

VI. ALTERNATIVES ANALYSIS

A. INTRODUCTION

The California Environmental Quality Act (CEQA), ~~Section 15126(a)~~, requires an EIR to describe a reasonable range of alternatives to a proposed project. The alternatives selected should feasibly attain most of the basic project objectives and avoid or substantially lessen any of the significant effects.⁷ This section discusses a range of alternatives to the proposed project including, the No Project Alternative, the Redesigned Project Alternative, the Alternative Project Location, and the Waste Diversion Alternative.

Criteria used to evaluate the range of alternatives and remove certain alternatives from further consideration are addressed. CEQA Guidelines Section 15126.6 provides direction for the discussion of alternatives to the proposed project. This section requires:

- Description of “...a range of reasonable alternatives to the project, or to the location of 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(a)]
- A setting forth of alternatives that “...shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project.” [Section 15126.6(f)]
- Discussion of the "No Project" alternative, and “...If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” [Section 15126.6(e)(2)]
- Discussion and analysis of alternative locations “Only locations that would substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR.” [Section 15126.6(f)(2)(A)]

Given the CEQA guidelines listed above, this section (1) describes the range of reasonable alternatives to the project; (2) examines and evaluates resource issue areas where significant adverse environmental effects have been identified and compares the impacts of the alternatives to those of the proposed project; and, (3) identifies the Environmentally Superior Alternative.

B. ALTERNATIVES SELECTION

An alternative screening analysis was implemented as part of the EIR analysis in order to limit the number of alternatives evaluated in detail. The use of an alternative screening analysis provides a detailed explanation of why some of the alternatives were rejected from further analysis and assures that only the environmentally preferred alternatives are evaluated and compared in the EIR. In addition, this screening analysis uses the “rule of reason” methodology as discussed in CEQA (Guidelines Section 15126.6(f)) that requires that EIRs address a range of only those feasible alternatives that are necessary to permit a reasoned choice. In defining

feasibility of alternatives, the CEQA Guidelines state: “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site” (Section 15126.6(f)(1)). Through the scoping process, if an alternative was found to be infeasible, as defined above, then it was dropped from further consideration. In addition, CEQA states that alternatives should “...attain most of the basic objectives of the project...” (Section 15126.6(a)). If an alternative was found not to obtain most of the basic objectives of the proposed project, then it was also eliminated.

The basic objectives of the proposed project that were used in the screening of project alternatives included those that were identified by the project applicant and the County of San Luis Obispo (County). The specific objectives of the proposed project are as follows:

- To provide cost effective, long-term waste diversion capacity while helping local communities meet state-mandated waste diversion goals.
- To provide cost effective, long-term disposal capacity while maintaining consistency with the County-wide Siting Element, and optimizing fill space on the project property.
- To provide a well-engineered and environmentally sound operation that meets or exceeds federal, state, and local standards to minimize the impacts of waste diversion and disposal activities, and protects and enhances the site’s sensitive biological resources.

The alternatives evaluated include those that would avoid or reduce, to the maximum extent feasible, the identified unavoidable impacts that cannot be mitigated to insignificance (Class I) and avoid or reduce other significant effects (Class II). A complete list of Class I, II, and III impacts is included in Section II, Summary. Significant adverse environmental effects resulting from the project include:

- Aesthetic Resource impacts associated with visibility of the disposal area ~~and Compost Operation (CO)~~ from public roads (AES Impacts 1, 2, and 10).
- Agricultural Resource impacts resulting from the cumulative loss of approximately 75-acres of potentially productive farmland ~~and potential water resources required for agricultural intensification (AG Impact 1 and 2).~~
- ~~Air Quality impacts from increased odors associated with the disposal area and CO (AQ Impact 4)~~
- Greenhouse Gas Emission increases of approximately 50 percent at project build-out (GHG Impact 1).

- Hazardous material impacts associated with odors and fugitive trash on, ~~the potential to result in the spread of disease, such as Pine pitch canker to adjacent properties~~ (HAZ Impacts 1 and 6-3).
- Noise impacts resulting from the RRP and the cumulative effects of the project noise generating components (NS Impacts 1, 2, 4, 6, 7, and 9-3 and 7).
- ~~Water Resource (WR) impacts resulting from the cumulative contribution to potential overdraft of the local groundwater basin (WR Impact 3).~~

The most intensive Class II, significant but mitigable, impacts include:

- Biological Resource impacts resulting from conversion of oak woodlands and wetlands disturbance (BR Impacts 1 through 4).
- Cultural Resource impacts to paleontological and historic resources (PR Impact 1 and AR Impact 1).

The following seven preliminary alternatives to the proposed project were considered as part of the screening analysis:

- No Project Alternative. This alternative considers impacts based on the existing conditions and zoning without further development such as the proposed project.
- Redesigned Project – Onsite Relocation of Recovery Facilities Alternative. This alternative considers relocating the Resource Recovery Park (RRP) and the Materials Recovery Facility (MRF) to the center of the site, replacing Module 10, and some of Module 8, and keeps the entrance in its current location.
- Redesigned Project – Offsite Relocation of Recovery Facilities Alternative. This alternative considers a project in which the MRF is moved to an urbanized area and only the permanent disposal operation remains at the current site. The entrance road would remain in its current location.
- Redesigned Project – Onsite Relocation of Disposal Area and Entrance Alternative. This alternative would focus the expansion of the disposal area to the west, where the former compost detention basin ~~is~~ was previously ~~currently~~ proposed to be located.
- Alternative Project Location. This alternative will include analysis of a project located on an alternative site that would reduce otherwise significant impacts to less than significant levels.
- Waste Diversion Alternative. This alternative would include expanding the ~~CO~~, RRP, and MRF, and moving the entrance similar to Alternative 3, but would not include an expansion of the disposal area. Waste for permanent disposal would be hauled to another location in or out of San Luis Obispo County, by truck or rail.

- *Waste to Energy Alternative.* This alternative would include mass burning waste and using the steam to generate electricity. The waste to be used as fuel can either be minimally processed or heavily processed to reduce the amount of non-combustible material entering the furnace.

The *Redesigned Project – Onsite Relocation of Recovery Facilities Alternative* was rejected because the most significant aesthetic ~~and agricultural~~ impacts are associated with the disposal area, not with the RRP and MRF. It also would not reduce GHG emissions. In addition, it would move those noise sources away from residences to the south, but towards residences on the west side of the landfill to the west, negating any benefits.

The *Redesigned Project – Offsite Relocation of Recovery Facilities Alternative* was rejected because it would not reduce Class I aesthetic ~~or agricultural~~ impacts, nor would it reduce GHG emissions. It would reduce traffic at the site and noise impacts associated with construction of the new entrance and operation of the RRP and MRF. Impacts associated with construction of new facilities, perhaps in the industrial areas near Tank Farm Road or Buckley Road, of San Luis Obispo, are unknown. They may potentially be reduced because urban/industrial development is anticipated in those areas, based on current zoning.

The *Waste to Energy Alternative* was rejected because it would likely result in significant aesthetic impacts associated with the visibility of a furnace, cooling towers, transmission lines, etc. Also, odors would likely still be a significant issue. Biological and agricultural impacts would remain the same as well, due to the need to construct a new power plant and associated facilities, including transmission lines. This alternative would result in lower GHG emissions associated with waste decomposition; however, the combustion process would result in the production of significant GHG emissions.

Of these seven preliminary alternatives, the following were brought forward for further review:

1. No Project Alternative
2. Redesigned Project – Onsite Relocation of Disposal Area and Entrance
3. Alternative Project Location
4. Waste Diversion Alternative

C. ALTERNATIVES ANALYSIS

The following is a qualitative analysis of the alternatives brought forward for further review. The analysis identifies the level of impact that would result if the alternatives were to be implemented and how they compare to the proposed project. These alternatives would either have comparable impacts or would reduce environmental impacts when compared to the proposed project, would meet most of the basic objectives of the proposed project (other than the No Project Alternative), and are considered feasible for implementation. CEQA does not require the alternatives evaluation to be at the same level of detail as the proposed project, but does require the EIR to include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project (CEQA Guidelines Section 15126.6(d)).

1. No Project Alternative

The No-Project Alternative would leave the Landfill operating as it does currently. The RRP and MRF would continue to operate, although their processing capacities would remain static. The disposal area currently has approximately eight years of service life left. The CO, RRP and MRF may be able to accommodate the increase in waste diverted to them over eight years. After eight years, waste would need to be diverted to other facilities. Other facilities located in and around San Luis Obispo County include the Paso Robles Landfill, in Paso Robles; the Chicago Grade Landfill, in Templeton; and, the Santa Maria Regional Landfill in Santa Maria, Santa Barbara County. Both the Chicago Grade Landfill and the Santa Maria Regional Landfill have recently undergone permitting, allowing them to expand; however, their anticipated intake of waste assumed that the Cold Canyon Landfill would be in operation. There most likely would not be enough capacity at any one of these locations to accommodate waste generated in San Luis Obispo County, resulting in the need to develop a new landfill at another location or haul waste out of San Luis Obispo County. The possibility of developing a new landfill was discussed in the 1991 County Siting Element. A summary of a range of sites and their relative potential as new landfill locations as described in the Siting Element is included in the Alternative 3 – Alternative Project Location discussion.

Landfills inherently create traffic, noise, dust, and emit GHGs. If located in an undeveloped rural area, aesthetic impacts may be reduced and other impacts may be less significant; however, biological resource, cultural resource, and air quality impacts may increase, due to longer travel distances to landfill locations.

Hauling waste on rural roads may also impact traffic levels and safety on rural highways. Landfill noise would most likely significantly increase over ambient noise levels in rural areas. Fugitive trash levels and illegal dumping may also increase as the public may be less likely to drive the additional distance to a legal disposal site.

This alternative does not meet two of the project objectives, including providing long-term disposal capacity, and optimizing fill space on the project site. It is unclear how cost effective this alternative would be given the need for some communities to haul waste farther than they do currently, particularly the Cities of San Luis Obispo, Pismo Beach, and Arroyo Grande.

2. Redesigned Project – Onsite Relocation of Disposal Area and Entrance Alternative

This alternative would relocate the proposed disposal area to the eastern side of the site, and would require the applicant to purchase or lease a portion of an adjacent parcel. The entrance road would be relocated to the southern and eastern side of the disposal area, but not as far south as currently proposed. A conceptual site layout is shown in Figure VI-1. The proposed CO, RRP, and MRF would remain the same size and in approximately the same location as currently proposed. Two detention basins and a stockpile would be relocated. This alternative design allows the disposal area contours to continue in a more consistent, efficient manner, rather than having to “bend” around the sharp property line, as is currently proposed. With the use of a portion of the neighboring property, it appears that the disposal area footprint may be slightly reduced, but the total volume would be approximately equal to the proposed project.

This alternative would appear to meet all of the applicant's project objectives. However, the "cost-effectiveness" of this alternative is perhaps less than the proposed project due to the applicant not currently owning or leasing all of the proposed alternative disposal area. The following is an issue by issue analysis of Alternative 2, Redesigned Project – Onsite Relocation of Disposal Area and Entrance.

a. Aesthetic Resources

Aesthetic resource impacts associated with the RRP and MRF would be similar with this alternative. The interim and final topography of the Landfill would also still silhouette above ridgelines as viewed from Highway 227, Corbett Canyon Road, and Price Canyon Road, resulting in a Class I impact. However, it appears that the total disposal area footprint would be smaller because the disposal area could expand into the eastern edge of the disposal area rather than to the undeveloped south. When viewed from the east, the backdrop of the east area is already altered by the existing Landfill. This alternative would, therefore, not avoid but lessen the Class I impact, particularly when compared to the proposed project.

b. Agricultural Resources

This alternative would require the conversion of soils considered Farmland of Local Potential, although it would convert far fewer acres than the proposed project, and the conversion would be of those previously disturbed by the former CO, wood grinding, and detention basins. It would leave intact the connection between these soils and those on neighboring properties to the south because the entrance road would not be moved to the south side of the drainage. ~~It would potentially reduce Class I cumulative impacts related to the conversion to Class II impacts.~~ Impacts associated with agricultural compatibility may be slightly reduced by this alternative due to the reduced footprint. This alternative would leave a more substantial buffer in place between the disposal area and the access road, as well as properties to the south and the equestrian facility to the west. ~~This alternative would not reduce the significant agricultural water supply impact.~~

c. Air Quality

This alternative would have impacts similar to the proposed project, although nuisance dust may be less likely to affect those downwind because the active work area would remain farther to the north than currently proposed. Because this alternative would use a more efficient design for the disposal area, the footprint may be slightly reduced when compared to the proposed project, reducing total earthwork required for excavation and the associated air quality impacts. ~~Other impacts, the only Class I Air Quality impact resulting from the proposed project, would still result from this alternative.~~

d. Biological Resources

This alternative would result in new significant impacts to the oak woodland located on the parcel east of the existing site (refer to Figure VI-1). It would, however, reduce impacts to the smaller oak woodland and wetlands located within or adjacent to the proposed expansion area and entrance road. Because it would entirely avoid impacts to wetlands and partially avoid impacts to Obispo Indian paintbrush, this alternative would have reduced impacts to biological resources compared to the proposed project.



Source: Morro Group/SWCA 6/2008



Alternative 2: Redesigned Project – Onsite Relocation of Disposal Area and Entrance Alternative
FIGURE VI-1

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e. Climate Change/Greenhouse Gas Emissions

This alternative would result in GHG emission impacts similar to the proposed project. Activities at the Landfill that result in GHG emissions, including the production and leakage of landfill gas, the combustion of captured landfill gas, and the use of electricity and diesel fuels would be similar to the proposed project.

f. Cultural Resources

This alternative would avoid impacts to historic archaeological resources associated with the Weir residences. Impacts to paleontological resources would be similar to the proposed project due to the sensitive nature of the geologic formations underlying the Landfill.

g. Geology and Soils

This alternative would have geology and soils impacts similar to the proposed project. Engineering design for landfill components would remain similar. Slopes, drainage control features, building foundations, etc. would all be located on the same geologic formations as the proposed project and would require the same level of engineering and construction techniques described in Section V.G., Geology and Soils. Sedimentation of surface water may be reduced with this alternative, because in the event that there was a failure of a detention basin or other onsite drainage control feature, there would be an increase in the distance between the disposal area and the existing drainage.

h. Hazards and Hazardous Materials

This alternative would have similar impacts to the proposed project. Odor and fugitive trash impacts, the Class I Hazards and Hazardous Materials impacts resulting from the proposed project, would still result from this alternative. Household hazardous wastes, E-waste, and U-waste would still be accepted for processing with this alternative. The Landfill would still be Class III, so no hazardous waste would be accepted for permanent disposal. Because this alternative would involve the same operations as the proposed project, vector and pathogen control and fugitive trash impacts would be similar to the proposed project.

i. Noise

This alternative would reduce noise impacts because the disposal area and access road would be oriented closer to the center of the existing site (refer to Figure VI-1). This would increase the distance between the construction, excavation, and traffic noise sources and the sensitive receptors located south of the project site, identified in Figure V.I.-1. It would potentially increase noise levels at long-term noise monitoring location "Site B" sensitive receptors SR-7 through 9 located east of the project site (refer to Figure V.I.-2), although the distance between the existing operations and the sensitive receptors would not change significantly. This alternative would most likely avoid the need to construct an earthen noise berm along the southeastern boundary of the property.

j. Transportation and Circulation

This alternative would require the same number of trips as the proposed project. Because the existing driveway length could be increased between the entrance and the scalehouse with this

alternative, it appears that it would provide enough room for traffic to queue onsite and not backup onto Highway 227, similar to the proposed project. Line of sight for oncoming traffic would remain similar to existing conditions and would not be considered a significant impact (refer to Table V.J.-6).

k. Water Resources

This alternative would use a similar volume of groundwater for use as daily dust control, dust control during excavation, and in the MRF. Water used for landscaping the entrance would be reduced because the entrance would not be moved. However, because this alternative would result in additional oak tree impacts (see Biological Resources discussion below), the total water used for landscaping may be equal to the proposed project.

3. Alternative Project Location

The Solid Waste Facility Siting Element prepared for the County in 1991 identified a number of locations where a new solid waste facility could be located. The proposed project site finished third in the coastal landfill sites. The other two sites that ranked higher in 1991 were Gragg Canyon and Shell Canyon, both of which are located northwest of Pismo Creek, between Highway 101 and Price Canyon Road. The study was completed in 1991, and since that time, large lot subdivisions have been approved immediately east of those two locations. Estate homes have been constructed in Gragg Canyon and south and east of Shell Canyon. The sites have a high potential for sensitive plant species and cultural resources.

The fourth ranked site, Ontario, is located off Ontario Road, in a canyon on the eastern edge of the Irish Hills (refer to Figure VI-2). The area has seen little change since the completion of the siting study. The most substantial drawback to this site was the potential for significant numbers of sensitive species and habitat types to be located at the site. Other issues included a high potential for cultural resources, the need for significant road improvements, and geological instability.

The fifth ranked site, Little Cayucos North, is located in a canyon above the town of Cayucos. This area has seen some agricultural intensification and residential development since completion of the Siting Element.

The sixth ranked site, Sycamore, is located on the Suey Ranch, off Highway 166 at the southern end of the county. This site has seen little change since completion of the Siting Element. Drawbacks to this site include its distance from where waste is produced, significant riparian vegetation, the need to construct substantial road improvements on Highway 166, and the potential for cultural resources.

All of these sites scored well in the Visual Resources criteria, as views of the sites are significantly blocked from public roads by intervening topography. The first four sites scored well in haul route distance, as they are relatively close to the areas where production of waste occurs. Because GHG and Air Quality impacts are significant, and because haul distances are directly correlated with emission rates, the sites ranked fifth and sixth were eliminated from the Alternatives Analysis in this EIR.

The fourth ranked site, Ontario, was chosen to move forward for this analysis because it ranked relatively high in the Siting Element and, unlike Gragg and Shell Canyons, the location is removed from the Price Canyon area, which borders the existing Landfill. The geologic conditions, transportation infrastructure, and other physical characteristics are different enough at the Ontario site to allow for a meaningful comparison of this alternative site with the proposed project.

The Ontario site is a canyon bordered on the eastern edge of the Irish Hills. The northern boundary of the site is near the headwaters of Froom Creek. The site is near the center of the coastal waste production zone identified in the Siting Element. It would be accessed from Ontario Road, which has a partial interchange with Highway 101. The interchange would need to be improved to accommodate a landfill. Views of the site from public roads would be blocked by intervening topography and vegetation. The analysis below was based on information in the Siting Element, the County's GIS database, and the consultant's familiarity with local environmental conditions.

This alternative appears to meet most of the project objectives with the exception of "optimizing fill space on the project site," although this is true of any alternative not located on the proposed project site. It does appear to be consistent with the Siting Element and could be an alternative that provides long-term disposal capacity and meets or exceeds all applicable federal, state, and local standards. The following is an issue by issue analysis of Alternative 3, Alternative Project Location.

a. Aesthetic Resources

This alternative would result in less significant impacts when compared to the proposed project. The site is significantly shielded from viewers on public roads due to existing topography and vegetation. Based on aerial photos, however, it does appear that the site may be partially visible from Prefumo Canyon Road, although from a considerable distance. Given the relative remoteness of the site and distance from public roads, it appears that development of the landfill at this location would not result in significant, unavoidable aesthetic resource impacts.

b. Agricultural Resources

This alternative would generally result in fewer ~~significant~~ impacts to agricultural resources than the proposed project. No intensified agriculture exists onsite or adjacent to the site. Row crops are grown on the opposite side of Highway 101 and San Luis Obispo Creek. The soil types at the site include Diablo and Cibo clays (Class VI), Gazos Lodo clay loam (Class VI), and Obispo Rock outcrop complex (Class VII). This alternative would not result in the conversion of any farmland identified as significant using either the National Resource Conservation Service or California Department of Conservation standards. Portions of the area shown in Figure VI-2 appear to be under a Williamson Act contract to protect grazing land. Cancellation of the contract to facilitate development of a new landfill may be considered a significant impact to agricultural resources. There are few options to reduce that type of impact to a less than significant level.

Grazing has occurred on the proposed expansion area in recent years, even during Landfill operation. There is no evidence that the two activities are incompatible. However, with this

proposed alternative, the Landfill would be an entirely new use in the area, and therefore compatibility may be more of an issue.

c. Air Quality

This alternative would have more significant vehicle-related air quality impacts compared to the proposed project. The two sites are a similar distance from the waste production centers and operational emissions would be similar except for the fact that the Ontario site does not have cover material available onsite. The additional truck trips necessary to import cover material and export excavated material would increase air quality impacts for this alternative. There may be some reduction in operational emissions due to the site being easily accessible from the freeway and therefore travel to and from the site would potentially require fewer stops and occur at steadier, more optimal speeds. The Franciscan Formation is known to contain naturally-occurring asbestos. As a result, this alternative may result in a new potentially significant air quality impact associated with the release of potentially hazardous dust from the site due to disturbance and transport of the material. ~~Due to the distance between the alternative location and neighboring residences, odor impacts would not be significant and unavoidable, as they are with the proposed project.~~

d. Biological Resources

This alternative would result in potentially more significant biological resource impacts than the proposed project. The site is located near the Irish Hills Sensitive Resource Area, due to the biological sensitivity of the area. Local conservation organizations are actively trying to reach agreements with landowners that would result in the preservation of the habitats and species found in the Irish Hills. Surveys performed for projects to the northwest, near Prefumo Canyon, have identified numerous sensitive species, including the State and Federally endangered Chorro Creek bog thistle.

Based on aerial photos, the project site includes grasslands, oak woodlands, and riparian habitats, all of which would be permanently removed by construction of the landfill.

e. Climate Change/Greenhouse Gas Emissions

This alternative would result in increased GHG emissions associated with landfill operations. There is currently no connection between the site and a user that could process the captured landfill gas. It would most likely all be combusted onsite. This would produce more GHG than the proposed project because the landfill gas captured by the proposed project is used in place of electricity from other sources. If it were combusted by flares at the alternative location, it would not be a replacement for other fuel.

f. Cultural Resources

The Irish Hills are known to contain significant cultural resources. Given that the site is in a canyon whose drainage feature is a tributary to San Luis Obispo Creek, prehistoric human activity may have occurred there. This alternative may have impacts to archaeological resources similar or greater than ~~to~~ the proposed project. The Franciscan formation is not known to contain significant paleontological resources, although some discoveries have been made (Cogstone, 2006). Impacts to paleontological resources would be less than the proposed project.

g. Geology and Soils

This alternative would have more significant geology and soils impacts, as the Irish Hills are in a moderately high landslide area. In addition, the bedrock in the area is in the Franciscan Formation, which in the areas around Cayucos and the north coast of San Luis Obispo County is prone to geologic instability. The site is moderately to steeply sloping, which would require significant cut and fill slopes to be constructed in order to accommodate large structures, detention ponds, etc. ~~It~~ An inactive fault exists near the southern boundary of this location.

h. Hazards and Hazardous Materials

This alternative would have similar fugitive trash and pathogen impacts when compared to the proposed project. This alternative site is located slightly closer to the San Luis Obispo County airport than the proposed project. Because this landfill would be a new use at the Ontario site, impacts to the airport (i.e., bird attraction) would be considered more significant. Similar to the proposed project, the alternative location is not in the Airport Review Combining designation. This alternative may reduce the amount of fugitive trash located near the landfill as Caltrans already has Highway 101 cleanup operations in place. Due to the distance between the alternative location and neighboring residences, odor impacts would not be significant and unavoidable, as they are with the proposed project.

i. Noise

This alternative may have significantly reduced noise impacts compared to the proposed project. The facility would be a considerable distance from neighboring homes. Truck traffic would add little additional noise to the already heavily traveled Highway 101 corridor. Based on aerial photos, homes closest to the disposal site are approximately one mile to the north, near the top of Prefumo Canyon. It does not appear that significant noise mitigation would be required.

j. Transportation and Circulation

This alternative would potentially have more significant impacts to traffic and circulation than the proposed project. The 1991 County Siting Study noted that the Ontario site would require improvements to the Ontario Road and Highway 101 interchange. The proposed project would add an additional 200 trips to Highway 227, for a total of 860 daily trips. The Alternative Project Location would move all operations to the new site, resulting in at least 860 new trips added to the Highway 101 corridor, and perhaps more significantly, they would be added to the Ontario Road interchange at Highway 101.

Based on the Siting Element there may be little material available onsite for cover. This would require the landfill to import material, increasing the number of truck trips to and from the site above the 860 required for the proposed project. More trips may result from the need to export excavated material as well.

This interchange is not designed for use by large trucks, and requires them to make multiple stops, cross traffic at unsignalized intersections, and maneuver on relatively sharp on and off ramps. Ontario Road is currently the road of choice for bicyclists traveling from San Luis Obispo to Avila Beach as well, due to its connection with South Higuera Street, Avila Bay Drive, and the Bob Jones Bike Trail. This may change once the Bob Jones trail extension is completed as it would be located east of Highway 101. This location would most likely need

substantial road improvements before it could safely accommodate the heavy truck traffic associated with landfill operations.

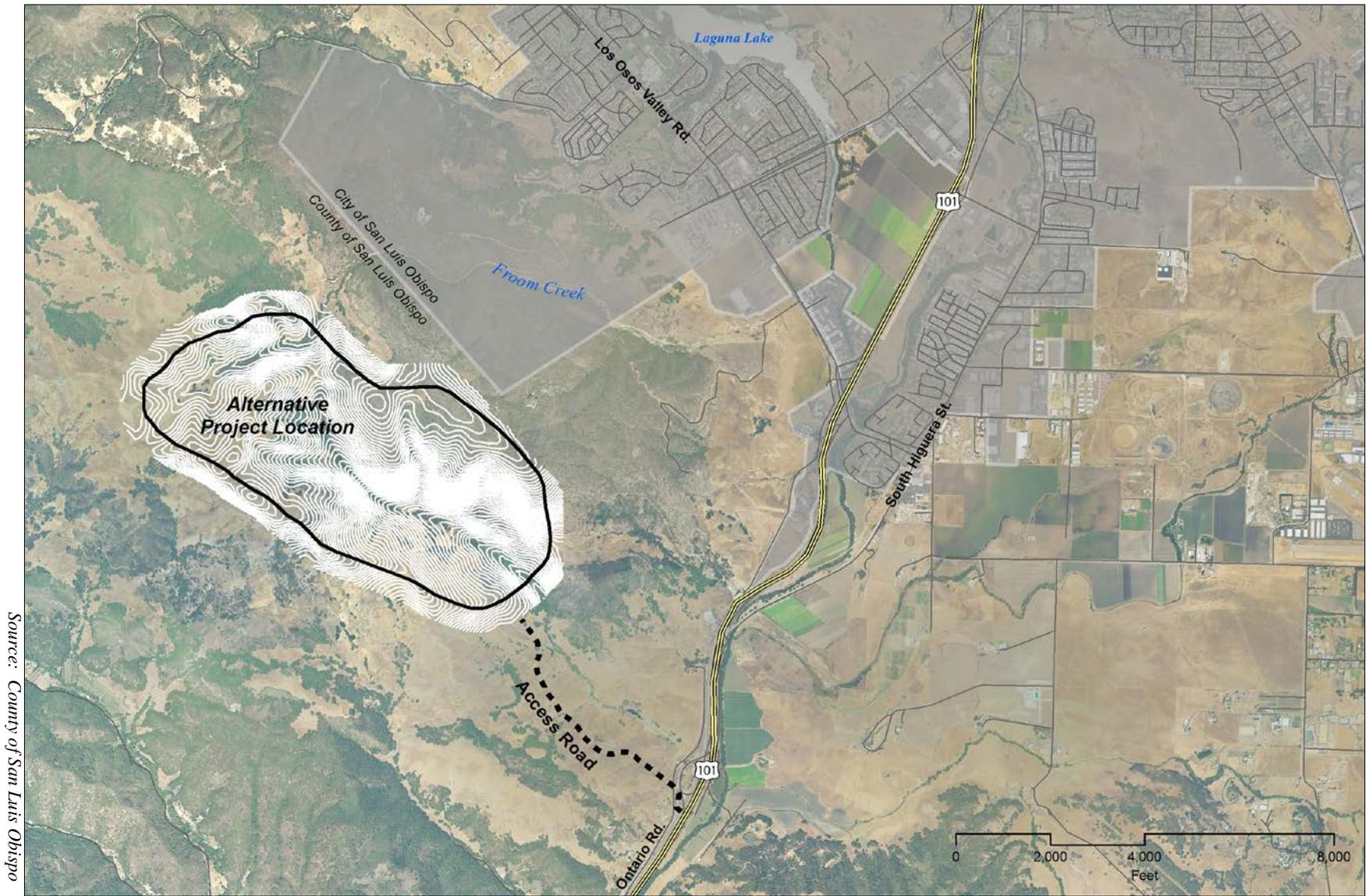
k. **Water Resources**

This alternative would potentially have more significant water resource impacts than the proposed project. Water consumption for this alternative would be used for dust control at the ~~CO~~ and disposal areas, as well as the MRF, similar to the proposed project, but not for landscaping. Based on the 2007 Annual Resource Management System report, prepared by the County of San Luis Obispo Department of Planning and Building, there are no significant groundwater basins underlying the site, and the watershed above the project site is relatively small making it difficult to retain enough water for use onsite. Assuming groundwater at the site is relatively difficult to reach and the quantities are low, this alternative may potentially reduce groundwater contamination associated with landfill development and operation.

4. Waste Diversion Alternative

Alternative 4 – Waste Diversion Alternative would include all of the components of the proposed project with the exception of the disposal area. The current disposal area would remain active for approximately eight more years based on existing capacity, but would then close permanently. The entrance road would be modified, but not entirely relocated. Instead, it would be configured similar to the road in Alternative 2, Redesigned Project – Onsite Relocation of Disposal Area and Entrance.

Waste that requires permanent disposal would be sent via truck or train to an alternate facility. In the county, these facilities include the Paso Robles Landfill, located east of the City of Paso Robles on Highway 46, and the Chicago Grade Landfill, located east of Templeton. A third landfill, the Santa Maria Regional Landfill, is located just south of San Luis Obispo County and may also be a possible location for permanent disposal of waste. Table VI-1 shows the tons per day (tpd) each of these landfills is currently permitted to accept, and includes three additional landfills that are located in proximity to San Luis Obispo County, although given the distance it seems less likely that it would be feasible to transport significant quantities of waste to these locations. The proposed project would accept up to 1,200 tpd of waste for permanent disposal, at buildout.



NORTH

Scale as Shown

Alternative 3: Alternative Project Location
FIGURE-VI-2

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**TABLE VI-1
Maximum Permitted Tonnage per Day (tpd)**

Landfill	tpd
Paso Robles Municipal	450
Chicago Grade	500
Santa Maria	858
Total Local Capacity	1,808
Johnson (Gonzales)	1,500
Taft	419
Tajiguas (Goleta)	1,500
Total Additional Capacity	3,419

The existing landfills in the area may have some ability to accept waste that would have been accommodated by the proposed project. However, the available capacity seems relatively limited locally. Also, capacity at landfills located outside of San Luis Obispo County seems limited. It is important to note that these landfills are most likely expecting additional waste from their existing service areas. As a result, it appears that much of the waste which would go to the Landfill would either be spread amongst these local landfills or shipped long distances via rail or truck to landfills in the Central Valley or Southern California, for example. The following is an issue by issue analysis of Alternative 4 – Waste Diversion Alternative. The analysis assumes that capacity for permanent disposal would be achieved through modifying existing service areas and distributing the waste between the six landfills listed above.

Of the alternatives brought forward for analysis, this alternative, along with the No Project Alternative, is least capable of meeting the project objectives. It does not meet the long-term disposal capacity objective of the applicant, nor does it optimize fill capacity on the project site. It is unclear how cost-effective it would be to haul waste longer distances. Generally the further it is hauled, the more it costs to dispose of waste. The cost increase impact would be based on tipping fee costs at each landfill and the specific increase in haul distance. This alternative would provide an operation that is well-engineered and environmentally sound, and it has the potential to meet all federal, state, and local standards to minimize the impacts from waste diversion and disposal activities. An issue by issue analysis of this alternative is provided below.

a. Aesthetic Resources

This alternative would have reduced aesthetic resource impacts associated with the disposal area when compared to the proposed project. This alternative would avoid Class I Aesthetic Resource impacts. Impacts associated with the CO₂, RRP, and MRF would remain and be similar to the proposed project. These impacts could be mitigated to a less than significant level.

b. Agricultural Resources

This alternative would not convert the Prime Farmland of Local Potential located in the proposed expansion area. It would also allow for a larger buffer between potential future agricultural operations to the south and the equestrian center to the west of the expansion area.

c. Air Quality

This alternative would potentially have significantly more air quality impacts compared to the proposed project. Local odor impacts associated with the disposal area would be reduced once the existing disposal area was filled, ~~although the proposed compost operation would still exist. It is expected that this operation would result in the majority of the significant odors.~~ Significant air quality impacts would result from this alternative due to the extended hauling distances associated with hauling the waste to other landfills. It was estimated in the air quality analysis for the proposed project that each trip to the landfill was approximately 14 miles, one way. In some cases, this hauling distance may be relatively equal when compared to the proposed project. For example, if waste from Nipomo was hauled to the Santa Maria Regional Landfill instead of Cold Canyon Landfill, total trip lengths may be similar. However, in general, hauling waste to Goleta, or Monterey or Kern Counties would increase trip distances substantially and the resulting air emissions significantly. The distances would be great enough that this alternative would most likely result in new Class I significant, unavoidable air quality impacts.

d. Biological Resources

This alternative would disturb a smaller area than the proposed project, and would avoid entirely the impacts to oak woodlands, wetlands, and Obispo Indian paintbrush that would result from the proposed project. Assuming the other six landfills have capacity to accommodate the waste diverted from Cold Canyon Landfill, no offsite biological resource impacts would result from this alternative.

e. Climate Change/Greenhouse Gas Emissions

This alternative would have greater GHG impacts to the proposed project in the short-term because the Landfill would continue to accept waste material and generate landfill gas. Once the disposal area reached capacity and waste was hauled to other landfills, the landfill gas production rate would be similar, although it is unknown how efficient the landfill gas collection and/or combustion rates are at these other landfills. Because the existing Landfill collection and reuse system already exists and functions at the high end of the typical landfill gas collection rate (approximately ~~85-63~~ percent), GHG emissions may be higher if waste is instead transferred to other locations. The increased emissions discussed in Air Quality would also increase GHG emissions.

f. Cultural Resources

This alternative would disturb an area similar to Alternative 2, Redesigned Project – Onsite Relocation of Disposal Area and Entrance. Potential impacts to the historic and prehistoric resources would be avoided. Impacts to paleontological resources would be less as excavation for the final Landfill modules would only extend to the existing Landfill boundaries with no significant expansion into the expansion area.

g. Geology and Soils

This alternative would result in fewer geology and soils impacts when compared to the proposed project. Less earthwork would be required onsite, given that the disposal area would not be expanded. Most earthwork would be associated with completion of the existing disposal area over the next eight years and preparation of the expanded RRP and MRF. It should be noted that additional earthwork would potentially be required on another site to accommodate the waste which would not be accommodated at the project site.

h. Hazards and Hazardous Materials

This alternative would have similar impacts to the proposed project. Household hazardous wastes, E-waste, and U-waste would still be accepted for processing with this alternative. The Landfill would still be Class III, so no hazardous waste would be accepted for permanent disposal. Because this alternative would involve the same operations as the proposed project, vector and pathogen control and fugitive trash impacts would be similar to the proposed project in the short-term. In the long-term, this alternative would have reduced impacts associated with birds, as the disposal area would only be operating for approximately eight more years. This alternative may have increased impacts associated with fugitive trash as the public may be less inclined to drive long distances to legal disposal sites. This alternative would likely not result in new odor impacts.

i. Noise

This alternative would significantly reduce noise impacts when compared to the proposed project. Noise impacts to sensitive receptors located south of the proposed expansion area would be reduced because the new entrance would not be constructed as proposed on the southern portion of the expansion area. In addition, the disposal area would not be expanded to the south, reducing noise impacts associated with construction of new modules and daily disposal activities. Construction of the noise berm along the southeastern boundary of the proposed expansion area would not be necessary with this alternative.

j. Transportation and Circulation

This alternative would result in reduced trips made to the Landfill after approximately eight years when disposal operations would cease. At that point, traffic would be reduced to that required for the ~~CO~~, RRP, and MRF, and those made by disposal vehicles would be added to other roads servicing the other six landfills. Assuming that the three most local landfills received most of the waste, this alternative would increase trips made to each of them by approximately 200 per day (or by 100 per day if all six other sites were utilized). This estimate is based on 860 total trips expected with the proposed project, and assumes approximately 25 percent of the trips are associated with employees, as well as the ~~CO~~, RRP, and MRF, and would still be made to the Landfill. It is unknown what affect this increase would have on local roads servicing the other landfills. Most likely the impact would be greater on those landfills in rural areas, such as Chicago Grade, and less on those with a designated landfill access road off a major highway, such as Tajiguas, which is accessed from Highway 101.

k. Water Resources

This alternative would potentially have less significant water resource impacts than the proposed project, particularly in the long-term. Water for dust control would be limited to ~~the CO and~~ that required for the excavation of the final modules. Landscaping water would be limited to that required for screening of the RRP and MRF. Assuming the additional waste could be absorbed into other existing landfills, water use for dust control at those facilities would increase minimally as it is already being used at those sites.

D. ALTERNATIVES COMPARISON

Table VI-2 summarizes the evaluation of each of the alternatives and was used as a tool to determine which alternatives could avoid or lessen potentially significant impacts associated with the proposed project, and identify which alternative is the Environmentally Superior Alternative. In addition, the table also identifies where new or substantially increased potentially significant impacts may be identified for an alternative. A combination of alternatives can be incorporated into the proposed project as deemed necessary to reduce the potential impacts. The potential impact levels below that are followed by an arrow are those that would increase or decrease, but not enough to change the impact class.

**TABLE VI-2
Impact Comparison of Project Alternatives**

Environmental Resource	Proposed Project	Alternatives			
		1. No Project	2. Redesigned Project	3. Alternative Location	4. Waste Diversion
Aesthetic Resources	I	II	I ↓	II	II
Agricultural Resources	↓ III	III ↓	III ↓	III ↓	III ↓
Air Quality	II	II	II	II	I ↑
Biological Resources	II	II ↓	II	I	II ↓
Climate Change/Greenhouse Gas Emissions	I	N/A	I	I ↑	I ↑
Cultural Resources	II	II ↓	II ↓	II	II ↓
Geology and Soils	II	II	II	II ↑	II
Hazards/Hazardous Materials	I	I	I	I	I
Noise	I	II	I ↓	II	II
Transportation and Circulation	II	II ↓	II	II	II ↑
Water Resources	↓ II	II	II	I ↑	II
Note: The arrows represents scenarios where the impact associated a resource issue area for a particular alternative would be the same as the proposed project (e.g. Class II), but more (upward arrow) or less (downward arrow) severe (refer to Aesthetic Resources, Proposed Project versus Redesigned Project Alternative).					

E. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Section 15126(d) requires the alternatives section of an EIR to describe a reasonable range of alternatives to the project that avoid or substantially lessen any of the significant effects identified in the EIR analysis while still attaining most of the basic project objectives. The alternative that most effectively reduces impacts while meeting project objectives should be considered the “environmentally superior alternative.” In the event that the No Project Alternative is considered the environmentally superior alternative, the EIR is also supposed to identify an environmentally superior alternative among the other alternatives.

The No Project Alternative would appear to result in fewer impacts than the proposed project; however, that would result in the Landfill closing in approximately eight years. As a result, new landfill capacity would need to be developed at a new site or waste would need to be transferred to another existing, permitted landfill. It is unclear at this time which alternate landfills would have enough capacity to accommodate the waste that would be disposed of by the proposed project. Ultimately, those landfills would also need to increase capacity to accommodate long-term waste generation by the residents of San Luis Obispo County. Those expansion plans may result in impacts similar to the proposed project, depending on their size and location.

Alternative 4, Waste Diversion Alternative, also appears to reduce the number of Class I impacts resulting from the proposed project. However, it is unclear what secondary impacts may result from diverting waste from San Luis Obispo County to other landfills. Even if alternate locations could accommodate the waste in the short-term, ultimately the waste material would require capacity somewhere, and developing new capacity would result in impacts that may or may not be more significant than those associated with the proposed project. Because of these unknowns, it is not considered the Environmentally Superior Alternative.

Alternative 2, Redesignated Project – Onsite Relocation of Disposal Area and Entrance, would reduce cultural, agricultural, noise, and aesthetic resource impacts when compared to the proposed project. Agricultural resource impacts associated with cumulative farmland conversion would most likely be reduced from Class I, significant and unavoidable, to Class II, significant but mitigable. Noise impacts resulting from the proposed entrance road and activity in the disposal area would be reduced from a Class II impact, to a Class III, less than significant, with implementation of Alternative 2. Noise from the RRP and cumulative noise impacts would still be considered Class I.

Aesthetic resource impacts would be reduced by Alternative 2 when compared to the proposed project because the disposal area footprint would be slightly smaller and would be located where existing views from public roads have already been compromised by the existing Landfill; however, Class I impacts would still result. Paleontological resource impacts would still be Class II given the sensitivity of the geologic formations, but Alternative 2 would avoid impacts to potential historic resources when compared to the proposed project, reducing the impact from Class II to Class III. This alternative would avoid some impacts to Obispo Indian paintbrush, wetlands, and the smaller oak woodland on the expansion area; however, it would result in conversion of a portion of the larger oak woodland located to the east of the existing disposal area (refer to Figure VI-1). Impacts to biological resources would remain Class II.

Alternative 2 would not increase the intensity of any impacts, nor would it increase the impact class of any issue area. This alternative would meet all of the project objectives but would require the applicant to purchase or lease an additional portion of land (approximately four acres). Because this alternative would avoid or lessen significant impacts of the proposed project and meet the basic objectives of the proposed project, Alternative 2, Redesigned Project – Onsite Relocation of Disposal Area and Entrance, would be considered the Environmentally Superior Alternative.

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