

DATE ISSUED: March 30, 2005 REPORT NO. 05-068 Rev.
(re-addressed to Mayor and
City Council)

ATTENTION: Honorable Mayor and City Council
Docket of April 5, 2005

SUBJECT: Countywide Integrated Waste Management Plan Summary and Siting
Element

REFERENCE: Manager's Report No. 04-175 (July 28, 2004)

SUMMARY

Issue – Should the City adopt the Negative Declaration for the Countywide Siting Element of the County Integrated Waste Management Plan and approve and adopt The Siting Element and The Summary Plan?

Manager's Recommendation – Adopt the Negative Declaration and the associated Siting Element, as well as The Summary Plan. These documents are reflective of the region's 2002 status and as such, given the assumptions utilized, are recommended for approval and adoption. However, direct the City Manager to report back in approximately six months after further exploring recent changes in the regional waste disposal infrastructure with information more specific to the City and its long-term disposal options.

Fiscal Impact – None at this time.

BACKGROUND

The Integrated Waste Management Act of 1989 (AB939) requires that each city and county develop certain plans and elements addressing solid waste management. Those requirements are codified in Public Resources Code (PRC) Sections 41700-41721.5 and 41750-41770. Each jurisdiction within the state is required to adopt an individual Source Reduction and Recycling Element, a Household Hazardous Waste Element, and a Non-Disposal Facility Element. Each jurisdiction is also required to adopt a Countywide Integrated Waste Management Plan that consists of a Countywide Summary Plan and Siting Element. These documents were last adopted in 1996.

The Countywide Summary Plan contains overall goals and policies and summarizes waste management programs developed by the jurisdictions within the County and progress toward meeting the AB939 50% waste reduction mandate.

The Countywide Siting Element must be reviewed, and revised if necessary, by the AB939 Local Task Force every five years pursuant to PRC Section 41770. The San Diego Association of Governments (SANDAG) serves as the Local Task Force for San Diego County, formed pursuant to PRC Section 40950. Technical and Citizen's Advisory Committees advise the Local Task Force. The Technical Committee consists of representatives from each jurisdiction. Members of the public, waste haulers, and community groups make up the Citizen's Committee. The Local Task Force reviewed The Summary Plan and The Siting Element on March 22, 2002, and recommended that revisions be made.

The Siting Element must demonstrate that 15 years of countywide or regional permitted solid waste disposal capacity are or will be available through existing or planned facilities or other strategies. The Siting Element is intended to serve as a guidance document, rather than a specific development program. While the Siting Element discusses new landfills and landfill expansions, it does not advocate or guarantee approval of facilities by any agency or jurisdiction. Each proposal for a new or expanded solid waste facility must be reviewed separately through local land use approval and state permitting procedures.

On January 23, 2004, SANDAG in its role as the AB939 Local Task Force voted unanimously to recommend that the revised Summary Plan and Siting Element be distributed to the cities and the County for formal adoption. Subsequently, on January 5, 2005, the County Board of Supervisors voted to approve and adopt the Final Draft Countywide Summary Plan and Countywide Siting Element (Attachment #1). The County Board of Supervisors also authorized the County of San Diego Department of Public Works to distribute the documents to all cities within the county seeking approval and adoption.

The Summary Plan and Siting Element, with its Negative Declaration, (Attachments #2,#3 and #4) must be approved by a majority of the cities within the county that contain a majority of the population of its incorporated areas within 90 days of receipt of the County's January 27, 2005 letter. Therefore, the County must be notified of the City's action by April 27, 2005. Approval of the documents does not limit any jurisdiction or interested party's right to provide its own strategy for waste disposal. If a city disapproves The Siting Element or The Summary Plan, it is required to give written notification to the Local Task Force, the County Board of Supervisors and the California Integrated Waste Management Board of the deficient areas in The Siting Element and/or The Summary Plan within 30 days of disapproval. Failure to act within 90 days is deemed as approval of the Plans and prerequisite Negative Declaration.

DISCUSSION

It is recommended that the associated Negative Declaration be adopted and that the Final Draft Countywide Summary Plan and The Siting Element be approved and adopted. For purposes of this report, the package is discussed in two parts: The Updated Countywide Summary Plan and The Siting Element.

The Updated Countywide Summary Plan

The first part of the package is The Updated Countywide Summary Plan which, as noted above, primarily summarizes waste management programs developed by the jurisdictions within the County as of 2002 to meet the AB939 50% waste reduction mandate. As discussed in City Manager’s Report 04-175 (July 28, 2004), during the coming year, several policy issues regarding the City’s waste diversion efforts will be brought forward for consideration and action by the Natural Resources and Culture Committee and the City Council. This process began with the discussion of construction and demolition debris recycling (July and November 2004) and is intended to keep the Council and the public aware of the most current issues and status.

The Siting Element

The Siting Element is based upon data available in 2002 and as such, given the assumptions utilized, is recommended for approval and adoption. The information contained within The Siting Element is discussed below in order to provide an overview of the regional landfill capacity issues. Existing landfills included in the report and resulting available regional disposal capacity are displayed in the chart below.

LANDFILL NAME	OWNER	OPERATOR	2002 REMAINING CAPACITY (Tons)
Las Pulgas	United States Marine Corps (USMC)	USMC	Accepts Only Military
San Onofre	USMC	USMC	Accepts Only Military
Borrego Springs	Allied Waste Industries (Allied)	Allied	147,300
Otay/Otay Annex	Allied	Allied	31,336,166
Ramona	Allied	Allied	294,550
Sycamore Canyon	Allied	Allied	17,280,000
Miramar	United States Navy	City of San Diego	13,835,679
TOTAL TONS			62,893,695
ESTIMATED DURATION (Year)			2016

Other projections in The Siting Element include the following:

- The 1997 Siting Element estimated that the 2001 generation rate for the region would be 5.3 million tons and disposal amount would be 2.6 million tons. The 2001 actual generation amount was an estimated 6.9 million tons and disposal was 3.7 million tons -- 42% greater than originally estimated in 1997.
- Disposal needs are projected to increase 65% from 3.7 million tons in 2002 to 6.1 million tons in 2017 with a total local disposal need of approximately 5.6 million tons. (The difference between 6.1 million and 5.6 million is due to assumptions regarding importation and exportation of local waste).

Future Landfill Space

The Siting Element includes discussion of future landfill space, but states, “Inclusion of proposed or tentatively reserved landfill sites in this Siting Element does not advocate or in any way guarantee approval of sites by any agency or jurisdiction. Nor does it advocate their use as a disposal option.

All proposals for new landfills or expansions require extensive permits, which include but (are) not limited to, local land use approval, environmental review, and state solid waste facility permitting procedures. Review and adoption of this Siting Element Amendment does not limit any jurisdiction’s or interested party’s right to conduct a more in-depth review of each proposal.”

The Siting Element discusses the potential for additional capacity of about 150 million tons based upon the proposed Gregory Canyon Landfill providing an additional 33.4 million tons of disposal capacity and Sycamore Canyon Landfill’s expansion plan for an additional 116.6 million tons.

Siting a new solid waste disposal facility or a major expansion is an intensive, lengthy and typically controversial process. It is characterized by a series of steps during which areas of increasing suitability are successively identified and evaluated. The use of established criteria is intended to ensure the objectivity of the site selection process. This complexity and associated challenges are evidenced by the chart below summarizing the differences in potential landfill sites included in the 1997 Siting Element as compared to the 2002 Siting Element.

1997 Element “Tentatively Reserved”	Estimated Capacity (Tons)	2002 Element “Proposed”	Estimated Capacity (Tons)
Oak Canyon (City)	39,000,000	no	NA
Spring Canyon (City)	80,000,000	no	NA
Oak/Spring Canyons (City)	135,000,000	no	NA
Upper Sycamore Canyon (City)	41,000,000	no	NA
Aspen Road (County)	21,000,000	no	NA
Miriam Mountain South (County)	40,000,000	no	NA
Gregory Canyon (Private/located in County)	29,000,000	yes	33,000,000
Wolf Canyon (County)	24,000,000	no	NA
North Otay Valley (County)	29,000,000	no	NA
East Otay Mesa (County)	48,000,000	no	NA
TOTALS	486,000,000	NA	33,000,000

Key to the current Siting Element are the projections related to Gregory Canyon and Sycamore Canyon Landfills. In considering the Siting Element, it is important to keep in mind the different perspectives regarding potential new landfills and expansions communicated through the Public Comment process (Attachment #5)

Annual Permitted Rates of Acceptance

Physical landfill capacity (discussed above) is defined as the remaining volumetric capacity of existing landfills. Physical capacity represents the volume available to be filled, and is different from the rate at which materials may enter.

The rate at which materials may enter is called the “annual permitted rate of acceptance” and is restricted by annual and/or daily traffic and tonnage limits at disposal and transfer facilities, even though there may be sufficient physical capacity. The permitted daily and annual disposal tonnages are specified in the Solid Waste Facility Permit for the facility, and sometimes in other permits.

These limits are established in consideration of traffic control and health and welfare protection.

According to the Siting Element, if the 2002 permitted limits on the rates at which waste enter the region’s landfills are not changed, the region may run out of the ability to accept all of the waste destined for disposal in 2007. The Siting Element notes that increasing the annual rate of acceptance (currently about 900,000 tons per year) at the existing Sycamore Canyon Landfill by 535,000 tons in about 2005 and by 2.7 million tons in 2011 would provide adequate rates of acceptance until approximately 2016. This would require increased in daily permitted tonnage from 3,300 tons per day currently to 5,000 tons per day in about 2005 and 12,000 tons per day in 2011. The document further estimates that the proposed addition of Gregory Canyon Landfill would provide adequate rates of acceptance until 2020.

Information regarding disposal capacity and rates of acceptance is summarized in the following chart.

**SAN DIEGO COUNTY REMAINING LANDFILL CAPACITY
AND ADDITIONS DISCUSSED IN SITING ELEMENT**

	Remaining Capacity (As of May 2002)	Additional Capacity	Rate of Acceptance (tons per day)	
			Current	Discussed in Siting Element
Gregory Canyon	NA	+ 33.4 million tons	0	1,950
Sycamore Canyon	NA	+ 116.6 million tons	3,300	5,000/12,000
Total	62.9 million tons	+ 150.0 million tons	3,300	+6,950/13,950
ESTIMATED DURATION (Year)	2002-2016	2005-2020+¹	NA	2020

As noted above, the Siting Element projects an exhaustion of disposal capacity in about 2016 assuming no changes to current disposal capacities; however, it indicates that if the expansions and permit revisions above occur and current rates of disposal continue, disposal capacity will be available beyond 2020. Increases in rates of acceptance must be carefully considered as this is the primary point where control can be exercised over how quickly capacity is utilized. Additionally, the importance of diversion efforts is further magnified.

Furthermore, this information highlights the importance of the City’s choices in regard to the disposal facilities it can directly influence (currently Miramar Landfill and Sycamore Canyon Landfill). The City will be faced with near term decisions requiring thoughtful, deliberation regarding its role in the regional disposal system as balanced against the responsibility of ensuring the needs of the city’s residents are met.

Waste Diversion Efforts

According to the Siting Element, at current landfill capacity, achieving 55% diversion in 2005 could

¹ Because the purpose of the Siting Element is to establish 15 years of available capacity, the document does not estimate beyond 2020 on this topic.

give the county an additional two years of capacity. Each 10% increase in diversion starting in 2005 could give the county between four and six additional years of landfill capacity. At 75% diversion, current landfill capacity would be available until about 2019. Assuming the Gregory Canyon opening, Sycamore Canyon expansion and 75% waste diversion, tons per year requiring disposal would be about three million and available tons per year capacity would be over six million serving the region's needs beyond 2050.

The document acknowledges that in order to meet higher diversion percentages, jurisdictions and their generators will have to commit funding, additional resources, and the ordinances to enforce mandatory programs.

Exportation of Waste

The amount of solid waste exported from San Diego County varies annually. In 1995, the region exported 14% of its waste compared to 4% in 2001. According to The Siting Element, if the Sycamore Canyon Landfill expansion and the proposed Gregory Canyon Landfill are approved with proposed increases in daily permitted disposal tonnages, the region may need to export 7.2% of its waste in 2017 to meet the region's disposal need of 6.1 million tons. If neither landfill proposal is approved and without implementation of other strategies, the region may need to export up to 55% of its waste in 2017.

Public Comment

It should be noted that records of the public comment received during the revision process for The Siting Element indicate several areas of concern. Most significantly, status of Gregory Canyon Landfill, status of Campo Landfill (not in the 2002 snapshot, but included in the 1996 document), treatment of Sycamore Canyon Landfill expansion, treatment of potential height increase at Miramar Landfill and consideration of East Otay Mesa as a potential future site (included in the 1996 document, but absent from the 2002 document).

Changes Since 2002

Since the 2002 snapshot represented by The Siting Element, according to the County Local Enforcement Agency the following changes have occurred:

- A January 6, 2005 permit revision for Otay Annex Landfill (Allied Waste Industries, Inc.) indicates a change in estimated closure date from 2027 to 2021. The County Local Enforcement Agency anticipates this item being before the California Integrated Waste Management in April or May 2005.
- An April 21, 2004 permit revision for Borrego Springs Landfill (Allied Waste Industries, Inc.) shows a capacity increase from 392,000 cubic yards to 727,000 cubic yards but indicates a change in the estimated closure date from 2040 to 2021.

CONCLUSION

The Countywide Summary Plan fulfills the goal of summarizing waste management programs developed by the jurisdictions within the County to meet the AB939 50% waste reduction mandate. The Siting Element provides a snapshot of 2002. As such, it and the associated Negative Declaration are recommended for approval and adoption.

However, The Siting Element projects that annual rates of acceptance will no longer meet regional

needs beginning in 2007 and regional disposal capacity will be exhausted by 2016. This information brings to the forefront the current challenges pertaining to regional disposal capacity, waste diversion efforts and resource conservation. Regardless of what combination of strategies (e.g., accommodation of increased disposal needs, exploration of new landfill technologies, increased waste diversion efforts, exportation of waste, etc.) is pursued to address this issue, it is likely that the cost of managing our waste will increase.

Furthermore, this information highlights the importance of the City's choices in regard to its waste diversion efforts and to the disposal facilities it can directly influence (currently Miramar Landfill and Sycamore Canyon Landfills). The City will be faced with near term decisions requiring thoughtful deliberation regarding its role in the regional disposal system as balanced against the responsibility of ensuring the needs of the city's residents are met.

The data and overview information presented in The Siting Element warrant continued monitoring and further exploration as the City faces its own challenges regarding solid waste management in the coming months and years.

ALTERNATIVES

- 1) Do not adopt Negative Declaration for the Countywide Siting Element of the County Integrated Waste Management Plan and do not approve and adopt the Summary Plan and Siting Element. Direct the City Manager to provide written notification to the Local Task Force, the County Board of Supervisors and the California Integrated Waste Management Board of the deficient areas in the Siting Element and/or the Summary Plan within 30 days of disapproval.

This is not recommended as the documents fulfill the purpose of providing general information to assist policy makers and residents with understanding the issues facing the region, as well as potential plans and options to address the issues.

Respectfully submitted,

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Environmental Services Department Director

Approved by: Richard Mendes
Deputy City Manager

HEAP/LLB

- [Attachment #1: County Board of Supervisors Minute Order 2 and Resolution 05-02 Approving and Adopting the Final Draft Countywide Summary Plan and Countywide Siting Element](#)
- [Attachment #2: Draft Countywide Summary Plan](#)
- [Attachment #3: Draft Countywide Siting Element](#)
- [Attachment #4: Siting Element Update of 2004 Negative Declaration](#)
- [Attachment #4a: Responses to Comments for Negative Declaration](#)
- [Attachment #5: Public Comment and County Response](#)