anticipated emissions from these facilities have been addressed in the EIR, Chapter 4.7.

A Site Specific Gas Monitoring Plan was prepared for Sycamore Landfill in March 1998. This plan describes the network of nine permanent perimeter gas monitoring probes surrounding the landfill, which are used to verify that subsurface migrations of landfill gas is not occurring. It also establishes standard procedures for monitoring structures on the site, and for monitoring surface emissions. Because this system would continue, and be expanded

along with the landfill, health and safety issues arising from migrating methane gas would be less than significant (see Air Quality Section 4.4.7.40 of this EIR).

The landfill would have lined cells with a leachate collection system. Detailed procedures for managing leachate have been developed and implemented to assure the site would not experience a surface release of leachate that could affect the public. Spill containment and response plans are in place to respond to any accidental releases of leachate. These practices would be used with the expanded landfill, therefore, the impact to public health and safety from the proposed landfill expansion would be less than significant.

The project site is located south of property used for military training (MCAS Miramar). However, the landfill would not be expanded into the military lands, and current landfill construction or operating practices would not change. Based on an airspace analysis prepared by Williams Aviation (September 2005(a)), and parameters regarding MCAS Miramar air operations, the maximum allowable elevation of a structure at the Sycamore Landfill site would be 1,146 ~~1,366~~ feet AMSL. Since the proposed maximum landfill elevation is 1,050 feet AMSL, no landfill interference with MCAS Miramar air operations is anticipated. Therefore, the impact to military operations from the proposed landfill expansion would be below a level of significance. Potential airspace safety issues relative to Gillespie Field operations was also reviewed, and found to be below a level of significance.

Williams also conducted an airspace analysis regarding potential conflicts with airplanes using Gillespie Field. Since the proposed maximum landfill elevation of 1,050 feet AMSL would not exceed the threshold elevation at the site associated with Gillespie Field of 1,145~~6~~ feet, the proposed landfill would not exceed FAA airspace guidelines relative to Gillespie Field. Therefore, no significant landfill impact relative to air safety and Gillespie Field operations would occur. These conclusions were supported by the FAA's Determination of No Hazard to Air Navigation, filed September 10, 2008, in EIR Appendix V3.

7.6.2 Transmission Line Relocation

The existing SDG&E Mission-Miguel transmission line corridor passes diagonally through the landfill site. Relocation of the corridor is required in order to utilize the landfill site more efficiently for waste disposal. The location for the transmission corridor is along the western and northern boundaries of the landfill parcel (Figure 3-6).

Construction of structures within the relocated corridor, and removal of existing structures within the landfill area, would be done in accordance with all applicable SDG&E and CPUC safety procedures and regulations. Therefore, no significant impact to construction worker safety is anticipated.

The relocated transmission lines would comply with CPUC policies regarding electric and magnetic fields, and would implement magnetic field reduction through the use of optimal phasing (as is done with the existing transmission lines). The new transmission structures would be located within a 200-foot wide corridor, completely contained within

parcels owned by SLI, and planned for landfill use, with the exception of parcels 366-031-20, at the northwest corner of the landfill, and 366-040-32, northeast of the landfill.

The latter parcel is owned by the Poway Unified School District. There is no possibility of its use for residential purposes. Parcel 366-031-20 is currently privately owned. SLI is in negotiations to purchase the parcel from its owner. If the owner sells the parcel to SLI, it would be used to provide biological mitigation lands, and for a landfill buffer. No residential use would be allowed. If the parcel is not sold in fee to SLI, then an easement for the proposed transmission line corridor across that parcel would have to be obtained by SLI. In either case, no residential development would be allowed within or immediately adjacent to the transmission corridor. Therefore, given compliance of the new transmission corridor with all applicable state EMF policies, review and approval of the project by CPUC prior to any transmission line relocation, and the fact that no residential uses will be allowed within to the relocated transmission corridor, no significant EMF impact would occur.

One leg of the relocated transmission line corridor would be located parallel to, and just south of, the MCAS/Miramar boundary. The transmission line corridor would not enter MCAS/Miramar lands, but would be immediately adjacent to them for a distance of approximately 0.3 mile. A portion of the same transmission corridor crosses MCAS Miramar lands further to the east. These lands are used by the Marine Corps for training of their personnel. Features of the proposed project were known to Marine Corps representatives prior to preparation of their letter of April 22, 2003, in response to the project Notice of Preparation. However, that letter raised no potential conflict or safety issues relative to the proximity of the proposed transmission line. Williams also conducted an airspace analysis (September 2005(b)) regarding potential conflicts between the proposed transmission line structures, and air operations at MCAS Miramar and at Gillespie Field. Williams found that the new 230 kV transmission line structure at the northeast corner of the landfill site (identified as SYCAMORETXL9 in the Williams report) would have a base at an elevation of 897 feet AMSL, and a potential maximum height of 1,017 feet AMSL. Such a structure would exceed the 978 feet AMSL elevation of the Military Outer Horizontal Surface at that location by 39 feet. The project applicant has filed a Notice of Proposed Construction (FAA 7460-1) with the FAA, to request an official evaluation of the proposed transmission line structure. The FAA concluded that the proposed structure is not an impediment to flight procedures. See the FAA letter in Appendix V3.

FAA also evaluated potential conflicts with Gillespie Field operations. According to the Williams analysis, the proposed SYCAMORETXL9 structure would exceed the Gillespie Field Diverse Departure "A" airspace, which has a maximum elevation of 935 feet AMSL, by approximately 82 feet. However, this is based on an analysis assuming a climb gradient of 200 feet per nautical mile, while Gillespie Field's published climb rate is 270 feet per nautical mile. Based on the analysis, the FAA found that no hazard to Gillespie Field operations would occur as a result of the transmission line. Therefore, no significant public safety impact is anticipated as a result of transmission line relocation relative to MCAS/Miramar operations or to Gillespie Field operations.

7.7 Ground Water Quantity

7.7.1 Landfill Expansion

Under the Master Plan, no groundwater extraction wells are proposed.

The small amount of potable water needed for the administrative offices would be obtained, as it is currently, from Padre Dam Municipal Water District. Reclaimed water for use in landfill dust control and irrigation would be obtained, as it is currently, through an existing above-ground water line from Padre Dam Municipal Water District. The project would not affect water levels in the adjacent wetlands mitigation site located along Little Sycamore Creek south of the landfill, and would not affect water levels in any nearby wells. As noted before, the nearest downgradient water well is located more than a mile from the landfill. Under the Master Plan, an additional 12.6 acres of landfill access road and parking areas near ancillary facilities would be paved (Emcon, 2004). This might have the potential of reducing groundwater recharge to the area from surface infiltration. However, the landfill is not located in an area that utilizes well water for human consumption or other use, and so that the proposed paving would not impact groundwater recharge associated with any water well use. In addition, the project is required to comply with all state and city regulations with respect to water quality, and compliance with these standards would preclude direct and cumulatively considerable water quality impacts.

Under the existing SDP, approximately 179 acres below the deposited MSW would be lined with impervious materials to minimize potential ground water contamination from landfill leachate (Emcon/OWT, SLI, 2006). Under the Master Plan design, the lined area of the landfill would total approximately 249 acres, an increase of 70 acres (Emcon/OWT, SLI, 2006). Finally, at the time of landfill closure, approximately 358 ~~356~~ acres of the landfill area would be capped with impervious materials to minimize potential infiltration of precipitation into and through the landfill (Emcon/OWT, 2006). Thus, under the Master Plan, approximately 160 ~~158~~ acres of the landfill site would have substantial reductions in permeability from anticipated SDP conditions (Emcon/OWT, SLI, 2006). The project vicinity within a mile of the site relies primarily on imported water for its water supply, and there are no ground water wells within one mile down gradient from the landfill site. Therefore, there would be no significant impacts regarding ground water supply as a result of the project.

7.7.2 Transmission Line Relocation

Relocation of the transmission line would not require use of any groundwater, or paving of any area. Access roads to the transmission line structures would be simple graded unpaved roads. Any water required for construction dust control, or for initial watering of revegetated areas, would be obtained from the reclaimed water line at the landfill. Therefore, there would be no impact by the transmission line relocation to ground water resources.

7.8 GEOLOGY/SOILS

As discussed in EIR Section 4.9, potential erosion associated with the project would be minimized through adherence to State erosion control procedures, City grading standards, and implementation of the facility Stormwater ~~Stormwater~~ Pollution Prevention Plan (SWPPP). Potential erosion impacts of the project would be below a level of significance.

8.0 ALTERNATIVES

In considering the appropriateness of a project, CEQA mandates that alternatives to its implementation be discussed. Section 15126.6(a) of the State CEQA Guidelines requires the discussion of "a range of reasonable alternatives to a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Section 15126.6(f) further states that "the range of alternatives in an EIR is governed by the 'rule of reason' that requires an the EIR to set forth only those alternatives necessary to present a reasoned choice." Thus, the following discussion focuses on those alternatives that are capable of reducing or eliminating significant environmental impacts even if they would impede the attainment of some project objectives, or would be more costly. In accordance with Section 15126.6(f)(1) of the State CEQA Guidelines, among the factors that may be taken into account when addressing the feasibility of alternatives are: (1) site suitability; (2) economic viability; (3) availability of infrastructure; (4) general plan consistency; (5) other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the proponent can reasonably acquire, control or otherwise have access to an alternative site.

In developing the alternatives to be addressed in this section, consideration was given regarding their ability to meet most of the basic objectives of the project. These objectives are:

1. Make more effective use of a site already permitted for landfill use by reconfiguring the development plans to increase disposal capacity available for the citizens and businesses of the City of San Diego, and the region;
2. Increase the allowable daily tonnage and associated traffic into the landfill to assist in meeting current and future increased waste disposal needs of both the City and other jurisdictions in the region;
3. Relocate existing landfill entrance facilities (scales and recycling areas) to improve site aesthetics, traffic queuing, and safety for both facility customers and employees;
4. Utilize architectural designs for proposed ancillary facilities that are compatible with possible future incorporation of the landfill site into Mission Trails Regional Park;
5. Assist County of San Diego communities with implementation of their Source Reduction and Recycling Elements (SRREs), consistent with minimization of possible environmental impacts, by providing a new public off-load and recycling area that is separate from the commercial area, establishing a new C&D debris processing operation, and implementing other recycling operations;
6. Provide a convenient, nearby location for disposal of solid waste within the jurisdiction of the City of San Diego, with affordable and predictable costs to the City, both before and after anticipated closure of Miramar Landfill;
7. Provide a centralized location for disposal of solid waste that is located within the City of San Diego, ensuring that it will be operated in accordance with all applicable City codes, regulations and conditions over which the City has authority;

8. Provide a solid waste facility that complies with provisions of the Facility Franchise Agreement between the City of San Diego and San Diego Landfill Systems, Inc., owner of Sycamore Landfill, Inc., the landfill operator;
9. Extend the life of the county-wide landfill system (incorporated and unincorporated areas) and assist in fulfilling the City of San Diego's need for long term waste disposal in a facility that utilizes up-to-date environmental controls;
10. Assist the City of San Diego in its pursuit of "energy independence" by making maximum feasible use of landfill gas as a local power source;
11. Provide the City with an opportunity for increased revenues from tipping fee surcharges on increased tonnage; and
12. Allow for more efficient use of the landfill site by placing the existing transmission lines in a location that allows for the most effective use of the landfill footprint, while minimizing potential environmental impacts, and ensuring continued reliability and operation of the electric transmission system.

Based on the analysis contained in Section 4.0, the project, without mitigation, would result in significant direct or indirect impacts to land use, air quality, biological resources, visual quality and landform, noise, paleontological resources, traffic and circulation. With mitigation, remaining direct or indirect significant impacts would include air quality (NO_x, VOCs, odor), and visual impacts/landform changes associated with landfill development. Significant cumulative impacts would occur regarding air quality (PM₁₀, PM_{2.5}, NO_x and odors); cumulative greenhouse gases impact; cumulative impacts associated with native grasslands; visual impacts associated with other anticipated land development in the area; and traffic and circulation (peak-hour travel on SR-52). The alternatives identified in this analysis are intended to reduce or avoid identified impacts of the project.

In accordance with Section 15126.6(c) of the State CEQA Guidelines, the following analysis of project alternatives is preceded by a brief description of the rationale for selecting the alternatives to be discussed. In addition, alternatives are identified that were considered but rejected as infeasible in the course of preparing the draft EIR.

The reduced footprint alternative with the transmission line relocation to the west and north would be the environmentally-preferred alternative for near-term impacts because it would minimize potential biological impacts associated with the Master Plan project. However, it would have the effect of requiring a replacement landfill, with its anticipated impacts, five to six years earlier than would implementation of the Master Plan. It is anticipated that any such replacement landfill would have many significant environmental impacts of its own.

8.1 NO PROJECT ALTERNATIVE

The current Sycamore Landfill site comprises approximately 493-491 acres in Little Sycamore Canyon, of which approximately 150 acres have been disturbed to date by prior and on-going landfill operations. Consideration of the

No Project Alternative is required by State CEQA Guidelines Section 15126(e). Under the No Project Alternative, the site would continue to be developed under the approved 1994 Staged Development Plan and PDP/SDP 40-0765.

Features of the approved plan are shown in Figure 8.1-1 and 8.1-2. Approximately 324 acres of the site are permitted for disposal use under State Solid Waste Facility Permit 37-AA-0023 (October 2004), but only Stage I has been used for waste disposal purposes to date. Landfill Development Stages II, III and IV, comprising approximately 88, 35 and 28 acres respectively, have not yet been used for waste disposal. The remaining MSW disposal capacity available is estimated to be approximately 47 million cubic yards. An aggregate extraction and processing operation, originally located within Stage III, has been completed, and the aggregate operation has moved north to an unexcavated part of the SDP. No increase in daily truck trips or daily tonnage would occur under the No Project Alternative. No relocation of the existing transmission line corridor would be required.

8.1.1 Land Use

The No Project Alternative assumes no subsequent alteration of the MHPA boundary or necessity to acquire additional parcels. In addition, this alternative has been approved and deemed consistent with all applicable land use policies and regulations. However, Revision to the currently approved plans for the Solid Waste Facility Permit and the Waste Discharge Requirements would be necessary as a result of the termination of the former Navy lease of lands within MCAS Miramar and the need to modify the design at the northern end to keep surface water from ponding in MCAS Miramar. However, the regional need for disposal capacity would mean that another landfill site would have to be found, which would likely have land use impacts of its own.

8.1.2 Landform Alteration/Visual Quality

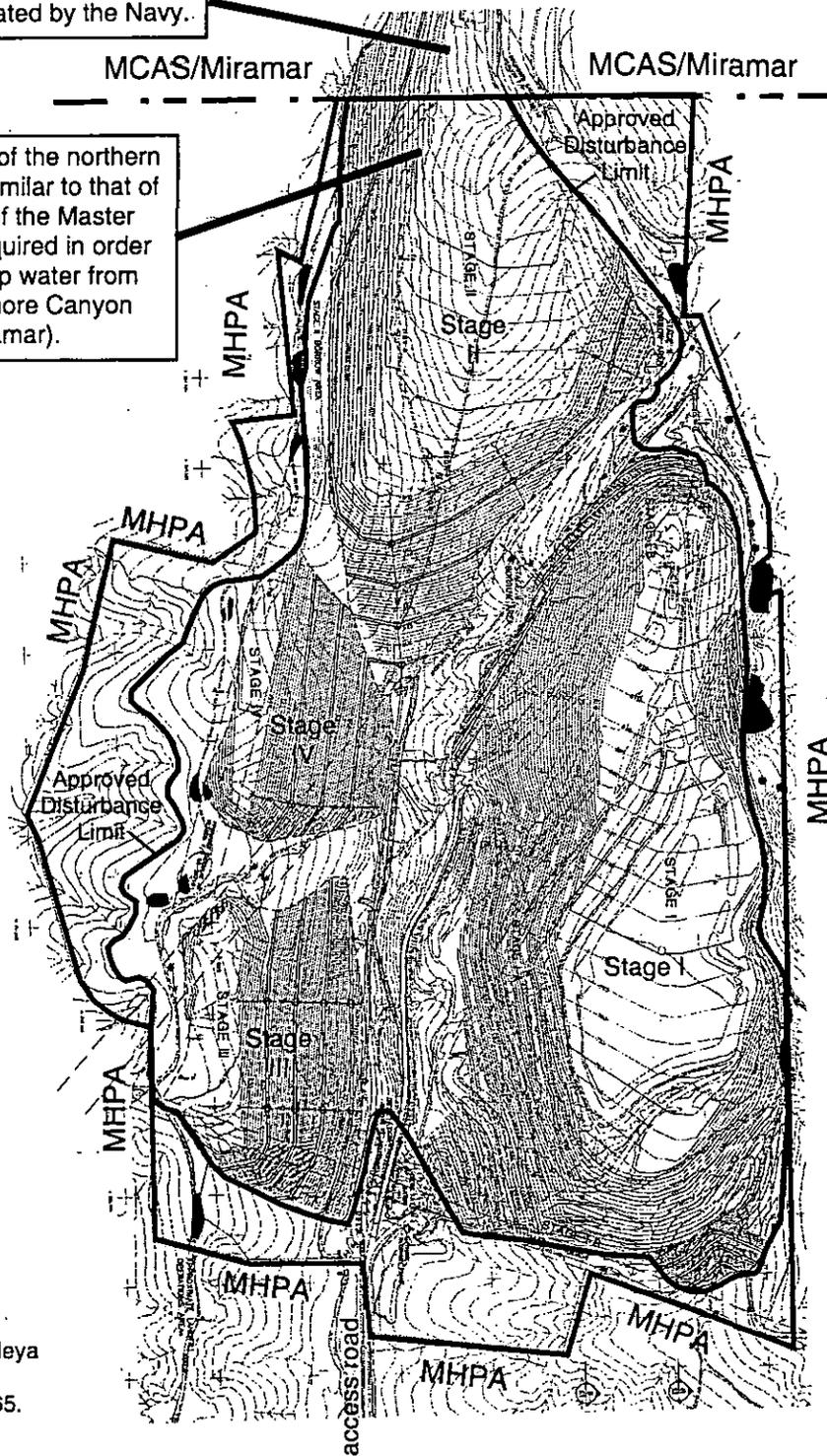
Under the No Project Alternative, landfill grading and filling is anticipated to be visible from Viewpoints 2 and 12 south of the landfill (see Figures 8.1-3 and 8.1-4). Also, see Section 4.2 of this document, Landform Alteration/Visual Quality, for a discussion on the selection process for the key viewpoints. However, the No Project Alternative would not create new significant visual impacts beyond those anticipated in the previous CUP or the PDP/SDP. Grading impacts would be addressed through the landfill's approved preliminary closure plan. Operational impacts would include the continuation of approved aggregate processing operations, but since this activity is located far from any key viewpoint, its visual impacts are considered less than significant.

8.1.3 Biological Resources

Biological issues associated with the No Project Alternative were addressed in MND 40-0765 for Sycamore Landfill Brush and Clearing. Full development of the landfill as allowed by existing state and regional permits would result in removal of more than 150 acres of native habitats within four development stages. A specialized grading permit

The former lease of this area by the County was terminated by the Navy.

Note: A redesign of the northern part of this plan, similar to that of the northern part of the Master Plan, would be required in order to collect and pump water from upper Little Sycamore Canyon (within MCAS Miramar).



Locations of Dudleya protected under PDP/SDP 40-0765.

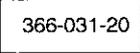
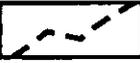
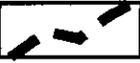
SOURCE: County of San Diego, 1994; BRG Consulting, Inc., 2007.

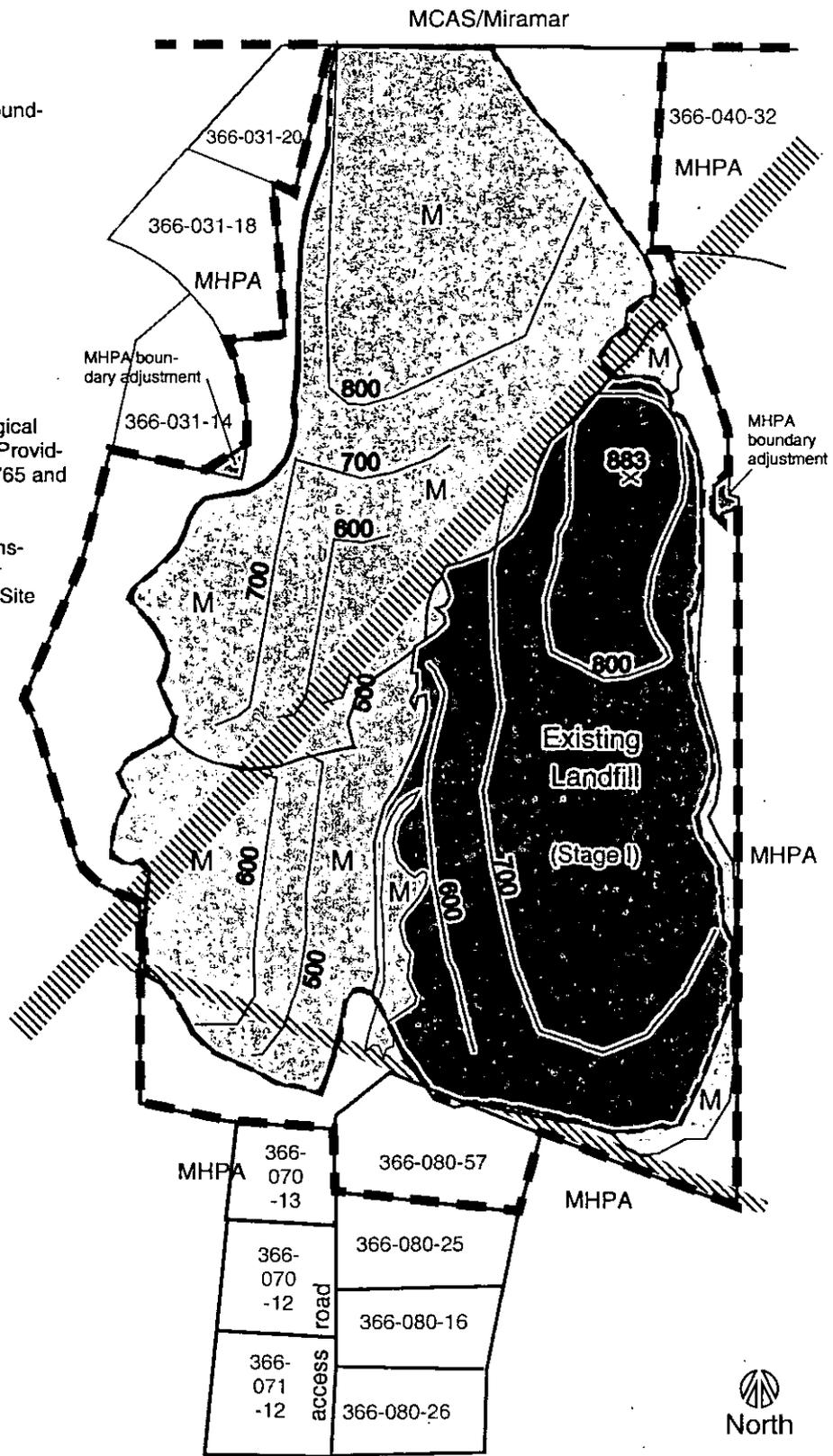
North
3/27/07

Sycamore Landfill Master Plan EIR
**No Project Alternative
(Existing Approved Plan)**

**FIGURE
8.1-1**

LEGEND

-  Assessor's Parcel Boundaries and Numbers
-  Limit of disturbance, approved 1994 Plan
-  MHPA Boundary
-  Final Grade (100-foot contours)
-  Area for Which Biological Mitigation Has Been Provided Under MND 40-0765 and HLP 95-008
-  Existing Electric Transmission Line Corridor Crossing the Landfill Site



SOURCE: Emcon, 2002-2004; BRG Consulting, Inc., 2003-2006.

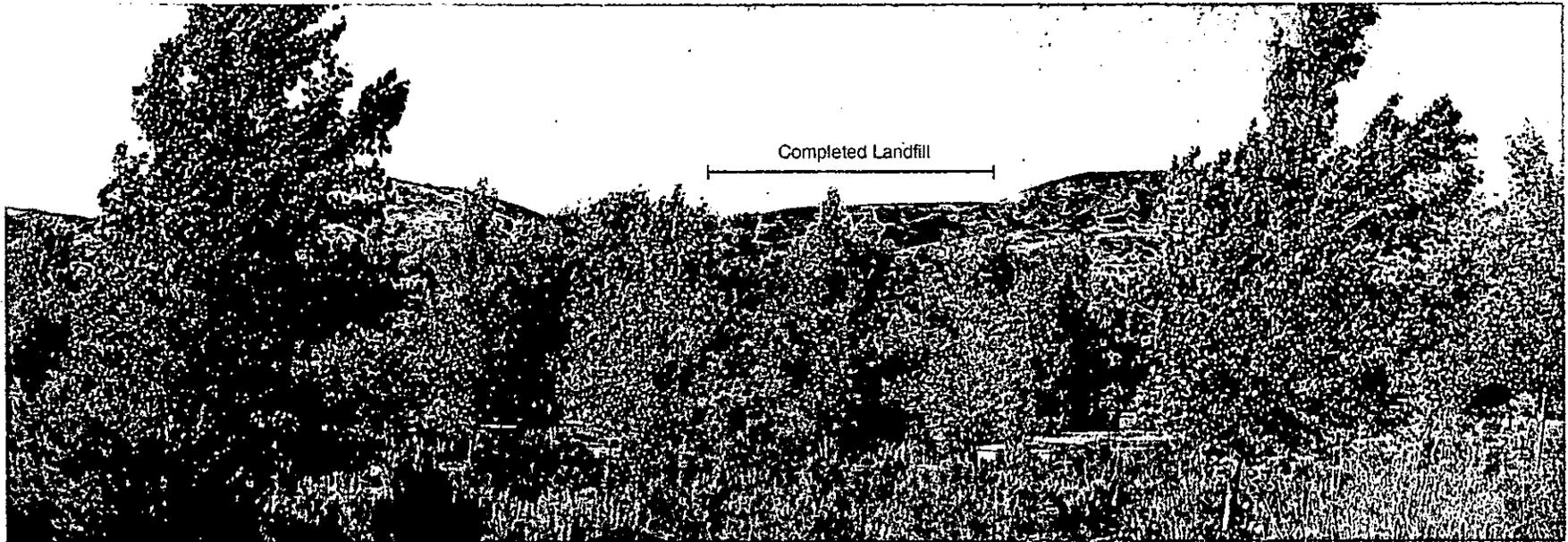
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Sycamore Landfill Master Plan EIR

Relationship of No Project Alternative (Existing Approved Plan) to Mitigation for Biological Impacts

FIGURE

8.1-2



- Note:
1. It is anticipated that the trees in the foreground of this view will grow substantially over the next 20 years, blocking this view of the future landfill to a substantial degree.
 2. Anticipated landfill appearance several years after landfill closure and revegetation.

SOURCE: BRG Consulting, Inc., 2007.

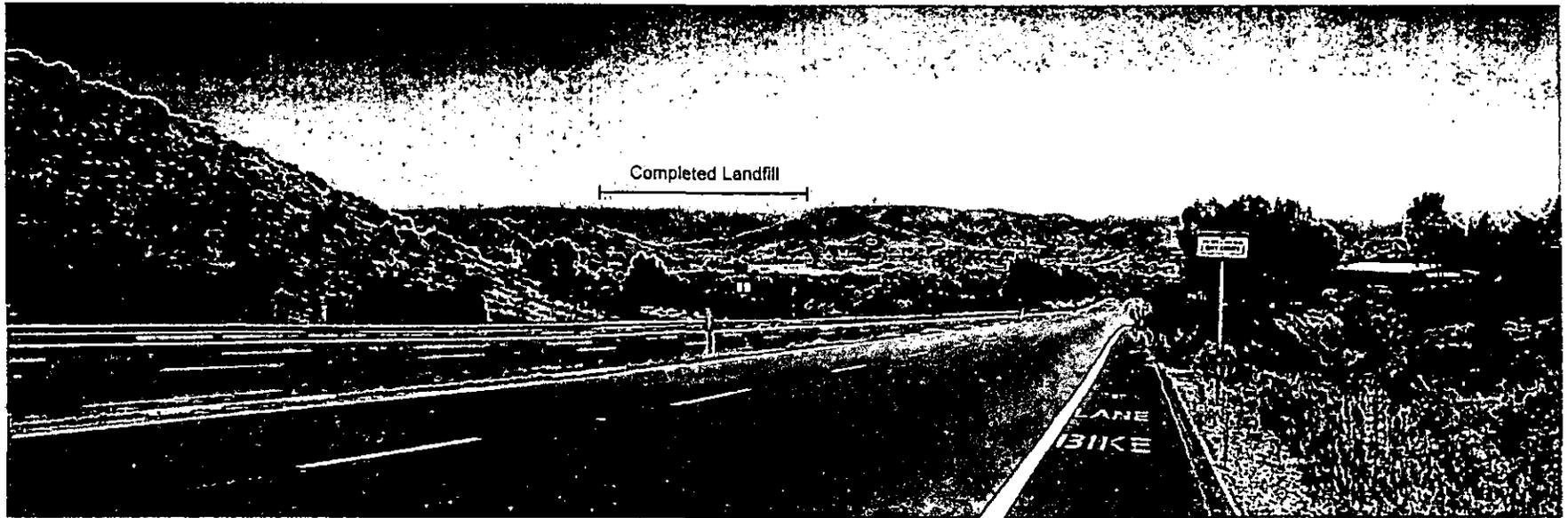
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Sycamore Landfill Master Plan EIR

**Photosimulation of the No Project Alternative from Viewpoint 2
(Kumeyaay Campground)**

**FIGURE
8.1-3**

001051



SOURCE: BRG Consulting, Inc., 2003.

11/25/03

Sycamore Landfill Master Plan EIR

**Photosimulation of the No Project Alternative from Viewpoint 12
(Mission Gorge Road)**

**FIGURE
8.1-4**

(PTS# 4847, W.O. No. 42-0663) was issued by the City of San Diego Manager on November 27, 2003, which approved the project's construction/grading plan and proposed mitigation measures for Stages I and III. Currently, Stages I and III have been completely cleared and mitigation lands have been conveyed by SLI to the City of San Diego for mitigation of upland impacts for landfill Stages I and III. Construction/development for Stages II and IV has been conceptually approved by the City in PDP/SDP 40-0765, and an agreement that provides mitigation for impacts associated with these Stages has been finalized between the City of San Diego and Sycamore Landfill. Impacts to approximately 2.71 acres of wetlands within the site are being mitigated through wetland creation south of the landfill under SAA # R5-2002-0174, and through preservation/enhancement of existing stream channels in (mitigation parcels 366-030-34 and 366-070-19. Impacts to a narrow endemic plant species on site, *Dudleya variegata*, would be minimized by avoidance of more than 10,000 individual plants near the western ridgeline, and by translocation of at least 8,600 plants from the site to a mitigation parcel southeast of the landfill (APN 366-080-29). The No Project Alternative would not result in any unmitigable impacts. All impacts discussed in the MND either have been mitigated, or the conceptual mitigation approach has been approved by the City of San Diego. Therefore, biological impacts associated with the No Project Alternative would be less than significant. However, the No Project Alternative would not address mitigation of potential exotic invasive plants in the landfill vicinity, unlike the proposed Master Plan (MM 4.3.104-5.3).

8.1.4 Traffic/Circulation

The traffic associated with the No Project Alternative has been approved under Solid Waste Facility Permit No. 37-AA-0023, and City of San Diego permits PDP/SDP 40-0765. The approved traffic, in conjunction with traffic associated with other uses in the area, is part of the baseline conditions for future traffic analysis. According to the traffic study prepared by LLG Engineers for the Master Plan, these baseline conditions would have low levels of service and high congestion during peak hours, primarily on State Route 52. Under the No Project Alternative, no additional traffic would be added beyond that already permitted. Therefore, there would be no significant local traffic impact associated with the No Project Alternative, from now until anticipated landfill closure in 2031 (SWFP, September 15, 2006). However, if the No Project Alternative is selected, and the daily waste limits are kept at 3,965 tpd, increasing amounts of solid waste from the area served by Sycamore Landfill would need to be diverted to other disposal sites, either within San Diego County, or outside. This amount is estimated at approximately 5,400 tpd in 2010, based on the 9,400 tpd disposal rate requested in 2010 for the Master Plan. West Miramar Landfill is projected to close in approximately 2011 under current conditions, although approval of a requested limited height increase by MCAS/Miramar would allow landfill operations at that site to continue for four more years (final service life extension as yet unknown). When West Miramar Landfill closes, perhaps in the 2015-2020 time period, more than 3,500 tpd of waste now deposited there would have to be sent to other landfills, rather than being accepted at the Sycamore Landfill, under the Master Plan.

According to SANDAG (pers. comm. Ed Schaefer, 11/18/04), the centroid of population in San Diego County is approximately located at I-15 and Miramar Road, and the centroid location is not expected to change appreciably in

the next twenty to thirty years. That location also would be the approximate center of waste generation for the County. West Miramar Landfill is located approximately 3.9 miles (straight-line distance) from the centroid, while Sycamore Landfill is located approximately 6.6 miles from the centroid. The only other existing landfill in the metro area, Otay Landfill, is located in Chula Vista, approximately 23 straight-line miles to the centroid. After the closure of West Miramar Landfill, the Sycamore site would be the existing landfill closest to the centroid of County population, and its continued use would thus minimize the waste haul distance required from waste generator to landfill disposal. As discussed in Section 8.24.3 of this EIR, several potential landfill sites for the urban area have been identified and studied. However, with the exception of Site A-1b, located in Oak Canyon approximately 1.5 miles west of Sycamore Landfill, they are all farther from the existing and anticipated future waste generation centroid than the Sycamore site. Site A-1b, along with the other potential sites, was rejected as a feasible project alternative in Section 8.1.3 as a result of its small waste disposal capacity (33 mcy) and anticipated significant biological impacts (300+ acres). In addition, a landfill at Site A-1b would be immediately adjacent to the approved Military Family Housing Site 8.

The diversion of the waste stream from Sycamore to any other existing, planned or feasible potential site would result in substantial but unquantified increases in waste vehicle mileage, and thus increases in traffic congestion.

8.1.5 Paleontological Resources

According to the approved MND 40-0765 for Sycamore Landfill Brushing and Clearing, the No Project Alternative was approved under the CUP (No. 6066-PC/Amended 1974) for the operation and expansion of the landfill. No additional grading or excavation would be performed beyond that already approved and no additional impact to paleontological resources would occur.

8.1.6 Noise

The No Project Alternative is limited by provisions of PDP/SDP 40-0765 (City of San Diego, 2002) to not exceed 60 dB(A) Leq at landfill parcel boundaries. When this limit is compared to the existing ambient sound levels in the vicinity, 35-41 dB(A) Leq (Table 4.6-4), it can be seen that this alternative would have noise levels at the property line exceeding existing sound levels by more than 19 decibels when landfill operations occur near the ridgeline, much greater than the 3 decibel criterion for sound perception. However, the issue for this alternative, as it is for the others, is whether anyone would be present to hear the increased noise level. Although the lands east and west and southeast and southwest of the landfill are zoned residential, they are designated in the Elliott Community Plan as open space. No specific residential developments have been proposed formally or are planned adjacent to the landfill site, although the western edge of the proposed Castlerock development would be located approximately one-quarter mile east of the landfill site (see Figure 5-1). No significant impact is identified for the No Project Alternative associated with a projected increase in ambient sound levels in the landfill vicinity.

Implementation of the No Project Alternative would not require relocation of the existing transmission line that divides the landfill site. Therefore, unlike the Master Plan, the No Project Alternative would not result in temporary increases in noise associated with transmission line construction activities.

Since the No Project Alternative is limited by provisions of PDP/SDP 40-0765 (City of San Diego, 2002) to not exceed 60 dB(A) Leq at landfill parcel boundaries, this, combined with no nighttime operations, would preclude potential noise impacts to residential uses, should such uses develop adjacent to the landfill property.

Under the No Project Alternative, no additional landfill ancillary facilities would be constructed. Therefore, no temporary noise impacts associated with facility construction would occur as a result of the No Project Alternative.

Aggregate processing operations would continue to be located at the bottom of the canyon, as they are for the Master Plan. No noise impact was identified for aggregate processing as part of the 2002 MND 40-0765.

The grinding of green waste for use as mulch and alternative daily cover would continue. No noise impact is anticipated to result from this work, since the grinder would continue to be located either far from the landfill boundaries, or below the natural canyon ridgelines, or both. Thus, potential noise from the grinder would be dissipated by distance or blocked by the natural ridgeline barriers.

Under the No Project Alternative, no increase in daily truck or tonnage limits would occur. Therefore, there would be no substantive change in peak hour truck noise within the landfill site compared to existing conditions. Under the No Project Alternative, there would be no substantive change in numbers of waste haul trucks passing near the residential tract located southeast of Mast Boulevard and West Hills Parkway. Therefore, there would be no direct or cumulative noise impacts to residents of that tract as a result of the No Project Alternative.

In summary, the No Project Alternative would increase landfill-area ambient noise levels by more than three decibels, but this is not considered a significant impact. No other potentially significant noise impacts would occur as a result of the No Project Alternative.

8.1.7 Air Quality

In the No Project Alternative, emissions in the short term would increase from the heavy equipment as the Master Plan Development calls for additional controls on existing heavy equipment at the landfill. These emissions would include criteria pollutants (PM₁₀, PM_{2.5}, and NO_x), as well as toxic air contaminants (Diesel Particulate Matter). The emissions from heavy equipment for the No Project Alternative would be greater than the Master Plan Development emissions until the anticipated closure of the landfill in 2031. In addition, as discussed in Section 8.12.4 of this EIR, implementation of the No Project Alternative would require increasing diversions of solid waste from Sycamore Landfill. Since no existing landfill other than West Miramar Landfill is closer to the existing and assumed future

population/waste generation centroid of San Diego County, any future solid waste diversion would result in substantial but unquantified additional waste haul vehicle miles per day and per year, when compared to Sycamore Landfill Master Plan. This does not even take into account that no existing landfill has agreed to take waste diverted from the Sycamore site. As a result, if another landfill did agree to take waste that otherwise would have gone to Sycamore, it would be located farther away from the waste centroid, would result in substantial additional vehicle miles traveled, and would consequently result in higher emissions of PM₁₀, PM_{2.5}, SO_x, NO_x and CO.

As with the Proposed Project, H₂S odors from landfill gas emissions or odors from greens recycling could occur on occasion. Like the Proposed Project, this is considered a significant, unmitigable impact. Numerous measures are being undertaken to minimize potential odor emissions, but there is no guarantee that the measures would be effective under all atmospheric conditions. Potential odor emissions for the No Project Alternative would continue for approximately the same period of time as for the Master Plan Alternative.

Since the No Project Alternative is the “baseline” project for air quality analysis, no additional Greenhouse Gases (GHGs) would be emitted in excess of that baseline. However, GHG emissions are expected to increase over time, within that baseline, as the landfill continues to grow with ongoing MSW disposal. And analysis for the No Project Alternative does not address the GHG emission potential for regional MSW not disposed at Sycamore due to capacity limits retained at the site if the No Project Alternative is selected.

8.1.8 Other Environmental Topics

The project was found to result in no significant impacts to any of the other environmental topics, as a result of project design features, absence of specific resources, and/or compliance with all applicable regulations. These topics included population/housing, water conservation, recreation, energy, public services, public utilities, human health/public safety/hazardous materials, hydrology/water quality, and geology. Since the no project alternative is less extensive than that of the Master Plan, no impacts to these topics are anticipated as a result of the implementation of the No Project Alternative.

8.1.9 Summary of Impacts

The No Project Alternative would not require additional parcels for landfill expansion compared to the Master Plan. No significant impacts are anticipated to land use, landform/visual quality, biological resources, traffic/circulation, paleontological resources, or noise. The No Project Alternative would result in higher emissions of Toxic Air Contaminants (TAC) than would the Master Plan. Odor impacts of the No Project Alternative would be significant, as for the project, since the improved procedures for handling greens materials cannot guarantee that no odor will be detectable off-site. In addition, the criteria pollutants CO, NO_x, SO_x, PM₁₀ and PM_{2.5} are expected to increase with this alternative, since this alternative would divert increases in waste volume above 3,965 tons per day, as well as following its closure in 2031 due to the need to haul solid waste greater distances to alternative disposal locations.

No additional mitigation measures are required for the No Project Alternative. The majority of the biological resources mitigation measures, discussed in the approved MND 40-0765 for Sycamore Landfill Brush and Clearing, have been completed, or have been conceptually approved and are in the process of implementation (Dudleya translocation).

8.2 ALTERNATIVES CONSIDERED BUT REJECTED

8.2.1 Alternative Above-Ground Transmission Line Routes

The transmission line relocation alternatives depicted in Figure 3-12 and addressed in detail in this EIR represent the shortest feasible connections that avoid areas of proposed landfill expansion. In addition, all new structures would be located within lands owned by SLI, except for the end structures, in APN 366-040-32, which are located within an existing SDG&E transmission line easement. Avoidance of the landfill area is required, because the surfaces of landfills “settle” as solid waste in them decomposes. The effect is most easily experienced along SR-52 near Convoy Street, where the highway elevation varies substantially as a result of settlement of solid waste under the pavement. Transmission structures would be subject to the same condition if they were to be placed on a closed portion of the landfill.

Any alternative transmission line routing other than the two presented in this EIR would therefore, by necessity, have to be longer, with structures placed outside lands controlled either by SLI or SDG&E. Such potential alternatives would have no environmental advantages compared to the two addressed in this EIR. To the extent that they would be longer, they would intrude to a greater degree into the adjacent MHPA lands, require additional structures and habitat disturbance, and require longer access roads, with additional habitat disturbance. Additional transmission lines within MCAS Miramar, located directly north of the landfill site, could result in possible aircraft safety issues. Therefore, this alternative is rejected because it would not reduce any of the significant project environmental impacts.

8.2.2 Installation of Transmission Lines Underground

While it is possible to build and operate underground transmission lines, because of the expense of their construction, and complexity of maintenance, they are typically utilized only when no above ground option is available. Because of the settlement and landfill gas issues associated with landfills, as discussed above, it would not be feasible to build such an underground transmission line through the landfill itself. Therefore, any such underground alternative would have to follow one of the two alternative routings around the landfill, where the above ground transmission line alternatives are located. It is anticipated that the hilly topography of those routings would present substantial challenges to the utility engineers. The underground alternatives would result in disturbance of much more habitat than is required for the above ground alternatives, both for trench construction and for access roads for construction and maintenance. Since no significant visual impact was identified for either the above ground

transmission line relocation, or for the alternative south and east of the landfill site, there is no CEQA-based rationale for inclusion of underground transmission lines, as this alternative would not avoid or reduce any significant impacts. Therefore, a detailed analysis of such facilities in this EIR is rejected.

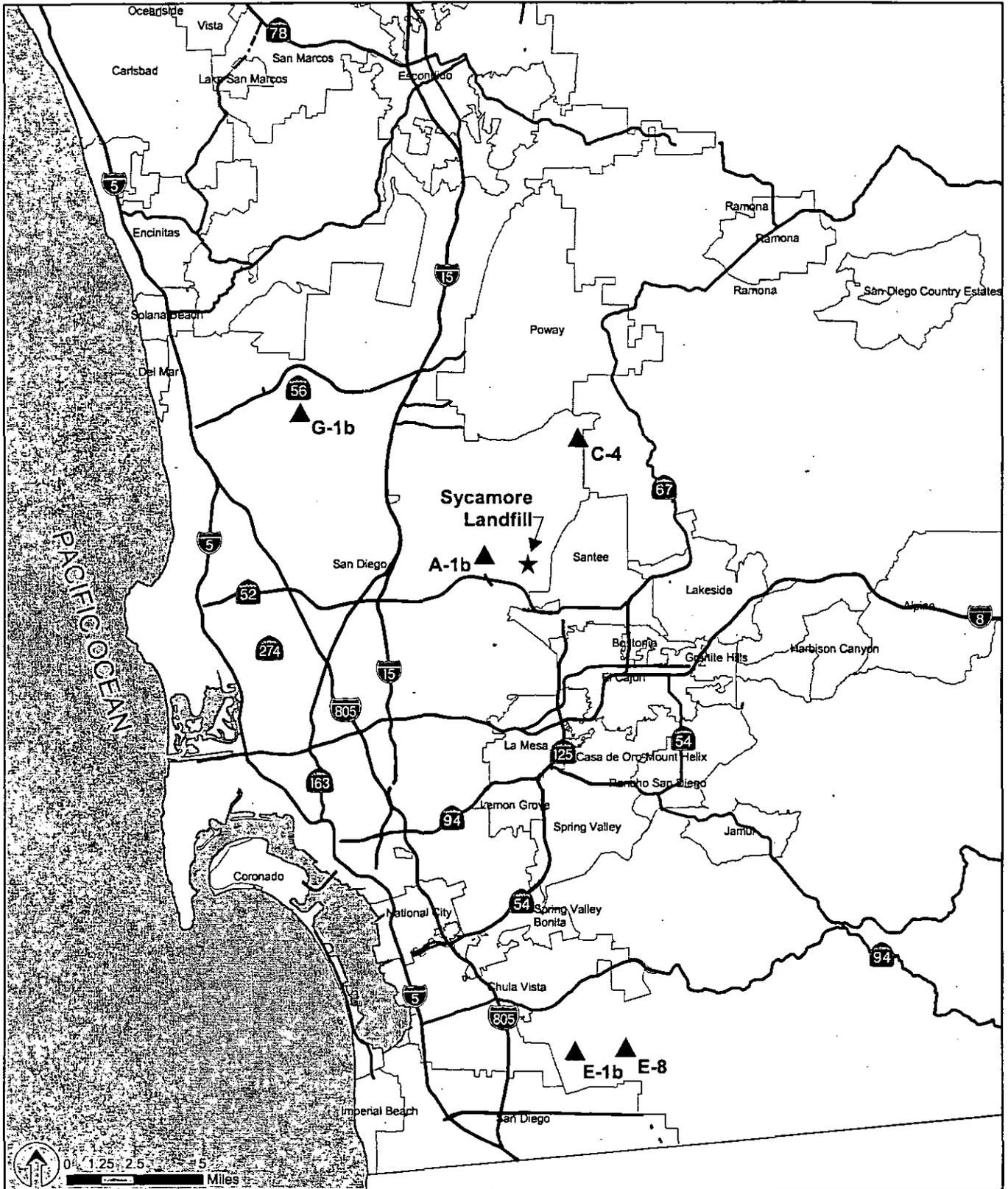
8.2.3 Development of an Alternative Site

Landfill siting studies conducted by the City of San Diego and the County of San Diego in the 1988-92 period identified four potential regional-size landfill sites, one site within the City, and three sites in County jurisdiction (Dames & Moore, 1990). All of these potential sites are smaller, ranging from 23 to 33 million cubic yards (mcy). Site locations are shown in Figure 8.2-1. Of the locations identified at that time, only two, Sites C-4 and A-1b, would meet all the aspects of project Objective 6, i.e., being located within ten miles of the existing Sycamore site, within the City of San Diego, and not developed or surrounded by development. Site C-4 is located in Sycamore Canyon, approximately five miles north of the landfill site. Site A-1b is located in Oak Canyon, 1.5 miles west of Sycamore Landfill.

Conceptual development plans prepared for those two sites estimated a waste capacity of 23 and 33 mcy, respectively. Each would disturb substantial areas of existing native habitat, encompassing approximately 300 acres for Oak Canyon, and 140 acres for Sycamore Canyon. These totals do not include disturbance required for ancillary facilities, or for access roads to the landfill. Visual resources, air quality, and traffic impacts would be expected for the alternative sites, as for the proposed Master Plan. Measures to minimize potential water quality impacts would be the same for the alternative sites and the Master Plan. It appears that alternative landfill sites would not result in avoidance of significant impacts associated with the proposed project, as directed by CEQA Guidelines, but rather would increase potential biological impacts, while decreasing landfill capacity. Furthermore, the use of alternative sites would preclude achieving Objective 1, which is to make more effective use of a site already permitted for landfill use by reconfiguring the development plans to increase disposal capacity. For these reasons, alternative landfill sites have been rejected as potential alternatives to the project.

8.3 MASTER PLAN LANDFILL EXPANSION, BUT WITH TRANSMISSION LINE RELOCATION TO THE SOUTH AND EAST

Alternative 8.3 would be identical to the 1,050 AMSL Master Plan design with the exception of the relocation of the existing transmission lines. This alternative has been addressed in order to reduce potential project visual and biological resource impacts within Spring Canyon. The lines from the southwest would change course to cross the southern boundary of the site as they reach the landfill. The corridor would then turn north along the eastern boundary of the site where the lines would re-connect with the existing transmission lines. Figures 8.3-1 and 8.3-2 show the relationship of this corridor line with the landfill Master Plan.



SOURCE: Dames & Moore, 1990, SanGIS 2007, and BRG Consulting, Inc., 2007

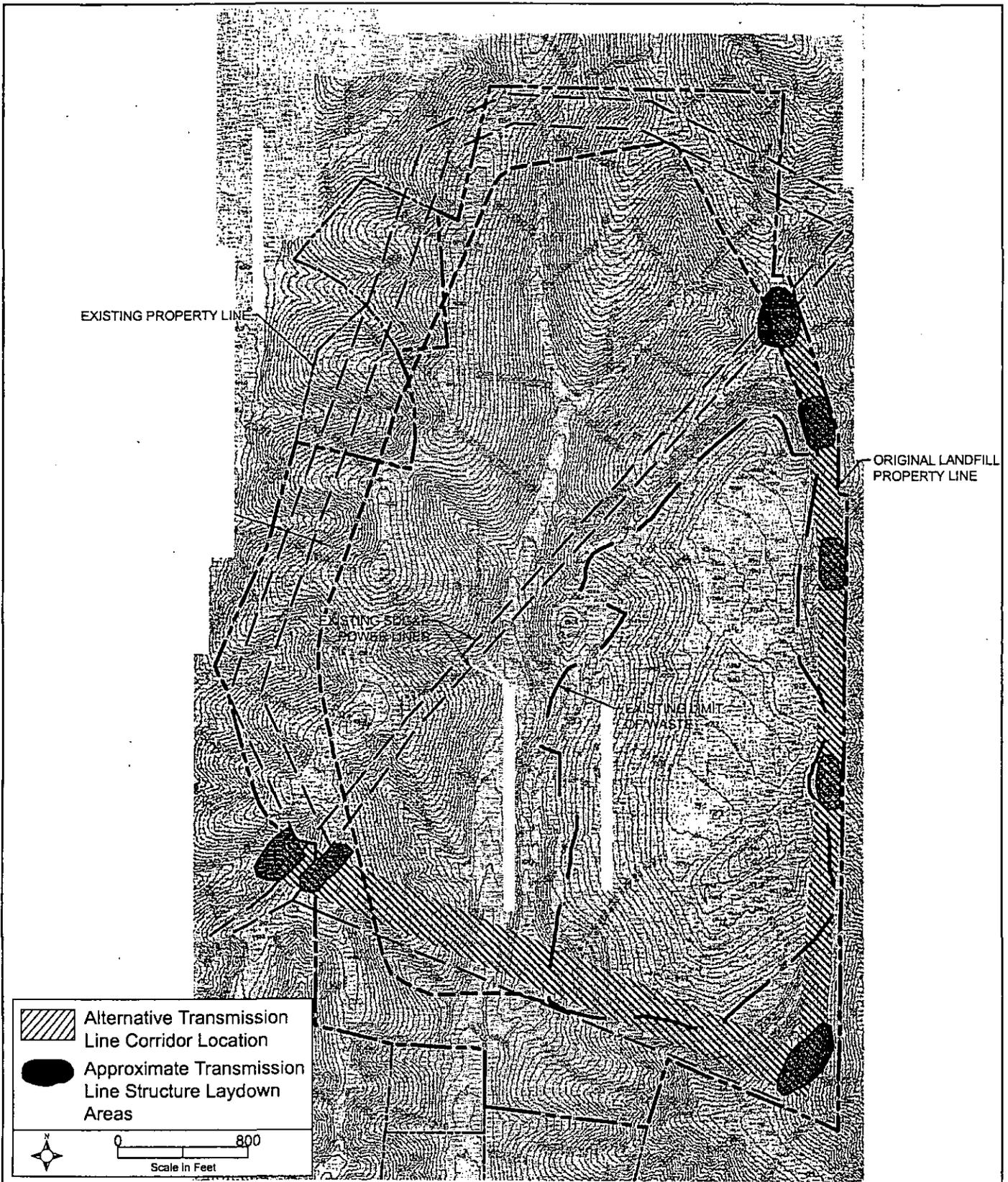
03/23/07

Sycamore Landfill Master Plan
**Possible Regional Landfill Sites,
 Southwest San Diego County
 Solid Waste Facility Siting Study**

**FIGURE
 8.2-1**

001059

820100



SOURCE: Shaw Emcon/OWT, Inc., topography provided by A-Mehr, Inc., SDG&E, and BRG Consulting, Inc., 2003

1/4/06

Sycamore Landfill Master Plan EIR

Alternative Transmission Line Relocation

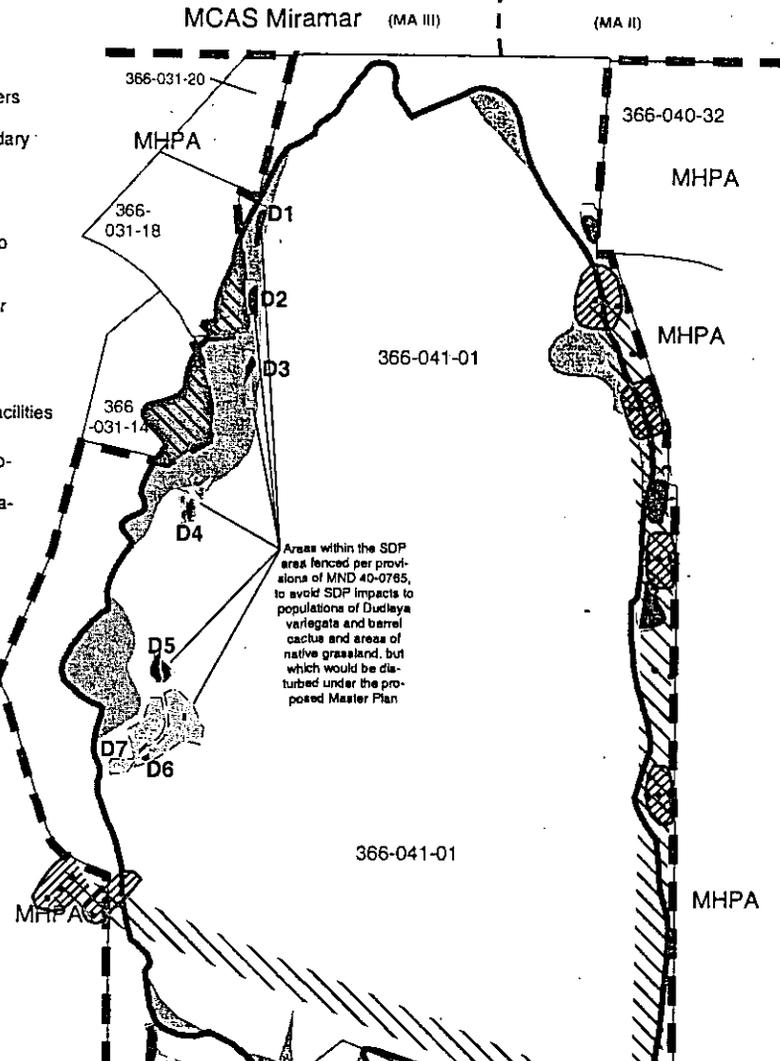
**FIGURE
8.3-1**

001060

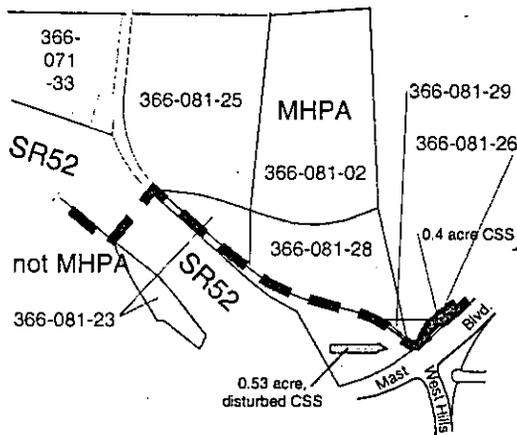
00100

LEGEND

- 366-031-18 Assessor's Parcel boundaries and numbers
- Proposed Master Plan disturbance boundary
- MHPA boundary
- Proposed additional areas in the MHPA to be designated "landfill" and disturbed.
- Proposed new areas of disturbance under proposed Master Plan that are outside of boundaries of the 1994 Staged Development Plan and outside of the MHPA
- A** Locations of proposed landfill Ancillary facilities
- Areas within the SDP area fenced per provisions of MND 40-0765, to avoid SDP impacts to populations of Dudleya variegata and barrel cactus and areas of native grassland, but which would be disturbed under the proposed Master Plan
- Locations of Dudleya voided under PDP/SDP 40-0765.
- D4** Dudleya variegata population ID #, avoided under MND 40-0765, proposed to be taken under Master Plan
- Existing dirt roads and trails
- Areas of temporary disturbance by proposed T/L relocation (Alt. B)
- Alternative transmission line structure locations - long-term disturbance
- alternative long-term 12-ft. wide spur roads to transmission line structures.



INSET LANDFILL ENTRANCE AND ACCESS ROAD



10/12/07
 SOURCE: Emcon, 2004-2006;
 BRG Consulting, Inc., 2003-2006

Sycamore Landfill Master Plan EIR

Areas of Biological Disturbance, Master Plan Landfill Development with Alternative Transmission Line Relocation (South and East)

FIGURE 8.3-2

Since this alternative is identical to the Master Plan, with the sole exception of an alternative transmission line relocation, the following impacts would be the same as for the Master Plan: land use, traffic/circulation, paleontological resources, noise and air quality. The only topics for which there may be a substantive difference with the Master Plan are landform alteration/visual quality and biological resources.

8.3.1 Landform Alteration/Visual Quality

Alternative 8.3 would not change the landform alterations related to Master Plan landfill operations. However, as shown in visual simulations created in Figures 8.3-3 through 8.3-7, the relocation of the transmission lines to the south and east of the project site would be visible from one key viewpoint as viewers travel eastbound on the State Route 52 (Figure 8.3-3), and would be partially screened from West Hills High School (Figure 8.3-6). Views of the transmission line alternative from other key viewpoints would be blocked by topography or vegetation, or diminished by distance. See Section 4.2, Landform Alteration/Visual Quality, of this document for a discussion on the selection process for the key viewpoints.

The transmission lines would be located along the eastern ridgeline of Little Sycamore Canyon, with structure heights of 80 to 120 feet above grade. The majority of the transmission lines would be blocked from the key viewpoints by hills surrounding the project site. Also, the visible portions of the relocated transmission lines are not easily seen due to the distance from the viewpoint. In addition, several existing transmission lines traverse the surrounding landscape, and the small number of additional transmission lines structures that would be visible from key viewpoints would incrementally contribute to reducing the visual quality of the area.

Finally, the landfill expansion would, at its completion, be several hundred feet higher in elevation than the transmission structures, and from distant viewpoints would act as a "backdrop" to transmission structures that otherwise would be silhouetted against the sky. See Figure 8.3-6. This analysis is consistent with findings of the 1996 subsequent EIR that previously addressed the identical transmission line location (County of San Diego, 1996, SCH #90010305). That study found that, while there would be some open, but distant, views of the relocated transmission lines from some viewpoints, the views from other viewpoints would be blocked by topography or vegetation. The 1996 EIR found that there would be no significant visual quality impacts associated with the transmission line relocation. However, because the landfill landform would slope upwards at approximately the same slope as the existing topography to the east, viewers from Medina and Pebble Beach Drives at the bottom of the hill would be able to see the alternative transmission lines without backdropping, silhouetted against the sky.

Alternative 8.3 would not add significant impacts to the existing visual impacts associated with the Master Plan due to the alternative relocation of the transmission structures, based on views from the approved key viewpoints, but would result in additional impacts to viewers from the residential areas immediately east of the landfill site.



A. Existing View - - - - - Interim Height 883' amsl - - - - - Ultimate Planned Height - 1,050' amsl

Note: The 883' level is not expected to be exceeded until the year 2020 or later.



B. Photosimulation of proposed 1,050' amsl design several years after landfill closure and revegetation.

SOURCE: BRG Consulting, Inc., 2006.

7/25/06

Sycamore Landfill Master Plan EIR

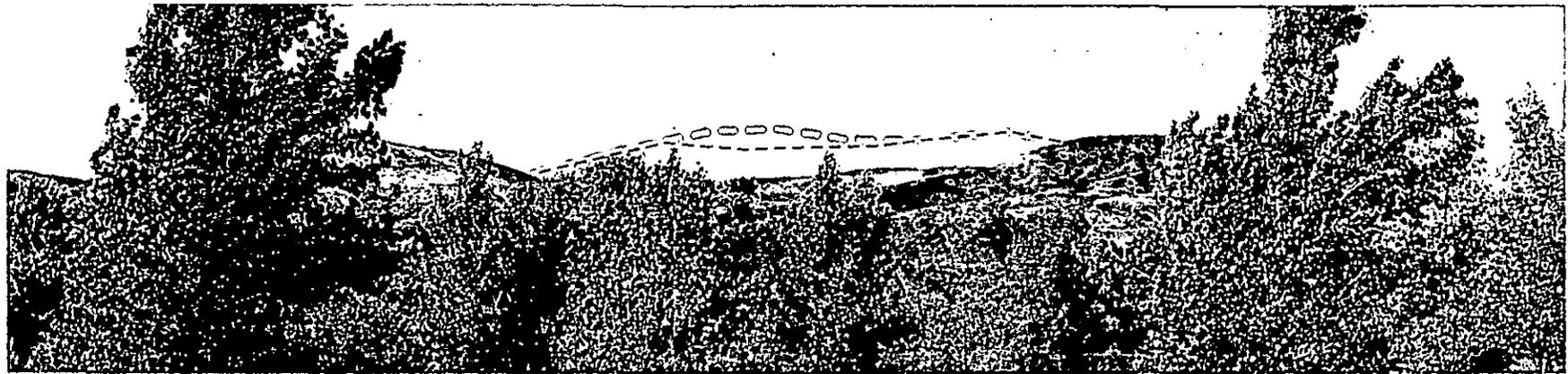
**Photosimulation of Proposed 1050' amsl Design from Viewpoint 1
(Eastbound SR-52)**

FIGURE

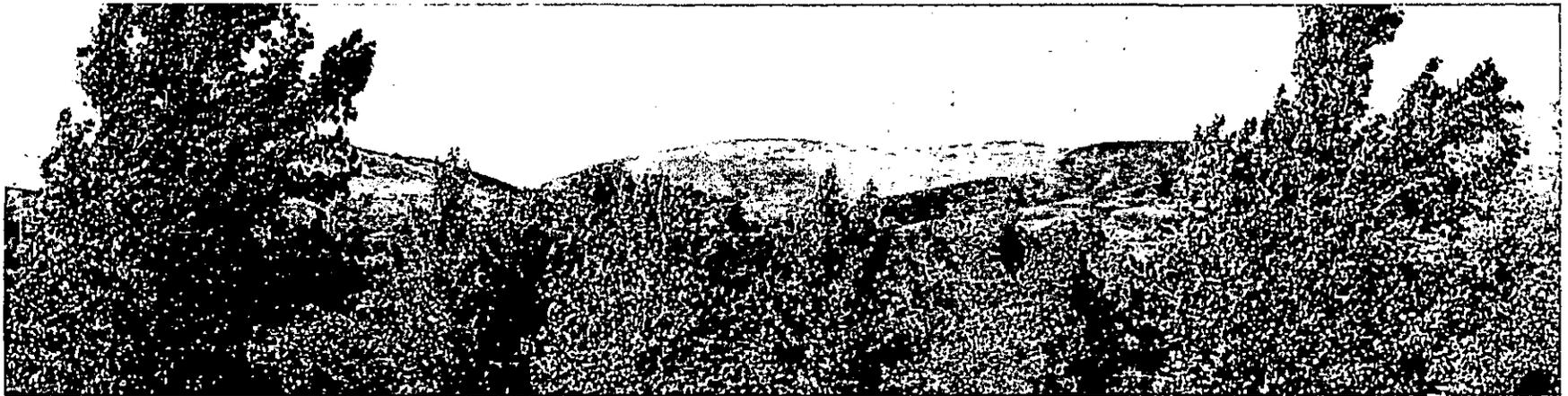
8.3-3

001063

8-18



A. Existing View - - - - - Interim Height - 883' AMSL - - - - - Ultimate Planned Height - 1,050' AMSL



B. Photosimulation of proposed 1,050' AMSL design

- Note:
1. The 883' level is not expected to be exceeded until the year 2020 or later.
 2. It is anticipated that the trees in the foreground of this view will grow substantially over the next 20 years, blocking this view of the future landfill to a substantial degree.
 3. Anticipated landfill appearance several years after landfill closure and revegetation.

SOURCE: BRG Consulting, Inc., 2007.

03/26/07

Sycamore Landfill Master Plan EIR

**Photosimulation of Proposed 1,050' AMSL Design from
Viewpoint 2 (Kumeyaay Campground)**

**FIGURE
8.3-4**



A. Existing View - - - - - Ultimate Planned Height - 1,050' AMSL - - - - - Interim Height - 883' feet AMSL



B. Photosimulation of proposed 1,050' AMSL design

- Notes:
1. The 883' level is not expected to be exceeded until the year 2020 or later.
 2. It is anticipated that the trees in the foreground of this view will grow substantially over the next 20 years, blocking this view of the future landfill to a substantial degree.
 3. Anticipated landfill appearance several years after landfill closure and revegetation.

SOURCE: BRG Consulting, Inc., 2007.

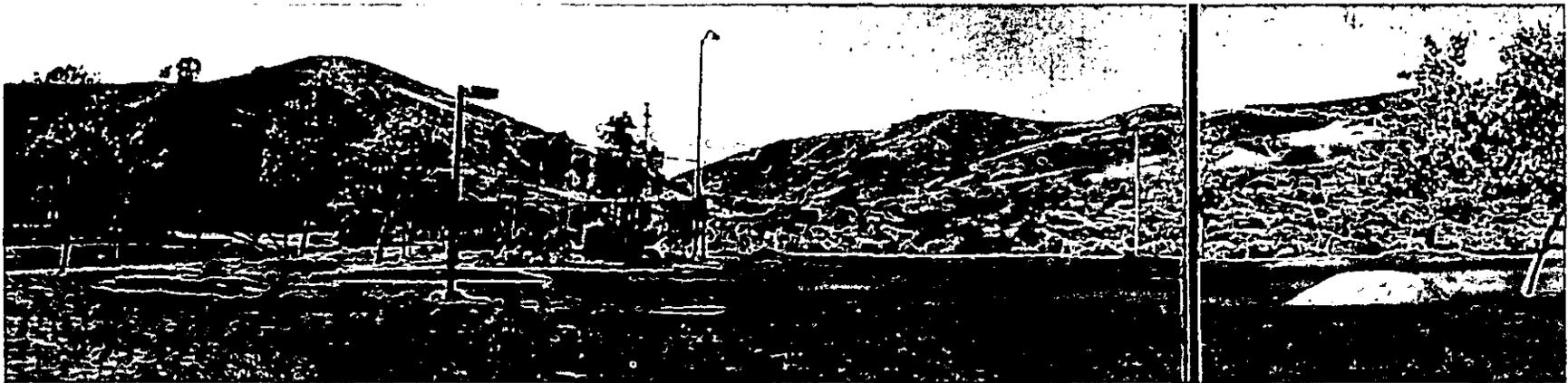
03/26/07

Sycamore Landfill Master Plan EIR

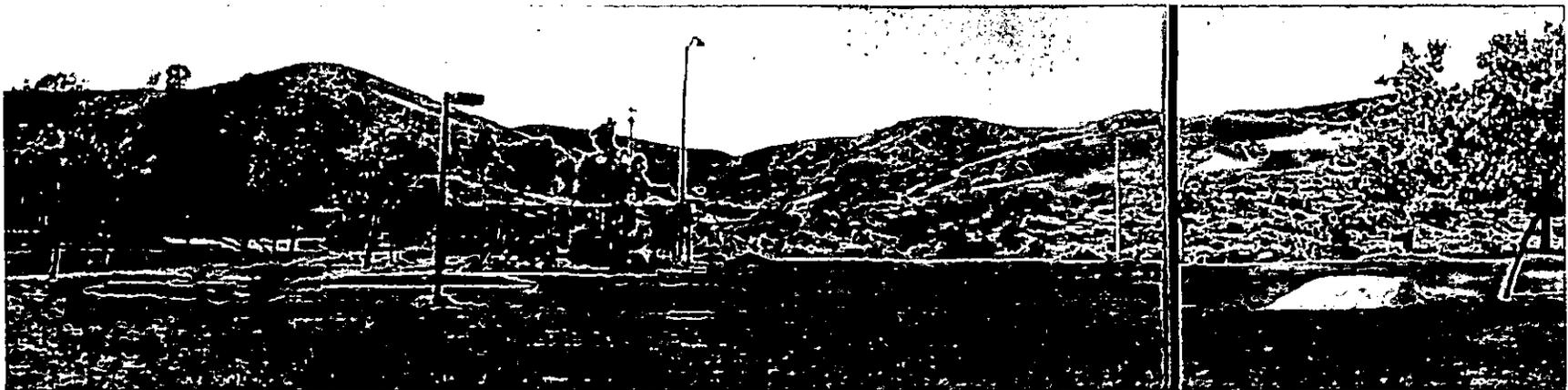
**Photosimulation of Proposed 1,050' AMSL Design
from Viewpoint 3 (Santee Lakes/Fanita Parkway)**

**FIGURE
8.3-5**

001065



A. - - - - - Alternative Height - 1,050' AMSL - - - - - Interim Height - 883' AMSL



B. Photosimulation of 1,050' Alternative several years after landfill closure and revegetation.

8-21

SOURCE: BRG Consulting, Inc., 2006.

7/25/06

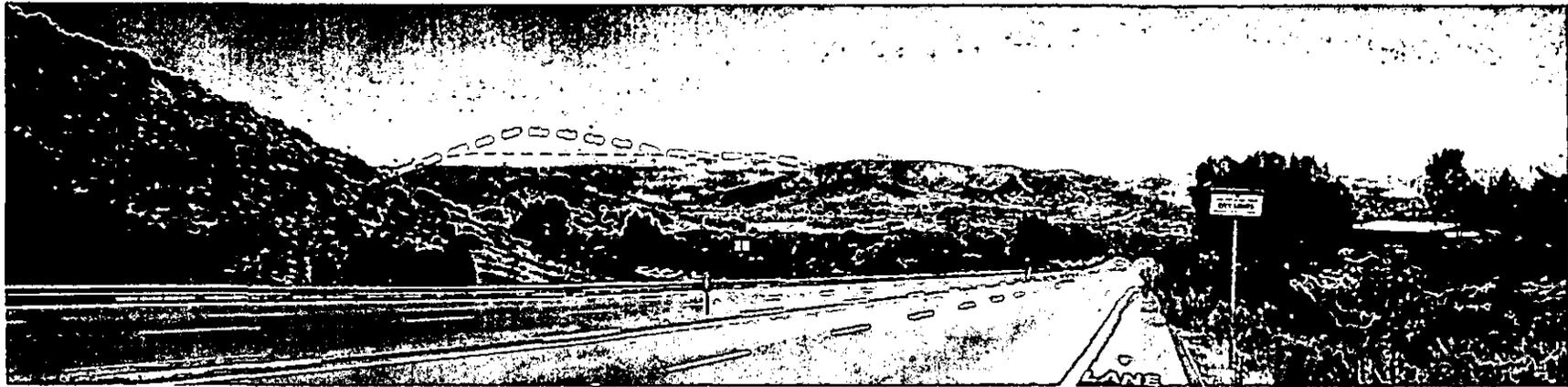
Sycamore Landfill Master Plan EIR

**Photosimulation of Proposed 1050' amsl Design
from Viewpoint 11 (West Hills High School)**

FIGURE

8.3-6

001066



A. ----- Alternative Height, 1,050' AMSL ----- Interim Height, 883' AMSL



B. Photosimulation of 1,050' Alternative several years after landfill closure and revegetation.

SOURCE: BRG Consulting, Inc., 2006

07/29/06

Sycamore Landfill Master Plan EIR

**Photosimulation of Proposed 1,050' amsl Design
from Viewpoint 12(Mission Gorge Road)**

**FIGURE
8.3-7**

001067

8.3.2 Biological Resources

Alternative 8.3 is identical to the Master Plan except for an alternative transmission line relocation, which would be developed along the south and east sides of the landfill. Relocating the transmission line to the south and eastern sides of the landfill, would impact a total of 9.7 acres of vegetation communities, 0.3 acre of which would be long-term or permanent, and 9.4 acres of temporary construction impacts. The transmission line relocation would potentially result in impacts to an area containing variegated dudleya located on the east side of the landfill, which is protected under PDP/SDP 40-0765. However, SDG&E would be required to avoid impacting this area by adjusting the location of the laydown areas and pull sites away from the protected dudleya. Impacts resulting from Alternative 8.3 would be mitigated with the mitigation measures used for the Master Plan. Therefore, impacts to biological resources would be mitigated to below a level of significance.

8.3.3 Other Environmental Topics

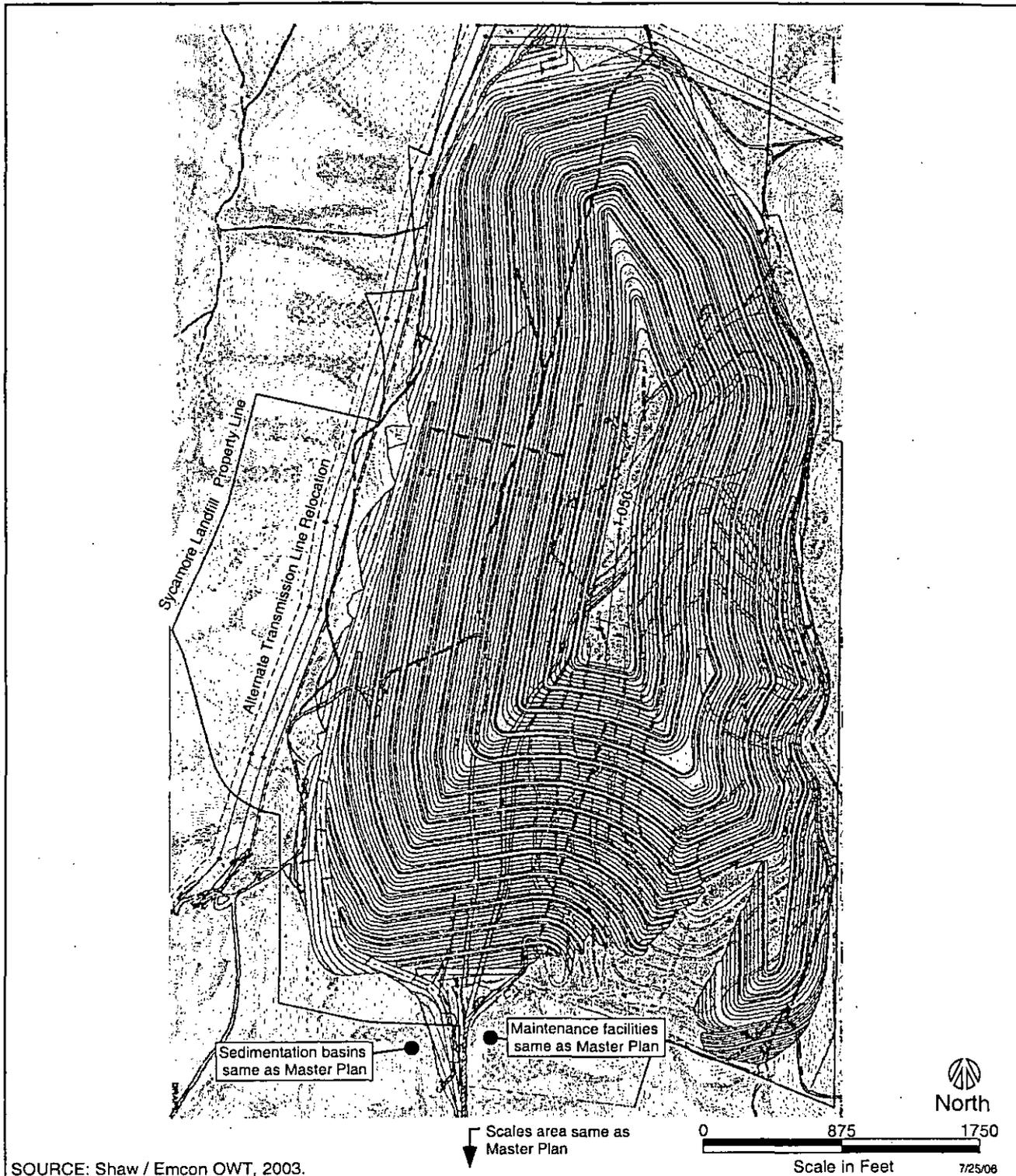
The Master Plan was found to result in no significant impacts to any of the other environmental topics, as a result of project design features, absence of specific resources, and/or compliance with all applicable regulations. These topics included population/housing, water conservation, recreation, energy, public services, public utilities, human health/public safety/hazardous materials, hydrology/water quality, and geology. Since this alternative is identical to the Master Plan except for an alternative transmission line relocation, no additional impacts to these topics are anticipated.

8.3.4 Summary of Impacts

Alternative 8.3 would be identical to the Master Plan with the exception of the relocation of the existing transmission lines. No significant impacts beyond those discussed for the Master Plan are anticipated relative to land use, landform alteration/visual quality, biological resources, traffic/circulation, paleontological resources, noise, or air quality. Therefore, mitigation measures for these topics under Alternative 8.3 would be the same as for the Master Plan.

8.4 REDUCED FOOTPRINT ALTERNATIVE

The Reduced Footprint Alternative (referred to as Alternative 8.4) would result in an overall reduction in landfill volume by altering the boundary line of the impact area along the western side of the project site. It is being considered because it would result in less biological resource impact than the Master Plan. The Reduced Footprint Alternative would have a total capacity of 133 million cubic yards (mcy) The total additional disposal capacity compared to existing conditions is estimated to be approximately ~~107 million cubic yards (110 mcy)~~, compared to an additional 134.426 mcy for the Master Plan. Compared to the approved plan (the No Project Alternative) the Reduced Footprint Alternative would result in an increase of approximately 62 mcy capacity. The Reduced Footprint Alternative plan is shown in Figures 8.4-1 and 8.4-2. Elevation of the top of this alternative would be similar to that of the Master Plan, at 1,050 feet AMSL.

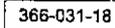


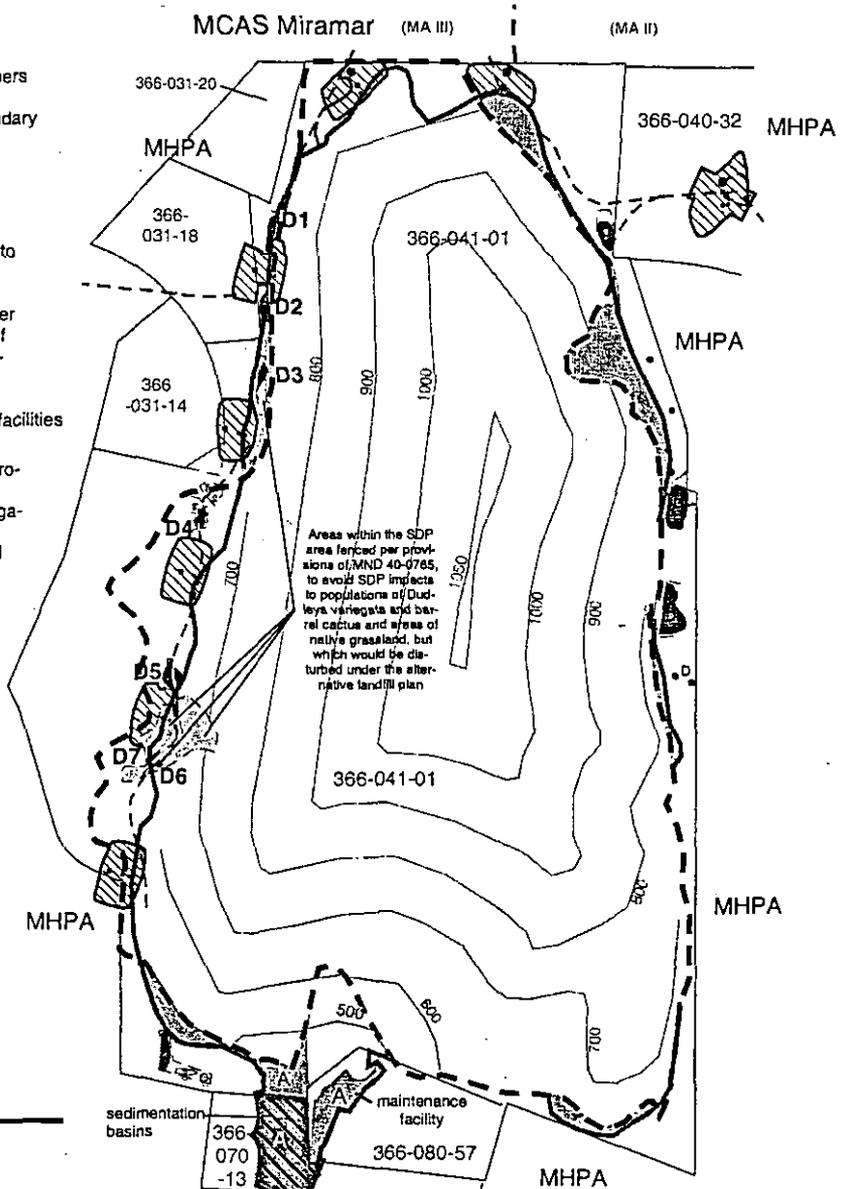
Sycamore Landfill Master Plan

**Reduced Footprint Alternative
Final Grading Plan**

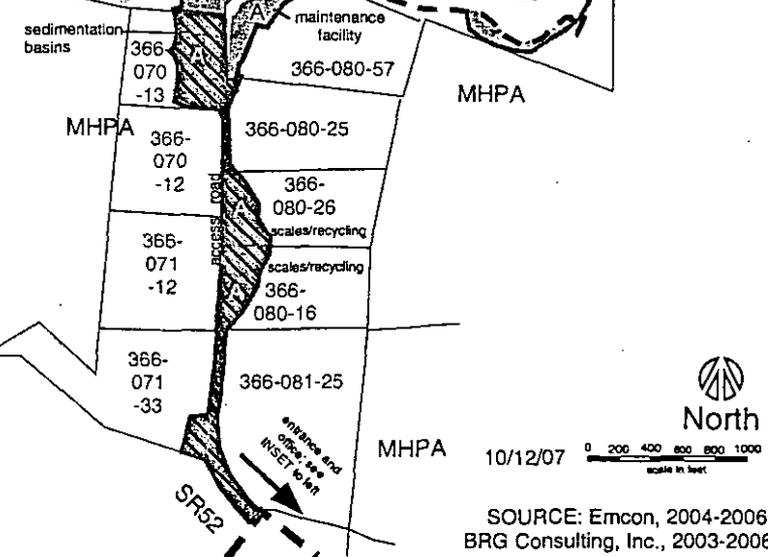
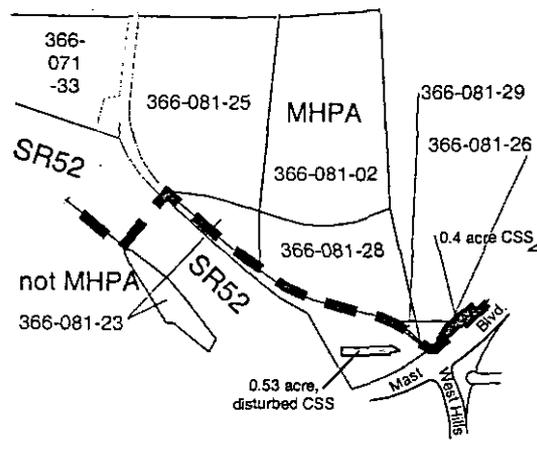
**FIGURE
8.4-1**

LEGEND

-  366-031-18 Assessor's Parcel boundaries and numbers
-  Proposed Master Plan disturbance boundary
-  MHPA boundary
-  Approved 1994 SDP development limits
-  Proposed additional areas in the MHPA to be designated "landfill" and disturbed.
-  Proposed new areas of disturbance under proposed Master Plan that are outside of boundaries of the 1994 Staged Development Plan and outside of the MHPA
- A** Locations of proposed landfill Ancillary facilities
-  Areas within the SDP area fenced per provisions of MND 40-0765, to avoid SDP impacts to populations of *Dudleya variegata* and barrel cactus and areas of native grassland, but which would be disturbed under the proposed Master Plan
-  Locations of *Dudleya* avoided under PDP/SDP 40-0765.
- D4** *Dudleya variegata* population ID #, avoided under MND 40-0765, proposed to be taken under Master Plan
-  Existing dirt roads and trails
-  Areas of temporary disturbance by proposed TL relocation (Alt. A)
-  Proposed transmission line structure locations - long-term disturbance
-  Proposed long-term 12-ft. wide spur roads to transmission line structures.



INSET LANDFILL ENTRANCE AND ACCESS ROAD



SOURCE: Emcon, 2004-2006; BRG Consulting, Inc., 2003-2006

Sycamore Landfill Master Plan EIR

Generalized Grading Contours and Locations of Areas of Biological Disturbance, Reduced Footprint Alternative

FIGURE 8.4-2

001070

The associated transmission line relocation would be west and north of the landfill footprint, but would be somewhat farther east compared to that of the Master Plan. This is due to the western boundary of the disposal area for the Reduced Footprint Alternative not extending as far west as that of the Master Plan.

8.4.1 Land Use

The Reduced Footprint Alternative would not require the acquisition of surrounding parcels or alteration of MHPA boundaries. All other land use impacts associated with Alternative 8.4 are similar to those discussed for the Master Plan, and would not result in a significant impact.

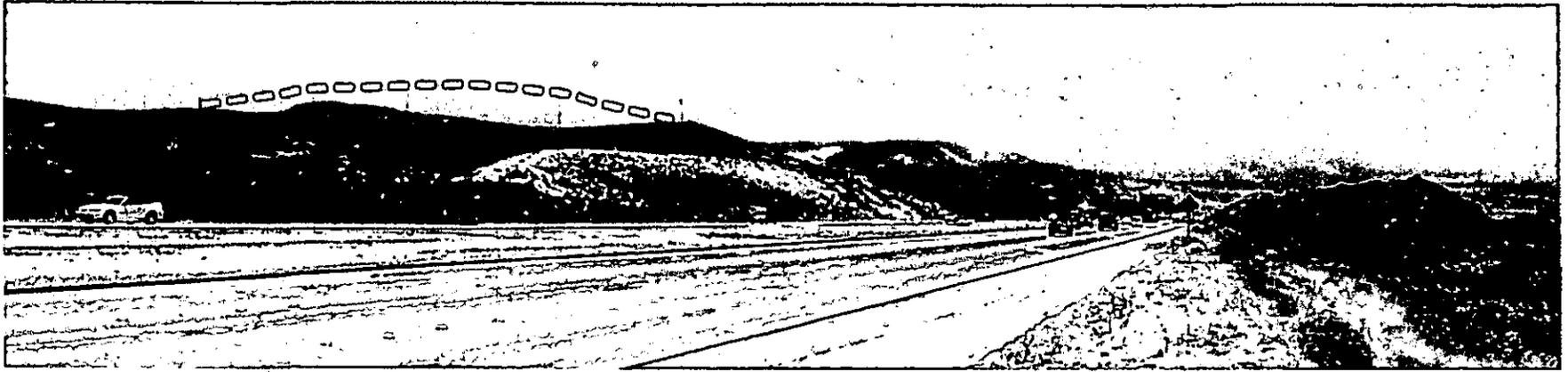
8.4.2 Landform Alteration/Visual Quality

This Reduced Footprint Alternative would result in a slight alteration of the western boundary of the landfill footprint and the overall shape of the completed landfill would differ somewhat from the Master Plan as shown in Figures 8.4-1 and 8.4-2. However, the visual impacts associated with the Reduced Footprint Alternative would be basically the same as those identified for the Master Plan.

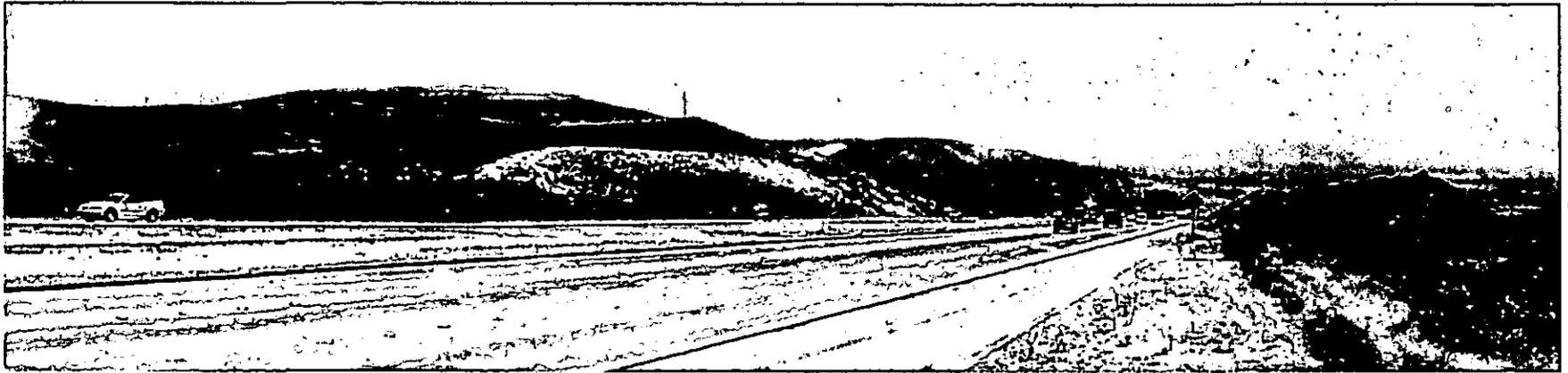
As shown in Figures 8.4-3 through 8.4-7, the Reduced Footprint Alternative landfill would be visible from the key viewpoints. The Reduced Footprint Alternative would have visual impacts similar to the Master Plan due to the visibility of several hundred feet of man-made slopes and contrast to the visual character of the surrounding natural landscape. As with the Master Plan, the Reduced Footprint Alternative would have an irregular footprint and implement planned revegetation of the landform as it is developed, thereby reducing the visual contrast with the surrounding natural setting. However, the top surface of the Reduced Footprint Alternative would be flat, not undulating like the Master Plan.

8.4.3 Biological Resources

The Reduced Footprint Alternative (see Figures 8.4-1 and 8.4-2) would disturb the same biological habitats as the Master Plan, except for two areas on the western side of the landfill expansion. RECON determined biological impacts for the Reduced Footprint Alternative, as documented in Technical Appendix C3. Long-term impacts due to the Reduced Footprint Alternative total 37.0639-46 acres. This includes 9.7-10.6 acres inside the MHPA and 27.3630-06 acres outside the MHPA. Long-term landfill Landfill and ancillary facilities expansion impacts are summarized in Table 8.4-1. Total impacts to native vegetation communities includes 2.4 acres of chamise chaparral, 13.846-2 acres of Diegan and disturbed coastal sage scrub, 0.70-9 acre of Diegan coastal sage scrub/native grassland, 0.84-0 acre of Diegan coastal sage scrub/native grassland/non-native grassland, 2.06 acres of native grassland, 0.9 acre of southern mixed chaparral, 0.1 acre of mule fat scrub, and 0.3 acre of non-native grassland. These native communities are considered biologically sensitive; impacts are considered significant and would require mitigation. Impacts to 16.44 acres of developed lands, including the active landfill, access roads, and landscaped areas would not be considered significant.



A



B

8-27

SOURCE: BRG Consulting, Inc., 2003.

10/31/05

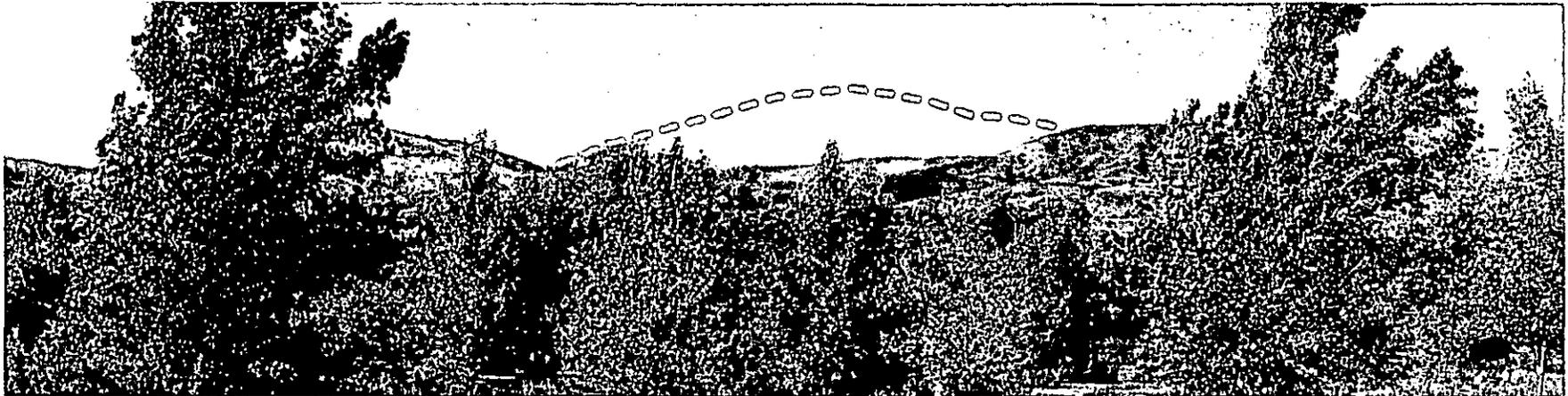
Sycamore Landfill Master Plan EIR

**Photosimulation of the Reduced Footprint Alternative
from Viewpoint 1 (Eastbound SR-52)**

FIGURE

8.4-3

CG1072



A



B Note: It is anticipated that the trees in the foreground of this view will grow substantially over the next 20 years, blocking this view of the future landfill to a substantial degree.

SOURCE: BRG Consulting, Inc., 2007.

03/26/07

Sycamore Landfill Master Plan EIR

**Photosimulation of the Reduced Footprint Alternative
from Viewpoint 2 (Kumeyaay Campground)**

FIGURE

8.4-4

001673



A



B Note: It is anticipated that the trees in the foreground of this view will grow substantially over the next 20 years, blocking this view of the future landfill to a substantial degree.

SOURCE: BRG Consulting, Inc., 2007.

03/28/07

Sycamore Landfill Master Plan EIR

**Photosimulation of the Reduced Footprint Alternative
from Viewpoint 3 (Santee Lakes/Fanita Parkway)**

FIGURE

8.4-5



SOURCE: BRG Consulting, Inc., 2003.

7/25/06

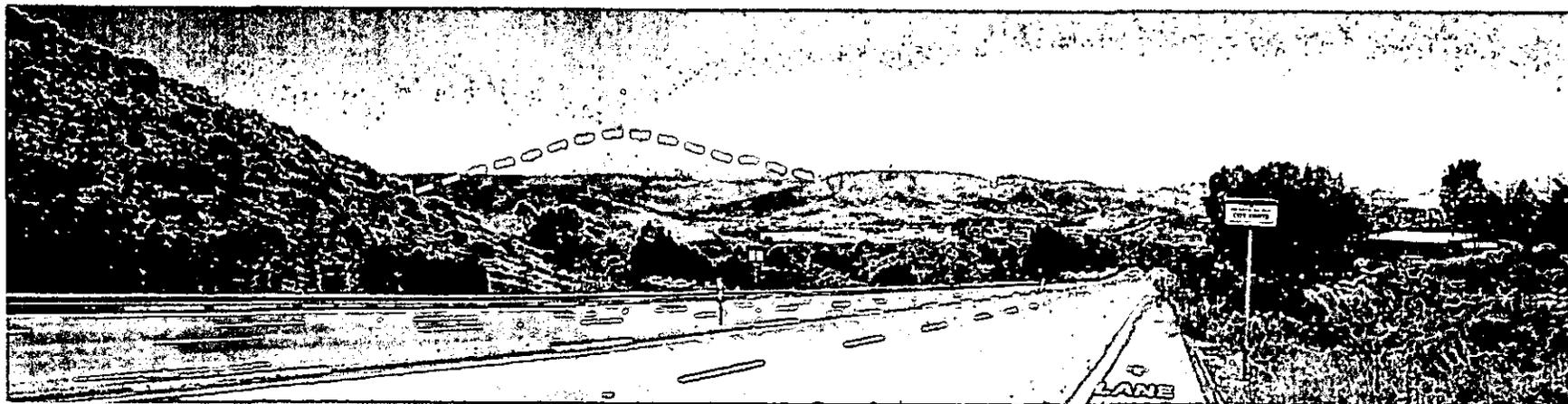
Sycamore Landfill Master Plan EIR

**Photosimulation of the Reduced Footprint Alternative
from Viewpoint 11 (West Hills High School)**

FIGURE

8.4-6

001675



A



B

8-31

SOURCE: BRG Consulting, Inc., 2003.

7/25/06

Sycamore Landfill Master Plan EIR

**Photosimulation of the Reduced Footprint Alternative from
Viewpoint 12 (Mission Gorge Road)**

FIGURE

8.4-7

001676

TABLE 8.4-1
Estimated Long-Term Project Habitat Impacts for the Reduced Footprint
Alternative, Sycamore Landfill and Ancillary Facilities

Vegetation Community	Tier	Sycamore Landfill Expansion Impacts				Total Habitat Impacts	
		Inside MHPA		Outside MHPA		Master Plan	Reduced Footprint
		Master Plan	Reduced Footprint	Master Plan	Reduced Footprint		
Native grassland	I	0.42	0.4	1.72**	1.66**	2.14	2.06
Diegan coastal sage scrub/Native grassland	I*	0.77	--	1.01	<u>0.7</u> 0.9	1.78	<u>0.7</u> 0.9
Diegan coastal sage scrub/Non-native grassland/Native grassland	I*	0.79	<u>0.8</u> 4.0	--	--	0.79	<u>0.8</u> 4.0
Diegan coastal sage scrub and disturbed DCSS	II	6.35	<u>5.4</u> 6.0	<u>15.37</u> 14.84	<u>8.4</u> 10.2	<u>21.72</u> 21.19	<u>13.8</u> 16.2
Chamise chaparral	IIIA	3.22	--	7.12	2.4	10.34	2.4
Southern mixed chaparral	IIIA	--	--	0.88	0.9	0.88	0.9
Non-native grassland	IIIB	0.22	0.2	0.42	0.1	0.64	0.3
Developed/Ruderal (not sensitive)	N/A	2.83	<u>2.8</u> 2.9	<u>13.07</u> 13.31	<u>13.20</u> 13.9	<u>15.90</u> 16.14	<u>16.0</u> 16.8
Mule fat scrub	N/A	0.09	0.1	--	--	0.09	0.1
TOTAL		14.69	<u>9.7</u> 10.6	<u>39.60</u> 39.30	<u>27.36</u> 30.06	<u>54.29</u> 53.99	<u>37.06</u> 39.46

Source: RECON, 2004, revised 2006, 2007.

* Contains communities having several Tier designations, but is treated as Tier I for purposes of assessment and mitigation in this EIR.

** Would impact 1.66 acres of nature grassland fenced and avoided in PDP/SCP 40-0765

The 21.060 acres of landfill/ancillary facility impacts to sensitive native habitats would be mitigated prior to any disturbance of those lands in the same manner as habitat impacts from the Master Plan, that is, by preservation of comparable habitats, using City-mandated mitigation ratios.

The Reduced Footprint Alternative, in general, avoids most areas of *Dudleya variegata* that were avoided under PDP/SDP 40-0765 (see Figure 8.4-2). However, it is possible that as many as 300 of the 2,000 dudleya plants located outside the MHPA in Population 1 (the population west of the landfill and located farthest north in Figure 8.4-2) could be disturbed by transmission line relocation construction. SDG&E will attempt to avoid these impacts by relocating the transmission structures and their access road, but it is possible that some of the dudleya cannot be avoided. In that case, up to 300 of the plants would be translocated to a suitable nearby site, per the procedures identified in the Mitigated Negative Declaration for PDP/SDP 40-0765. Anticipated avoidance and impacts to previously avoided dudleya population is shown in Table 8.4-2.

TABLE 8.4-2
Additional Impacts to Variegated Dudleya

Dudleya Population Number ¹	MND/Staged Development Plan (PDP/SDP 40-0765)		Proposed Master Plan		Difference from SDP	Reduced Footprint Alternative		Difference from SDP
	Taken ²	Avoided	Taken	Avoided	Additional Plants Impacted	Taken	Avoided	Additional Plants Impacted
1	50	2,000	2,050	0	+2,000	350	1,700	+300 (BRG estimate ³)
2	1,300	1,700	3,000	0	+1,700	1,300	1,700	0
3	0	1,400	1,400	0	+1,400	0	1,400	0
4	0	3,500	3,500	0	+3,500	0	3,500	0
5	0	1,850	1,850	0	+1,850	0	1,850	0
6	1,600	1,600	3,200	0	+1,600	1,600	1,600	0
7	0	175	175	0	+175	0	175	0
TOTAL	2,950	12,225	15,175	0	+ 12,225	3,250	11,925	+300

¹ Dudleya populations mapped by Merkel & Associates, Inc. are located on the west ridge and are numbered north to south (see Figure 4.3-2).

² Portions of the Dudleya populations shown bolded under the SDP in populations 1, 2, and 6 have already been removed as part of the dudleya salvage. Therefore, if alternative plans avoided these areas, no benefit would accrue regarding the avoidance of dudleya.

³ While SDG&E will attempt to avoid dudleya located near proposed tower cluster "7", numbered from south to north, as many as 300 dudleya may need to be translocated out of construction area, spur road and clear zone.

The Reduced Footprint Alternative would incur the same jurisdictional wetland impacts as the Master Plan. Regarding impacts associated with transmission line relocation, Table 5 of EIR Appendix C3 indicates that the transmission line would impact 0.9 acres of sensitive habitat on a long-term basis, and 9.4 acres temporarily. These acres are less than 60 percent of those of the Master Plan.

8.4.4 Traffic/Circulation

Alternative 8.4 would result in an overall reduction in size and volume of the landfill by altering the boundary line of the impact area and would result in the shortening of the lifespan of the landfill. Although the overall capacity of the landfill would be reduced, the traffic volumes associated with Alternative 8.4 would remain essentially the same as the volumes of the Master Plan, but would occur for a shorter time period. Therefore, local traffic related impacts and the associated mitigation measures for the Reduced Footprint Alternative would be the same as those identified for the Master Plan. However, as discussed in Section 8.2.4, a landfill alternative with less capacity than proposed in the Master Plan would result in substantial diversion of solid waste to other landfill sites that are farther away from the San Diego County waste generation centroid. Thus, from a regional perspective, while the Reduced Footprint Alternative would accommodate the traffic coming to Sycamore Landfill for a time period as short as approximately 14 years, from 2008 to 2022 or so, its closure at that time, and subsequent diversion of waste to other, more distant sites, would result in substantial but unquantified regional increases in waste vehicle mileage and congestion impacts, relative to the Master Plan (estimated closure date of 2028 or later).

8.4.5 Paleontological Resources

The Reduced Footprint Alternative would result in the excavation of approximately 102.4 acres of fossil-bearing strata. The proposed Master Plan would result in excavating of 128 acres of such strata. However, a reduction in the amount of acres being excavated would not reduce potential impacts to paleontological resources. Alternative 8.4 would result in impacts that would not differ substantially from the Master Plan. As discussed in Section 4.5 of this EIR, if fossils are discovered onsite during grading and trenching for redevelopment within the community plan boundaries, the measures described in Section 4.5 would mitigate potential adverse impacts to the resources to below a level of significance.

8.4.6 Noise

The western boundary of the Reduced Footprint Alternative would be located as much as 500 feet farther east than the corresponding boundary of the Master Plan. Consequently, in locations such as cross-section B, its anticipated noise level would be several decibels less than the 47.7 dB(A) Leq projected for the proposed Master Plan at that location. However, at other cross-section locations, its boundary would be similar to that of the Master Plan, and thus, its noise impacts would be similar as well. The Master Plan was found to result in lower noise levels than the approved No Project Alternative (see Table 4.6-4). The Reduced Footprint Alternative would have similar results, but be even lower at some locations on the western boundary. No significant impact is identified for the Reduced Footprint Alternative associated with a projected increase in ambient sound levels in the landfill vicinity.

Implementation of the Reduced Footprint Alternative would require relocation of the existing transmission line that divides the landfill site, similar to the proposed Master Plan. Therefore, like the Master Plan, the Reduced Footprint Alternative would result in temporary increases in noise associated with transmission line relocation activities.

The Reduced Footprint Alternative would, like the Master Plan, have no operational noise impacts during daytime or evening hours as a result of operating behind noise barrier berms required as mitigation. However, if 24-hour operations are approved, night operations for the Reduced Footprint Alternative would have to be restricted to more than 200 feet from the property boundary, as shown with diagonal hatching in Figure 4.6-3 for the Master Plan.

The proposed mitigation berms would keep noise levels below the 60 dB(A) avian criterion at property lines near landfill operations, as discussed for the Master Plan. However, as with the Master Plan, the avian criterion would be exceeded in lands totaling as much as 29.38 acres containing gnatcatcher habitat within 325 feet of the landfill access road, as shown in Figure 4.6-4. This value represents the maximum potential acreage of gnatcatcher habitat in which 60 dB is exceeded when the daily disposal rate is 13,000 tons per day. Smaller areas would be subject to similar impacts at the lower interim proposed daily tonnage limits prior to 2025.

Under the Reduced Footprint Alternative, like the Master Plan, several additional landfill ancillary facilities would be constructed. Therefore, temporary noise impacts associated with ancillary facility construction, similar to those of the Master Plan, would occur as a result of the Reduced Footprint Alternative. Aggregate processing operations would

continue to be located at the bottom of the canyon, as they are for the Master Plan. No noise impact was identified for aggregate processing as part of the 2002 MND 40-0765.

The grinding of green waste for use as mulch and alternative daily cover would continue. No noise impact is anticipated to result from this work, since the grinder would continue to be located either far from the landfill boundaries, or below the natural canyon ridgelines, or behind a noise barrier berm, as mitigation, similar to the Master Plan. Thus, no significant noise impacts are anticipated for the green waste grinder under the Reduced Footprint Alternative.

Under the Reduced Footprint Alternative, increases in daily truck and tonnage limits would occur, similar to the Master Plan. Therefore, peak hour truck noise within the landfill site would be similar to that for the Master Plan, but would occur for fewer years due to a smaller waste capacity (24 mcy smaller). Significant truck noise impacts would occur along the first 2,800 feet of the landfill access road, similar to those for the Master Plan.

Under the Reduced Footprint Alternative, the numbers of waste haul trucks passing near the residential tract located southeast of Mast Boulevard and West Hills Parkway would be similar to those of the Master Plan. No direct or cumulative noise impacts to residents of that tract were identified as a result of the Master Plan. Therefore, no residential noise impacts would occur as a result of the Reduced Footprint Alternative.

In summary, noise impacts of the Reduced Footprint Alternative would be similar to those of the Master Plan, but would have somewhat shorter duration (due to the alternative's smaller waste capacity and consequent shorter service life). Appropriate noise mitigation measures would include all measures identified under the Master Plan.

8.4.7 Air Quality

Emissions of criteria pollutants (PM_{10} , SO_x , NO_x and CO) as a result of the Reduced Footprint Alternative are expected to be similar to those for the Master Plan, i.e., SO_x and CO would not be significant. NO_x and VOC emissions would be regionally significant, and PM_{10} , NO_x , and $PM_{2.5}$ would be cumulatively significant, but for a shorter duration (as short as 14 years v. 20 years), as a result of the smaller total solid waste capacity of the Reduced Footprint Alternative (133 mcy v. 157 mcy). However, as discussed in Section 8.2.7, a landfill alternative with less capacity than the Master Plan would result in substantial diversion of solid waste to other landfill sites that are farther away from the San Diego County waste generation centroid. Thus, from a regional perspective, while the Reduced Footprint Alternative would accommodate the traffic coming to Sycamore Landfill for a minimum of approximately 14 years, from 2008 to 2022, its estimated closure at that time, and subsequent diversion of waste to other, more distant sites, would result in substantial but unquantified regional increases in waste vehicle mileage and congestion impacts. Waste vehicle haul emissions would thus be expected to increase substantially during the six-year period from 2022 to 2028.

As with the project, H₂S odors from landfill gas emissions or odors from greens recycling could occur on occasion. Like the project, this is considered a significant, unmitigable impact. Numerous measures are being undertaken to minimize potential odor emissions, but there is no guarantee that the measures would be effective under all atmospheric conditions.

As a result of the smaller waste capacity of the Reduced Footprint Alternative, emissions of Greenhouse Gases are expected to be similar to that of the Master Plan, but somewhat less. These emissions are considered cumulatively significant, and unmitigable, for the same reasons discussed in EIR Section 5.3.7 for the Master Plan.

8.4.8 Other Environmental Topics

The project was found to result in no significant impacts to any of the other environmental topics, as a result of project design features, absence of specific resources, and/or compliance with all applicable regulations. These topics included population/housing, water conservation, recreation, energy, public services, public utilities, human health/public safety/hazardous materials, hydrology/water quality, and geology. Since the Reduced Footprint Alternative would disturb less area than that of the Master Plan, no impacts to these other topics are expected to occur.

8.4.9 Summary of Impacts

The Reduced Footprint Alternative would result in an overall reduction in size by altering the boundary line of the impact area of the landfill along the western side of the project site, thereby reducing the area of the landfill footprint. Potential significant impacts to land use, landform alteration/visual quality, biological resources, transportation/circulation, paleontological resources, noise, and air quality would be similar to the potential impacts to those of the Master Plan, but would have somewhat shorter duration (due to smaller waste capacity). However, if waste is received at maximum requested rates, as a result of an estimated landfill closure approximately six years earlier than the Master Plan, solid waste would be diverted longer distances to other disposal sites after 2022, with consequent substantial impacts related to haul vehicle mileage and emissions. Appropriate mitigation measures would include all measures identified under the Master Plan.

8.5 REDUCED FOOTPRINT ALTERNATIVE, BUT WITH TRANSMISSION LINE RELOCATION TO THE SOUTH AND EAST

The Reduced Footprint Alternative, but with Transmission Line Relocation to the South and East (hereafter referred to as Alternative 8.5) would have identical elements to the Alternative 8.4 (Figure 8.4-1 and 8.4-2) with the exception of the relocation of the existing transmission lines. The lines would change course to cross the southern boundary of the site as they reach the landfill. The corridor would then be directed to the north along the eastern boundary of the

site where the lines would re-connect with the existing transmission lines, identical to the relocation in Alternative 8.3 (Figures 8.3-1 and 8.3-2).

Since this alternative is identical to Alternative 8.4, and because no significant visual impacts were identified from the alternative transmission line relocation of Alternative 8.3, the following impacts are the same as for Alternative 8.4: land use, landform alteration/visual quality, traffic/circulation, paleontological resources, noise and air quality. The only topic for which there may be a substantive difference with the first reduced footprint alternative is biological resources.

8.5.1 Biological Resources

Biological impacts of the landfill and ancillary facilities associated with this alternative would be identical to the discussion in Section 8.4.3 of this EIR: approximately 300 additional *dudleya variegata* would be disturbed, and loss of 16.2 acres of Diegan coastal sage scrub habitat. Impacts of the transmission line relocation component of the project would be identical to the discussions of that topic in Section 8.3.2 of this EIR. That is, anticipated permanent impacts to Diegan coastal sage scrub habitat would increase, from 0.08 to 0.3 acres, compared to the Master Plan. Anticipated temporary disturbance would decrease by approximately forty percent, from 17.35 acres under the Master Plan routing, to 10.3 acres for the alternative route to the south and east of the landfill. Long-term impacts would be mitigated by conservation of other off-site habitats, at approved mitigation ratios. Temporary transmission line construction impacts would be mitigated by reseeding the disturbed areas with seeds of species native to the area. The alternative route would potentially impact some areas of *Dudleya variegata* being avoided under PDP/SDP 40-0765. Therefore, SDG&E would be required to avoid the protected *dudleya* by adjusting the location of the transmission line structures or construction laydown area. Any *dudleya* that could not be avoided would be translocated, as provided for under PDP/SDP 40-0765. As a result, potential impacts to biological resources from Alternative 8.5 would be less than significant.

8.5.2 Traffic/Circulation

Alternative 8.5 would be identical to Alternative 8.4 (Figures 8.4-1 and 8.4-2) with the exception of the relocation of the existing transmission lines. This alternative would reduce the landfill "footprint" from that of the Master Plan. Although the overall capacity of the landfill would be reduced, the traffic volumes associated with Alternative 8.5 would remain the same as that of the Master Plan but would only occur for the duration of the reduced lifespan, approximately six years less than the Master Plan, if waste is received at the requested daily rates. Therefore, traffic related impacts and the associated mitigation measures for Alternative 8.5 would be the same as those identified for the Master Plan. Alternative 8.5 would also be identical to Alternative 8.4 relative to additional regional vehicle mileage, traffic and air quality impacts associated with diversion of solid waste from the Sycamore site to another, more distant disposal site, after 2022.

8.5.3 Other Environmental Topics

Alternative 8.5 was found to result in no significant impacts to any of the other environmental topics, as a result of project design features, absence of specific resources, and/or compliance with all applicable regulations. These topics included population/housing, water conservation, recreation, energy, public services, public utilities, human health/public safety/hazardous materials, hydrology/water quality, and geology. Since this alternative would disturb less area than that of the proposed Master Plan, no impacts to these other topics are expected to occur.

8.5.4 Summary of Impacts

The Reduced Footprint Alternative 8.5 would be identical to Alternative 8.4, with the exception of the relocation of the existing transmission lines to the southern and eastern boundaries of the site, as discussed in Alternative 8.3. Potential impacts to land use, landform alteration/visual quality, biological resources, transportation/circulation, paleontological resources, noise, and air quality would be similar to those of the Master Plan, but would have somewhat shorter duration (due to a smaller waste capacity). However, as a result of the estimated landfill closure approximately five years earlier than the Master Plan, solid waste would be diverted longer distances to other disposal sites as early as 2022, which may result in impacts related to longer haul vehicle mileage and emissions to reach any landfills that are located further from the region's population centroid. Appropriate mitigation measures would include all measures identified under the Master Plan.

8.6 OTHER ALTERNATIVES THAT WOULD AFFECT SOME DUDLEYA, BUT LESS THAN THE PROPOSED MASTER PLAN

An additional ~~12,636~~ ~~12,938~~ *Dudleya variegata*, a plant characterized as a "narrow endemic" species, would be disturbed as a result of the landfill Master Plan, which would provide approximately ~~134~~ ~~126~~ million cubic yards (mcy) of additional landfilling capacity compared to the existing waste now in place (see Table 4.3-2). If these plants are expected to be disturbed as a result of approval of the Master Plan by the City of San Diego, and subsequent implementation, they would be removed and "translocated" to a site previously approved for such translocation, southeast of the landfill site. Nearly all of these plants are located in seven populations along the western ridge of Little Sycamore Canyon, and currently have been avoided under provisions of PDP/SDP 40-0765 applying to the existing Staged Development Plan.

Those *Dudleya* populations would also be avoided should the Reduced Footprint Alternative be chosen. This alternative would provide approximately ~~110~~ ~~107~~ mcy of additional capacity, ~~24~~ ~~19~~ mcy less than the proposed Master Plan. That difference represents approximately ~~83~~ percent of the volume of waste now in place at Sycamore Landfill (23 mcy), and ~~34~~ ~~over~~ ~~27~~ percent of the volume accommodated in the entire Staged Development Plan (71 mcy). On the average, each additional million cubic yards of landfill capacity in the Master Plan would result in disturbance (and required translocation) of approximately ~~527~~ ~~403~~ individual *Dudleya* plants. Or, to put it another way, each *Dudleya* plant disturbed would allow an additional ~~1900~~ ~~4,000~~ cubic yards of waste to be put in place. That amount

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of waste capacity has a value, to the project proponent, to the City of San Diego, and to the San Diego region. Each cubic yard of waste that can be accommodated at the existing site is a cubic yard that does not need to go to a distant existing landfill, or to a new, unsited and unpermitted landfill.

An effort was made to determine if there was any alternative between the Reduced Footprint Alternative and the proposed Master Plan in volume, that had a higher ratio of additional waste capacity per Dudleya disturbed. Unfortunately, because all of the new potential Dudleya disturbed are located in a line along the western edge of Little Sycamore Canyon, no such alternative was identified. All of the specific designs examined had ratios of approximately 10,000 cubic yards per Dudleya disturbed.

8.7 REDUCED HEIGHT (883' AMSL) ALTERNATIVE, WITH TRANSMISSION LINE RELOCATION TO THE WEST AND NORTH

The Reduced Height (883' AMSL) Alternative would have the same disturbance "footprint" as the Master Plan, and would completely fill the portion of Little Sycamore Canyon within the landfill site, but would not increase the landfill maximum elevation above the level currently permitted under the Staged Development Plan (883 feet AMSL). Proposed final grade contours of the Reduced Height (883' AMSL) Alternative are shown in Figure 8.7-1. The Reduced Height (883' AMSL) Alternative would have a total capacity of 128.5 million cubic yards (mcy), an increase of approximately 105.5 mcy over existing conditions, an increase of approximately 6057.5 mcy over the existing approved plan, and a decrease of 28.5 mcy from the Master Plan.

8.7.1 Land Use

Since the footprints of the Reduced Height (883' AMSL) Alternative and the proposed Master Plan are exactly the same, the land use impacts would be exactly the same as well. No significant land use impacts were identified.

8.7.2 Landform Alteration/Visual Quality

Visual impacts of the Reduced Height (883' AMSL) Alternative would be similar to, but slightly greater than, those of the No Project Alternative. However, like the No Project Alternative, the Reduced Height (883' AMSL) Alternative would not create any significant new visual impacts beyond those anticipated in and approved by the City in CUP 6066/PC AM. From a plan-to-ground perspective, the Reduced Height (883' AMSL) Alternative would transform a valley into a mesa. The landfill would continue to be visible from the south, from the east from high elevations like Fortuna or Cowles Mountains, and from existing developed areas of Santee in Sycamore Canyon, and from Fanita Ranch to the northeast. Substantial portions of landfill views from the east or west would be blocked by intervening ridges east and west of Little Sycamore Canyon. As a result, the Reduced Height (883' AMSL) Alternative would not result in any new landform or visual impacts. However, substantial landform alterations would continue as approved under the 1994 Staged Development Plan and CUP 6066/PC AM.

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MCAS/Miramar

MCAS/Miramar



access road

MHPA

MHPA

0 1,000 feet
scale in feet

North
9/11/04

SOURCE: Emcon/OWT, 2004; BRG Consulting, Inc., 2004

Sycamore Landfill Master Plan EIR

Reduced Height Alternative

FIGURE

8.7-1

8.7.3 Biological Resources

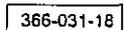
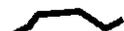
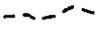
Since the footprint of the Reduced Height (883' AMSL) Alternative and the proposed Master Plan are exactly the same, the biological impacts would be exactly the same as well. Areas of potential impact are shown in Figure 8.7-2. Expansion of the landfill and development of new ancillary facilities would impact 10 Nuttall's scrub oak plants and approximately 12,621 variegated dudleya plants outside the MHPA (12,636 total). These impacts would be mitigated through planting or transplanting adequate numbers of the specific plants to ensure the long-term survival of the number of plants required by the City's mitigation ratios (2:1). The Reduced Height (883' AMSL) Alternative (and the Master Plan) would disturb sensitive native habitats long-term comprising approximately $(38.6638 - 22(38.2937 - 85 + 0.37))$ acres, and mitigation of these impacts meeting City mitigation ratios would be provided by conveyance of nearby MHPA parcels containing comparable habitats. Reduced Height (883' AMSL) Alternative impacts to jurisdictional wetlands would range from 0.09 to 0.52 acres of wetlands, depending on the agency and its wetlands definition, which would be mitigated through wetlands creation at the wetlands mitigation site south of the landfill, and through preservation and enhancement of drainages located within upland habitats to be conveyed to the City. Potential impacts to Cooper's hawk could occur if the species is present within 300 feet of construction of landfill or ancillary facilities. If so, steps have been identified to mitigate any potential impact. Potential traffic noise impacts to coastal California gnatcatchers could occur in 29.38 acres of coastal sage scrub habitat located near the existing and future landfill access road. Mitigation would consist of preservation of approximately 45.55 acres of habitat in the MHPA nearby.

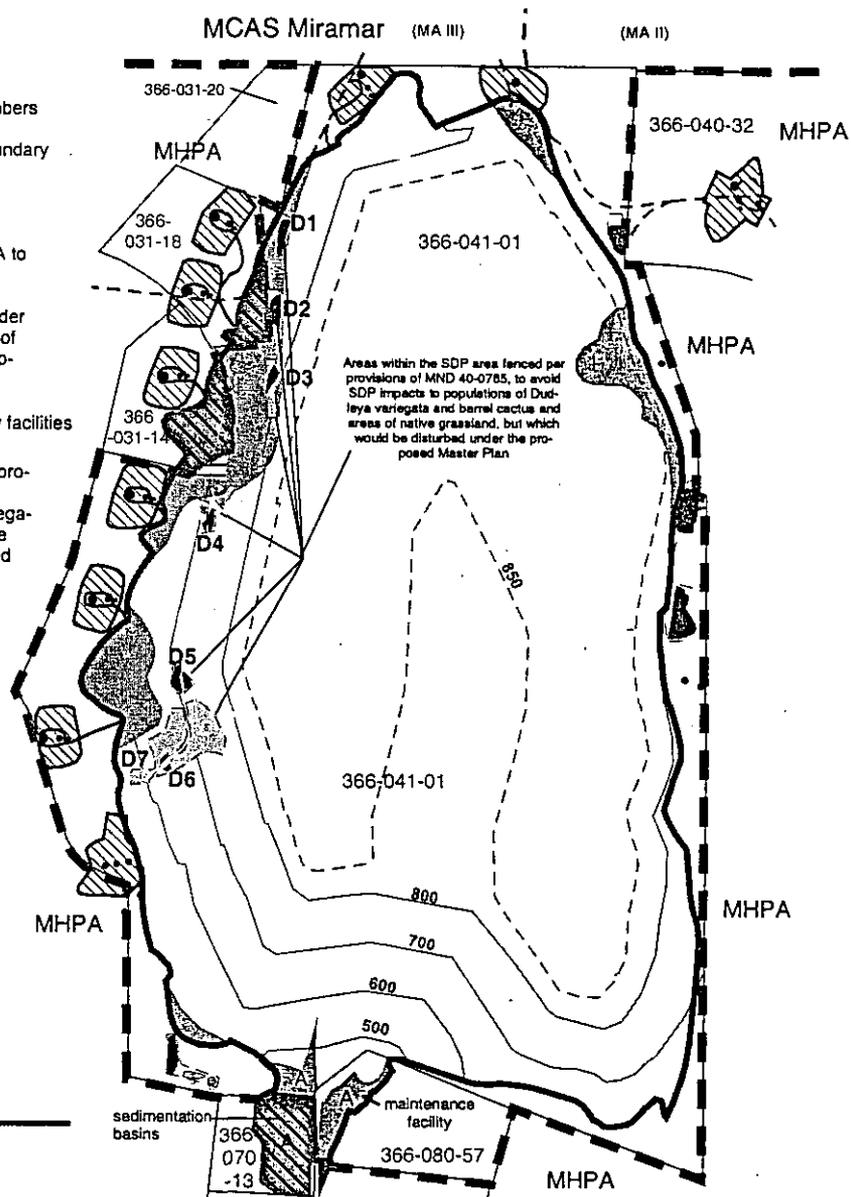
No sensitive plant species within the MHPA would incur impacts from the Reduced Height (883' AMSL) Alternative, other than 10 Nuttall's scrub oaks in 366-031-14, northwest of the existing landfill. These impacts would be mitigated through planting of 20 40 replacement plants in a suitable area, as described by MM 4.3.1. Approximately 0.20 acres of sensitive habitats would incur long-term impacts associated with transmission line structure foundations, and with spur roads to access the transmission structure sites. These impacts would be mitigated by SLI through conveyance of appropriate acreage of lands to be preserved to the City of San Diego. Impacts to the estimated 17.35 acres of sensitive habitats expected to be temporarily disturbed during transmission line construction would be mitigated through reseeded of the disturbed areas with seed mixes appropriate to the habitats present. Finally, potential impacts to Cooper's hawks could occur, if any nest within 300 feet of the transmission line construction. If so, steps have been identified to mitigate any potential impact.

8.7.4 Traffic/Circulation

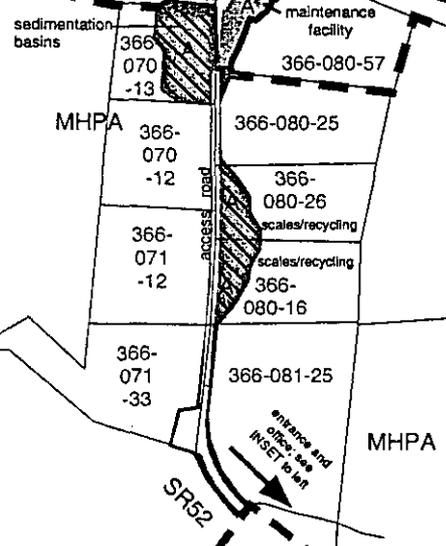
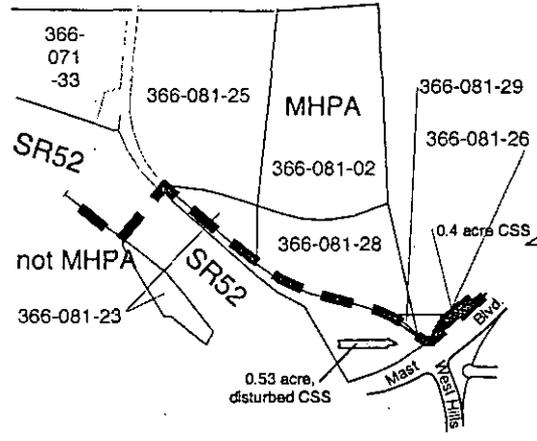
The Reduced Height (883' AMSL) Alternative would increase landfill capacity over the existing approved plan by ~~60.5~~ 57.5 mcy, versus the Master Plan increase of 86 mcy. Thus, the service life of this alternative would be shorter than that of the Master Plan, assuming that waste disposal rates would be the same as for the Master Plan. It is estimated that at those rates, the Reduced Height (883' AMSL) Alternative would have an estimated closure date of 2021. Thus, potential local traffic impacts, and associated mitigation measures, would be the same as for the Master Plan, except that they would end as early as 2021, approximately seven years sooner than for the proposed Master Plan.

LEGEND

-  366-031-18 Assessor's Parcel boundaries and numbers
-  Proposed Master Plan disturbance boundary
-  MHPA boundary
-  Proposed additional areas in the MHPA to be designated "landfill" and disturbed.
-  Proposed new areas of disturbance under proposed Master Plan that are outside of boundaries of the 1994 Staged Development Plan and outside of the MHPA
- A** Locations of proposed landfill Ancillary facilities
-  Areas within the SDP area fenced per provisions of MND 40-0765, to avoid SDP impacts to populations of *Dudleya variegata* and barrel cactus and areas of native grassland, but which would be disturbed under the proposed Master Plan
-  Locations of *Dudleya* svoided under PDP/SDP 40-0765.
- D4** *Dudleya variegata* population ID #, avoided under MND 40-0765, proposed to be taken under Master Plan
-  Existing dirt roads and trails
-  Areas of temporary disturbance by proposed T/L relocation (Alt. A)
-  Proposed transmission line structure locations - long-term disturbance
-  Proposed long-term 12-ft. wide spur roads to transmission line structures.



INSET LANDFILL ENTRANCE AND ACCESS ROAD



North
10/12/07
0 200 400 600 800 1000
scale in feet

SOURCE: Emcon, 2004-2006; BRG Consulting, Inc., 2003-2006

Sycamore Landfill Master Plan EIR

Generalized Grading Contours and Locations of Areas of Biological Disturbance, Reduced Height (883' amsl) Alternative

FIGURE 8.7-2

Plan. The Reduced Height (883' AMSL) Alternative would also be similar to Alternative 8.4 relative to additional regional vehicle mileage, traffic and air quality impacts associated with diversion of solid waste from the Sycamore site to another, more distant disposal site, after approximately 2021.

8.7.5 Paleontological Resources

Since the footprint of the Reduced Height (883' AMSL) Alternative and the Master Plan are exactly the same, the paleontological impacts would be exactly the same as well. Landfill development and ancillary facility construction would excavate approximately 128 acres of fossil-bearing formations. Mitigation would consist of excavation oversight by a qualified paleontologist.

8.7.6 Noise

Since the footprint and the hours of operation of the Reduced Height (883' AMSL) Alternative and the Master Plan are exactly the same, the noise impacts would be similar. Although the maximum height of the Reduced Height (883' AMSL) Alternative would be 167 feet lower in elevation than the Master Plan, that would not result in any substantive reduction in anticipated noise impacts, since landfilling operations for both the Master Plan and Reduced Height (883' AMSL) Alternative would be mitigated by conducting operations behind noise barrier berms in areas near the MHPA/residentially-zoned lands if the landfilling operation is less than 20 feet lower than the adjacent intervening ridgeline. Like the Master Plan, potential construction noise impacts associated with implementation of the noise barrier berms would be mitigated if construction is required during the gnatcatcher breeding/nesting season adjacent to gnatcatcher-occupied MHPA lands. Like the Master Plan, night operations near the landfill boundary would exceed Noise Ordinance levels unless conducted more than 200 feet from the landfill/residential boundary line; this mitigation would be required. Since on-site truck traffic volumes would be similar to those of the Master Plan, but end four years earlier, the trucks would result in vehicular noise levels exceeding 60 dBA Leq on 29.38 acres of past and anticipated future gnatcatcher habitat within the MHPA, until 2021 or so. Mitigation of this long-term impact would be accomplished by conveyance of 44.66 acres (Appendix C12) of MHPA habitat to the City for permanent preservation.

8.7.7 Air Quality

Since the tonnage of waste disposal per day would be similar for the Reduced Height (883' AMSL) Alternative and the Master Plan, and accomplished within the same site, using similar equipment, emissions of criteria pollutants under the Reduced Height (883' AMSL) Alternative would be similar to those of the Master Plan. Emissions of CO and SO_x would be less than significant, but PM₁₀ and PM_{2.5} emissions would be cumulatively significant and exceed state and federal standards (CAAQS and NAAQS). In addition, emissions of PM₁₀, VOC and NO_x would be regionally significant. However, as discussed in Section 8.2.7, a landfill alternative with less capacity than proposed in the Master Plan would, following landfill closure, result in substantial diversion of solid waste to other landfill sites that are farther away from the San Diego County waste generation centroid. Thus, from a regional perspective, while the Reduced Height (883' AMSL) Alternative would accommodate the traffic coming to Sycamore Landfill for as little as

approximately 13 years, from 2008 to 2021 or so, its estimated closure at that time if waste were received at the maximum requested daily rates, and subsequent diversion of waste to other, more distant sites, would result in substantial but unquantified regional increases in waste vehicle mileage and congestion impacts. Waste vehicle haul emissions would thus be expected to increase substantially during the seven year period after 2021.

Landfill gas emissions from the landfill would be substantially less than for the Master Plan, since the additional waste volume over the approved plan would be 57,559.5 mcy, compared to the proposed Master Plan's 8680 mcy additional. Anticipated landfill gas emissions and their odor implications would be less than significant. Potential greens processing volumes would be similar for the Reduced Height (883' AMSL) Alternative and the Master Plan, and potential odors would be minimized through the same mitigation measures. However, like the Master Plan, complete absence of odor episodes cannot be guaranteed, and so a significant, unmitigated impact must be assessed.

As a result of the smaller waste capacity of the Reduced Height Alternative, emissions of Greenhouse Gases are expected to be similar to that of the Master Plan, but somewhat less. These emissions are considered cumulatively significant, and unmitigable, for the same reasons discussed in EIR Section 5.3.7 for the Master Plan.

8.7.8 Other Environmental Topics

The Master Plan was found to result in no significant impacts to any of the other environmental topics, as a result of project design features, absence of specific resources at the site, and/or compliance with all applicable laws and regulations. Environmental topics with no significant impacts included population/housing, water conservation, recreation, energy, public services, public utilities, human health/public safety/hazardous materials, hydrology/water quality, and geology. Since this alternative is similar to the Master Plan except for a height that is 167262 feet lower, no additional impact to these topics from the Reduced Height (883' AMSL) Alternative is anticipated.

8.7.9 Summary of Impacts

Impacts associated with the Reduced Height (883' AMSL) Alternative would be similar or identical to those of the proposed Master Plan for all topics except for landform alteration/visual quality. However, if waste is received at a minimum requested daily rates, as a result of estimated landfill closure approximately seven years earlier than the Master Plan, solid waste would need to be diverted longer distances to other disposal sites after approximately 2021, with consequent substantial impacts related to haul vehicle mileage and emissions.

The Reduced Height (883' AMSL) Alternative would not create any significant new visual impacts beyond those anticipated in and approved by CUP 6066/PC AM. From a plan-to-ground perspective, the Reduced Height (883' AMSL) Alternative would transform a valley into a mesa. The landfill would continue to be visible from the south, but not from the east or west (except from high elevations like Fortuna or Cowles Mountains. Most east or west views would be blocked by intervening ridges east and west of Little Sycamore Canyon. As a result, the Reduced Height

(883' AMSL) Alternative would not result in any significant new landform or visual impacts. However, substantial landform alterations would continue as approved under the 1994 Staged Development Plan and CUP 6066/PC AM.

8.8 1,145' AMSL ALTERNATIVE, WITH TRANSMISSION LINE RELOCATION TO THE WEST AND NORTH

The 1,145' AMSL Alternative would have the same disturbance "footprint" as the Master Plan, and would completely fill the portion of Little Sycamore Canyon within the landfill site, but its maximum elevation would be 95 feet higher than that proposed in the Master Plan (1,145' AMSL versus 1,050' AMSL). Conceptual final grade contours of the 1,145' AMSL Alternative are shown in Figure 8.8-1. The 1,145' AMSL Alternative would have a total capacity of approximately 183 million cubic yards (mcy), an increase of approximately 160 mcy over existing conditions, an increase of approximately 112 mcy over the existing approved plan, and an increase of 26 mcy from the Master Plan.

8.8.1 Land Use

Since the footprint of the 1,145' AMSL Alternative and the Master Plan are similar, the land use impacts would be similar as well. No significant land use impacts were identified in the analysis of the Master Plan.

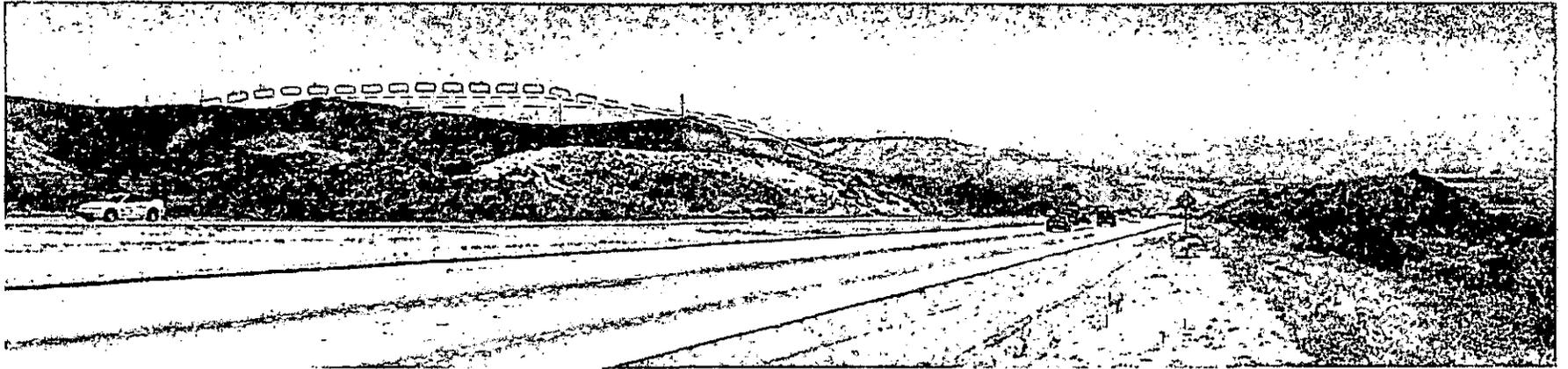
8.8.2 Landform Alteration/Visual Quality

Visual impacts of the 1,145' AMSL Alternative would be similar to, but greater than, those of the Master Plan. The contouring of the upper levels of the Master Plan would blend better with the existing topography than those proposed with this alternative. See Figures 8.8-2, 8.8-3, 8.8-4 and 8.8-5. From a plan-to-ground perspective, the 1,145' AMSL Alternative would transform a valley into a mountain. The landfill would be more visible after 2020 from the south, from the east from high elevations like Fortuna or Cowles Mountains, from existing developed areas of Santee in Sycamore Canyon, and from Fanita Ranch to the northeast than the Master Plan. This alternative would result in significant unmitigated visual impacts, greater than those of the Master Plan.

8.8.3 Biological Resources

Since the footprints of the 1,145' AMSL Alternative and the Master Plan are exactly the same, the biological impacts would be exactly the same as well. Areas of potential impact are the same, as shown in Figure 4.3-1. Expansion of the landfill and development of new ancillary facilities would impact 10 Nuttall's scrub oak plants and approximately 12,626 variegated dudleya plants (all but 15 plants outside the MHPA). These impacts would be mitigated through planting or transplanting adequate numbers of the specific plants to ensure the long-term survival of the number of plants required by the City's mitigation ratios. The 1,145' AMSL Alternative (and the Master Plan) would disturb sensitive native habitats comprising approximately 38.22 (37.85+0.37) acres, and mitigation of these impacts meeting City mitigation ratios would be provided by conveyance of nearby MHPA parcels containing comparable habitats. The 1,145' AMSL Alternative impacts to jurisdictional wetlands would range from 0.09 to 0.52 acres of

8-47



A. Existing View - - - Interim Height - 990' amsl - - - - Interim Height - 1,075' amsl - - - Ultimate Planned Height - 1,145' amsl



B. Anticipated landfill appearance several years after landfill closure and revegetation.

SOURCE: BRG Consulting, Inc., 2006.

12/10/07

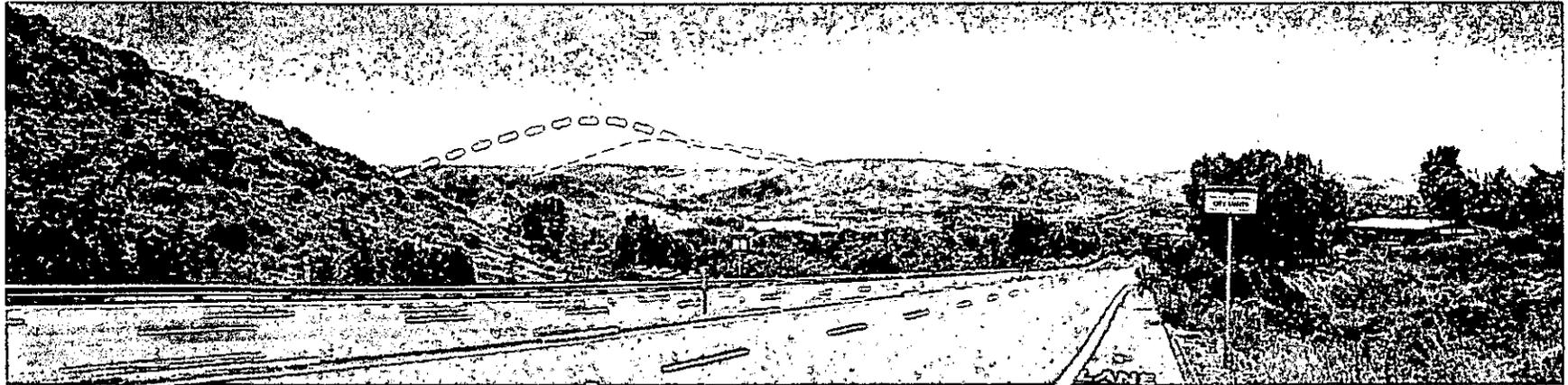
Sycamore Landfill Master Plan EIR

**Photosimulation of 1,145' AMSL Alternative
from Viewpoint 1 (Eastbound SR-52)**

FIGURE

8.8-2

001092



A. Existing View - - - - - Ultimate Planned Height, 1,145 feet amsl - - - - - Interim Height, 990 feet amsl



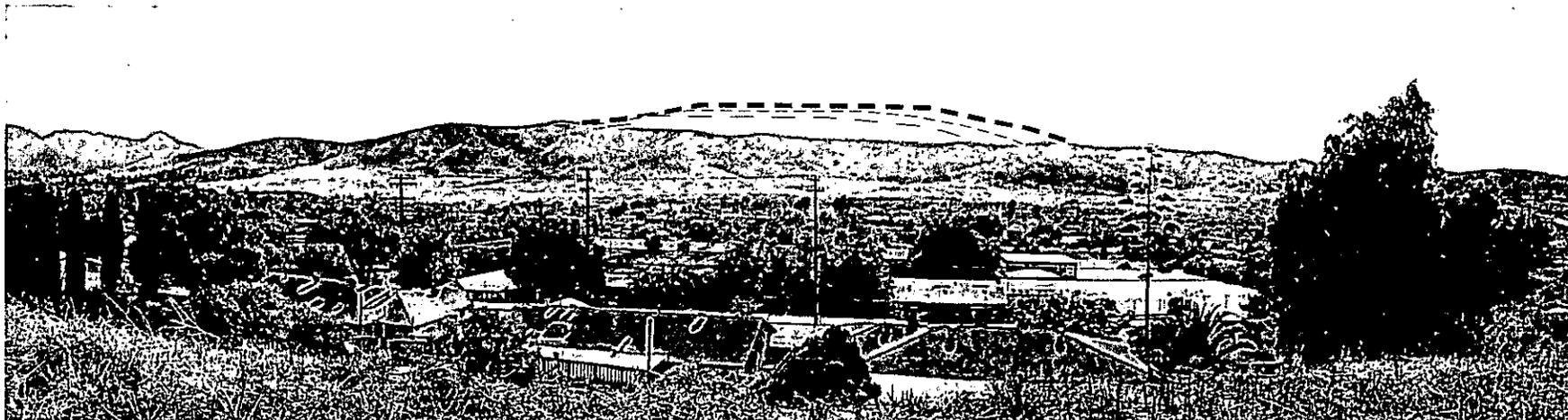
B. Anticipated landfill appearance several years after landfill closure and revegetation.

SOURCE: BRG Consulting, Inc., 2006.

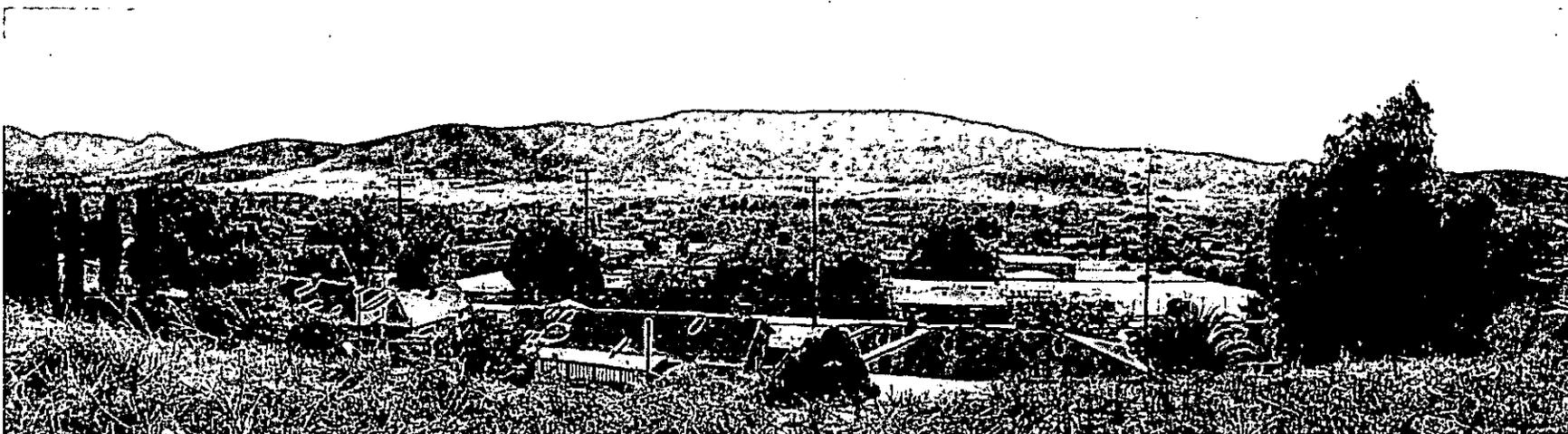
12/10/07

Sycamore Landfill Master Plan EIR
**Photosimulation of 1,145' AMSL Alternative from Viewpoint 12
 (Mission Gorge Road)**

**FIGURE
 8.8-3**



A. Existing View — — — Interim Height - 990' amsl - - - - Interim Height- 1,075' amsl - - - - 1,145 amsl



B. Photosimulation of Ultimate Planned Height - 1,145' amsl
 Note: Anticipated landfill appearance several years after landfill closure and revegetation.

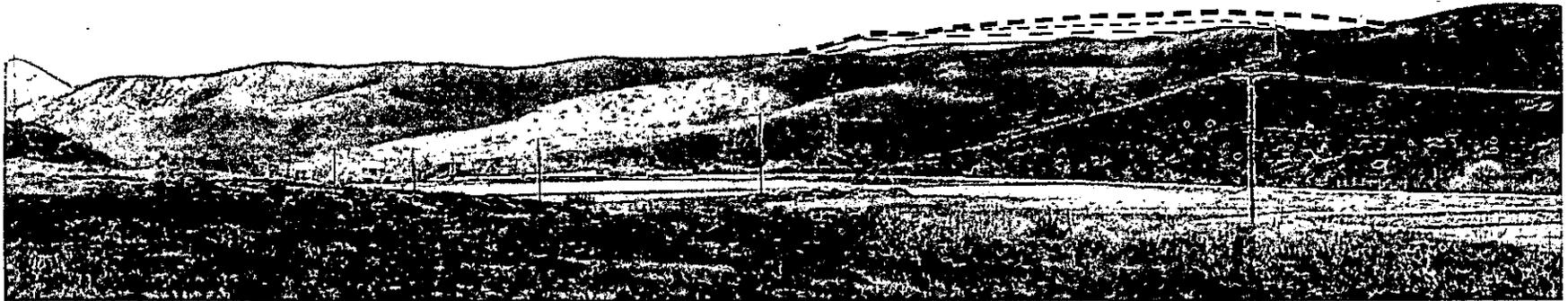
SOURCE: BRG Consulting, Inc., 2006.

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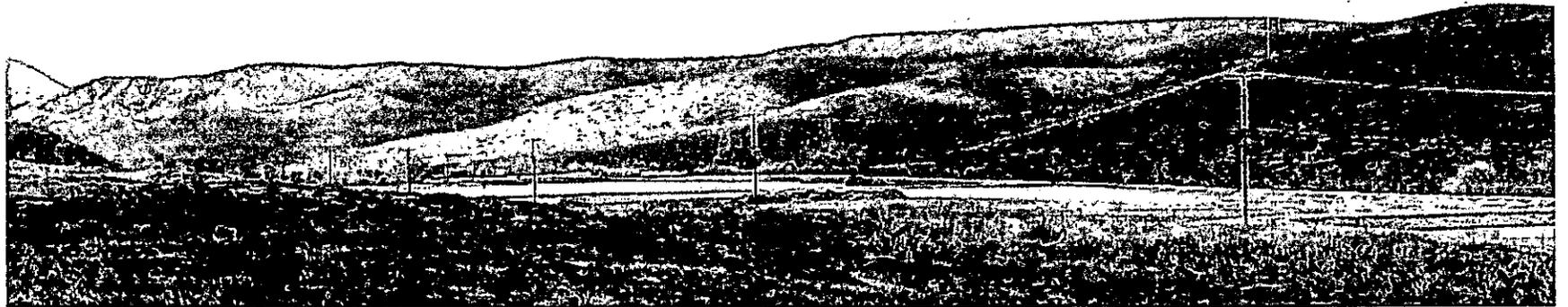
Sycamore Landfill Master Plan EIR

**Photosimulation of 1,145' AMSL Alternative from Viewpoint 6
 (Potential Park Site east of Sycamore Canyon School)**

**FIGURE
 8.8-4**



A. Existing View - - - Interim Height - 990' amsl Interim Height - 1,075' amsl - - - Ultimate Planned Height - 1,145' amsl



B. Photosimulation of Original Proposed Landfill Design

Note: 1. This photo was made with a telephoto lens approximately twice the power of the unaided human eye (110mm focal length v. 55 mm). Thus, the view of the landfill in this photo is enlarged approximately two times in comparison to an image equivalent to that of the human eye.
 2. Anticipated landfill appearance several years after closure and revegetation.

SOURCE: BRG Consulting, Inc., 2006.

12/10/07

Sycamore Landfill Master Plan EIR

Anticipated View of 1,145' AMSL Alternative from Viewpoint G
 (At boundary between potential future Fanita Ranch parklands and residential areas)

FIGURE
8.8-5

wetlands, depending on the agency and definition, which would be mitigated through wetlands creation at the wetlands mitigation site south of the landfill, and through preservation and enhancement of drainages located within upland habitats to be conveyed to the City. Potential impacts to Cooper's hawk could occur if the species is present within 300 feet of construction of landfill or ancillary facilities. If so, steps have been identified to mitigate any potential impact. Potential impacts to coastal California gnatcatchers could occur in 29.38 acres of coastal sage scrub habitat located near the existing and future landfill access road. Mitigation would consist of preservation of a comparable amount of coastal sage scrub habitat in the MHPA nearby.

No sensitive plant species within the MHPA would incur impacts from the 1,145' AMSL Alternative, other than ten Nuttall's scrub oaks in 366-031-14, northwest of the existing landfill. These impacts would be mitigated through planting of 20 replacement plants in a suitable area, as described by MM 4.3.1. Approximately, 0.20 acres of sensitive habitats would incur long-term impacts associated with transmission line structure foundations, and with spur roads to access the transmission structure sites. These impacts would be mitigated by SLI through conveyance of appropriate acreage of lands to be preserved to the City of San Diego. Impacts to the estimated 17.35 acres of sensitive habitats expected to be temporarily disturbed during transmission line construction would be mitigated through reseeding of the disturbed areas with seed mixes appropriate to the habitats present. Finally, potential impacts to Cooper's hawks could occur, if any nest within 300 feet of the transmission line construction. If so, steps have been identified to mitigate any potential impact.

8.8.4 Traffic/Circulation

The 1,145' AMSL Alternative would increase landfill capacity over the existing approved plan by 112 mcy, versus the Master Plan increase of 8680 mcy. Thus, the service life of this alternative would be considerably longer than that of the proposed Master Plan, assuming that waste disposal rates would be the same as for the Master Plan. It is estimated that at those rates, the 1,145' AMSL Alternative would have an estimated closure as early as ~~2031~~²⁰³² if waste is received at the maximum requested daily rates. Thus, potential local traffic impacts, and associated mitigation measures, would be the same as for the Master Plan, except that they would end as early as ~~2031~~²⁰³², approximately four years later than for the Master Plan. The 1,145' AMSL Alternative would defer additional regional vehicle mileage, traffic and air quality impacts associated with diversion of solid waste from the Sycamore site to another, more distant disposal site, for an additional four years.

8.8.5 Paleontological Resources

Since the footprint of the 1,145' AMSL Alternative and the Master Plan are exactly the same, the paleontological impacts would be exactly the same as well. Landfill development and ancillary facility construction would excavate approximately 128 acres of fossil-bearing formations. Mitigation would consist of excavation oversight by a qualified paleontologist.

8.8.6 Noise

Since the footprint and the hours of operation of the 1,145' AMSL Alternative and the Master Plan are exactly the same, the noise impacts would be similar. Although the maximum height of the 1,145' AMSL Alternative would be 95 feet higher in elevation than the Master Plan, that would not result in any substantive increase in anticipated noise impacts, since landfilling operations for both the Master Plan and 1,145' AMSL Alternative would be conducted behind noise barrier berms in areas near the MHPA/residentially-zoned lands if the landfilling operation is less than 20 feet lower than the adjacent intervening ridgeline. Like the Master Plan, potential construction noise impacts associated with implementation of the noise barrier berms would be mitigated if construction is required during the gnatcatcher breeding/nesting season adjacent to gnatcatcher-occupied MHPA lands. Like the Master Plan, night operations near the landfill boundary would exceed Noise Ordinance levels unless conducted more than 200 feet from the landfill/residential boundary line; this mitigation would be required. Since on-site truck traffic volumes would be similar to those of the Master Plan, but possibly end four years later, the trucks would result in vehicular noise levels exceeding 60 dBA Leq on 29.38 acres of past and anticipated future gnatcatcher habitat within the MHPA. Mitigation of this long-term impact would be accomplished by conveyance of 44.66 acres of (Appendix C12) MHPA habitat to the City for permanent preservation.

8.8.7 Air Quality

Since the tonnage of waste disposal per day would be similar for the 1,145' AMSL Alternative and the Master Plan, and accomplished within the same site, using similar equipment, emissions of criteria pollutants under the 1,145' AMSL Alternative would be similar to, but greater than, those of the Master Plan. Emissions of CO and SO_x would be less than significant, but PM₁₀, PM_{2.5} and NO_x emissions would be cumulatively significant and exceed state and federal standards (CAAQS and NAAQS). In addition, emissions of VOC and NO_x would be regionally significant. However, a landfill alternative with greater capacity than the current Master Plan would delay by four years or more substantial diversion of solid waste to other landfill sites that are farther away from the San Diego County waste generation centroid. Thus, from a regional perspective, while the 1,145' AMSL Alternative would accommodate the traffic coming to Sycamore Landfill for approximately 24 years, from 2008 to 2032, its estimated closure at that time, and subsequent diversion of waste to other, more distant sites, would result in substantial but unquantified regional increases in waste vehicle mileage and congestion impacts. Waste vehicle haul emissions would thus be expected to be less than those of the Master Plan during the threefour-year period from 2028 to 20312032.

Landfill gas emissions from the (1,145' AMSL) landfill would be greater than for the Master Plan, since the additional waste volume over the approved plan would be 112 mcy, compared to the Master Plan's 140 86 mcy additional. Anticipated landfill gas emissions and their odor implications would be less than significant. Potential greens processing volumes would be similar for the 1,145' AMSL Alternative and the proposed Master Plan, and potential odors would be minimized through the same mitigation measures. However, like the proposed Master Plan, complete absence of odor episodes cannot be guaranteed, and so a significant, unmitigated impact must be assessed.

As a result of the greater waste capacity of the 1,145' AMSL Alternative, emissions of Greenhouse Gases are expected to be similar to that of the Master Plan, but somewhat greater. These emissions are considered cumulatively significant, and unmitigable, for the same reasons discussed in EIR Section 5.3.7 for the Master Plan. However, the greater capacity of this alternative would reduce the anticipated GHGs associated with finding and operating another landfill site within San Diego County after closure of the Master Plan alternative.

8.8.8 Other Environmental Topics

The 1,145' AMSL Alternative ~~Original Proposed Master Plan~~ was found to result in no significant impacts to any of the other environmental topics, as a result of project design features, absence of specific resources at the site, and/or compliance with all applicable laws and regulations. Environmental topics with no significant impacts included population/housing, water conservation, recreation, energy, public services, public utilities, human health/public safety/hazardous materials, hydrology/water quality, and geology. Since this alternative is similar to the Master Plan except for a height that is 95 feet higher, no additional impact to these topics from the 1,145' AMSL Alternative is anticipated.

8.8.9 Summary of Impacts

Impacts associated with the 1,145' AMSL Alternative would be similar or identical to those of the current Master Plan for all topics, except for air quality. Similar mitigation measures would be required. However, the landfill would be 95 feet higher in this alternative, and the top surface would not undulate as much, so visual impacts would be somewhat greater. Also, as a result of possible landfill closure approximately four years later than the Master Plan, solid waste would be diverted longer distances to other disposal sites after 2031~~2~~ or so, with consequent reduction of impacts related to haul vehicle mileage and emissions during that ~~four~~three-year period (2028-2031~~2~~).

The 1,145' AMSL Alternative would have significant visual impacts similar to, but greater than, those identified for the Master Plan. From a plan-to-ground perspective, the 1,145' AMSL Alternative would transform a valley into a mountain. The landfill would be more visible from the south, from high elevations like Fortuna or Cowles Mountains, from residential areas in Sycamore Canyon, and from possible planned and approved future development in Fanita Ranch, than the Master Plan.

8.9 CONCLUSION

Table 8.9-1 summarizes the potential impacts for the proposed Master Plan and six alternative projects. Figures 8.9-1a, 8.9-1b, 8.9-2a, and 8.9-2b show views of the various alternatives from SR-52 and Kumeyaay Campground. Figures 8.9-3a and 8.9-3b show views of the alternatives from Viewpoint B in Fanita Ranch.

The main purpose of Figures 8.9-1a through 8.9-1b is primarily to compare the appearance of the resultant landforms of the project alternatives. No effort was made to hide any of the transmission lines, but for a variety of reasons they

are not visible in these figures. For example, in Figure 8.9-2a, No Project Alternative, an existing transmission line lattice structure is just barely visible at the ridgeline 2.55 inches from the right edge of the photo. The existing lattice tower is 1.25 miles from the camera location. It tends to "disappear" as a result of its pale gray color and atmospheric perspective (haziness) at that distance.

**Table 8.9-1
Significant Impacts Associated with the Proposed Project and Alternatives**

Alternatives Environmental Topic	Proposed Master Plan (1,050' AMSL) with T/L Route to the West and North of LF)	No Project Alternative; no T/L change	Master Plan with Altern. T/L Route South & East of the LF	Reduced Foot- print Alternative (with T/L to West and North of LF)	Reduced Foot- print Alt. w/ Alt. T/L Route South & East of LF	Reduced Ht./Alt. (883' AMSL) with T/L Route to West & North	1,145' AMSL Alternative with T/L Route to West & North of LF
Land Use	MITIGABLE: Santee to decide if proposed odor and visual minimization measures are adequate; impacts to wetlands and upland habitats would be mitigated as required.	None	Same as the Master Plan.	Substantially the same as the Master Plan; however, no additional parcel to the north-west would be needed by SLI.	Same as the impacts described in the Reduced Foot-print Alternative to the left.	Same as the Master Plan.	Same as Master Plan.
Landform Alteration/ Visual Quality	NOT MITIGABLE: The proposed project would substantially alter the natural landform of Little Sycamore Canyon by grading the canyon and filling it to create a large landform; steep (25 percent gradient or steeper) slopes are present within the proposed area of impact. Through the grading and filling of Little Sycamore Canyon, the proposed project would disturb these steep sensitive slopes in excess of the encroachment allowances of the Land Development Code; the proposed landfill would create manufactured slopes several hundred feet in height; the project would result in an elimination of many steep natural slopes	No <u>new</u> landform impacts; however, substantial modification to landforms would continue under the approved 1994 Staged Development Plan.	Similar to the Master Plan, but greater. The trans-mission line component would be more visible to viewers from the east. From distant viewpoints, the line would ultimately be backdropped by the landfill behind it, reducing its visual contrast. However, for existing residential viewers along the first streets east of the landfill, the alternative transmission lines would be silhouetted against the sky as a result of the angle of view.	Substantially the same as the Master Plan. However, the top surface would be flat, not undulating like the Master Plan.	Substantially the same as the Master Plan.	Similar but somewhat greater than the No Project Alternative. A valley would be transformed into a mesa. Substantial landform alterations would continue as under the approved 1994 Staged Development Plan.	Similar to the Master Plan but greater. Also, the proposed upper contours of the design would be flatter and less undulating than those of the proposed Master Plan. Visual impacts of this alternative would still significant and unmitigable, as is the Master Plan.

Alternatives Environmental Topic	Proposed Master Plan (1,050' AMSL with T/L Route to the West and North of LF)	No Project Alternative: no T/L change	Master Plan with Altern: T/L Route South & East of the LF	Reduced Foot- print Alternative (with T/L to West and North of LF)	Reduced Foot- print Alt. w/ Alt. T/L Route South & East of LF	Reduced Ht. Alt. (883' AMSL) with T/L Route to West & North	1,145' AMSL Alternative with T/L Route to West & North of LF
	<p>(25 percent gradient or steeper) due to the large extent of excavation and fill; significant impacts to unique existing physical features would occur as a result of the implementation of the proposed project. However, the proposed upper contours of the design would blend better with the existing topography than those of the original proposed Master Plan design.</p>						
<p>Biological Resources (landfill and ancillary facilities)</p>	<p>MITIGABLE: Significant landfill expansion impacts: 10 Nuttall's scrub oak, 411 variegated dudleya plants; no continued avoidance of approximately 12,225 variegated dudleya plants located within the boundaries of the approved 1994 Staged Develop. Plan; potential impacts to coastal California gnatcatchers within the MHPA area would occur if the species is present within 1,600 feet of the construction of noise barrier berms during the coastal California gnatcatcher season; potential impacts to coastal California gnatcatchers</p>	<p>No new biological impacts would occur; however, potential dissemination of exotic invasive plants to the landfill vicinity would not be addressed.</p>	<p>Landfill and ancillary impacts would be the same as for the Master Plan.</p>	<p>Approximately 14.5 acres less sensitive habitat would incur impacts, compared to the Master Plan (5 acres less MHPA impacts, and 9.5 acres less impact for the non-MHPA lands). There would be no impacts to Nuttall's scrub oak, and approximately 300 additional dudleya would be disturbed (compared to existing conditions).</p>	<p>Same as the impacts described in the Reduced Foot-print Alternative to the left.</p>	<p>Same as the Master Plan.</p>	<p>Same as the Master Plan.</p>

Alternatives Environmental Topic	Proposed Master Plan (1,050' AMSL) with T/L Route to the West and North of LF	No Project Alternative: no T/L change	Master Plan with Altern. T/L Route South & East of the LF	Reduced Foot- print Alternative (with T/L to West and North of LF)	Reduced Foot- print Alt. w. Alt. T/L Route South & East of LF	Reduced Ht. Alt. (883' AMSL) with T/L Route to West & North	1,145' AMSL Alternative with T/L Route to West & North of LF
	<p>would occur in 29.38 acres of future gnatcatcher habitat within 250 feet of the landfill access road south of the landfill; potential impacts to nesting Cooper's hawks or other raptors nesting within the MHPA area would occur if the raptors are present within 300 feet of the construction of the landfill expansion or ancillary facilities. The proposed landfill expansion/ ancillary facilities would permanently impact 10.34 acres of chamise chaparral, 21.19 acres of Diegan coastal sage scrub, 1.78 acres of Diegan coastal sage scrub/ native grassland mix, 2.14 acres of native grassland, 0.88 acre of southern mixed chaparral, and 0.09 acre of mule fat scrub and 0.64 acre of non-native grassland. The proposed landfill expansion would impact 0.37 acre of USACE non-wetland jurisdictional waters of the U.S., 0.03 acre of USACE wetlands (mule fat scrub), 0.09 acre of CDFG riparian habitat (mule fat scrub), 0.40 acre of CDFG jurisdictional</p>						

001102

Alternatives/ Environmental Topic	Proposed Master Plan (1,050' AMSL with T/L Route to the West and North of LF)	No Project Alternative: no T/L change	Master Plan with Altern. T/L Route South & East of the LF	Reduced Foot- print Alternative: (with T/L to West and North of LF)	Reduced Foot- print Alt. w/ Alt. T/L Route South & East of LF	Reduced Ht. Alt. (883' AMSL) with T/L Route to West & North	1,145' AMSL Alternative with T/L Route to West & North of LF
	<p>streambed, and 0.09 acre of lands classified as City of San Diego (ESL) wetlands (mule fat scrub). Since the wetland definitions of these agencies differ, the maximum impacts would be those listed here under CDFG.</p> <p>Potential facilitation of dissemination of exotic invasive plants at a site surrounded by the MHPA.</p>						
Biological Resources (transmission line relocation)	<p>MITIGABLE: Significant potential transmission line impacts to 25 Nuttall's scrub oak; potential impacts to Cooper's hawks nesting inside the MHPA, if present within 300 feet; 17.35 acres of temporary impact to native habitats and 0.37 acres of permanent impact. This includes 8.95 acres inside the MHPA (8.75 acres temporary and 0.22 acre permanent) and 8.80 acres outside the MHPA (8.60 acres temporary and 0.20 acre permanent). Total temporary construction impacts to native vegetation communities include 9.1 acres of chamise chaparral, 5.9 acres of Diegan coastal</p>	No new biological impacts;	The transmission line impacts would be comparable to the impacts of the proposed Master Plan.	Less than 54% the transmission line impacts described under the Master Plan: 0.9 long-term impacts v. 0.37 acres; 9.4 acres temporary v. 17.35 acres.	Same as the impacts described in the Reduced Foot-print Alternative to the left.	Same as the Master Plan.	Same as the Master Plan.

Alternatives/ Environmental Topic	Proposed Master Plan (1,050' AMSL with T/L Route to the West and North of LF)	No Project Alternative; no T/L change	Master Plan with Altern. T/L Route South & East of the LF	Reduced Foot- print Alternative (with T/L to West and North of LF)	Reduced Foot- print Alt. w. Alt. T/L Route South & East of LF	Reduced Ht. Alt. (883' AMSL) with T/L Route to West & North	1,145' AMSL Alternative with T/L Route to West & North of LF
	sage scrub, 1.43 acre of Diegan coastal sage scrub/native grassland mix, and 0.59 acre of southern mixed chaparral.						
Traffic/ Circulation	MITIGABLE: Significant project impacts would occur only during AM or PM peak hours at the following locations and dates: 1) Mast Blvd. /West Hills Parkway/ Project Driveway from approval, until landfill closure; 2) SR-52 west of Mast Blvd. from approval, until landfill closure; 3) SR-52 east of Mast Blvd. 2010; 4) Mast Blvd. from SR-52 to West Hills Pkwy/Project Driveway, 2010; 5) Mast Blvd./SR-52 westbound ramps, prior to 2025. NOT MITIGABLE by applicant: 2025-closure impacts at westbound SR-52 ramp from Mast Boulevard in AM. Requires interchange improvements by Caltrans, now in design studies.	No new local traffic impacts. However, solid waste diversion to other landfill sites required by a continued tonnage limit of 3,965 tpd and a continued limit of 620 MSW vehicles per day, would result in substantial increases in regional waste vehicle mileage and traffic congestion until landfill closure in 2031 or so.	Same as the Master Plan.	Substantially the same as the Master Plan, but for a shorter duration: approx. 6 years less. Also, regional traffic after 2022 would increase relative to the Master Plan, as a result of waste diversion from the closed Sycamore Landfill to other more distant disposal sites.	Same as the impacts described in the Reduced Foot-print Alternative to the left.	Substantially the same as the Master Plan, but for a shorter duration: approximately six to seven yrs less. Also, regional traffic after 2021 would increase relative to the Master Plan, as a result of waste diversion from the Sycamore Landfill to other more distant disposal sites.	Substantially the same as the Master Plan, but for a longer duration: approx. 4 years later. Solid waste traffic would not need to be diverted from Sycamore to other more distant disposal sites until after 2032.
Paleonto- logical Resources	MITIGABLE: Proposed new landfill excavations would impact approximately 128 acres of fossil-bearing formations.	None. No new areas of excavation would occur.	Same as the Master Plan.	Similar to Master Plan, but 25 acres less.	Similar to Master Plan, but 25 acres less.	Same as the Master Plan.	Same as the Master Plan.

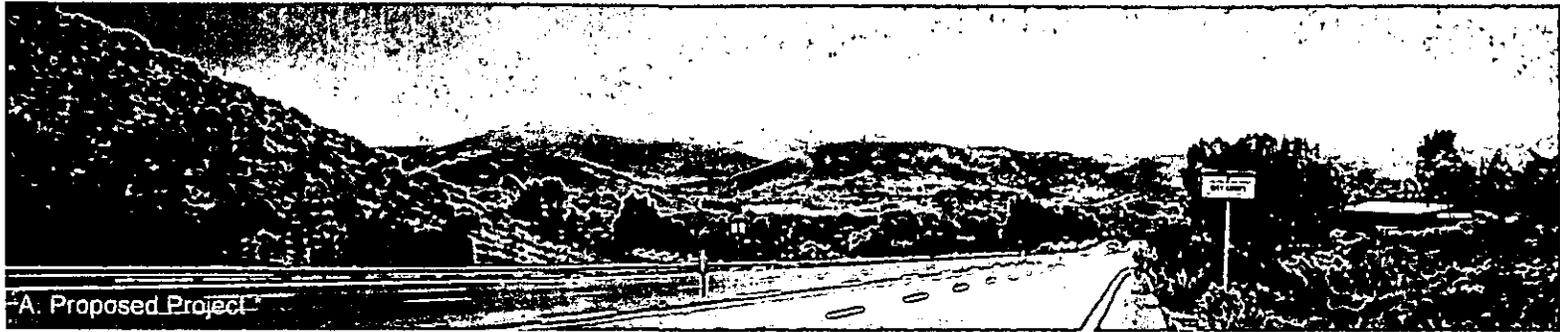
001104

Alternatives Environmental Topic	Proposed Master Plan (1,050' AMSL with T/L Route to the West and North of LF)	No Project Alternative; no T/L change	Master Plan with Altern. T/L Route South & East of the LF	Reduced Foot- print Alternative (with T/L to West and North of LF)	Reduced Foot- print Alt. w. Alt. T/L Route South & East of LF	Reduced Ht. Alt. (883' AMSL) with T/L Route to West & North	1,145' AMSL Alternative with T/L Route to West & North of LF
Noise	<p>MITIGABLE: Night operations near the landfill boundary would exceed Noise Ordinance provisions unless they are conducted more than 200 feet from the residential boundary; potential Noise Ordinance impacts from on-site truck traffic may occur in an area adjacent to the existing landfill access road and within 420 feet of the property line of residentially-zoned parcels 366-081-25, -26, -27, -28, and -29, within which daytime noise levels in excess of 62.5 dBA would be exceeded, or nighttime noise levels of 57.5 dBA would be exceeded; approximately 29.38 acres of former and anticipated future gnatcatcher habitat would be located within the maximum projected 60 dBA Leq zone near the landfill access road; potential impacts to nesting gnatcatchers if, during occasional berm construction during the gnatcatcher season, the adjacent MHPA habitat within 1,600 feet is occupied by nesting gnatcatchers; potential impacts to California</p>	None.	Same as the Master Plan.	Substantially the same as the Master Plan, but for a shorter duration: approximately 6 years less.	Substantially the same as the Master Plan, but for a shorter duration: approximately 6 years less.	Substantially the same as the Master Plan, but for a shorter duration: approximately six to seven years less.	Substantially the same as the Master Plan, but for a longer duration: 4 years more.

Alternatives Environmental Topic	Proposed Master Plan (1,050' AMSL with T/L Route to the West and North of LF)	No Project Alternative, no T/L change	Master Plan with Altern. T/L Route South & East of the LF	Reduced Foot- print Alternative (with T/L to West and North of LF)	Reduced Foot- print Alt. w. Alt. T/L Route South & East of LF	Reduced Ht. Alt. (883' AMSL) with T/L Route to West & North	1,145' AMSL Alternative with T/L Route to West & North of LF
	<p>gnatcatchers nesting inside the MHPA, if they are present within 500 feet of proposed transmission line construction.</p>						
Air Quality/ Odor	<p>NOT MITIGABLE: Operation of the proposed landfill under the Master Plan would result in emissions of NO_x, VOC, and PM₁₀ that would exceed the applicable regional emissions thresholds. Implementation of feasible mitigation measures would reduce project impacts, but not to a level less than significant.</p> <p>Construction of proposed landfill ancillary facilities [and transmission line relocation] would result in emissions of NO_x, VOC, and PM₁₀ that would exceed the applicable regional emissions thresholds. Implementation of feasible mitigation measures would reduce project impacts, but not to a level less than significant.</p> <p>Project emissions of PM₁₀ and PM_{2.5} would, if added to estimated background levels at nearby sensitive receptors increase the exceedance of PM₁₀ and PM_{2.5} over the levels established by the state</p>	<p>No <u>new</u> air or odor impacts would occur; however, odor from ongoing greens processing may be detected by nearby residents.</p> <p>Emissions of NO_x, PM₁₀, PM_{2.5}, and diesel particulates prior to 2016 would be greater than for the Master Plan, without mitigation measures proposed for Master Plan implementation. Waste vehicle emissions would increase on a regional basis as a result of limited daily disposal capacity at Sycamore, and the resultant diversion of solid waste to other, more distant disposal sites.</p>	<p>Same as the Master Plan.</p>	<p>Substantially the same as the Master Plan, but with shorter duration of emissions: approximately 6 yrs. less. Waste vehicle emissions would increase after 2022 on a regional basis as a result of limited disposal capacity at Sycamore, and the resultant diversion of solid waste to other, more distant disposal sites.</p> <p>Cumulative Greenhouse Gas emissions would be less than that of the Master Plan, but greater than zero. As with the Master Plan, because no threshold of significance has been promulgated by the State, impacts are considered</p>	<p>Substantially the same as the Master Plan, but with shorter duration of emissions: approximately 6 yrs. less. Waste vehicle emissions would increase after 2022 on a regional basis as a result of limited disposal capacity at Sycamore, and the resultant diversion of solid waste to other, more distant disposal site</p> <p>Cumulative Greenhouse Gas emissions would be less than that of the Master Plan, but greater than zero. As with the Master Plan, because no threshold of significance has been promulgated by the State, impacts are considered</p>	<p>Substantially the same as the Master Plan, but with shorter duration of emissions: approximately six to seven years less. Waste vehicle emissions would increase on a regional basis after 2021-2022 as a result of limited disposal capacity at Sycamore, and the resultant diversion of solid waste to other, more distant disposal sites.</p> <p>Cumulative Greenhouse Gas emissions would be less than that of the Master Plan, but greater than zero. As with the</p>	<p>Substantially the same as the Master Plan, but with a longer duration of emissions: approximately four years more. Waste vehicle emissions would not increase on a regional basis until after 2032 as a result of anticipated closure of Sycamore, and the resultant diversion of solid waste to other, more distant disposal sites.</p> <p>Cumulative Greenhouse Gas emissions would be greater than that of the Master Plan, and greater than zero. As with the Master Plan, because no</p>

Alternatives Environmental Topic	Proposed Master Plan (1,050' AMSL with T/L Route to the West and North of LF)	No Project Alternative: no T/L change	Master Plan with Altern T/L Route South & East of the LF	Reduced Foot- print Alternative (with T/L to West and North of LF)	Reduced Foot- print Alt. w/ Alt. T/L Route South & East of LF	Reduced Ht. Alt. (883' AMSL) with T/L Route to West & North	1,145' AMSL Alternative with T/L Route to West & North of LF
	<p>standards (CAAQS). Odors from landfill gas (H₂S) and from greens processing operations may be detected periodically by nearby residents; although greens management procedures would reduce the potential intensity of greens odors, there would always be a chance of odor detection while greens are processed at the site, done to help communities comply with AB939.</p> <p>It is possible that, under some atmospheric conditions, odor from solid waste materials received at the landfill scales may be detected at nearby residences. Proposed mitigation measures would minimize potential odor impacts, but could not guarantee that no such impacts would occur.</p> <p>Cumulative Greenhouse Gas emissions would be greater than zero. Because no threshold of significance has been promulgated by the State, impacts are considered significant and unmitigable.</p>	<p>Since this alternative is the 'base case,' there would be no substantive increases in GHG emissions at this site. However, this alternative does not address the need to develop and operate an additional landfill if Sycamore Landfill does not expand, which would have its own GHG impacts.</p>		<p>significant and unmitigable.</p>	<p>significant and unmitigable.s.</p>	<p>Master Plan, because no threshold of significance has been promulgated by the State, impacts are considered significant and unmitigable.</p>	<p>threshold of significance has been promulgated by the State, impacts are considered significant and unmitigable.</p>

Source: BRG Consulting, Inc., 2007, 2008



* Transmission lines not visible from this viewpoint, whether west and north, or south and east of the landfill.

SOURCE: BRG Consulting, Inc., 2006.

07/05/06

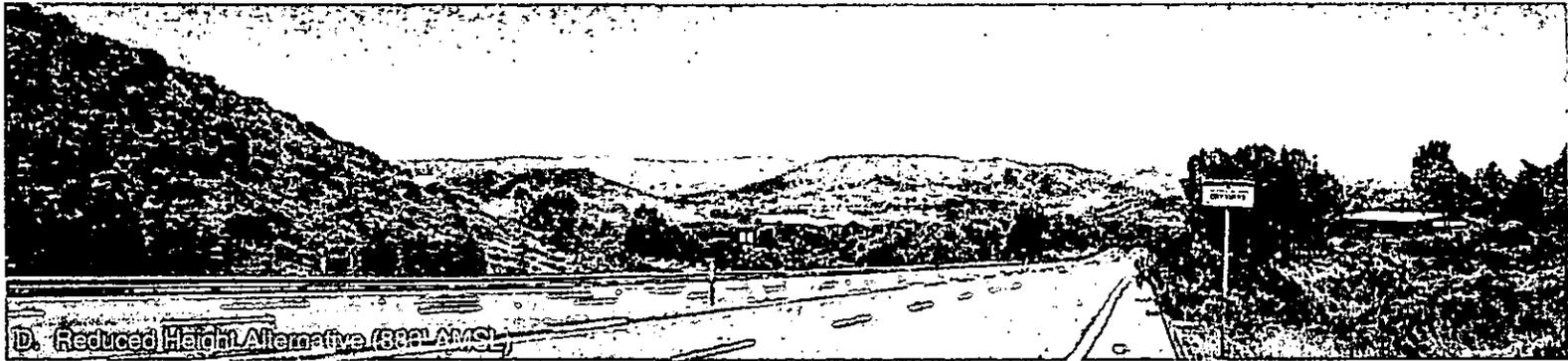
Sycamore Landfill Master Plan EIR

**Comparison of Alternatives from
Viewpoint 12 (Mission Gorge Road)**

**FIGURE
8.9-1a**

001108

8-63



* Transmission lines not visible from this viewpoint, whether west and north, or south and east of the landfill.

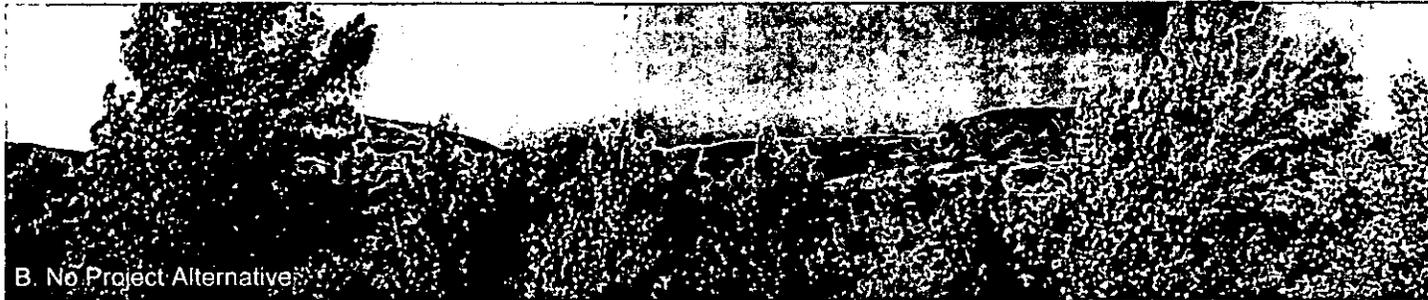
SOURCE: BRG Consulting, Inc., 2006.

12/10/07

Sycamore Landfill Master Plan

**Comparison of Alternatives from
Viewpoint 12 (Mission Gorge Road)**

**FIGURE
8.9-1b**



SOURCE: BRG Consulting, Inc., 2006.

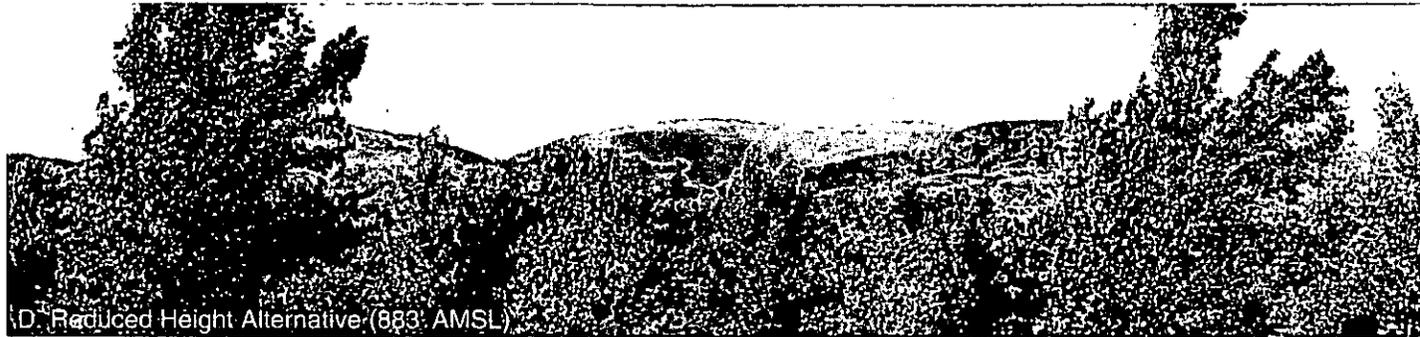
07/05/06

Sycamore Landfill Master Plan EIR

**Comparison of Alternatives from
Viewpoint 2 (Kumeyaay Campground)**

**FIGURE
8.9-2a**

8-66



SOURCE: BRG Consulting, Inc., 2006.

12/10/07

Sycamore Landfill Master Plan EIR

**Comparison of Alternatives from
Viewpoint 2 (Kumeyaay Campground)**

**FIGURE
8.9-2b**

001111



* Relocated transmission line not visible from this viewpoint , whether west and north, or south and east of the landfill.

SOURCE: BRG Consulting, Inc., 2006.

07/05/06

Sycamore Landfill Master Plan EIR

**Comparison of Alternatives
from Viewpoint B (Fanita Ranch)**

**FIGURE
8.9-3a**



* Relocated transmission line not visible from this viewpoint , whether west and north, or south and east of the landfill.

SOURCE: BRG Consulting, Inc., 2006.

12/10/07

Sycamore Landfill Master Plan EIR
**Comparison of Alternatives
 from Viewpoint B (Fanita Ranch)**

**FIGURE
 8.9-3b**

00113

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10.0 GLOSSARY OF TERMS

Alternate Daily Cover: An approved material such as geosynthetic materials or green waste materials that can be used as a top cover for the refuse on a daily basis, in addition to or in place of soil as a way of controlling vectors, nuisances, and odors.

California Department of Transportation (CALTRANS): The state agency in charge of transportation planning, construction and maintenance of the state's highway system.

California Environmental Quality Act (CEQA): A California law [Public Resources Code Sections 21000-21178] that requires the assessment of projects for environmental effects, establishes procedures for preparing and processing environmental documents and includes requirements for the monitoring of environmental mitigation conditions placed on a project.

Coastal Overlay Zone: An area adjacent to the coast with special regulations to protect and enhance the quality of public access and coastal resources.

Cogeneration: The production of electricity using waste products of industrial processes.

Ephemeral (drainage): A streambed that has no base flow, and in which water flows periodically and only briefly in response to substantial precipitation.

Geosynthetic: A planar product manufactured from polymeric material used with soil, rock, earth or other geotechnical related material as an integral part of a man-made project, structure or system. (ASTM D4439)

Habitat Loss Permit: A County of San Diego permit, used to implement the MSCP that addresses loss of Coastal Sage Scrub habitat in areas of San Diego County jurisdiction.

Leachate: Liquid that has been generated by and percolated through landfill solid waste.

Mean Sea Level: The average sea level at a location, adjusting for variations due to tides and other factors; used as a baseline for variations in land elevation.

Multi-Habitat Planning Area: Those lands that have been identified in the City of San Diego's Multiple Species Conservation Program Subarea Plan, and other lands outside of the Multi-Habitat Planning Area that contain wetlands; vegetation communities classifiable as Tier I, II, IIIA or IIIB; habitat for rare, endangered or threatened species; or narrow endemic species.

Multiple Species Conservation Program (MSCP): A comprehensive habitat conservation planning program that will preserve a network of habitat and open space, protecting biodiversity and enhancing the region's quality of life.

Narrow Endemic Species: Some native species, primarily plants with restricted geographic distributions, soil affinities, and/or habitats, are referred to as "narrow endemic species." For vernal pools and identified narrow endemic species, the jurisdictions will specify measures in their subarea plans to ensure that impacts to these resources are avoided to the maximum extent practicable. Species adopted by the City Council as narrow endemic species, identified below are considered sensitive biological resources.

Natural Community Conservation Plan (NCCP): A NCCP is a cooperative effort to provide for the regional or area-wide protection of plants, animals, and their habitats, while accommodating compatible land use and appropriate economic activity (e.g. San Diego MSCP).

Right-of-Way (ROW or R/W): An area of land that has been dedicated for public use for transportation purposes (e.g. a street, freeway, or railroad).

Runoff: Surface water (stormwater) flows that leaves a specific site and ultimately reaches streams, often carrying dissolved or suspended material.

Runon: Surface water (stormwater) that flows onto a specific site from areas of higher elevation.

Sedimentation Basins: Areas used to temporarily capture site runoff and its suspended sediments.

Site Development Permit: Procedures applied to site-specific conditions when environmentally sensitive lands are present as necessary to assure that the development does not adversely affect the applicable land use plan and to help ensure that all regulations are met.

Topography: The physical or natural features of an object or entity and their structural relationships.

Vector: An organism that is capable of transmitting a pathogen.

Viewpoints: Specified locations from which a project's visual character or impact is proposed to be evaluated.

11.0 INDIVIDUALS AND AGENCIES CONSULTED

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12.0 PREPARERS OF EIR AND CERTIFICATION

This document has been completed by the City of San Diego's Environmental Analysis Section under the direction of the Development Services Department Environmental Review manager and is based on independent analysis and determinations made pursuant to the San Diego Municipal Code Section 128.0103.

City of San Diego

Jeanette Temple, Development Project Manager, DSD
Martha Blake, EAS, DSD
Elizabeth Shearer-Nguyen, EAS, DSD
Max Stalheim, Long-Range Planning, City Planning Community Investment
Billy Church, Planning Review, DSD
William Prinz, Local Enforcement Agency
Lisa Wood, Environmental Services Department
Barry Kelleher, Park Planning and Development)
Jeff Harkness, Park Planning and Development)
Adolfo Aguilar, Open Space, DSD
Patrick Thomas, Geology, DSD
Hamid Bagheri, Wastewater Review, DSD
Kristen Forburger, MSCP, City Planning Community Investment
Craig Hooker, Landscaping, DSD
Jim Currier, Engineering Review, DSD
Bob Medan, Fire-Plans Officer, Fire Department
Labib Qasem, LDR Transportation, DSD
Frank January, Facilities Financing
Kim La Selle, Water Review, DSD
Frank Hafner, Housing and Code Enforcement, Deputy Director

City of Santee

Melanie Kush, Planning Department

BRG Consulting, Inc.

Erich R. Lathers, Principal-in-Charge
Tim Gnibus, Senior Project Manager
Ralph Kingery, Project Manager
Mary E. Brady, Production Manager
Kathie Washington, Environmental Planner

Anna Buzaitis, Environmental Planner
Ryan Donald, Environmental Planner
Eddie Arcadia, Visual Simulations and Graphics
Totran Mai, GIS Coordinator
Megan Tunney, Production Assistant
Erica Petersen, Production Assistant

Technical Appendices Preparers:

RECON – Biological Resources (Appendices C1, C2, C3, C5, C6, C7, C8, C8b, C8c, C9, C12)

Wendy E. Loeffler
Amy E. Clark
Darin Busby
Mark Doderio
Robert MacAller
Nicole Bailey
Shirley Innecken

Linscott, Law & Greenspan – Transportation/Circulation (Appendices D1, D2)

John Keating, P.E.
Chris Mendiara

Gordon Bricken & Associates – Noise (Appendices E1, E2, E3 and E4)

Gordon Bricken

Emcon/OWT – Air Quality and Odor (Appendices F and G)

Richard Merrill
Jason Nettleton

Gallegos & Associates – Cultural Resources (Appendices H1, H2, H3)

Dennis R. Gallegos
Carolyn E. Kyle

Diaz•Yourman & Associates – Geology and Geotechnical Investigations (Appendices J1, J2)

Paul Davis
Saroj Weeraratne

GeoLogic Associates – Water Quality (Appendices K and M)

William Lopez, RG, CHG, CEG

A-Mehr, Inc. SWPPP (Appendix L) and Preliminary Closure and Postclosure Plans (Appendix N)

Ali Mehrazarin

Glen O'Dell

Shaw Environmental – Hydrology/Drainage (Appendix P)

Randall Wall

BRG Consulting, Inc. – Visual Analysis of Proposed Transmission Line Relocation (Appendix V);
Biological Appendices C10, C11.

Ralph Kingery

Other Contributors

A-Mehr, Inc. – Landfill Operations

Ali Mehrazarin

Glen O'Dell

Shaw Environmental – Landfill Design

Randall Wall

W & H Pacific Landscape Architects – Landscape Design

Mike Smyth

San Diego Gas & Electric – Transmission Line Relocation Issues, and Appendix B

Charles Eck

Jesse Sandoval

Dash Meeks

13.0 MITIGATION MONITORING AND REPORTING PROGRAM

SYCAMORE LANDFILL MASTER PLAN PROJECT No. 5617

Section 21081.6 of the State of California Public Resources Code requires a lead or responsible agency that approves or carries out a project where an environmental impact report (EIR) has identified significant environmental effects to adopt a "reporting or monitoring program for adopted or required changes to mitigate or avoid significant environmental effects." The City of San Diego is the lead agency for the Sycamore Landfill Master Plan EIR, and therefore must ensure the enforceability of the Mitigation Monitoring and Reporting Program (MMRP). An EIR has been prepared for this project, which addresses potential environmental impacts and, where appropriate, recommends measures to mitigate these impacts. As such, an MMRP is required to ensure that adopted mitigation measures are implemented.

As Lead Agency for the proposed project under CEQA, the City of San Diego will administer the MMRP for the following environmental issue areas as identified in the Sycamore Landfill Master Plan EIR: landform alteration/visual quality; biological resources; traffic/circulation; paleontological resources; noise; air quality; and geology/soils. This program identifies at a minimum: the department responsible for the monitoring, what is to be monitored, how the monitoring shall be accomplished, the monitoring and reporting schedule, and completion requirements. A record of the Mitigation Monitoring and Reporting Program shall be maintained at the offices of the Land Development Review Division, 1222 First Avenue, Fifth Floor, San Diego, CA, 92101. The mitigation measures identified below include all applicable measures from the Sycamore Landfill Master Plan EIR (Project No. 5617; SCH No. 2003041057), revised and updated as appropriate. This MMRP shall be made a requirement of project approval. All mitigation measures outlined in this MMRP shall be included in the Site Development and Planned Development Permits for the Project.

GENERAL

Grading related to the proposed landfill development and operations shall be monitored by two agencies: the City of San Diego Development Services Department (DSD) for ancillary facilities outside the landfill footprint, such as scales, maintenance facilities, sedimentation basin, and administrative offices; and the San Diego Regional Water Quality Control Board (RWQCB), for development and operation of the landfill disposal areas.

Prior to the issuance of any City of San Diego grading permits for landfill ancillary facility construction, the Assistant Deputy Director (ADD) environmental designee of the City's Land Development Review Division (LDR) of DSD shall verify that the following statement is shown on the grading and/or construction plans as a note under the heading Environmental Requirements: "SYCAMORE LANDFILL MASTER PLAN is subject to a Mitigation, Monitoring and Reporting Program and shall conform to the mitigation conditions as contained in the Environmental Impact Report Number 5617."

Prior to RWQCB approval of detailed grading plans for landfill development and operation, and the issuance of specific WDRs for such grading, RWQCB staff shall verify that the following statement is shown on those grading plans as a note under the heading Environmental Requirements: "SYCAMORE LANDFILL MASTER PLAN is subject to a Mitigation, Monitoring and Reporting Program and shall conform to the mitigation conditions as contained in the City of San Diego Environmental Impact Report Number 5617." Applicant shall send a copy of those grading plans containing that note to DSD.

The City of San Diego LEA shall not issue a Solid Waste Facility Permit (SWFP) for the Master Plan until such time as the owner/permittee conducts a preconstruction meeting (precon meeting) to ensure implementation of the Mitigation Monitoring and Reporting Program (MMRP). The meeting shall include the Landfill General Manager, the Operations Manager, Resident Engineer (RE), Environmental Manager, Principal Qualified Biologist (PQB) biologist, monitoring paleontologist, and staff from the City's Mitigation Monitoring Coordination (MMC) Section. Applicant shall submit precon meeting minutes to the LEA to document that the required meeting took place.

Several of the mitigation measures that follow reference specific EIR figures, tables or appendices that provide details of how the mitigation measure is to be implemented. These MMRP references are compiled following Mitigation Measure 4.9.1 for use by reviewers, those who implement the mitigation measure, and those who monitor their implementation.

LAND USE

Project impacts identified in the land use chapter are the same as impacts addressed under discussions of biological and noise-related impacts. To minimize redundancy, the applicable biological mitigation measures have been referenced in the land use text, including Mitigation Measures 4.3.3a, 4.3.4, 4.3.5, 4.3.6, 4.3.7, 4.3.8, 4.3.9, 4.3.10, and 4.3.13. Please see the Biological Resources section of this MMRP to review those mitigation measures. Noise mitigation measures 4.6.3a through 4.6.6 are the same as biological mitigation measures 4.3.3a through 4.6.6. With implementation of these mitigation measures, potential project land use impacts would be reduced to a level less than significant.

LANDFORM ALTERATION/VISUAL QUALITY

The following mitigation measures would reduce the interim visual quality impacts created by the proposed project, but not to below a level of significance.

LANDFILL CONSTRUCTION AND OPERATION

Mitigation Measure 4.2.4: In order to minimize visual impacts during grading and filling activities, an interim vegetation plan shall be implemented by SLI. This plan shall include the following measures to ensure visual impacts would be reduced.

- a. To minimize value and color contrast with the surrounding areas, visible south and east facing graded areas not planned to be active for six months shall be planted within one month of grading, using native, drought-tolerant plant material listed in the approved Landscape Development Plan, EIR Figure 4.1-5. The color and value palette shall be derived from natural areas surrounding project site.
- b. Native vegetation shall be chosen, from the plant material listed in EIR Figure 4.1-5 to create a texture similar to that of surrounding natural areas. Natural variations in soil and vegetation shall be used to avoid a uniform geometric appearance of large areas. If this native vegetation must be disturbed later to implement final cover and revegetation of the approved landfill, it is assumed in this analysis that no impact to native habitat will be assessed, due to its interim, temporary nature.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department (DSD)

Mitigation/Monitoring Timing: During landfill operations, following LEA approval of the revised SWFP, and following completion of grading and interim cover for areas of the landfill plan visible from the south and east, and not planned for subsequent disturbance in the following six months.

Monitoring Frequency: Ongoing throughout landfill operations, during regular DSD inspections.

Reporting Program: SLI shall notify DSD when areas not planned to be graded for six months or more have been covered with interim cover per state regulations, defining those areas in a map of the site, and also informing DSD of planned or completed interim vegetation work required by this mitigation measure within those areas.

Completion Requirements: End of landfill operations, as documented in a letter from SLI to the City of San Diego DSD.

Significance after Mitigation: Significant and unmitigable.

BIOLOGICAL RESOURCES

Potential impacts to sensitive species, including Nuttall's scrub oak, variegated dudleya, and coastal California gnatcatchers, would be reduced to below a level of significance through implementation of the mitigation measures 4.3.1 through 4.3.9. Mitigation Measures 4.3.10 through 4.3.13 would reduce project impacts related to exotic invasive plants, sensitive upland habitats, and wetlands, to below a level of significance.

LANDFILL CONSTRUCTION

Mitigation Measure 4.3.1: SLI shall mitigate impacts to 10 Nuttall's scrub oaks through planting a minimum of 20 Nuttall's scrub oaks, 20 in nearby areas of chamise chaparral containing scrub oak in APN 366-031-14, and 20 more in mitigation parcel 366-080-29, based on the plan in EIR Appendix C8. This would include the following major steps: (1) planting of at least 20 Nuttall's scrub oaks according to the approved site-specific mitigation plan; (2) maintenance and monitoring of the plantings and translocated individuals according to the approved maintenance/monitoring plan; and (3) achievement of the restoration success criteria in the approved maintenance and monitoring program.

Responsible Party: SLI

Monitoring Agency: City of San Diego DSD

Mitigation/Monitoring Timing: The oaks shall be planted by SLI or their contractors within one year of the approval of the PDP/SDP.

Monitoring Frequency: Step (1) - One time, following planting of the Nuttall's scrub oaks and review of the biologist's initial report; Step (2) - Ongoing; review biologist's annual status reports; Step (3) - One time, following achievement of planting plan success criteria, as documented in the biologist's report.

Reporting Program: SLI shall submit biological reports to the City of San Diego DSD within 90 days following planting of the oaks; then annually until the planting plan success criteria have been achieved.

Completion Requirements: Achievement of planting plan success criteria, as documented in the biologist's report.

Significance after Mitigation: Below a level of significance.

Mitigation Measure 4.3.1a: Prior to the grading of the areas containing the goldenstar plants listed in Impact 4.3.1a, SLI shall translocate the approximately 1,362,512 San Diego goldenstar plants to a suitable area within existing mitigation parcel 366-080-29, as described "San Diego Goldenstar Translocation Plan for the Sycamore Landfill Expansion," prepared by RECON (September 17, 2007).

Responsible Party: SLI

Monitoring Agency: City of San Diego DSD

Mitigation/Monitoring Timing: The goldenstar shall be planted by SLI or their contractors within one year of the approval of the PDP/SDP.

Monitoring Frequency: Step (1) - One time, following planting of the goldenstar and review of the biologist's initial report; Step (2) - Ongoing; review biologist's annual status reports; Step (3) - One time, following achievement of planting plan success criteria, as documented in the biologist's report.

Reporting Program: SLI shall submit biological reports to the City of San Diego DSD within 90 days following planting of the goldenstar; then annually until the planting plan success criteria have been achieved.

Completion Requirements: Achievement of planting plan success criteria, as documented in the biologist's report.

Significance after Mitigation: Below a level of significance.

Mitigation Measure 4.3.1b: Prior to the grading of the areas containing the barrel cactus listed in Impact 4.3.1b, SLI shall translocate the approximately 95 barrel cactus to a suitable area within existing mitigation parcel 366-080-29, as described in Coastal Barrel Cactus Translocation Plan for the Sycamore Landfill Expansion, prepared by RECON (September 24, 2007).

Responsible Party: SLI

Monitoring Agency: City of San Diego DSD

Mitigation/Monitoring Timing: The cactus shall be planted by SLI or their contractors within one year of the approval of the PDP/SDP.

Monitoring Frequency: Step (1) - One time, following planting of the cactus and review of the biologist's initial report; Step (2) - Ongoing; review biologist's annual status reports; Step (3) - One time, following achievement of planting plan success criteria, as documented in the biologist's report.

Reporting Program: SLI shall submit biological reports to the City of San Diego DSD within 90 days following planting of the cactus; then annually until the planting plan success criteria have been achieved.

Completion Requirements: Achievement of planting plan success criteria, as documented in the biologist's report.

Significance after Mitigation: Below a level of significance.

LANDFILL CONSTRUCTION

Mitigation Measures 4.3.2 & 4.3.3: Non-MHPA impacts to approximately 12,621 variegated dudleya plants, a narrow endemic species, and MHPA impacts to approximately 15 variegated dudleya plants would be mitigated by

SLI in mitigation parcel 366-080-29 according to the translocation plan in EIR Appendix C8, prepared in accordance with City of San Diego Biology Guidelines. This would include the following major steps: (1) collection of seed from the impacted population which would include flagging of the plants in the spring when visible for collection of seed once fully matured; (2) a pre-grading salvage of the top four to six inches of soil which contains the corms to be impacted; (3) maintenance of cuttings and seedlings in an appropriate nursery, until translocation conditions are right at the approved translocation site; (4) propagation and handbroadcasting seed and/or placement of leaf cuttings onto the translocation site, transplantation of salvaged corms, and transplantation of individuals grown in a nursery setting; (5) maintenance and monitoring of the plantings and translocated individuals at the translocation site, according to the approved maintenance and monitoring plan; and (6) achievement of the restoration success criteria in the approved maintenance and monitoring program.

Prior to grading of new project areas suitable for *Dudleya*, a final *Dudleya* survey shall be undertaken, with the objective of identifying plants that may have been missed in prior surveys. Any new plants found in the final survey shall be included in the translocation effort detailed in the *Dudleya* Translocation Plan, prepared by RECON (January 13, 2006).

Responsible Party: SLI

Monitoring Agency: City of San Diego DSD

Mitigation/Monitoring Timing: The plants will be flagged and seeds collected from them, and a pre-grading salvage of the top 4-6 inches of soil containing the corms to be impacted, prior to any landfill disturbance of *dudleya* populations D1-D7 within APN 366-041-01, as shown on EIR Figure 4.3-1. Nursery maintenance of the seedlings and cuttings will occur until translocation conditions are right at the approved site. As soon as conditions are right, and as early as possible in the first five years of the translocation program, the propagation and hand broadcasting of seed and placement of leaf cuttings at the translocation site will occur, after which they will be monitored for up to five years or when the plantings meet the listed success criteria, whichever comes first.

Monitoring Frequency: Following collection of seed and salvage of topsoil; then ongoing, until translocation, at which time the monitoring will be annual review of each yearly biologist's annual reports until achievement of planting plan success criteria, as documented in the biologist's report.

Reporting Program: SLI shall submit biological reports to DSD following seed collection, salvage of soil containing corms, and propagation and hand broadcasting of seed and placement of leaf cuttings; then annually until the planting plan success criteria have been achieved.

Completion Requirements: Achievement of planting plan success criteria, as documented in the biologist's report.

Significance after Mitigation: Below a level of significance.

LANDFILL CONSTRUCTION AND OPERATION

Mitigation Measure 4.3.3a: SLI shall construct 15-20 foot high noise and visual barrier berms between the landfill working face, C&D processing areas, and greens processing areas and the nearest MHPA boundary when such operations are located less than 20 feet below existing topographic barriers, within 1,600 feet of the nearest MHPA habitat occupied by the coastal California gnatcatcher during the breeding season, March 1 – August 15. The berm on the eastern side of the landfill would be constructed of soil and rock only.

Responsible Party: SLI

Monitoring Agency: City of San Diego DSD

Mitigation/Monitoring Timing: Prior to landfill, C&D, or greens processing operations occurring within 1,600 feet of the nearest MHPA habitat occupied by coastal California gnatcatchers during the breeding season March 1 – August 15.

Monitoring Frequency: Ongoing throughout life of landfill; annually for review of the reports described in the Reporting Program below; periodically during regular LEA site inspections during the gnatcatcher breeding season.

Reporting Program: SLI shall submit annual construction plans by April 30 of each year containing maps of where it is anticipated that berms would be built during the following year, identifying berms to be built OUTSIDE the breeding season, and those to be built WITHIN the breeding season. In addition, by April 30 of each year, SLI shall submit biological reports that document whether there is any occupied gnatcatcher habitat in the MHPA located within 1,600 feet of the anticipated berm construction locations that are less than 20 feet below existing topographic barriers (to be prepared for MM 4.3.4 A). These reports shall be submitted annually to the City of San Diego DSD until a biological report demonstrates that subsequent landfill activity has no potential of disturbing breeding gnatcatchers.

Completion Requirements: Completion of landfill activities, or documentation of no potential for gnatcatcher disturbance, whichever occurs first, as documented in a letter from SLI to the City of San Diego DSD.

Significance after Mitigation: Below a level of significance.

LANDFILL CONSTRUCTION AND OPERATION

Mitigation Measure 4.3.4: To ensure that landfill activities, including the construction of noise berms, would not result in indirect impacts to coastal California gnatcatchers, the following measures will be implemented:

Prior to the issuance of any City of San Diego grading permits for landfill ancillary facility construction, the Assistant Deputy Director (ADD) environmental designee of the City's Land Development Review Division (LDR) of DSD shall

verify that the Multi-Habitat Planning Area (MHPA) boundaries and the following project requirements regarding the coastal California gnatcatchers are shown on the grading and/or construction plans:

Prior to RWQCB approval of detailed grading plans for landfill development and operation, and the issuance of specific WDRs for such grading, RWQCB staff shall verify that the Multi-Habitat Planning Area (MHPA) boundaries and the following project requirements regarding the coastal California gnatcatchers are shown on the grading and/or construction plans: Applicant shall send a copy of those grading plans containing that note to DSD.

- A. On an annual basis, a qualified biologist (possessing a valid Endangered Species Act Section 10(a)(1)(A) recovery permit) shall survey those habitat areas within the MHPA that would be subject to construction noise levels exceeding 60 decibels [dBA] hourly average for the presence of the coastal California gnatcatcher. Surveys for the coastal California gnatcatcher shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife Service within the breeding season prior to the commencement of any construction. If gnatcatchers are present, then Condition I and either of Conditions II or III shall be met:
 - I. No clearing, grubbing, or grading of occupied gnatcatcher habitat within the MHPA shall be permitted during gnatcatcher nesting season. Areas restricted from such activities shall be staked or fenced under the supervisions of a qualified biologist; AND
 - II. No construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dBA hourly average at the edge of occupied gnatcatcher habitat. An analysis showing that noise generated by construction activities would not exceed 60 dBA hourly average at the edge of occupied habitat must be completed by a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the ADD environmental designee of LDR. Prior to the commencement of landfilling activities above the surrounding ridgelines during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; OR
 - III. Under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dBA hourly average at the edge of habitat occupied by the coastal California gnatcatcher. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring* shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dBA hourly average during noise berm construction. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved, or until the end of the breeding season, August 16.

* *Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of*

occupied habitat are maintained below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the Manager of the Development Services Department, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

- B. If coastal California gnatcatchers are not detected during the protocol survey, the qualified biologist shall submit substantial evidence to the ADD environmental designee and applicable Resource Agencies that demonstrates whether or not mitigation measures such as noise walls are necessary between March 1 and August 15 as follows:
- I. If this evidence indicates that the potential is high for coastal California gnatcatcher to be present based on historical records or site conditions, then condition A.III shall be adhered to as specified above.
 - II. If this evidence concludes that no significant impacts to this species are anticipated, no mitigation measures would be necessary.

Responsible Party: SLI

Monitoring Agency: City of San Diego DSD

Mitigation/Monitoring Timing: The biologist will comply with Mitigation Measure 4.3.4 prior to construction activities within 1,600 feet of the MHPA boundary, at elevations at or above the existing ridge lines between the planned disposal area and the MHPA, as shown on EIR Figure 4.3-1 and follow the timing set forth in that mitigation measure.

Monitoring Frequency: Ongoing during the life of the landfill. Construction noise monitoring to be conducted two times per week on varying days if such monitoring is required by Mitigation Measure 4.3.4(A)III.

Reporting Program: SLI to submit planning reports by April 30 of each year containing maps of where it is anticipated that berms would be built during the following year, identifying berms planned to be built OUTSIDE the breeding season, and those to be built WITHIN the breeding season. In addition, by April 30 of each year, SLI shall submit biological survey reports that document whether there is any berm construction location within 1000 feet of the MHPA boundary and which surveys have shown to be occupied gnatcatcher habitat. Both these reports shall be submitted annually to City of San Diego DSD until a biological report demonstrates that subsequent landfill activity has no potential of disturbing breeding gnatcatchers.

Reporting Program: SLI to submit planning reports by April 30 of each year containing maps of where it is anticipated that berms would be built during the following year, identifying berms planned to be built OUTSIDE the breeding season, and those to be built WITHIN the breeding season. In addition, by April 30 of each year, SLI shall submit biological survey reports that document whether there is any occupied gnatcatcher habitat in the MHPA

located within 1,600 feet of the anticipated berm construction locations. Both these reports shall be submitted annually to City of San Diego DSD until a biological report demonstrates that subsequent landfill activity has no potential of disturbing breeding gnatcatchers.

Prior to landfilling or berm construction activities after March 1 of each year, an acoustical report prepared by a qualified professional also must be submitted to the City DSD that demonstrates that the planned landfilling activities for the subsequent gnatcatcher breeding season would not exceed 60 dBA Leq at any gnatcatcher-occupied habitat within the MHPA. If the noise levels in any such habitat are expected to exceed the 60 dBA Leq level, the acoustical consultant shall identify those areas in their report, and to delineate and stake the areas of the landfill site in the field within which landfilling or berm construction activities would not be permitted during the breeding season without the use of additional noise barriers or noise reduction procedures.

If the applicant proposes landfilling or berm construction activities within 1,600 feet of occupied gnatcatcher habitat within the MHPA during the gnatcatcher breeding season within the staked areas delineated above, the acoustical professional shall monitor and control sound levels at the habitat as described in MM 4.3.4 A. III, and provide a report on the results to the City DSD by May 30 (the midpoint of the breeding season) and September 30.

Completion Requirements: Following the end of landfill operations; OR, if an acoustical report demonstrates to the satisfaction of the City of San Diego DSD/MSCP that the remaining berm construction activities would not result in noise levels in occupied gnatcatcher habitat >60 dB Leq.

Significance after Mitigation: Below a level of significance.

LANDFILL OPERATION

Mitigation Measure 4.3.5: Prior to City issuance of the PDP/SDP permit, the ADD environmental designee of LDR shall verify that SLI has fulfilled the requirement for mitigation of temporary but long-term truck noise and lighting impacts along the access road. As the mitigation, SLI shall convey fee title to 46.3 acres of native grassland, chamise chaparral, non-native grassland and southern mixed chaparral within the MHPA to the City of San Diego for preservation, per details listed in EIR Table 4.3-3, in exchange for potential temporary truck noise impacts to 29.38 acres of former coastal sage scrub habitat (potential gnatcatcher habitat) located adjacent to the landfill access road. The 46.3 acres of habitat are located in six MHPA parcels owned by SLI (see MM 4.3.11 and Tables 4.3-3 and 4.3-4).

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: Prior to City issuance of the new PDP/SDP permit.

Monitoring Frequency: One time

Reporting Program: SLI to document the land conveyance to the City in a letter to the City DSD.

Completion Requirements: When the identified lands have been conveyed to the City of San Diego.

Significance after Mitigation: Below a level of significance.

LANDFILL OR ANCILLARY FACILITIES CONSTRUCTION

Mitigation Measure 4.3.6: A qualified biologist shall conduct a survey for Cooper's hawk's or other raptors' nests to protect Cooper's hawks or other any raptors present within 300-500 feet of the proposed landfill or ancillary facilities to be constructed during the following nesting season, February 1 to September 15. If raptor nests are present, construction activities shall not occur within a ~~300~~500-foot avoidance zone from each active nest site until fledglings are fully independent of the nest, as determined by the biologist. Prior to any ~~transmission-line~~ landfill or ancillary facility construction, SLI or its authorized representative shall send a letter of verification to the ADD environmental designee of LDR identifying the Principal Qualified Biologist for this work, as defined in the City of San Diego LDC Biology Guidelines (2002).

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: Prior to landfill grading or disturbance in proposed additional areas shown on Figure 4.3-1, or prior to construction of proposed ancillary facilities (administrative offices, maintenance facility, scales area, sedimentation basins).

Monitoring Frequency: Prior to landfill development within the listed areas, or prior to construction of proposed ancillary facilities.

Reporting Program: Prior to any landfill or ancillary facility construction proposed during the raptor breeding season, SLI shall document retention of a qualified biologist for raptor surveys in a letter to the City DSD. A copy of the biologist's report on the presence or absence of raptors near the landfill or proposed landfill ancillary facilities, and the locations of any applicable construction avoidance zones, shall be submitted to the City DSD prior to proceeding with construction of such facilities during the raptor breeding season.

Completion Requirements: Completion of landfill or ancillary facility construction; OR, acceptance by the manager of the SD MSCP of a biological report that demonstrates no active raptor nests exist near the remaining proposed construction areas.

Significance after Mitigation: Below a level of significance.

TRANSMISSION LINE CONSTRUCTION

General Measure: Staking, flagging, fencing, and monitoring of sensitive biological resources shall be conducted in accordance with the approved Natural Community Conservation Program (NCCP) SDG&E Protocols, prepared by SDG&E (July 2002). A copy of the NCCP shall be maintained on-site.

Mitigation Measure 4.3.6a: Prior to transmission line construction activities in the areas containing the twelve barrel cactus listed in Impact 4.3.6a, SLI shall fence the two plants located within the MHPA, and translocate the remaining ten barrel cactus to a suitable area within existing mitigation parcel 366-080-29, as described in Coastal Barrel Cactus Translocation Plan for the Sycamore Landfill Expansion prepared by RECON (September 24, 2007).

Responsible Party: SLI

Monitoring Agency: City of San Diego DSD

Mitigation/Monitoring Timing: The cactus shall be planted by SLI or their contractors within one year of the approval of the PDP/SDP.

Monitoring Frequency: Step (1) - One time, following planting of the cactus and review of the biologist's initial report; Step (2) - Ongoing; review biologist's annual status reports; Step (3) - One time, following achievement of planting plan success criteria, as documented in the biologist's report.

Reporting Program: SLI shall submit biological reports to the City of San Diego DSD within 90 days following planting of the cactus; then annually until the planting plan success criteria have been achieved.

Completion Requirements: Achievement of planting plan success criteria, as documented in the biologist's report.

Significance after Mitigation: Below a level of significance.

Mitigation Measure 4.3.7: SLI shall mitigate potential impacts to Nuttall's scrub oaks, *Dudleya variegata* and San Diego goldenstar associated with the proposed transmission line relocation by: (1) installing three-strand wire fencing around areas of these plants located near proposed construction areas, prior to initiation of transmission line construction, as shown in EIR Figure 4.3-5, and (2) subsequent avoidance of impacts to these areas during transmission line construction by SDG&E or their contractors. Project biologists shall monitor the fencing on a weekly basis to ensure its integrity during transmission line construction activities at the sites within 100 feet of the fenced areas, and report any inadvertent, unforeseen impacts.

Prior to construction, all SDG&E, contractor, and subcontractor project personnel shall receive training regarding the appropriate work practices necessary to effectively implement the Protocols and to comply with the applicable environmental laws and regulations including, but not limited to, a description of the protected species and their habitats, conservation and/or mitigation measures listed in this EIR to conserve species of concern, limiting construction activities to the fenced project footprint, hazardous materials spill prevention and response measures, erosion control, dust suppression, and appropriate wildlife avoidance, impact minimization procedures, and Stormwater Pollution Prevention Plan (SWPPP) BMPs. To assist in this effort, the training shall address: (a) the general provisions of federal, state, local, and tribal laws regarding antiquities, fossils, plants, and wildlife, including collection and removal; (b) the importance of these resources and the purpose and necessity of protecting them; (c) penalties associated with violating resource protection laws; (d) methods for protecting sensitive cultural, paleontological, and ecological resources during construction; and (e) the protocol to resolve conflicts that may arise during the construction process.
~~Prior to construction, all SDG&E, contractor, and subcontractor project personnel shall receive training regarding the appropriate work practices necessary to effectively implement the Protocols and to comply with the applicable environmental laws and regulations including, without limitations, hazardous materials spill prevention and response measures, erosion control, dust suppression, and appropriate wildlife avoidance, impact minimization procedures, and Stormwater Pollution Plan (SWPPP) BMPs. To assist in this effort, the training shall address: (a) federal, state, local, and tribal laws regarding antiquities, fossils, plants, and wildlife, including collection and removal; (b) the importance of these resources and the purpose and necessity of protecting them; and (c) methods for protecting sensitive cultural, paleontological, and ecological resources.~~

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: Prior to initiation of transmission line construction at that location, with weekly monitoring during activities within 100 feet of fenced areas.

Monitoring Frequency: One-time monitoring to confirm fence installation, then weekly until work completed that is within 100 feet of fenced areas.

Reporting Program: SLI to document the fencing of areas of Nuttall's scrub oaks in a letter to the City DSD prior to transmission line construction. Following transmission line construction in the area of Nuttall's scrub oaks shown in EIR Figure 4.3-5, SLI shall submit to the City DSD a copy of the biologist's report documenting monitoring of the fenced area on a weekly basis.

Completion Requirements: Step (1) – Completion of fencing installation; Step (2) – Completion of transmission line construction.

Significance after Mitigation: Below a level of significance.

TRANSMISSION LINE CONSTRUCTION

Mitigation Measure 4.3.8: A qualified biologist shall conduct a survey for Cooper's hawk's or other raptors' nests within ~~300~~-500 feet of the transmission line corridor immediately prior to the nesting season, February 1 to September 15. If construction is to occur during raptor breeding season, a pre-construction survey will be conducted to identify any active raptor nests. If an active nest is identified, a ~~300~~500-foot buffer will be established until the young are determined to be independent by the biologist. Prior to any transmission line construction, SLI or its authorized representative shall send a letter of verification to the ADD environmental designee of LDR identifying the Principal Qualified Biologist for this work, as defined in the City of San Diego LDC Biology Guidelines (2002). The existing towers will not be removed until the new towers have been constructed so there would not be a loss of roosting or nesting habitat.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: Prior to transmission line construction or removal.

Monitoring Frequency: One or two times, depending on the transmission line construction schedule versus the nesting season.

Reporting Program: Prior to any transmission line construction, SLI shall document retention of a qualified biologist for raptor surveys in a letter to the City DSD. A copy of the biologist's report on the presence or absence of raptors near the planned transmission line structures, and the locations of any applicable construction avoidance zones, shall be submitted to the City DSD prior to proceeding with construction of such facilities during the raptor breeding season.

Completion Requirements: Completion of transmission line construction or removal; OR, acceptance by the Manager of the San Diego MSCP section of a biological report that demonstrates that no active raptor nests exist near the remaining transmission line construction areas.

Significance after Mitigation: Below a level of significance.

TRANSMISSION LINE CONSTRUCTION

Mitigation Measure 4.3.9: To ensure that transmission line relocation construction activities would not result in indirect impacts to coastal California gnatcatchers, the following measures will be implemented:

Prior to initiation of transmission line construction, SLI shall submit a letter to the Assistant Deputy Director (ADD) environmental designee of the City's Land Development Review Division (LDR) stating that the Multi-Habitat Planning Area (MHPA) boundaries and the following project requirements regarding the coastal California

gnatcatchers are shown on the transmission line construction plans, and provide a copy of those plans documenting the inclusion of the following requirements:

- A. A qualified biologist (possessing a valid Endangered Species Act Section 10(a)(1)(A) recovery permit) shall survey those habitat areas within the MHPA that would be subject to construction noise levels exceeding 60 decibels [dBA] hourly average for the presence of the coastal California gnatcatcher. Surveys for the coastal California gnatcatcher shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife Service within the breeding season prior to the commencement of any construction. If gnatcatchers are present, then Condition I and either of Conditions II or III shall be met:
- I. No clearing, grubbing, or grading of occupied gnatcatcher habitat within the MHPA shall be permitted during gnatcatcher nesting season. Areas restricted from such activities shall be staked or fenced under the supervisions of a qualified biologist; AND
 - II. No construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dBA hourly average at the edge of occupied gnatcatcher habitat. An analysis showing that noise generated by construction activities would not exceed 60 dBA hourly average at the edge of occupied habitat must be completed by a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the ADD environmental designee of LDR. Prior to the commencement of transmission line construction activities within 500 feet of the MHPA boundary during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; OR
 - III. Under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from transmission line construction activities will not exceed 60 dBA hourly average at the edge of habitat occupied by the coastal California gnatcatcher. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring* shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dBA hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved, or until the end of the breeding season, August 16.

* *Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the Manager of the Development Services Department, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level*

if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

- B. If coastal California gnatcatchers are not detected during the protocol survey, the qualified biologist shall submit substantial evidence to the ADD environmental designee and applicable Resource Agencies that demonstrates whether or not mitigation measures such as noise walls are necessary between March 1 and August 15 as follows:
- I. If this evidence indicates that the potential is high for coastal California gnatcatcher to be present based on historical records or site conditions, then condition A.III shall be adhered to as specified above.
 - II. If this evidence concludes that no significant impacts to this species are anticipated, no mitigation measures would be necessary.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: Step (A.) – Prior to transmission line construction within 500 feet of the MHPA boundary, at elevations at or above the existing ridge lines between the transmission line construction and the MHPA. See EIR Figure 4.3-5; Step (A.I.) – Grading within the MHPA during the gnatcatcher nesting season, between March 1 and August 15; Step (A.II.) – Between March 1 and August 15 during transmission line construction within 500 feet of the MHPA boundary, at elevations at or above the existing ridge lines between the transmission line construction area and the MHPA. See EIR Figure 4.3-5; Step (A.III.) – One week prior to commencement of construction activities between March 1 and August 15 during transmission line construction at elevations at or above the existing ridge lines between the transmission line construction area and the MHPA; Step (B.) – Following completion of gnatcatcher surveys, where no nesting gnatcatchers have been detected in the areas near the planned transmission line construction activities.

Monitoring Frequency: Step (A.) – Ongoing during the transmission line construction activities; Step (A.I.) – Ongoing during the transmission line construction activities; Step (A.II.) – Ongoing during the transmission line construction activities; Step (A.III.) – Ongoing during the transmission line construction activities. Construction noise monitoring to be conducted two times per week on varying days; Step (B.) – Ongoing during the transmission-line construction activities.

Reporting Program: SLI to submit planning reports from SDG&E by February 15 of each year containing maps of where it is anticipated transmission line structures would be erected during the following year, identifying structures planned to be built OUTSIDE the breeding season, and those to be built WITHIN the breeding season. In addition, by April 30 of each year, SLI shall submit biological survey reports that document whether there is any occupied

gnatcatcher habitat in the MHPA located within 500 feet of the anticipated transmission line structure locations. Both these reports shall be submitted annually to City of San Diego [DSD] until transmission line construction is complete.

Prior to transmission line construction activities after April 30 of each year, an acoustical report prepared by a qualified professional also must be submitted to the City DSD that demonstrates that the planned transmission line construction activities for the subsequent gnatcatcher breeding season would not exceed 60 dBA Leq at any gnatcatcher-occupied habitat within the MHPA. If the noise levels in any such habitat are expected to exceed the 60 dBA Leq level, the acoustical consultant shall identify those areas in their report, and to delineate and stake the areas of the landfill site in the field within which transmission line construction activities would not be permitted during the breeding season without the use of additional noise barriers or noise reduction procedures.

If SDG&E proposes transmission line construction activities within 500 feet of occupied gnatcatcher habitat within the MHPA during the gnatcatcher breeding season within the staked areas delineated above, the acoustical professional shall monitor and control sound levels at the habitat as described in MM 4.3.4 A. III, and provide a report on the results to the City DSD by May 30 (the midpoint of the breeding season) and September 30.

Completion Requirements: Following the end of transmission line construction activities; OR, if an acoustical report demonstrates to the satisfaction of the City DSD manager that the remaining construction activities would not result in noise levels in occupied gnatcatcher habitat >60 dB Leq.

Significance after Mitigation: Below a level of significance.

LANDFILL CLOSURE

Mitigation Measure 4.3.9a: In order to minimize potential dissemination of exotic invasive plants that may become established at the site during and following landfill closure, SLI shall implement the exotic invasive plant management plan, as described in EIR Appendix C7. This includes: (1) quarterly monitoring of the landfill site by qualified biologists in order to identify any exotic invasive plants that may be present, and control through physical means or use of an herbicide to preclude their spread; and (2) preparation/submittal of an annual report on the exotic invasive plant control program, to MSCP. The program shall continue throughout the landfill closure and post-closure maintenance period unless an exotic-invasive qualified biologist submits a report that demonstrates that the program is no longer required, and the City of San Diego MSCP staff agrees with that conclusion.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Dept.; Planning Dept., MSCP Section.

Mitigation/Monitoring Timing: Step (1) – Quarterly, following SLI notification to the City of landfill closure; Step (2) – Annually, following landfill closure.

Monitoring Frequency: Step (1) – Ongoing, quarterly; Step (2) – Ongoing, annually.

Reporting Program: SLI shall retain a qualified biologist to monitor and control exotic invasive plants on a quarterly basis, and to document that program in an annual report, to be submitted to the City DSD and MSCP.

Completion Requirements: Completion of post-closure maintenance period, unless a biological report demonstrates that the program is no longer required.

Significance after Mitigation: Below a level of significance.

LANDFILL OPERATIONS

Mitigation Measure 4.3.10: In order to minimize potential dissemination of exotic invasive plants that may be related to landfill operations, SLI shall implement the exotic invasive plant management plan, as described in Exotic Invasive Plant Removal Plan, prepared by RECON (December 27, 2005). This includes: (1) quarterly monitoring of the landfill site by qualified biologists in order to identify any exotic invasive plants that may be present, and control them either through physical means or use of an herbicide to preclude their spread; (2) surveying the following adjacent City-owned parcels or portions of parcels within the MHPA every three years, with landowner permission, to provide a basis of comparison with exotic invasives that may be found on the landfill-owned parcels (City parcels are APNs 366-031-10, 366-031-11, 366-031-14, 366-031-18, 366-070-12, 366-070-13, 366-070-19, 366-071-12, 366-071-13, 366-080-25, 366-080-26, 366-080-16, and 366-080-29); and (3) preparation/submittal of an annual report on the exotic invasive plant control program, to DSD.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: Monitoring and control commences upon LEA approval of a revised SWFP, and occurs quarterly; survey of adjacent MHPA lands occurs every three years, following City LEA approval of the first revised SWFP; and report on program is submitted annually, following approval of the revised SWFP, until closure.

Monitoring Frequency: Monitoring and control will occur quarterly; with the survey occurring every three years during the life of the landfill, and reporting annually, until landfill closure.

Reporting Program: SLI shall retain a qualified biologist to monitor and control exotic invasive plants on a quarterly basis, and to document that program in an annual report, to be submitted to the City DSD. Results of the survey of adjacent MHPA lands shall be incorporated in the annual report following the MHPA exotic plant survey.

Completion Requirements: End of landfill operations.

Significance after Mitigation: Below a level of significance.

LANDFILL ANCILLARY FACILITY DEVELOPMENT

Mitigation Measure 4.3.11: Prior to City issuance of the PDP/SDP permits, the ADD environmental designee of LDR shall verify that SLI has fulfilled the requirement for mitigation of long-term impacts to sensitive vegetation communities. SLI shall provide biological mitigation for long-term direct habitat disturbance to approximately 38.66 acres of sensitive upland habitats associated with development of the landfill and associated ancillary facilities consistent with the mitigation ratios contained in City of San Diego Land Development Manual Biology Guidelines for continued landfill development. Acreages of the specific upland habitats anticipated to be disturbed as a result of this project, as well as applicable mitigation ratios, are shown in EIR Tables 4.3-3 and 4.3-4. Landfill use of up to 16.2 acres of MHPA lands (approximately 12 acres sensitive) shall comply with MHPA procedures by conveying the balance of those six parcels to the City of San Diego for preservation. Impacts to non-MHPA habitats shall be mitigated through conveyance to the City of San Diego of comparable habitats in SLI-owned parcels listed below, as detailed in Table 4.3-4. The 36.37 acres of required mitigation lands to be conveyed to the City shall come from MHPA parcels 360-031-14, 366-031-18, 366-070-13, 366-080-16, 366-080-25, 366-080-26, 366-031-10, 366-031-11, 366-070-12, 366-071-12, 366-071-33, and 366-030-46, all owned by SLI, or other MHPA parcels within the East Elliott area that contain the required mitigation acreage by habitat and are acceptable to the City. Locations of the identified mitigation parcels are shown in EIR Figure 4.3-7.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: Prior to issuance of the PDP/SDP permits by the City of San Diego.

Monitoring Frequency: One time

Reporting Program: SLI to document the land conveyance in a letter to the City DSD.

Completion Requirements: Completion of mitigation lands conveyance process in the amounts listed in EIR Table 4.3-3.

Significance after Mitigation: Below a level of significance.

Mitigation Measure 4.3.11a: To reduce potential water quality impacts to Little Sycamore Canyon Creek the following BMPs shall be utilized:

1. An asphalt concrete (AC) dike shall be installed along the western edge of the access road to control stormwater from directly discharging into the basins or creek. The AC dike shall follow the slope of the road and convey stormwater to drop inlets and culverts.

Table 4.3-3

Summary of Permanent Sycamore Landfill Master Plan-Related Impacts to Sensitive Upland Communities, Required Mitigation, Available Mitigation and Surplus/Deficit

Column 1	2	3	4	5	6	7	8	9	10
	Permanent Impacts	Mitigation Ratio (using MHPA Lands)	Required Mitigation	Mitigation Available (MHPA Lands)	Surplus / (Deficit)	Tier I Mitig. Req'd	Tier I Mitig. Provided	CAGN Habitat Avail./Provided For Mitigation of Temp. CAGN Noise Impacts	Notes
Native Grassland-NG (Tier I)									
LF Inside MHPA	0.42	2:1	0.84						
LF Outside MHPA	1.72	1:1	1.72						
TL Inside MHPA	0	2:1	0						
TL Outside MHPA	0	1:1	0						
Totals			2.56	3.28	0.72	2.56	3.28		
Coastal Sage Scrub/Native Grassland-CSS/NG (Tier I)									
LF Inside MHPA	0.77	2:1	1.54						
LF Outside MHPA	1.01	1:1	1.01						
TL Inside MHPA	0.01	2:1	0.02						
TL Outside MHPA	0	1:1	0						
Totals			2.57	0.40	(2.17)	2.57	0.4		
Coastal Sage Scrub/Native Grassland/NonNative Grassland-CSS/NG/NNG (Tier I)									
LF Inside MHPA	0.79	2:1	1.58						
LF Outside MHPA	0	1:1	0						
TL Inside MHPA	0	2:1	0						
TL Outside MHPA	0	1:1	0						
Totals			1.58	15.42	13.84	1.58	3.03	12.39	Balance available
Coastal Sage Scrub-CSS (Tier II)									
LF Inside MHPA	6.35	1:1	6.35						
LF Outside MHPA	15.37	1:1	15.37						
TL Inside MHPA	0.06	1:1	0.06						
TL Outside MHPA	0.03	1:1	0.03						
Totals			21.81	30.39	8.58			8.58	
Chamise Chaparral-CC (Tier IIIA)									
LF Inside MHPA	3.22	1:1	3.22						
LF Outside MHPA	7.12	0.5:1	3.56						
TL Inside MHPA	0.13	1:1	0.13						
TL Outside MHPA	0.14	0.5:1	0.07						
Totals			6.98	31.62	24.64				
Southern Mixed Chaparral (Tier IIIA)									
LF Inside MHPA	0	1:1	0						
LF Outside MHPA	0.88	0.5:1	0.44						
TL Inside MHPA	0	1:1	0						
TL Outside MHPA	0	0.5:1	0						
Totals			0.44	18.30	17.86			17.86	
NonNative Grassland-NNG (Tier IIIB)									
LF Inside MHPA	0.22	1:1	0.22						
LF Outside MHPA	0.42	0.5:1	0.21						
TL Inside MHPA	0	1:1	0						
TL Outside MHPA	0	0.5:1	0						
Totals			0.43	2.83	2.40			38.83	Total CAGN habitat provided
								29.38	Total required
								24.64	Other habitat (CC)
								2.40	Other habitat (NNG)
								65.87	TOTAL ACRES AVAILABLE
Impact Totals - MHPA	11.97		Total Required	Total Available	Mitigation Surplus				
Impact Totals - non-MHPA	26.69		36.37	102.24	65.87				
TOTAL	38.66								

Use this acreage to convey 46.3 acres to mitigate noise impacts to CAGN along the landfill access road, per MM 4.3.5

**Table 4.3-4
Sycamore Landfill Mitigation Habitat Available by Parcel**

PARCEL NUMBER	Native Grassland-NG (Tier I)	Coastal Sage Scrub/Native Grassland-CSS/NG (Tier I)	Coastal Sage Scrub/Native Grassland/NonNative Grassland-CSS/NG/NNG	Coastal Sage Scrub-CSS (Tier II)	Chamise Chaparral-CC (Tier IIIA)	Southern Mixed Chaparral (Tier IIIA)	NonNative Grassland-NNG (Tier IIIB)	Ruderal/Developed	Mulefat Scrub-MFS (Wetland)	Total
366-031-14 *	0.00	0.25	0.00	1.53	5.17	0.00	0.00	0.00	0.00	6.95
366-031-18 *	0.00	0.54	0.00	3.96	5.50	0.00	0.00	0.00	0.00	10.00
366-070-12 +	0.00	0.43	0.00	5.24	0.00	0.00	0.00	0.00	0.00	5.67
366-070-13 *	0.00	0.00	0.00	4.57	0.00	0.00	0.00	0.00	0.00	4.57
366-080-16 *	0.04	0.00	5.59	2.01	0.00	0.00	0.05	0.00	0.00	7.69
366-080-25 *	0.00	0.00	6.75	4.70	0.00	0.00	0.00	0.00	0.00	11.45
366-080-26 *	0.04	0.00	3.26	2.88	0.00	0.00	0.00	0.00	0.00	6.18
366-031-10 +	0.00	0.00	0.00	0.00	5.40	5.30	0.50	0.00	0.00	11.20
366-031-11 +	0.00	0.00	0.00	0.00	2.90	4.50	0.70	0.00	0.00	8.10
366-071-12 +	0.14	0.81	0.00	3.90	0.00	0.00	0.38	0.00	0.00	5.23
366-071-33 +	0.24	0.00	0.00	6.37	0.00	0.00	0.00	0.00	0.00	6.61
366-030-46 +	3.00	0.00	0.00	0.00	18.20	8.50	1.20	0.00	0.00	30.90
SUBTOTAL	3.46	2.03	15.60	35.16	37.17	18.30	2.83	0.00	0.00	114.55
Less Esmts A-E +	0.18	0.14	0.18	3.41	0.77	0.00	0.00	0.00	0.00	4.68
Less TL Esmt in -14, -18*		1.49		1.36	4.78					7.63
TOTAL AVAILABLE	3.28	0.40	15.42	30.39	31.62	18.30	2.83	0.00	0.00	102.24

Habitats available in the six impacted MHPA parcels * 39.21
 Habitats available in the six MHPA parcels proposed for mitigation of non-MHPA impacts + 63.03
 Total 102.24

2. Sediment and petroleum control devices shall be installed at the drop inlets. These include sediment logs to filter stormwater before it discharges to the inlet; and vortex control devices that force stormwater to move in a circular motion to trap sediment, oils and trash in the center of the vortex where it can settle. Other methods such as continuous deflective separation shall be used as needed in drop inlets to separate out contaminants.

A combination of the methods mentioned above shall be utilized to control stormwater pollution at the site. The exact methods to be used at specific locations would be based on the quantity of flow, the type of pollutants expected and the geometry of the discharge system.

Responsible Party: SLI

Monitoring Agency: City of San Diego DSD;

Mitigation/Monitoring Timing: During scales facility construction.

Monitoring Frequency: Ongoing, during regular construction inspections of the scales facility by DSD personnel

Reporting Program: SLI to report initiation of planned construction of the scales facility to DSD at least one month prior to the beginning of actual site work.

Completion Requirements: End of scales facility construction, as documented by letter from SLI to the City of San Diego DSD.

Significance after Mitigation: Below a level of significance.

LANDFILL DEVELOPMENT

Mitigation Measure 4.3.12a: Prior to project disturbance of proposed additional wetland areas shown in Figure 4.3-5, the ADD environmental designee of LDR shall verify that SLI has fulfilled the requirement for mitigation of these long-term impacts. As the mitigation, SLI shall create or restore 0.09 acre of mulefat scrub, and create, restore or enhance 0.09 acre of mulefat scrub within the San Diego MHPA. SLI shall also create, restore, or enhance 0.40 acre of CDFG non-vegetated streambed. Wetland mitigation is proposed, as listed below.

- Impacts to 0.38 acre of USACE non-wetland jurisdictional waters of the U.S. would be mitigated at a 1:1 ratio, for a total of 0.38 acre of USACE non-wetland jurisdictional waters of the U.S. that must be created.
- Impacts to 0.03 acre of USACE wetlands (mule fat scrub) would be mitigated at a 2:1 ratio, for a total of 0.06 acre of mule fat scrub that must be created, restored, or enhanced.

- Impacts to 0.09 acre of CDFG riparian habitat (mule fat scrub) would be mitigated at a 2:1 ratio, for a total of 0.18 acre of mule fat scrub that must be created, restored, or enhanced.
- Impacts to 0.4 acre of CDFG streambed would be mitigated at a 1:1 ratio, for a total of 0.4 acre of CDFG streambed that must be created, restored, or enhanced.
- Impacts to 0.09 acre of City of San Diego wetlands (mule fat scrub) would be mitigated at a 2:1 ratio, for a total of 0.18 acre of mule fat scrub that must be created, restored, enhanced.

With City approval of the vacation of Road Easement No. 17 across the new wetlands created south of the landfill in accordance with MND 40-0765, adequate wetlands have been created by SLI to mitigate for project wetlands impacts, as stated in EIR Appendix C11 and depicted below.

Appendix C11

Sycamore Landfill Wetlands Mitigation Requirements and Implementation

	Acres	Source of Information
Mitigation Requirements for PDP/SDP/MND 40-0765		
Stage I	0.00	Table A, Jan. 24, 2002 MND 40-0765
Stage II	1.38	Table A, Jan. 24, 2002 MND 40-0766
Stage III	3.24	Table A, Jan. 24, 2002 MND 40-0767
Stage IV	0.80	Table A, Jan. 24, 2002 MND 40-0768
Type of Wetland Mitigation Required		
Creation*	2.81	Amendment No. 1 to SAA R5-2002-0174, Feb. 3, 2003
Preservation/Enhancement	2.61	Amendment No. 1 to SAA R5-2002-0174, Feb. 3, 2003
TOTAL	5.42	Sum of 2.81 and 2.61 above.
Maximum Wetland Mitigation Required for Sycamore LF Master Plan (includes CDFG and City of San Diego Requirements)		
Mulefat scrub (creation)	0.09	Table 8, Bio. Tech. Report, Appx. C1 to EIR; also table in MM 4.3.12
Unvegetated streambed (creation)	0.40	Table 8, Biological Report, RECON 8/16/04, Appx. C1 to Sycamore EIR; also table in MM 4.3.12
TOTAL creation required for MP	0.49	Sum of two figures (0.13+0.40)
TOTAL CREATION REQUIREMENT	3.30	Sum of creation requirements for Master Plan and MND 40-0765 (2.81+0.49)
Mulefat scrub (pres./restor./enhancement)	0.09	Table 8, Bio. Tech. Report, Appx. C1 to EIR; also table in MM 4.3.12
TOTAL PRESERVATION/RESTORATION /ENHANCEMENT REQUIREMENT	2.70	Sum of preservation/restoration/enhancement requirements for Master Plan and MND 40-0766 (2.61+0.09)
TOTAL	6.00	Sum of creation + preservation/restoration/enhancement (3.30+2.70)
Wetland Mitigation Implemented by Sycamore Landfill to Date (MND 40-0765)		
Creation APNs 366-070-12, 366-071-12, 366-071-33	3.44	Sycamore Landfill Mitigation Plan, KTU+A; Jan. 20, 2003
Preservation/Restoration/Enhancement APNs 366-070-12, 366-071-12, 366-071-33	1.52	Unvegetated streambed within wetlands mitigation easement conveyed to the City of San Diego; BRG, based on Merkel Assoc. wetlands delineation, Fig 9c, 3/20/01
APNs 366-070-12, 366-071-12, 366-071-34	0.46	Unvegetated Streambeds in listed parcels, from Table 2, BRG letter to CDFG of 1/23/03
TOTAL	1.98	Sum of two figures above.
TOTAL	5.42	Sum of creation plus preservation/restoration/enhancement
Wetland Mitigation Planned As Part of Sycamore Landfill Master Plan		
Creation	0.66	Wetland created within unused utility or slope easements and road easements, available if easements are vacated by the City per SLI proposal; see RECON letter of Dec. 23, 2003, detailing wetland creation for Sycamore Landfill.
Preservation/Restoration/Enhancement	0.00	Based on the total mitigation provided of 6.26 acres below, no additional preservation/restoration/enhancement acreage is required; however, it is anticipated that upland parcels to be conveyed to the City of San Diego for upland habitat impacts contain substantial acres of streambeds that would be preserved.
TOTAL CREATED	4.10	Sum of 0.66 plus 3.44
TOTAL PRES./RESTORED/ENHANCED	1.98	Sum of 0.00 plus 1.98
TOTAL	6.08	Sum of two numbers above
EXCESS CREATION	0.80	4.10 acres created less 3.30 acre requirement
DEFICIT OF PRES./RESTORE/ENHANCE.	-0.72	1.98 acres preserved/restored/enhanced less 2.70 acre requirement
EXCESS WETLAND MITIGATION	0.08	0.80 acres excess creation less 0.72 acres

Note: * Minimum wetland creation required; if more is created, it can be used to comply with preservation/enhancement requirement.

Source: BRG Consulting, Inc. September 23, 2007.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: Prior to issuance of the PDP/SDP permits by the City of San Diego.

Monitoring Frequency: One time

Reporting Program: SLI to document compliance with the mitigation requirements in a letter to the City DSD.

Completion Requirements: Compliance with the mitigation requirements.

Significance after Mitigation: Below a level of significance.

Mitigation Measure 4.3.12b: Prior to the commencement of any construction-related activities on-site for projects impacting wetland habitat (including earthwork and fencing), the applicant shall provide evidence¹ of the following to the ADD of LDR prior to any construction activity:

- A. Compliance with United States Army Corps of Engineers (ACOE) Section 404 nationwide permit;
- B. Compliance with the Regional Water Quality Control Board Sec. 401 Water Quality certification; and
- C. Compliance with the CDFG Sec. 1601-1603 Streambed Alteration Agreement.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: Prior to construction affecting wetland habitats on-site.

Monitoring Frequency: One time

Reporting Program: SLI to provide copies of applicable permit documentation to City DSD (MMC, EAS).

Completion Requirements: Evidence of compliance provided to the City by SLI.

Significance after Mitigation: Below a level of significance.

¹ Evidence shall include either copies of permits issued, letter of resolutions issued by the responsible agency documenting compliance, or other evidence documenting compliance and deemed acceptable by the ADD of LDR.

TRANSMISSION LINE CONSTRUCTION

Mitigation Measure 4.3.13a: Prior to City issuance of the PDP/SDP permits, the ADD environmental designee of LDR shall verify that SLI has fulfilled the requirement for mitigation of the long-term impacts to sensitive vegetation communities associated with transmission line relocation. As the mitigation, SLI shall provide biological mitigation for direct long-term disturbance to 0.37 acres of upland habitat consistent with the mitigation ratios contained in City of San Diego Land Development Code Biology Guidelines. Acreages of the various habitats anticipated to be subject to long-term disturbance as a result of this component of the project, as well as applicable mitigation ratios, are shown in EIR Table 4.3-7, and in EIR Table 4.3-3. Mitigation lands comprising 0.31 acres of comparable habitat shall be conveyed to the City of San Diego by SLI from MHPA parcels listed in MM 4.3.11 above, and in Table 4.3-4.

Areas subject to temporary disturbance associated with transmission line construction shall be restored, to pre-impact conditions using seeds of species native to the area, in accordance with Habitat Restoration Plan for Areas of Temporary Construction Impacts Associated with the Sycamore Landfill Expansion, prepared by RECON (January 4, 2008).

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: Prior to issuance of the PDP/SDP permits by the City of San Diego.

Monitoring Frequency: One time

Reporting Program: SLI to document the land conveyance in a letter to the City DSD.

Completion Requirements: Compliance with the mitigation requirements.

Significance after Mitigation: Below a level of significance.

TRANSMISSION LINE CONSTRUCTION

Mitigation Measure 4.3.13b: Prior to City LEA approval of the second step of landfill expansion (9,400 tpd, 1,900 tickets per day), the ADD environmental designee of LDR shall verify that SLI has fulfilled the requirement for mitigation of temporary construction impacts to sensitive vegetation communities associated with transmission line relocation. Areas subject to temporary disturbance associated with transmission line construction shall be restored using seeds of species native to the area, as described in the Restoration Plan, Appendix C12, and as listed and delineated in EIR Figure 4.1-5.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: Prior to approval to implement 1,900 tickets per day by the City of San Diego LEA.

Monitoring Frequency: One time

Reporting Program: SLI to provide documentation of the reseeding of the areas of construction disturbance in a letter to the City DSD.

Completion Requirements: Compliance with the mitigation requirements.

Significance after Mitigation: Below a level of significance.

TRAFFIC/CIRCULATION

Potential peak-hour traffic congestion impacts would be reduced to below a level of significance through implementation of the following mitigation measures, except for cumulative post-1,900 ticket impacts to SR-52 ramps and mainline peak hour travel, as documented in the EIR. Mitigation measures requiring fair share contributions would remain significant and unmitigated until the improvements are completed. If the peak-hour values listed in Mitigation Measure 4.4.5c are exceeded, a significant unmitigated impact would occur.

LANDFILL OPERATION

Mitigation Measure 4.4.1: Prior to the first phase of expansion (maximum of 1,250 tickets/ 3,040 average daily trips (ADT) not assuming a conversion for Passenger Car Equivalence (PCE) of 2), the applicant shall provide the following transportation mitigation measures to the satisfaction of the City Engineer: widen the intersection of Mast Boulevard and the Project's access point/West Hills Parkway to include dual eastbound left turn lanes.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department (Transportation)

Mitigation/Monitoring Timing: SLI to provide transportation mitigation as listed above to the satisfaction of the City Engineer.

Monitoring Frequency: One time

Reporting Program: SLI to provide documentation of City Engineer satisfaction in a letter to the City DSD.

Completion Requirements: Completion of the listed physical improvements.

Significance after Mitigation: Below a level of significance.

LANDFILL OPERATION

Mitigation Measure 4.4.2: Prior to increasing landfill tickets above the 620 tickets per day now allowed, the applicant shall make a fair share contribution to Caltrans Project (Managed Lanes Project) to widen SR-52 west of Mast Boulevard, working with the City of San Diego and Caltrans to implement the appropriate payment.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department (Transportation)

Mitigation/Monitoring Timing: Prior to increasing landfill tickets above 620 tickets per day now allowed.

Monitoring Frequency: One time

Reporting Program: SLI to provide documentation of the payment to Caltrans in a letter to the City DSD.

Completion Requirements: Completion of the listed fair share contributions.

Significance after Mitigation: Significant and unmitigated until Caltrans improvements are completed.

LANDFILL OPERATION

Mitigation Measure 4.4.3: Prior to expansion to 1,900 tickets/5,270 ADT (not assuming conversion for PCE of 2), the applicant shall widen the Mast/West Hills/Project Driveway intersection to include a westbound right turn lane, a northbound through lane, a southbound left turn lane, southbound dual right turn lanes, a westbound through lane, and an eastbound through lane to the satisfaction of the City Engineer.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department (Transportation);

Mitigation/Monitoring Timing: SLI to provide transportation mitigation as listed above to the satisfaction of the City Engineer.

Monitoring Frequency: One time

Reporting Program: SLI to provide documentation of City Engineer satisfaction in a letter to the City DSD.

Completion Requirements: Completion of the listed physical improvements.

Significance after Mitigation: Below a level of significance.

LANDFILL OPERATION

Mitigation Measure 4.4.4: Prior to the second phase of the expansion (maximum of 1,900 tickets/5,270 ADT not assuming a conversion for PCE of 2), the applicant shall provide the following transportation mitigation measures to the satisfaction of the City Engineer: widen Mast Boulevard to six lanes from the SR-52 interchange to east of the project's access point/West Hills Parkway.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department (Transportation)

Mitigation/Monitoring Timing: Prior to landfill expansion to 1,900 tickets per day/5,270 ADT.

Monitoring Frequency: One time

Completion Requirements: Completion of the listed physical improvements.

Significance after Mitigation: Below a level of significance.

LANDFILL OPERATION

Mitigation Measure 4.4.5a: Prior to landfill expansion to 2,150 tickets/5,942 ADT (not assuming conversion for PCE of 2), the Caltrans Managed Lanes Project on SR-52 (six lanes, plus two high-occupancy lanes) must be assured to the satisfaction of the City Engineer between I-15 and SR-125.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department (Transportation); Caltrans

Mitigation/Monitoring Timing: Prior to increasing landfill tickets and traffic to 2,150 tickets per day /5,942 ADT.

Monitoring Frequency: One time

Reporting Program: SLI to provide documentation of the assured completion of the Caltrans Managed Lanes Project improvements in a letter to the City DSD.

Completion Requirements: Completion of Caltrans Managed Lanes Project is assured.

Significance after Mitigation: Significant and unmitigated until Caltrans improvements are completed.

LANDFILL OPERATION; note that MMs 4.4.5b through 4.4.5d are part of the TDM program

Mitigation Measure 4.4.5b: Prior to the first phase of the expansion (maximum of 1,250 tickets/3,040 average daily trips (ADT), the project shall provide a mitigation monitoring program with an annual traffic information summary to ensure the ticket counts, numbers of trucks, daily trips, trips per hour and tons per day are within the limits of operation to the satisfaction of the City Engineer. Copies of the annual report shall be provided to Caltrans, the City of Santee and City of San Diego DSD Transportation.

On a quarterly basis, report to the City Engineer and Caltrans peak-period a.m and p.m. tickets by hour and by day, and provide tickets per hour and inbound trips per hour for a representative day during the reporting months. If measures to reduce trips or tickets under MM 4.4.5d were implemented prior to the report, the report shall describe what measures were implemented, and what effect, if any, they had on the trips or tickets being monitored.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department (Transportation);

Mitigation/Monitoring Timing: Quarterly and annually following increase of tickets and traffic to 1,250 tickets/ 3,040 ADT.

Monitoring Frequency: Annually for traffic information summary report; quarterly for tickets and trips report.

Reporting Program: SLI shall submit quarterly reports of monthly tickets and trips and annual reports of traffic information summaries to the City DSD (Transportation).

Completion Requirements: End of landfill operations (closure)

Significance after Mitigation: Below a level of significance if the project traffic targets listed in MM 4.4.5c are not exceeded more than five percent in any given month.

LANDFILL OPERATION

Mitigation Measure 4.4.5c: The project targets for maximum hourly operation for any expansion are as follows:

- a.m. Peak (7:00 a.m. to 9:00 a.m.) – 104 tickets per hour; 132 inbound trips per hour
- p.m. Peak (4:00 p.m. to 7:00 p.m.) – 44 tickets per hour; 56 inbound trips per hour

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department (Transportation)

Mitigation/Monitoring Timing: During quarterly and annual reports following increase of tickets and traffic to 1,250 tickets/ 3,040 ADT.

Monitoring Frequency: Annually during review of traffic information summary report; quarterly during review of tickets and trips report.

Reporting Program: SLI shall submit quarterly reports of monthly tickets and trips and annual reports of traffic information summaries to the City DSD (Transportation).

Completion Requirements: End of landfill operations (closure)

Significance after Mitigation: Below a level of significance if the project traffic targets listed in MM 4.4.5c are not exceeded more than five percent in any given month.

Mitigation Measure 4.4.5d: To reduce traffic impacts to State Route 52 during peak periods SLI shall implement the following Transportation Demand Management Plan (TDMP). Prior to the first phase of the expansion (maximum of 1,250 tickets/3,040 average daily trips (ADT)), SLI shall monitor and report the tickets as required by MM 4.4.5b. If peak-period tickets exceed the levels set forth in MM 4.4.5c more than five percent of the time in a given month, SLI shall take action to reduce landfill peak-period traffic by implementing one or more of the following steps in subsequent months:

- Reduce deliveries by vendors during a.m. and/or p.m. peak periods.
- Revise employee hours to allow commutes outside a.m. and/or p.m. peak periods.
- Implement a.m. and/or p.m. peak-period disposal pricing measures.

- Prohibit self-haul trash disposal during a.m. and/or p.m. peak periods.
- Adjust transfer vehicle deliveries during a.m. and/or p.m. peak periods.
- Convene a meeting of the TDMP Committee to consider other possible traffic management issues.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department (Transportation)

Mitigation/Monitoring Timing: Following increase of tickets and traffic to 1,250 tickets/ 3,040 ADT.

Monitoring Frequency: Annually during review of traffic information summary report; quarterly during review of tickets and trips report.

Reporting Program: SLI shall submit quarterly reports of monthly tickets and trips and annual reports of traffic information summaries to the City DSD (Transportation).

Completion Requirements: End of landfill operations (closure)

Significance after Mitigation: Below a level of significance if the project traffic targets listed in MM 4.4.5c are not exceeded more than five percent in any given month.

PALEONTOLOGICAL RESOURCES

Potential project impacts to paleontological resources would be reduced to below a level of significance through implementation of the following mitigation measure.

LANDFILL AND ANCILLARY FACILITY DEVELOPMENT

Mitigation Measure 4.5.1: During anticipated 20-year excavation of the landfill into approximately 128 acres of paleontologically-sensitive Friars Formation and Stadium Conglomerate (locations shown hatched in EIR Figure 4.5-1) the excavation process and fossils uncovered shall be regularly monitored and the results reported to the City Mitigation Monitoring Coordinator (MMC) by qualified paleontologists.

4.5.1a Prior to Permit Issuance

A. Land Development Review (LDR) Plan Check

1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, but prior to the first preconstruction meeting,

whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.

B. Letters of Qualification have been submitted to ADD

1. Because of the proposed 20+ year duration of the landfill expansion project, each individual phase of site development may require a more focused mitigation program. With this in mind, for each excavation phase, the applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City of San Diego Paleontology Guidelines.
2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of each excavation phase of the project.
3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.

4.5.1b Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

Over the projected life of the project, it may be necessary to complete supplemental record searches to update the understanding of the paleontological resource potential of the remaining undeveloped portions of the site.

B. PI Shall Attend Precon Meetings

1. For each phase of site development, and prior to beginning any work that requires monitoring, the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor.
 - a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
2. Identify Areas to be Monitored
Prior to the start of any work that requires monitoring for a given phase of site development, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of

grading/excavation limits. The PME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).

3. When Monitoring Will Occur
 - a. Prior to the start of any work for a given phase of site development, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
 - b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents, which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

4.5.1c During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching

1. The monitor shall be present full-time during grading/excavation/trenching activities for the ancillary infrastructure (e.g., site management offices and scales) construction phase of site development. As identified on the PME these activities could result in impacts to formations with high (Friars Formation) and moderate (Stadium Conglomerate) resource sensitivity. **The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities.**
2. The monitor shall document field activity via the Consultant Site Visit Record (CSVSR). The CSVSR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (**Notification of Monitoring Completion**), and in the case of ANY discoveries. The RE shall forward copies to MMC.
3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as grading/excavation/trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.
4. The monitor shall be present on a part-time basis during grading/excavation/trenching activities for the main landfill materials extraction phase of site development. As identified on the PME, these activities could result in impacts to formations with high (Friars Formation) and moderate (Stadium Conglomerate) resource sensitivity. Because of the continuous but slow nature of the materials extraction process, it would be unproductive to require full-time monitoring. Instead, periodic inspections should be made and paced according to which geologic formation is being graded. As an initial level of monitoring effort, 4 hours/day @ 3 days/week for grading activities in the Friars Formation and 5 hours/day @ 1 day/week for grading activities in the Stadium Conglomerate is proposed. As the work goes on, and more paleontological experience with the site is obtained, the level of monitoring work may be adjusted based on the observed and planned pace of excavation and the nature of the paleontological resources observed. If adjustments are warranted, a written proposal to fine-tune the monitoring hours proposed by the PI will be submitted to MMC for input and approval.

B. Discovery Notification Process

1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

C. Determination of Significance

1. The PI shall evaluate the significance of the resource.
 - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.
 - b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.
 - c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.
 - d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

4.5.1d Night Work

A. If night work is included in the contract

1. When night work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
2. The following procedures shall be followed.
 - a. No Discoveries
In the event that no discoveries were encountered during night work, The PI shall record the information on the CSVr and submit to MMC via fax by 9am the following morning, if possible.
 - b. Discoveries
All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction.
 - c. Potentially Significant Discoveries

If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.

- d. The PI shall immediately contact MMC, or by 8AM the following morning to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.
- B. If night work becomes necessary during the course of construction
1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
 2. The RE, or BI, as appropriate, shall notify MMC immediately.
- C. All other procedures described above shall apply, as appropriate.

4.5.1e Post Construction

A. Submittal of Draft Monitoring Report

1. Because of the proposed 20+ year duration of the landfill expansion project, each individual phase of site development may require a more focused mitigation program. With this in mind, the PI shall submit two copies of the Draft Monitoring Progress Report (even if negative) which describes the results, analysis, and conclusions of the relevant phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. Each report should include a project-specific stratigraphic column with all discovered fossil localities plotted, a discussion of methods and results, and a complete list of recovered and cataloged fossil specimens. Each progress report should build on the results and findings of the previous reports.
 - a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.
 - b. Recording Sites with the San Diego Natural History Museum
The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.
2. MMC shall return the Draft Monitoring Progress Report to the PI for revision or, for preparation of the Final Progress Report.
3. The PI shall submit revised Draft Monitoring Progress Report to MMC for approval.
4. MMC shall provide written verification to the PI of the approved report.
5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Progress Report submittals and approvals.

B. Handling of Fossil Remains

1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.
2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.

C. Curation of fossil remains: Deed of Gift and Acceptance Verification

1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for each phase of this project are permanently curated with an appropriate institution.
2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Progress Report submitted to the RE or BI and MMC.

D. Final Monitoring Report(s)

1. The PI shall submit two copies of the Final Monitoring Progress Report to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Progress Report from MMC, which includes the Acceptance Verification from the curation institution.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department (MMC)

Mitigation/Monitoring Timing: Prior to and during landfill excavation into approximately 128 acres of paleontologically-sensitive Friars Formation and Stadium Conglomerate at locations shown hatched in EIR Figure 4.5-1.

Monitoring Frequency: One time for initial conditions, ongoing during excavation into fossil-bearing formations.

Reporting Program: Prior to City issuance of the PDF/SDP, SLI shall provide qualifications of the paleontological principal investigator (PI) and other paleontological monitors in a letter to the City DSD (MMC). Prior to the start of excavation of the areas shown in EIR Figure 4.5-1, the PI is to verify by letter to MMC that a site-specific record search has been completed, to submit a paleontological monitoring exhibit of what areas are to be monitored, and submit a schedule of excavation. During excavation within the areas shown in Figure 4.5-1, the monitor shall document field activities by completion of Consultant Site Visit Records, and submittal to MMC. If significant fossils are found, the PI shall submit a letter to MMC indicating how the fossils are to be collected, curated and documented in the Final Monitoring Report. If excavation and monitoring occurs in phases, the PI is to submit copies of the Draft Monitoring Progress Report to MMC within 90 days following completion of a phase of monitoring. The PI shall

submit two copies of the Final Monitoring Progress Report to MMC within 90 days after notification from MMC that the draft report has been approved. Following completion of excavation of the 128 acres depicted in EIR Figure 4.5-1, SLI shall inform the City MMC by letter.

Completion Requirements: Completion of excavation of the 128 acres depicted in EIR Figure 4.5-1.

Significance after Mitigation: Below a level of significance.

NOISE

Potential project impacts caused by exceedance of the City Noise Ordinance would be reduced to below a level of significance through implementation of the following mitigation measures.

LANDFILL DEVELOPMENT/OPERATION; *these measures correspond to MM 4.3.3a under biology*

Mitigation Measures 4.6.0, 4.6.1c, and 4.6.1d: SLI shall construct 15-20 foot high noise and visual barrier berms of solid waste covered with soil, or of soil and rock alone (on the eastern side), between the landfill operations area (working face) and the nearest MHPA/residentially-zoned boundary when the working face is within 1,600 feet of that boundary, and the working face elevation is above, or less than 20 feet below, existing topographic barriers between the working face and the boundary.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: Prior to the working face being located within 1,600 feet of the MHPA/residentially-zoned boundary, and less than twenty feet below existing adjacent topographic barriers.

Monitoring Frequency: Ongoing during landfill operations, during regular LEA site inspections.

Reporting Program: SLI shall submit annual construction plans by April 30 of each year containing maps of where it is anticipated that berms would be built during the following year. SLI shall inform DSD and LEA by letter of the planned closure of the landfill and the end of landfill operations.

Completion Requirements: End of landfill operations

Significance after Mitigation: Below a level of significance.

LANDFILL OPERATIONS

Mitigation Measures 4.6.1a & 4.6.1b: Nighttime landfill operations shall be prohibited within 200 feet of the nearest residential parcel boundary (see EIR Figure 4.6-3) if the residential parcel(s) adjacent to the landfill has/have been developed.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: Development of a residence within 500 feet of APN 366-041-01.

Monitoring Frequency: Ongoing during landfill operations, if the adjacent residential parcels have been developed.

Reporting Program: SLI shall inform DSD if a residence is constructed within 500 feet of the parcel boundary, provide a map of that residence location, and showing the locations of landfilling areas within 200 feet of the landfill parcel boundary where nighttime landfill operations shall be prohibited. Also, SLI shall inform DSD and LEA by letter of the planned closure of the landfill and the end of landfill operations.

Completion Requirements: End of landfill operations

Significance after Mitigation: Below a level of significance.

Mitigation Measure 4.6.2: Any future development of residentially-zoned parcels in the MHPA adjacent to the existing landfill access road would require environmental review by the City of San Diego. In the event such review includes a noise analysis that identifies any landfill truck traffic noise that would exceed City Noise Ordinance limits at the proposed residential use, SLI shall work with the developer of the residential use to identify feasible noise mitigation measures that would reduce the noise levels to less than significant. If the residential development subsequently is approved by the City, SLI shall provide the identified noise mitigation at no cost to the developer.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: If and when development of a residence within a parcel adjacent to the landfill access road is proposed.

Monitoring Frequency: If and when conditions described in Mitigation Measure 4.6.2 occur.

Reporting Program: If a building permit for a residence near the landfill access road is requested, SLI shall document how noise mitigation measures to be funded by SLI would allow the proposed residence to comply with City residential noise standards, and provide such documentation to DSD. Also, SLI shall inform DSD and LEA by letter of the planned closure of the landfill and the end of landfill operations.

Completion Requirements: End of landfill operations

Significance after Mitigation: Below a level of significance.

Mitigation of Potential Noise-Related Biological Impacts

Potential noise-related impacts to MHPA lands or coastal California gnatcatchers as a result of the proposed project would be reduced to below a level of significance through implementation of the following mitigation measures. MMRP requirements for these measures are described under the heading "Biological Resources."

Mitigation Measure 4.6.3a: Same as Mitigation Measure 4.3.3a.

Monitoring Requirements: See Monitoring Requirements for Mitigation Measure 4.3.3a.

Mitigation Measure 4.6.3b: Same as Mitigation Measure 4.3.4.

Monitoring Requirements: See Monitoring Requirements for Mitigation Measure 4.3.4.

Mitigation Measure 4.6.4: Same as Mitigation Measure 4.3.4.

Monitoring Requirements: See Monitoring Requirements for Mitigation Measure 4.3.4.

Mitigation Measure 4.6.5: Same as Mitigation Measure 4.3.5.

Monitoring Requirements: See Monitoring Requirements for Mitigation Measure 4.3.5.

Mitigation Measure 4.6.6: Same as Mitigation Measure 4.3.9.

Monitoring Requirements: See Monitoring Requirements for Mitigation Measure 4.3.9.

AIR QUALITY

LANDFILL OPERATIONS

The following mitigation measures 4.7.1a through 4.7.1n would reduce the potential criteria pollutant air quality impacts related to the project, but not to below a level of significance.

Mitigation Measure 4.7.1a: SLI personnel shall properly maintain engine-powered equipment per manufacturers' specifications and maintain logs demonstrating that such maintenance has occurred.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: During landfill operations

Monitoring Frequency: Ongoing, during periodic LEA inspections of the site.

Reporting Program: SLI to submit a letter annually to the DSD that summarizes and attaches copies of all applicable engine maintenance logs. Also, SLI shall inform DSD by letter of the planned closure of the landfill and the end of landfill operations.

Completion Requirements: End of landfill operations

Mitigation Measure 4.7.1b: SLI personnel shall either surface temporary unpaved roads with low-dust material or water landfill haul roads no less than every four hours during operations unless roads are visibly wet.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: During landfill operations

Monitoring Frequency: Ongoing, during periodic LEA inspections of the site.

Reporting Program: SLI to submit a letter annually to the DSD describing the dust-control measures used on landfill roads. Also, SLI shall inform DSD by letter of the planned closure of the landfill and the end of landfill operations.

Completion Requirements: End of landfill operations

Mitigation Measure 4.7.1c: SLI shall sweep the paved portion of the landfill access road at least every two weeks.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: During landfill operations

Monitoring Frequency: Ongoing, during periodic LEA inspections of the site.

Reporting Program: SLI to submit a letter annually to the DSD describing the dust-control measures used on landfill roads. Also, SLI shall inform DSD by letter of the planned closure of the landfill and the end of landfill operations.

Completion Requirements: End of landfill operations

Mitigation Measure 4.7.1d: SLI personnel shall water active sites of soil disturbance no less than every four hours during operations unless area is visibly wet.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: During landfill operations

Monitoring Frequency: Ongoing, during periodic LEA inspections of the site.

Reporting Program: SLI to submit a letter annually to the DSD describing the dust-control measures used on landfill active disposal areas. Also, SLI shall inform DSD by letter of the planned closure of the landfill and the end of landfill operations.

Completion Requirements: End of landfill operations

Mitigation Measure 4.7.1e: SLI personnel shall use soil stabilizers on areas with long-term exposure of disturbed or unvegetated surfaces (e.g., stockpiles).

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: During landfill operations

Monitoring Frequency: Ongoing, during periodic LEA inspections of the site.

Reporting Program: SLI to submit a letter annually to the DSD describing the dust-control measures used on landfill stockpile areas. Also, SLI shall inform DSD by letter of the planned closure of the landfill and the end of landfill operations.

Completion Requirements: End of landfill operations

Mitigation Measure 4.7.1f: At the C&D processing area, SLI personnel shall keep fine materials (fines) moist by frequent water sprays.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: During C&D processing operations

Monitoring Frequency: Ongoing, during periodic LEA inspections of the site.

Reporting Program: SLI to submit a letter annually to the DSD describing the dust-control measures used at the C&D processing area. Also, SLI shall inform DSD by letter of the planned end of C&D processing operations.

Completion Requirements: End of C&D processing operations

Mitigation Measure 4.7.1g: At the C&D processing area, SLI personnel shall wet materials to be sorted prior to their loading onto the sorting conveyor.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: During C&D processing operations

Monitoring Frequency: Ongoing, during periodic LEA inspections of the site.

Reporting Program: SLI to submit a letter annually to the DSD describing the dust-control measures used at the C&D processing area. Also, SLI shall inform DSD by letter of the planned end of C&D processing operations.

Completion Requirements: End of C&D processing operations

Mitigation Measure 4.7.1h: SLI personnel shall conduct methane surface emissions screening every calendar quarter to ensure that there are no emissions greater than 500 ppm.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: During landfill operations and post-closure maintenance periods.

Monitoring Frequency: Ongoing, during periodic LEA inspections of the site.

Reporting Program: SLI to submit a letter annually to the APCD, with cc to DSD, describing the results of the surface emissions screening work for methane just above the landfill surface area. Also, SLI shall inform DSD by letter of the planned end of post-closure maintenance.

Completion Requirements: End of post-closure maintenance

Mitigation Measure 4.7.1i: SLI personnel shall conduct inspections of the landfill cover every calendar quarter to ensure that the cover is in good condition so that the maximum amount of landfill gas (LFG) is collected.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: During landfill operations and post-closure maintenance.

Monitoring Frequency: Ongoing, during periodic LEA inspections of the site.

Reporting Program: SLI to submit a letter annually to the DSD describing the results of quarterly inspections for landfill cover erosion. Also, SLI shall inform DSD by letter of the planned end of post-closure maintenance.

Completion Requirements: End of post-closure maintenance.

Mitigation Measure 4.7.1j: SLI personnel shall inspect the LFG collection system every month.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: During landfill operations and post-closure maintenance.

Monitoring Frequency: Ongoing, during periodic LEA inspections of the site.

Reporting Program: SLI to submit a letter annually to the DSD describing the results of monthly inspections of the landfill LFG system. Also, SLI shall inform DSD by letter of the planned end of post-closure maintenance.

Completion Requirements: End of post-closure maintenance.

Mitigation Measure 4.7.1k: SLI personnel shall maintain and follow a Startup, Shut Down, and Malfunction Plan.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: During landfill operations and post-closure maintenance periods.

Monitoring Frequency: Ongoing, during periodic LEA inspections of the site.

Reporting Program: SLI to submit a letter annually to the DSD describing the status of the Startup, Shut Down and Malfunction Plan. Also, SLI shall inform DSD by letter of the planned end of post-closure maintenance.

Completion Requirements: End of post-closure maintenance.

Mitigation Measure 4.7.1l: SLI personnel shall route all collected LFG to an NSPS-approved control device.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: During landfill operations and post-closure maintenance periods.

Monitoring Frequency: Ongoing, during periodic LEA inspections of the site.

Reporting Program: SLI to submit a letter annually to the DSD describing the status of routing LFG to NSPS-approved control devices. Also, SLI shall inform DSD by letter of the planned end of post-closure maintenance.

Completion Requirements: End of post-closure maintenance.

Mitigation Measure 4.7.1m: SLI personnel shall continuously monitor LFG temperature and oxygen levels at the control device.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: During landfill operations and post-closure maintenance.

Monitoring Frequency: Ongoing, during periodic LEA inspections of the site.

Reporting Program: SLI to submit a letter annually to the DSD describing results from the monitoring of LFG temperature and oxygen levels at the control device. Also, SLI shall inform DSD by letter of the planned end of post-closure maintenance.

Completion Requirements: End of post-closure maintenance.

Mitigation Measure 4.7.1n: SLI personnel shall conduct performance tests of landfill gas flares as required by NSPS Subpart WWW.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: During landfill operations and post-closure maintenance.

Monitoring Frequency: One time, upon initial startup of each flare.

Reporting Program: SLI to submit a letter annually to the LEA describing the results of performance tests of the landfill gas flares. Also, SLI shall inform DSD and LEA by letter of the planned end of post-closure maintenance.

Completion Requirements: End of post-closure maintenance.

LANDFILL ANCILLARY FACILITY CONSTRUCTION

The following mitigation measures 4.7.2a through 4.7.2c would reduce the potential air quality impacts related to project construction of landfill ancillary facilities, but not to below a level of significance.

Mitigation Measure 4.7.2a: SLI personnel shall properly maintain engine-powered equipment per manufacturers' specifications and maintain logs demonstrating such maintenance has occurred.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: During landfill ancillary facility construction.

Monitoring Frequency: Ongoing, during periodic DSD inspections of the site.

Reporting Program: SLI to submit a letter annually to the DSD that summarizes and attaches copies of all applicable engine maintenance logs. Also, SLI shall inform DSD by letter of the completion of landfill ancillary facility construction.

Completion Requirements: End of landfill ancillary facility construction.

Mitigation Measure 4.7.2b: SLI and SDG&E personnel or contractors shall use low VOC paints, if painting structures onsite is required.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: During project facilities construction, and subsequent landfill operations

Monitoring Frequency: Ongoing, during periodic LEA inspections of the site.

Reporting Program: SLI to submit a letter annually to the DSD that identifies any landfill or transmission line structures that were painted onsite during the reporting year, and provide low-VOC specifications of the paint(s) used. Also, SLI shall inform DSD by letter of the planned closure of the landfill and the end of landfill operations.

Completion Requirements: End of landfill operations

Mitigation Measure 4.7.2c: SLI and SDG&E personnel or contractors shall water active sites of soil disturbance no less than every four hours during construction unless construction areas are visibly wet.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: During landfill ancillary facility construction.

Monitoring Frequency: Ongoing, during periodic LEA inspections of the site.

Reporting Program: SLI to submit a letter annually to the DSD describing the dust-control measures used on landfill active disposal areas. Also, SLI shall inform DSD by letter of the completion of landfill ancillary facilities.

Completion Requirements: End of landfill ancillary facility construction

LANDFILL AND COMPOSTING OPERATION

The following mitigation measures 4.7.3a through 4.7.3h would reduce the potential odor impacts related to receipt and processing of greens/compost materials, but not to below a level of significance.

Mitigation Measure 4.7.3a: SLI personnel shall prepare and distribute informational materials to use with local governments and private groups aimed at eliminating the storage and transporting of green material in plastic bags or containers to delay/reduce the start of an aerobic digestion.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: During operations accepting green materials

Monitoring Frequency: Ongoing, during periodic LEA inspections of the site.

Reporting Program: SLI to submit a letter annually to the LEA describing the informational material distributed, and the effect, if any, it had on elimination of plastic bags for the disposal of greens. Also, SLI shall inform DSD and LEA by letter of the planned end of green material acceptance.

Completion Requirements: End of green materials acceptance

Mitigation Measure 4.7.3b: If immediate processing of green material is not possible due to an unusual situation, SLI personnel shall store green material to be processed in windrows perpendicular to the prevailing wind direction.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: During operations accepting green material

Monitoring Frequency: Ongoing, during periodic LEA inspections of the site.

Reporting Program: SLI to submit a letter annually to the DSD describing the extent to which this measure was implemented in the preceding year, and why. Also, SLI shall inform DSD by letter of the planned end of green material acceptance.

Completion Requirements: End of green materials acceptance

Mitigation Measure 4.7.3c: SLI personnel shall turn any green material storage windrows/piles no less frequently than every two days to aerate them and to promote drying.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: During operations accepting green material

Monitoring Frequency: Ongoing, during periodic LEA inspections of the site.

Reporting Program: SLI to submit a letter annually to the DSD confirming adequate turning, and shall submit the odor complaint record as documentation. Also, SLI shall inform DSD by letter of the planned end of green material acceptance.

Completion Requirements: End of operations accepting green material

Mitigation Measure 4.7.3d: SLI personnel shall mix dense (fine) greens materials with coarse materials to increase material porosity before placement.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: During operations accepting green material

Monitoring Frequency: Ongoing, during periodic LEA inspections of the site.

Reporting Program: SLI to submit a letter annually to the DSD confirming adequate turning, and shall submit the odor complaint record as documentation. Also, SLI shall inform DSD by letter of the planned end of green material acceptance.

Completion Requirements: End of operations accepting green material

Mitigation Measure 4.7.3e: As a standard operating procedure, SLI personnel shall place ground green material at the desired final location on the day processed. Overnight storage of the ground green material shall be minimized.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: During operations accepting green material

Monitoring Frequency: Ongoing, during periodic LEA inspections of the site.

Reporting Program: SLI to submit a letter annually to the DSD confirming adequate turning, and shall submit the odor complaint record as documentation. Also, SLI shall inform DSD by letter of the planned end of green material acceptance.

Completion Requirements: End of operations accepting green material

Mitigation Measure 4.7.3f: If and when compost operations are initiated, compost pile temperature, oxygen level, and moisture content shall be monitored and adjusted on a daily basis, in order to assure rapid decomposition and minimization of odors. The compost pile(s) will be turned (aerated) as frequently as required to keep the monitored factors in balance, but turning will be limited to times when there is adequate wind to disperse potential odors. These times typically occur during the late morning and in the afternoon.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: Following initiation of composting operations.

Monitoring Frequency: Ongoing, during periodic LEA inspections of the site.

Reporting Program: SLI to submit a letter annually to the DSD confirming adequate turning, and shall submit the odor complaint record as documentation. Also, SLI shall inform DSD by letter of the planned end of green material acceptance.

Completion Requirements: End of composting operations

Mitigation Measure 4.7.3g: SLI personnel shall update the Odor Management Plan as may be necessary in the future.

Responsible Party: SLI

Monitoring Agency: City of San Diego Development Services Department

Mitigation/Monitoring Timing: During green material / composting operations

Monitoring Frequency: Review of revised Odor Management Plan, as required by the LEA

Reporting Program: SLI to update the Odor Management Plan as required by the LEA.

Completion Requirements: End of green material / composting operations

Mitigation Measure 4.7.3h: SLI personnel shall maintain an odor complaint log and shall notify the City of Santee and Padre Dam Municipal Water District within 24 hours of receiving such complaints. In addition, SLI shall provide the City of Santee, Padre Dam Municipal Water District, and the City of San Diego DSD with a written report on a quarterly basis, which summarizes any significant activity that may have produced odors or odor complaints.

Responsible Party: SLI

Monitoring Agency: City of San Diego DSD

Mitigation/Monitoring Timing: During landfill, greens and/or composting operations; quarterly report on odor complaints.

Monitoring Frequency: Review of quarterly odor complaints report.

Reporting Program: SLI to notify the City of Santee within 24 hours of receiving an odor complaint. Also, SLI to compile such information on a quarterly basis, and submit it to the City of Santee and to the City of San Diego DSD.

Completion Requirements: End of landfill, greens and/or composting operations

INDEX to MMRP REFERENCES (following)

Appendices

- C7 Exotic Invasive Plant Removal Plan
prepared by RECON Environmental, Inc., December 27, 2005
- C8 Dudleya Translocation Plan
prepared by RECON Environmental, Inc., August 30, 2006
- C8 Nuttall's Scrub Oak Translocation Plan
prepared by RECON Environmental, Inc., August 30, 2006
- C12 Sycamore Landfill Temporary Impact Restoration Plan
prepared by RECON Environmental, Inc., December 2007
- F3 Air Quality Mitigation Management Plan
prepared by ENVIRON Corporation, April 19, 2006

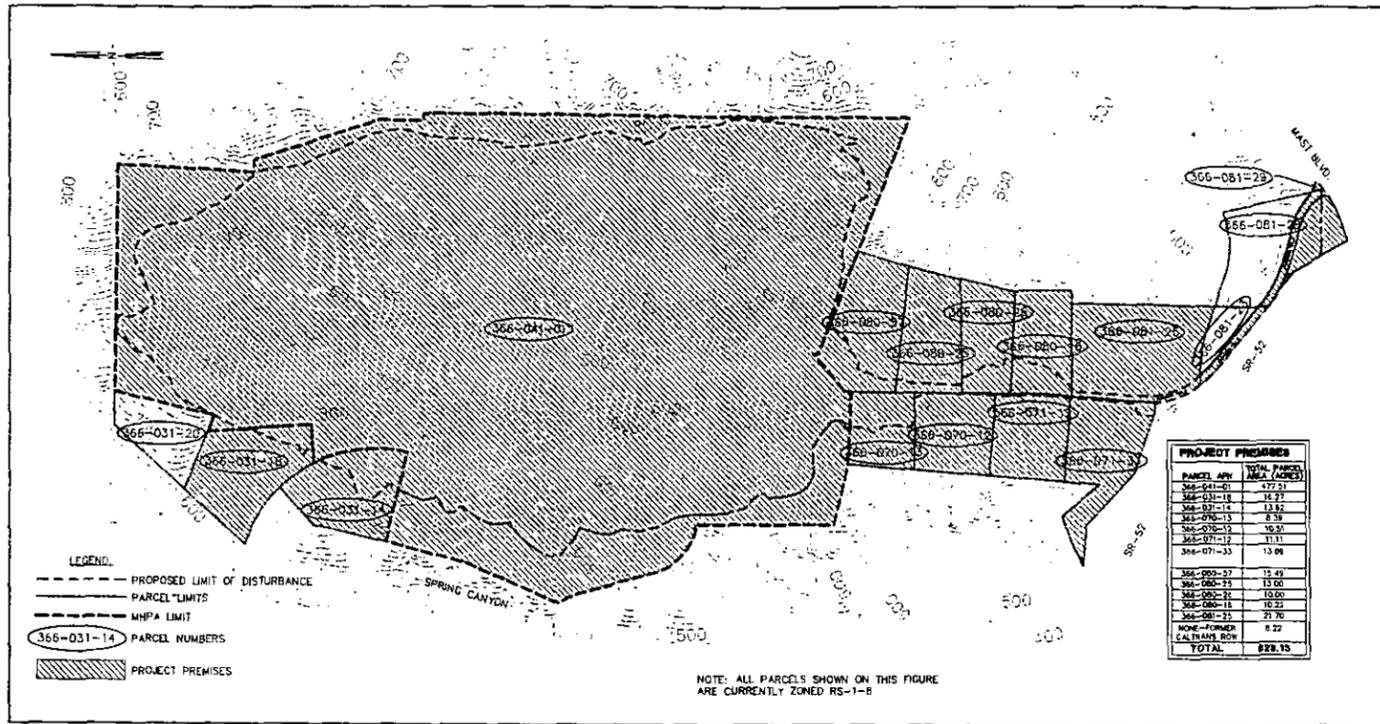
Tables

- 4.3-7 Upland Mitigation Requirements for the Proposed SDG&E Transmission Line Relocation,
(Alternative A)

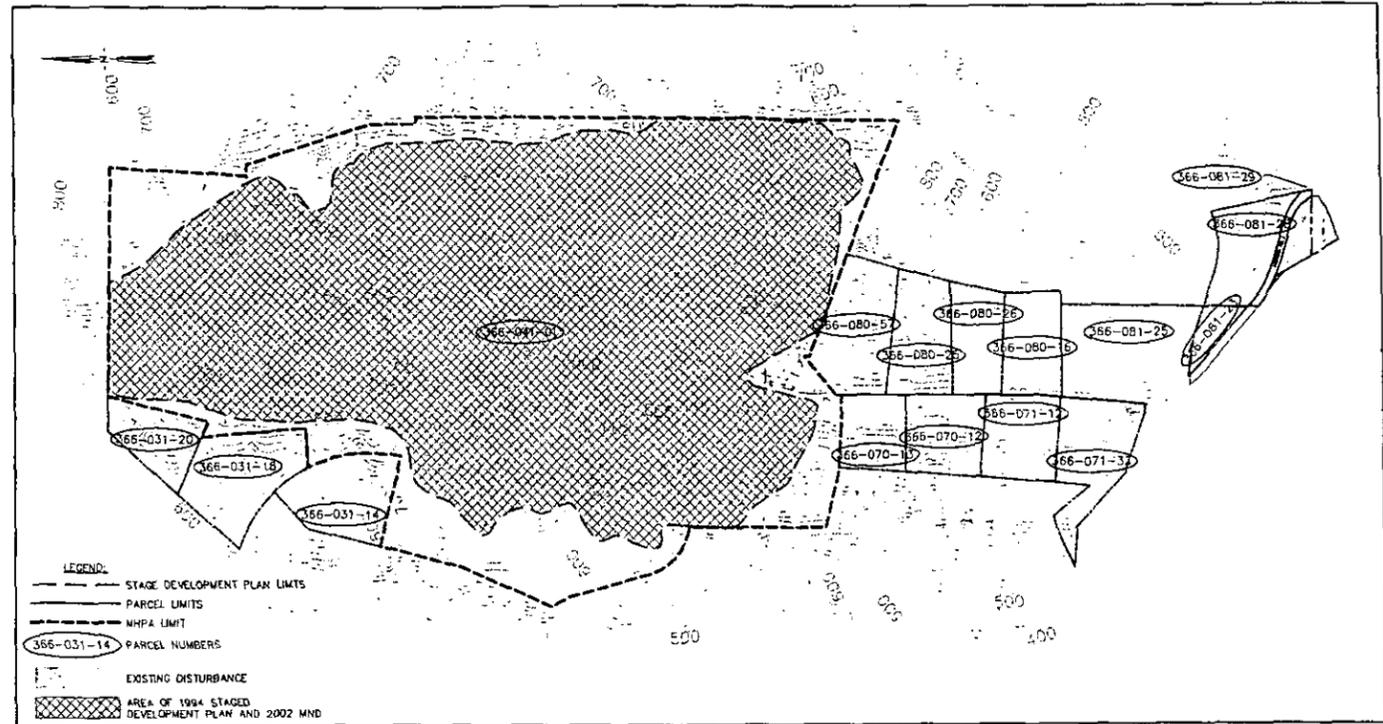
Figures

- 4.1-5 Landscape Development Plan – Slope Revegetation Plan
- G8 Steep Slope Determination
- L8A Plan Sheet: Temporary Construction Disturbance – Typical Details
- 4.3-1 Locations of Proposed Master Plan New Areas of Biological Disturbance
- 4.3-5 Detail of Project Impacts and Impact Avoidance Measures
- 4.5-1 New Fossil-Bearing Geologic Strata to be Excavated
- 4.6-3 Areas Zoned Residential Not Set Aside for Other Uses In Which Landfill Operations or Haul Vehicle Noise
Would Exceed City of San Diego Noise Ordinance Limits

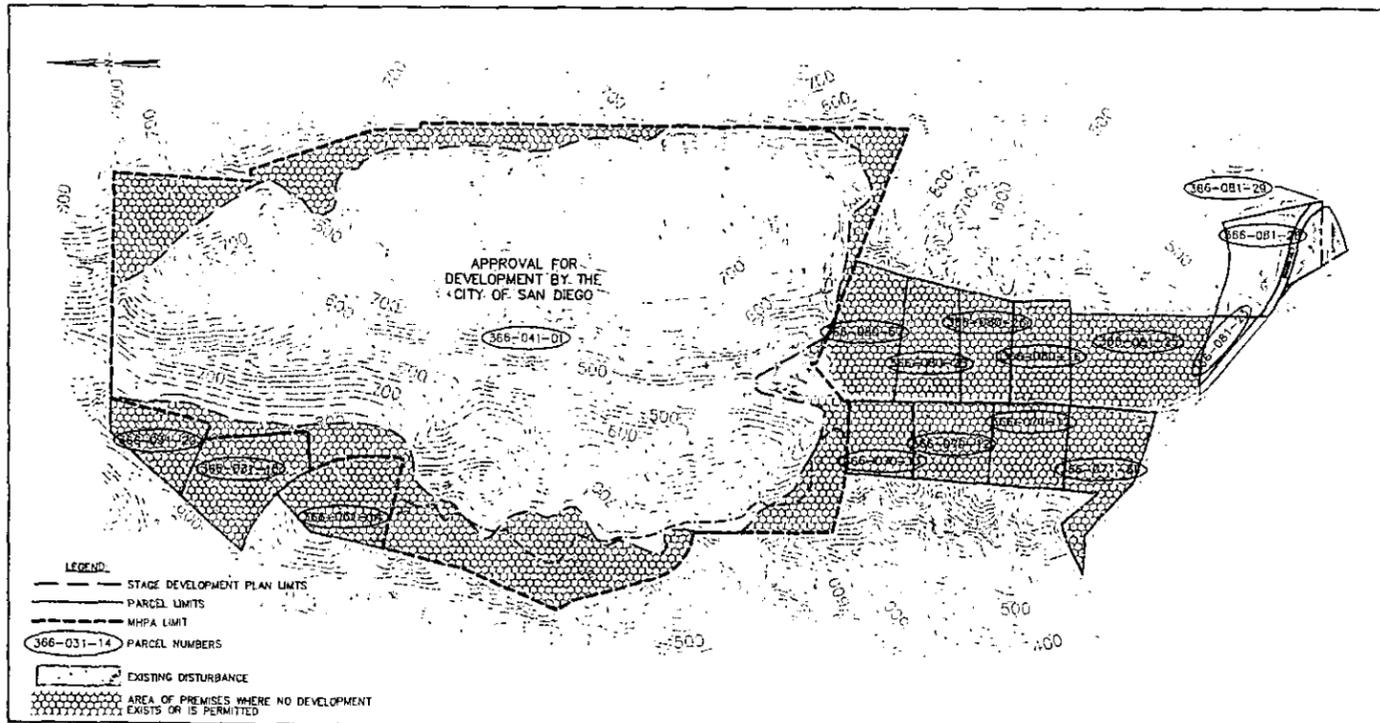
NOTE: Only errata pages related to Appendices C7, C8 and C12, and new sheet G8, have been provided in this document. For the original MMRP references, please see the compilation at the end of the DEIR.



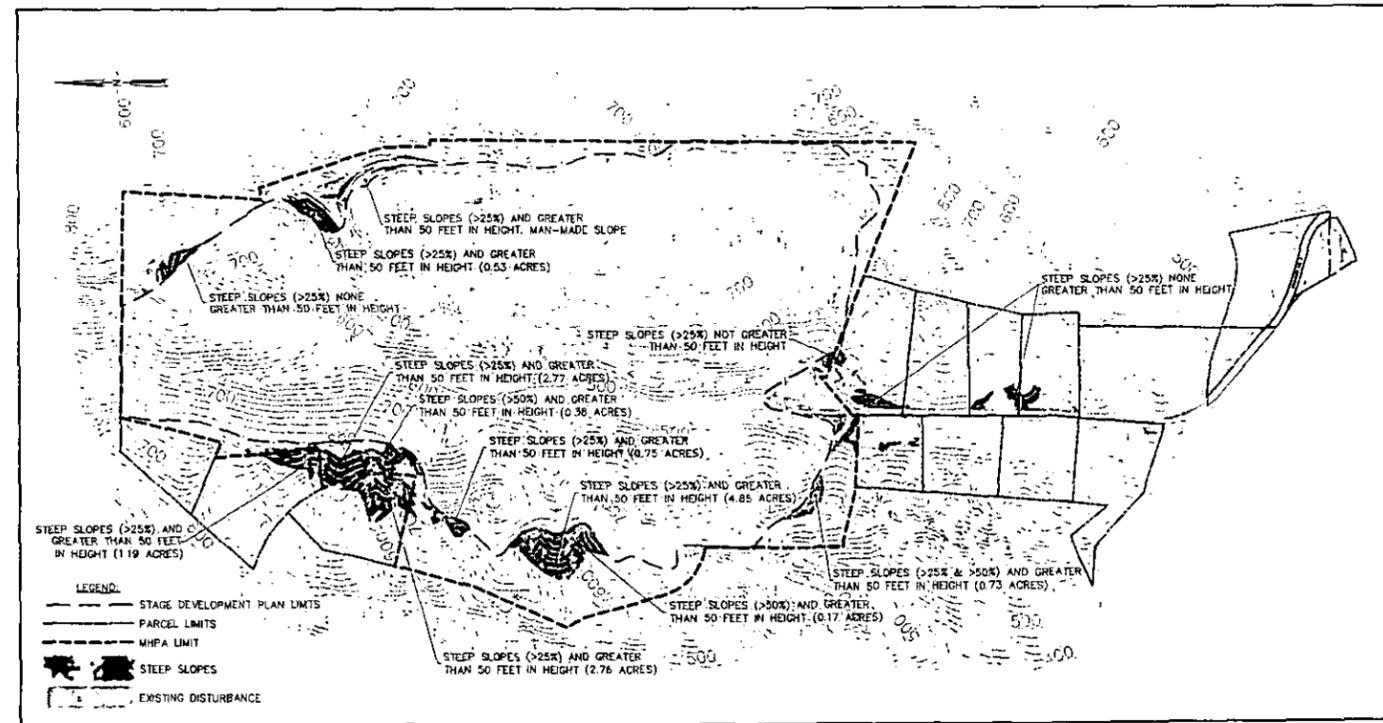
PROJECT PREMISES



EXISTING DEVELOPED AREAS AND AREAS PREVIOUSLY APPROVED BY THE CITY OF SAN DIEGO FOR LANDFILL DEVELOPMENT



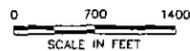
AREA OF UNDEVELOPED, UNPERMITTED 'PREMISE'



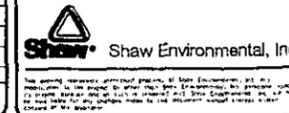
PROPOSED DEVELOPMENT AREAS AND AREAS WITHIN THEM CONTAINING STEEP NATURAL SLOPES

NOTES:
1. STEEP SLOPE CRITERIA BASED ON JULY 2002 SITE TOPOGRAPHY.

Environmental Requirements: "Sycamore Landfill Master Plan is subject to a Mitigation, Monitoring and Reporting Program and shall conform to the mitigation conditions as contained in the Environmental Impact Report No. 5617/SCH 2063041057."



REV	DATE	DESCRIPTION	OWN BY	DES BY	CHK BY	APP BY
6	3/14/06	REVISED PER CITY COMMENT	RVW	RVW	RVW	RVW
5	8/27/07	REVISED PER CITY COMMENT	RVW	RVW	RVW	RVW
4	4/9/07	REVISED PER CITY COMMENT	RVW	RVW	RVW	RVW
3	8/24/06	REVISED PER CITY COMMENT	RE	RVW	FWC	RVW
2	11/27/04	REVISED PER CITY COMMENT	RVW	RVW	FWC	RVW
1	9/25/03	REVISED PER CITY COMMENT	RVW	RVW	FWC	RVW
0	11/13/02	APPLICATION SUBMITTAL	RVW	RVW	FWC	RVW



SAN DIEGO LANDFILL SYSTEMS
SYCAMORE LANDFILL
SAN DIEGO COUNTY, CALIFORNIA
MASTER DEVELOPMENT PLANS
STEEP SLOPE DETERMINATION

DRAWING NO.
G8
8 OF 31
PROJECT NO.
843106

001177