THE CITY OF SAN DIEGO

ADDENDUM TO AN ENVIRONMENTAL IMPACT REPORT

Project No. 600213
Addendum to EIR No 122833.
SCH No. 2006051004

SUBJECT: **MIRAMAR LANDFILL SERVICE LIFE EXTENSION/ HEIGHT INCREASE** for the modification of existing permits, waste discharge requirements (WDRs), and lease with the Department of Defense (DOD) to allow for the increase in the permitted height of the existing active portion of West Miramar Landfill (WML) 238-acre Phase II from 485 feet above mean sea level (MSL) to 510 feet MSL. The project is addressed at 5180 Convoy Street, north of Highway 52, east of Interstate 805, and west of Interstate 15 on a leased area of Marine Corps Air Station. Latitude and longitude: N 32° 51'17" N 117° 10 ' 11"E, Township 15S Range 3W Section 22, 23, 24, and 25 San Bernardino Meridian APPLICANT: City of San Diego.

I. SUMMARY OF PROPOSED PROJECT

The proposed project is a maximum 25-foot increase to the active portion of the West Miramar Landfill (WML) Phase II from 485 feet above Mean Sea Level (MSL) to 510 MSL. The proposed project requests for no other change than the 25-foot increase in height within Phase II of WML (see Figure 2). No horizontal expansion is proposed. No change in daily throughput is proposed. No changes in operations other than those necessary to accommodate the vertical expansion are proposed.

The City of San Diego Environmental Services Department (ESD) operates the landfill under a lease with the Department of Navy Operation. The facility requires a Solid Waste Facility Permit, which is issued by the City's Local Enforcement Agency, which reports to the California Department of Resources Recycling and Recovery. The facility also operates under a City of San Diego-issued Site Development Permit. The Air Pollution Control Board and California Water Board impose additional requirements on landfill operations.

Consistent with the purposes of California Environmental Quality Act (CEQA), and with City of San Diego, County of San Diego, and SANDAG planning documents, all of which emphasize extending the life of existing disposal facilities, the objective of the proposed project is to increase the capacity and thereby extend the operation of an existing, conveniently located, environmentally focused site for disposal of municipal solid waste, provided this increase is consistent with the primary mission of the landlord, Marine Corps Air Station (MCAS) Miramar. In pursuing the proposed project, it is the objective of the City to provide cost-effective, environmentally sound disposal options for those

residual materials that remain after all appropriate methods of waste reduction, recycling, composting, and/or conversion have been employed.

The following changes are proposed to the WML;

- Increase maximum height of WML Phase II from 485 feet MSL to 510 feet MSL.

II. ENVIRONMENTAL SETTING

The 807-acre WML is located at 5180 Convoy Street (APN 3490200300) on MCAS Miramar, on land owned by the Department of Defense (DoD). The landfill is surrounded by the Interstate 805 (I-805) to the west, the State Route 52 (SR 52) and the east and the north by more MCAS Miramar property. Surrounding land uses include industrial, commercial, office, residential to the south; industrial and undeveloped open space to the east; residential, office and commercial to west; and MCAS Miramar to the north and east.

South of the WML is San Clemente Canyon, which runs roughly east to west. The Canyon area is excluded from the lease and the existing landfill has no direct impact on the Canyon. Indirect impacts of the existing operation, such as runoff, are controlled through various Best Management Practices (BMPs), which are routinely inspected by regulatory agencies. The Canyon contains an ephemeral stream linking the mountainous areas in eastern San Diego County with Rose Canyon, and eventually Mission Bay and the Pacific Ocean. The Canyon, where it is adjacent to the proposed project site, functions as a wildlife corridor and provides habitat for many plants and animals.

In a status of Federal Aviation Administration (FAA) fling, the FAA has determined that there would not be a hazard to air navigation concerning the proposed height extension of 510 feet to the WML in Phase II. The FAA based this determination on aeronautical studies conducted under the provisions of 49 U.S.C., Section 44718 and, if applicable, Title 14 of the Code of Federal Regulations, part 77. The nearest residence is located roughly 0.93 mile (4,919 feet) southwest of the landfill site in the University City community in the City of San Diego. The nearest commercial property is located roughly 0.83 miles west of the WML in Kearny Mesa.

III. SUMMARY OF ORIGINAL PROJECT

The City has been operating sanitary landfills on the MCAS Miramar (previously Naval Air Station Miramar) since 1959. These non-hazardous landfills were developed in four separate areas. City of San Diego use of the site began with the South Miramar Landfill commencing operation in 1959. The North Miramar Landfill was in operation from 1973 for 10 years. Phase I of WML began operation in 1983. Phase II of WML began operation in 1993.

WML Phase II operates on 228 acres of the western portion of West Miramar and started receiving waste in July 1993. In 2008 discretionary action was requested by the ESD to increase the permitted height of the WML. The decision was made based on input from MCAS Miramar to limit the request to raising the height from 465 feet to 485 feet to extend the life of the landfill and delay its closure. A Final Environmental Impact Report (FEIR) was certified in 2008 to increase the permitted height from 465 feet to 485 feet. The Miramar Landfill has served much of the City of San Diego municipal solid waste disposal needs for more than six decades.

The Miramar Landfill Service Life Extension/Height Increase (MLSLE) FEIR 2008 contains the following fifteen elements; Land Use; Air Quality; Biological Resources; Geologic Conditions; Health and Safety; Cultural Resources; Paleontological Resources; Mineral Resources; Noise; Traffic; Public Services and Facilities; Public Utilities; Landform Alteration/Visual Quality; Water Quality/Hydrology; and Energy Conservation. Each of these elements identifies a series of goals and policies intended to guide future development within the Miramar Landfill.

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the **Miramar Landfill Service Life Extension/ Height Increase at MCAS Miramar, County of San Diego, California Environmental Impact Report (EIR) No. 122833/ SCH No. 2006051004**. Based on all available information in light of the entire record, the analysis in this Addendum, and pursuant to Section 15162 of the State CEQA Guidelines, the City has determined the following:

- There are no substantial changes proposed in the project which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- Substantial changes have not occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental document was certified as complete or was adopted, shows any of the following:
    a. The project will have one or more significant effects not discussed in the previous environmental document;
    b. Significant effects previously examined will be substantially more severe than shown in the previous environmental document;
    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
    d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous environmental would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Based upon a review of the current project, none of the situations described in Sections 15162 and 15164 of the State CEQA Guidelines apply. No changes in circumstances have occurred, and no new information of substantial importance has manifested, which would result in new significant or

substantially increased adverse impacts as a result of the project. Therefore, this Addendum has been prepared in accordance with Section 15164 of the CEQA State Guidelines. Public review of this Addendum is not required per CEQA.

V. IMPACT ANALYSIS

The following includes the project-specific environmental review pursuant to the CEQA. The analysis in this document evaluates the adequacy of the EIR relative to the project.

Project approval for the proposed project would allow for a 25-foot height increase from the original permitted height of 485 feet MSL to 510 feet MSL on the active portion of WML Phase II. The analysis provided in this Addendum indicates that there are no new significant impacts that would result from the project and that all project-level impacts can be fully mitigated. A comparison of the project's impacts related to those of the adopted MLSLE FEIR is provided below in Table 1 and discussed in detail below the table.

Table 1. Impact Assessment Summary

Resource Area	MLSLE FEIR 2008 Analysis	Project Level Analysis	Project Impact Conclusion	MLSLE FEIR 2008 Mitigation	Project Level Mitigation
Land Use	No significant impact	No new impacts	No significant impact	No	No
Air Quality	No significant impact	No new impacts	No significant impact	No	No
Biological Resources	No significant impact	No new impacts	No significant impact	No	No
Geology	No significant impact	No new impacts	No significant impact	No	No
Health and Safety	No significant impact	No new impacts	No significant impact	No	No
Cultural Resources	No significant impact	No new impacts	No significant impact	No	No
Paleontological Resources	No significant impact	No new impacts	No significant impact	No	No
Mineral Resources	No significant impact	No new impacts	No significant impact	No	No
Noise	No significant impact	No new impacts	No significant impact	No	No
Traffic	No significant impact	No new impacts	No significant impact	No	No
Public Services and Facilities	No significant impact	No new impacts	No significant impact	No	No
Public Utilities	No significant impact	No new impacts	No significant impact	No	No

Table 1. Impact Assessment Summary					
Resource Area	MLSLE FEIR 2008 Analysis	Project Level Analysis	Project Impact Conclusion	MLSLE FEIR 2008 Mitigation	Project Level Mitigation
Landform Alteration/Visual Quality	No significant impact	No new impacts	No significant impact	No	No
Water Quality/ Hydrology	No significant impact	No new impacts	No significant impact	No	No
Energy Conservation	No significant impact	No new impacts	No significant impact	No	No

Land Use

FEIR

Potential impacts to land use were analyzed in Section 4.1 of the MLSLE FEIR. The MLSLE FEIR identifies less than significant impacts for consistency with local plans, regional land use plans, policies and regulations. The facility is depicted in the City's General Plan as a military facility. Land use on the project site is determined by the Marine Corps, which oversees all development and operations on the MCAS Miramar. The City operates the Miramar Landfill on leased land on MCAS Miramar. The Miramar Landfill has land uses listed as extractive industry, landfill/ ancillary facilities and inactive landfill. It is designated as such within the MCAS Integrated Natural Resources Management Plan (INRMP) and is consistent with the existing NAS Miramar Master Plan.

The MLSLE FEIR identified that the proposed height increase was in accordance with the Airport Land Use Combability Plan (ALUCP) MCAS Miramar, San Diego California. The landfill is considered an industrial use and is consistent with the MCAS Miramar ALUCP. The plan also includes a compatibility matrix for uses with the accident potential from military aircraft. "Landfill" is not included in the list of uses subject to restrictions. The Marine Corps has determined that this use, which occurs on the base property, but is not located at the end of the runway where the highest accident potential zone rating is applied, is compatible.

The MLSLE FEIR found that the vertical expansion of the Miramar Landfill would be consistent with the policies and goals for improving and meeting the City's waste disposal methods and needs. The MLSLE FEIR determined that the facility is listed in the existing use within the INRMP. The City of San Diego's Multiple Species Conservation Program (MSCP) identifies "hard line" preserve areas in which boundaries have been specifically determined known as Multi-Habitat Planning Areas (MHPA). No change to the existing land use was planned. According to the MLSLE FEIR, the WML area is not mapped as a conservation area in any local, regional, or state habitat plan.

These policies and goals are identified in the draft General Plan; Public Facilities, Services and Safety Element; and Integrated Waste Management Plan, Countywide Siting Element. The MLSLE FEIR found that there was no significant impact and no mitigation measures were required.

Proposed Project

Land Use Consistency

The proposed project would be consistent with the proposed land uses described in the City's General Plan, NAS Miramar Master Plan Update, ALUCP MCAS Miramar, and the MCAS INRMP as identified in the 2008 MLSLE FEIR. The land use would remain extractive industry/ landfill, ancillary facilities and inactive landfill (see Figure 3). With the height increase there is no change in land use and the Miramar Landfill is continuing an existing compatible use, there would be no significant impact caused by the proposed project. No mitigation measures are required.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in a new significant impact nor a substantial increase in the severity of impacts from that described in the EIR.

Air Quality

FEIR

Air Quality is addressed in Section 4.1.2 of the MLSLE FEIR and additionally an air quality technical report was prepared in March of 2007 to determine air quality impacts of the proposed height increase. The 2008 MLSLE FEIR identified that there was no significant impact to deterioration of ambient air quality, exposure of receptors to substantial pollutant concentrations, creation of objectionable odors, creation of dust and no cumulatively significant impacts to air quality.

It was identified that emissions from landfill operations include both criteria pollutants and toxic air contaminants (TAC). The criteria pollutants are: carbon monoxide (CO), oxides of nitrogen (NO_X), particulate matter 10 micrometers or less in diameter (PM_{10}), sulfur oxides (SO_X), and volatile organic compounds (VOCs). TACs are air pollutants that may pose a present or potential hazard to human health, specifically by causing an increase in mortality or serious illness. The stationary sources are landfill gases (LFGs) that are created by the decomposition of waste at landfills. The quantity of LFGs generated depends primarily on the size, age, and moisture content of each disposal site.

The MLSLE FEIR identified that the height increase of the landfill would extend the duration of emissions already generated at the landfill. No new sources of emissions would result from implementation of the height increase of the landfill. Best Available Control Technology of air pollutants would ensure that any emission increase would be controlled and minimized to the maximum achievable level. In addition, it was identified that the number of vehicular trips would remain unchanged and within permitted amounts.

Commercial receptors were identified 0.1 miles from the landfill and the nearest residence was identified 0.7 miles away. Neither the existing landfill or the height increase would expose receptors to substantial pollutant concentrations.

The MLSLE FEIR recognized that activities from the landfill result in detection of odors offsite. No increase in waste quantities, nor changes in placing daily covers, types, or odor management procedures was associated with the height increase of the landfill. The Landfill and the co-located composting operation, the Greenery, have been subject to odor complaints from time to time.

The MLSLE FEIR stipulated that the air quality of the initial height increase was within limit to be described as good air quality. The MLSLE FEIR found that no air quality impacts, in addition to existing impacts would be caused by the original height increase. Therefore, no significant air quality impact is anticipated. No mitigation measures were proposed.

Proposed Project

The proposed project is consistent with the findings of the MLSLE FEIR. Emission increases are expected to be similar to those previously analyzed, none of which resulted in any significant air quality impact. The FEIR documented that potential health risks caused by the maximum potential emissions associated with the proposed project did not exceed any of the applicable thresholds. The methodology for estimating potential health risks was modified in 2015 and the calculate risks are generally approximately three time higher than those calculated using the previous method for the same level of emissions. However, the potential maximum cancer, chronic and acute risk levels presented in the FEIR range from 8-60 times lower than the applicable thresholds. Therefore, the change in the methodology is not expected to result in any exceedance of the applicable thresholds.

Raising the height of the landfill could change the distribution of constituents that are carried by wind. The effect of this could be to distribute them higher in the atmosphere, where they would not be perceived as odors, but it is also possible wind patterns could continue to result in odors detectable at ground level under certain circumstances, and those circumstances might be different than the current conditions that result in odors. The height increase would also increase, very slightly, the distance to receptors, which is associated with odor attenuation (reduced odors). These changes may require modification to the way odors are managed, with specific methods to be identified in consultation with the Air Pollution Control District. Ongoing odor control efforts are subject to constant modification. Data that helps identify the source and the climate events associated with odors informs control measures. As more is learned about the various odor sources, and how climatic events affect them, in consultation with the Air Pollution Control District, modifications are made. A recent modification includes changing the daily cover method from a "tarping" method to a "sacrificial plastic cover." Under the tarping method, the tarp was rolled up at the beginning of each work day, potentially releasing odors. The new method involves placing a plastic cover over the waste at the end of the work day and then placing trash on top of it the next work day, rather than removing it to be reused. This continual reassessment and oversight would continue with the proposed height increase.

Based on the foregoing analysis and information, there is no evidence that the project would result in a major change to the EIR. The project would not result in a new significant impact nor a substantial increase in the severity of impacts from that described in the EIR.

Biological Resources

FEIR

The MLSLE analyzed impacts to Biological Resources in Section 4.1.3. According to the MLSLE FEIR the City of San Diego Development Services Department's Significance Determination Thresholds, impacts on biological resources are assessed through the CEQA review process, the Environmentally Sensitive Lands Ordinance, and through the review of consistency with the City's MSCP Subarea Plan. The MLSLE FEIR found that the project would have no direct impact on any unique, rare, endangered, sensitive, of fully protected species of plants or animals.

Sensitive Species

The MLSLE FEIR identified that no resident sensitive plant species are located within the site area. Sensitive animals in the vicinity, though also not within the project footprint, included species of concern such as California horned lark (*Eremophila alpestris*), northern harrier (*Circus cyaneus*), southern California rufous-crowned sparrow, (*Aimophila ruficeps* canescens), and government-listed animals, such as the endangered San Diego fairy shrimp (*Branchinecta sandiegonensis*), and the threatened California gnatcatcher (*Polioptila californica*). The MLSLE FEIR concluded there would be no significant impacts on sensitive species were within the landfill. Therefore, no mitigation measures were proposed.

Wildlife

The MLSLE FEIR found no wildlife present within the landfill. With regard to wildlife movement, San Clemente Canyon is located to the south of the WML site. The Canyon functions as a wildlife corridor and provides habitat for many plant and animal species, including small and large mammals. It contains coast live oak riparian forest, and willow scrub. The existing landfill does not interfere with any wildlife movement in this Canyon but may have indirect impacts as a result of noise, dust, exotic species, and runoff. The MLSLE FEIR found that there would be no change to the existing conditions for any important habitat and no mitigation measures were proposed.

Proposed Project

A separate Biological Resources Report was prepared for the addendum in accordance with the methodologies and thresholds of significance identified within the MLSLE FEIR (see Appendix 1). Biologists performed a 2-day survey of the Phase II portion of WML and a 100-foot buffer in January 2019. MSCP Covered Species and sensitive plants and wildlife were identified in the 100-foot buffer. Wart-stemmed ceanothus, Palmer's sagewort, and ashy spike-moss were sensitive plants identified within the 100-foot buffer and only one sensitive wildlife species which was the southern mule deer was identified. For a list of all sensitive species identified within the 100-foot buffer see Appendix 1. However, the proposed height increase of WML Phase II will not result in operational changes or in any new impacts other than what is already permitted under current conditions. Therefore, no impacts to biological resources are expected from the proposed project. Additionally, potential edge effects within the adjacent habitats will be similar to edge effects occurring from the current landfill operations.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in a new significant impact nor a substantial increase in the severity of impacts from that described in the EIR.

Geology

FEIR

The MLSLE FEIR analyzed the geotechnical conditions of the project site in Section 4.1.4. It was identified that the project site lies in the coastal plain section of the Peninsular Ranges geomorphic province and found that there are no active or potentially active faults known to exist at or near the Miramar Landfill. Minor offsets of Stadium Conglomerate beds at the site are thought to have resulted from older faulting or differential slumping during deposition. No Alquist-Priolo Special Studies Zones

are present at or near the site. Seismic hazards such as liquefaction, lateral spreading, and seismically-induced, and seismically induced were determined to not be credible causes of significant damage at the landfill. The MLSLE FEIR found that the landfill complies with stability standards and that no significant impact and no mitigation were required. The height increase of the landfill would result in no change to existing condition therefore no significant impact is anticipated. No mitigation measures were required or put into place.

The MLSLE FEIR concluded that there would be no change to off-site runoff velocities because of drainage controls. The landfill is a constantly changing landform. Onsite slopes were taller for the West Miramar Landfill, and designed with additional runoff controls to ensure no substantial increase in erosion. The engineered shape of the cells and final topography are streamlined, a shape that minimizes wind erosion. Further measures to minimize wind and water erosion include the use of mulch, berms, down drains, and detention basins. It was identified that there was no significant impact and no mitigation was required.

The MLSLE FEIR identified that liquefaction, lateral spreading, and seismically-induced settlement, are not credible causes of significant damage at West Miramar Landfill. These hazards generally require the presence of relatively loose, granular, saturated soils in the subsurface, in addition to strong ground motion. The landfill excavation penetrates clayey and sandy terrace deposits into bedrock of the Stadium Conglomerate and terminates well above the groundwater table. Under these conditions, significant liquefaction, lateral spreading, or seismically-induced settlement are very unlikely. There was no significant impact and no mitigation was required.

Proposed Project

Title 27 of the California Code of Regulations requires that municipal solid waste landfills be designed with appropriate slope stability. For landfill development, geological and engineering expertise is always required in order to design and operate the landfill in accordance with state and federal laws. The proposed project would result in no change to off-site runoff velocities because of drainage controls. These controls under the existing permit and under the proposed project are modified as necessary as the landfill topography is filled and covered. The landfill is a constantly changing landform. Onsite slopes would be taller for the proposed project and have been designed with additional runoff controls to ensure no substantial increase in erosion. The engineered shape of the cells and final topography are streamlined, a shape that minimizes wind erosion. The proposed project is situated so that it cannot affect slopes outside of its own footprint, from which the slopes rise, thus the proposed project would cause no slides offsite. The landfill would comply with all stability standards. No significant impact is anticipated.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in a new significant impact nor a substantial increase in the severity of impacts from that described in the EIR.

Health and Safety

FEIR

The MLSLE FEIR analyzed Health and Safety in Section 4.1.5. The Miramar Landfill is listed as a "Class III landfill" and is permitted to accept non-hazardous residential and commercial refuse. The Miramar

Landfill accepts treated wood waste, non-friable asbestos, contaminated soil, and industrial solids after approval and scheduling with an inspector from the landfill load check program. A liner is provided in portions of the landfill to further decrease the potential spread of harmful constituents that might be present within. The MLSLE FEIR found that layers on the existing trash pose no additional threat to the liner. Height and weight are not limiting factors in liner design. Therefore, no significant impact was found, and no mitigation was placed.

Hazardous materials are forbidden from entering the landfill under the existing permit and no changes to the landfill classification were added. The MLSLE FEIR found that since there would be no change in the existing measure for hazardous materials there is no significant impact. No mitigation measures were proposed.

Proposed Project

Adding additional layers on the existing landfill pose no additional threat to the liner. Height and weight of refuse are not limiting factors in liner design. Additional weight added to the landfill will not tear the liner system (City of San Diego, 2008).

Hazardous materials are prohibited from the landfill under existing permit, and no changes to the landfill classification are proposed. The landfill operation includes a load-check program to ensure their exclusion, and no changes to this program are proposed. No changes to safety procedures are proposed.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the MLSLE FEIR. The project would not result in a new significant impact nor a substantial increase in the severity of impacts from that described in the MLSLE FEIR. No mitigation is required.

Cultural Resources

FEIR

Historical or Archaeological

The MLSLE FEIR analyzed the cultural resources of the project site in Section 4.1.6 of the . (MLSLE FEIR 2008). Cultural resources were analyzed in the original 1980 EIR for the development of the site into a landfill. No recorded cultural sites or resources were identified as being impacted within the project footprint. The MLSLE FEIR concluded that the site is entirely underlain by waste deposited at the site since initiation of operations. Thus, there are no historical or archeological resources within the footprint of the site that would be disturbed by deposition of additional layers of waste. Therefore, no significant impact and no mitigation measures were required.

Proposed Project

A supplemental Cultural Resources Assessment is provided in Appendix 2. A records search revealed that 14 previous cultural resources investigations have been conducted within or partially within the project area. The results of the record search indicated that a total of 12 cultural resources have been previously recorded within the project area. However, the project continues to be completely within the footprint of the existing landfill. The Cultural Resources Assessment concurred with the findings of the 2008 MLSLE FEIR that, based on the results of the archival research and application of the City

of San Diego Significance Determination Thresholds, it is concluded that no significant cultural resources would be affected by the proposed WML height increase. No further cultural resources investigations are recommended.

On June 24 AECOM received a response from the NAHC indicating that tribal cultural resources have been recorded in the vicinity of the project area. As recommended by the NAHC, AECOM contacted a representative from the Viejas Band of Kumeyaay Indians, who confirmed the presence of tribal cultural resources in the area and recommended that any ground disturbing activities associated with the project should be monitored. Although the consultation with the NAHC and tribal representatives indicated that tribal cultural resources are known to be in the general vicinity, such resources would not be affected by the proposed landfill height increase.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the MLSLE FEIR. The project would not result in a new significant impact nor a substantial increase in the severity of impacts from that described in the EIR.

Paleontological Resources

FEIR

The MLSLE FEIR analyzed the geology from the project site in Section 4.1.7. As discussed in the MLSLE FEIR identification of underlain formations included Scripps, Friars, Stadium Conglomerate, terrace deposits, alluvium and slope wash. Although a significant amount of waste would be imported, and soils already stockpiled onsite would be moved, no intact paleontological formations were to be disturbed. The project resulted in no disturbances, grading, or excavation outside or beneath the footprint of the existing WML landfill. No change in the existing condition of the WML land fill regarding impacts to this type of resource. No significant impact and no mitigation measures were proposed.

Proposed Project

The proposed project is consistent with the findings of the MLSLE FEIR. It is located on the same parcel as the existing facility. The additional 25-foot height increase of the landfill would result in no impact to intact paleontological formations. The proposed project would result in no disturbances, grading or excavation outside or beneath the footprint of the existing Phase II WML. There would be no change in the existing condition regarding impacts to this type of resource.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in a new significant impact nor a substantial increase in the severity of impacts from that described in the EIR.

Mineral Resources

FEIR

The MLSLE FEIR analyzed the geology from the project site in Section 4.1.8. The City, which is the landfill operator, conducted studies identifying the presence of aggregate resources, identifying the site as an MRZ2a zone (areas known to be underlain by significant aggregate resources). The City then investigated the opportunity to exploit underlying mineral resources, while also increasing the capacity of the landfill. Prior to the start of fill operations at WML useful aggregate materials were

excavated to the degree considered appropriate considering the need to protect groundwater. Usable materials were exported from the site, and the residual material has been used onsite in the liner covering system. The MLSLE FEIR found that no mineral resources would be impacted or disturbed due to the height increase of the landfill. Therefore, no loss of valuable resources occurred. The proposed project would not change this existing condition. No mitigation measures were proposed.

Proposed Project

The proposed project is consistent with the findings of the MLSLE FEIR. The height increase of the WML does not include mineral excavation. No further mineral excavation is projected for the proposed project.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in a new significant impact nor a substantial increase in the severity of impacts from that described in the EIR.

Noise

FEIR

The MLSLE FEIR analyzed the noise from the project site in Section 4.1.9. Regarding noise levels, ambient noise levels are high as a result of the existing highways and aircraft overflights. The MLSLE FEIR concluded that by increasing the height of the landfill this would in turn reduce sound from traveling to nearby residents from manufactural and industrial noises that come from landfill operations. Just as the noise of the existing operation cannot be detected by receptors on the far side of the highway, so the noise of the increased height, which would slightly increase the separation distance, thus reducing the potential for perceived noise, would not be detectible by these receptors. Noise sources associated with the operation of the landfill include trucks and other heavy machinery used to transport refuse and dirt within the facility, and pyrotechnic devices used to manage seagulls and other wildlife nuisances. The initial height increase of the landfill would not increase or change the existing noise conditions. The MLSLE FEIR found that it would not change existing traffic. No changes to the operation of the facility were proposed. Therefore, there were no changes to existing traffic-related impacts, which includes noise. No mitigation measures were proposed.

Proposed Project

Ambient noise levels at the site are high as a result of the existing highways and aircraft overflights. Noise levels would not change as a result of the proposed project. Noise levels from the proposed project would be equivalent to noise levels from the current landfill operation, although eventually they would be slightly less, as a result of greater separation from noise sources. Noise would continue to come from trucks and other heavy machinery used to transport refuse and dirt within the facility, and pyrotechnic devices used to manage seagulls and nuisance wildlife. Therefore, no impact is anticipated to occur.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in a new significant impact nor a substantial increase in the severity of impacts from that were described in the EIR.

Traffic

FEIR

Traffic Circulation

The MLSLE FEIR analyzed the impacts from traffic in Section 4.1.10. A traffic study was prepared that found that the height increase would not change the daily 2,000 trips per day limit. No additional traffic into the site was expected for the height increase. No mitigation was required, and no significant impacts were identified.

Proposed Project

Traffic Circulation

A Transportation Assessment is included in Appendix 3, prepared by Linscott, Law & Greenspan, Engineers (LLG) that includes findings from the 2008 MLSLE FEIR and a discussion of the proposed project. The project continues to propose no changes to traffic patterns and no increase in daily throughput to the facility. The MLSLE FEIR concluded that no significant impact is anticipated since the height increase would not change the existing 2,000 trip per day limit and would not alter baseline traffic conditions. Similarly, the proposed project would increase the allowable height of the WML but would not change the 2,000 trip per day limit, would not alter baseline traffic conditions, and no additional impacts would be expected.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in a new significant impact nor a substantial increase in the severity of impacts from that described in the EIR.

Public Services and Facilities

FEIR

The MLSLE FEIR included analysis of public services and facilities in Section 4.1.11 of the MLSLE FEIR. It concluded that the existing public services and facilities were adequate to serve the project. The MLSLE FEIR found that the project did would not impede emergency response times of local fire and police. The public services required by the landfill include inspection by the Local Enforcement Agency, which charges cost-recoverable fees for this service. Personnel and equipment can be and have been used as part of the City's overall emergency response in the event of a disaster, for example by using the equipment to suppress fires and/or manage debris. Landfill personnel have also assisted San Diego Police with investigations. The MLSLE FEIR stated the project is already an existing landfill and therefore no additional public facilities and services are required. No significant impact was found and therefore no mitigation was required.

Proposed Project

No additional public facilities or services are needed due to the height increase of the landfill. There are existing facilities and services that adequately serve the landfill and no change will be implemented with the proposed project.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in a new significant impact nor a substantial increase in the severity of impacts from that described in the EIR.

Public Utilities

FEIR

Public Utilities is discussed in Section 4.1.12 of the 2008 MLSLE FEIR. It concluded that the existing utilities that serve the landfill were adequate. No new construction of any public utilities was proposed. Existing water supply at the landfill was 40,000 gallons per month and there would be no new demand on water supplies due to the height increase. Reclaimed water and water collected from drainage and leachate controls was used onsite as dust control. As stated in the 2008 MLSLE FEIR only native revegetation was proposed that did not require irrigation. Additionally, the facility is used to provide green power to the City of San Diego operations and San Diego Gas and Electric. A cogeneration plant is located near South Miramar and takes gas from the landfill and gas from a bio solid treatment plant and generates electricity onsite. No significant impact was found and therefore no mitigation was required.

Proposed Project

The proposed project is consistent with the MLSLE FEIR. Existing utilities that serve the landfill would be adequate to serve the proposed project, which includes no changes to operation. No construction of new public utilities is proposed. The proposed project would place no new demand on any public utility and would provide years of disposal capacity to the City of San Diego. Therefore, no significant impact was found.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in a new significant impact nor a substantial increase in the severity of impacts from that described in the EIR.

Landform Alteration/ Visual Quality

FEIR

Public Views

Landform alteration/visual quality is analyzed in Section 4.1.13 of the MLSLE FEIR. The densely developed communities surrounding MCAS include: Mira Mesa and Scripps Ranch to the north, University City to the west, Clairemont to the southwest, and Kearny Mesa and Tierrasanta to the south. There are also views several high-volume roadways including I-163, SR-52, I-15 and I-805. The site is most visible to travelers along SR-52 and I-805, since these roadways have high daily traffic counts. There are also direct views of the WML from Marian Beach Natural Park which is located 6 miles southwest of WML. The MLSLE FEIR found that the height increase would mimic the permitted, existing topography with the exception that it would raise the final grade by 25 feet. Therefore, there would be no impact to public views, and no mitigation measures were proposed.

Manmade Visual Features

Manmade features and vegetated mesas and canyons are especially dominant in the landscape. There are no major water bodies within the area, although ephemeral streams run through the region. The

existing open site contrasts strongly with the surrounding land uses. The landfill is located on MCAS Miramar. It is bounded on three sides by freeways and on the fourth side by the airstrip portion of the base. Beyond the freeways to the west, south, and east, is urban areas, where as more military uses are located to the north. Urban communities beyond the freeways include Kearny Mesa, Clairemont Mesa, University City, and Mira Mesa. The overall characterization of the landfill is rural, with interspersed landfill features including earth cuts and fills exposing unvegetated landfill areas. Other manmade elements, such as moving landfill vehicles, traverse the area. Intermittent green and/or brown mesas and canyons covered by grasses and shrubs are interspersed with obvious man-made tan landfill features and moving vehicles. The MLSLE FEIR found that the height increase would only affect prior man-modified topography and would not result in the loss, covering, or modification of any unique physical feature such as a natural canyon or hillside slope in excess of 25 percent gradient. Therefore, there was no impact to manmade visual features, and no mitigation measures were proposed.

Natural Landform

The visual patterns of MCAS Miramar can be grouped into three main categories: undeveloped mesas and canyons, airfield/developed areas, and landfill-related. Surrounding areas to the north, west, south, and southeast of the Station are characterized by dense development.

The MLSLE FEIR identified that the project would mimic the permitted, existing topography except for a raise of the final grade by 25 feet. The existing, permitted landfill will provide an engineered final appearance. The engineered shape of the WML was found not to have significant visual impacts in the 1980 EIR. The proposed height increase would raise this contour by a maximum of 25 feet and would occur over manufactured topography. There would be no impacts to natural topography and other ground surface relief features. Since no significant impact to natural topography in the area was expected, no mitigation measures were proposed.

Proposed Project

Public Views

A separate Visual Assessment was prepared in accordance with the methodologies and thresholds of significance identified within the MLSLE FEIR (see Appendix 4). In accordance with City of San Diego and CEQA regulations and guidelines, all residential and private viewsheds were stricken from the original report (URS 2007) as the City of San Diego and CEQA do not protect private viewsheds. The separate Visual Assessment found that the height increase would mimic the permitted, existing topography with the exception that it would raise the final grade by 25 feet. Therefore, there would be no impact to public views.

Manmade Visual Features

Since the proposed project is the height increase of the landfill which is a prior man-modified topography it would not result in the loss, covering, or modification of any unique physical feature such as a natural canyon or hillside slope in excess of 25 percent gradient. Therefore, there would be no impact to manmade visual features for the proposed project.

Natural Landform

The proposed project would only affect prior man-modified topography and would not result in the loss, covering, or modification of any unique physical feature such as a natural canyon or hillside slope in excess of 25 percent gradient. With the proposed project no natural or sensitive slopes would be affected. The proposed project demonstrates that the proposed landforms would very closely imitate the existing topography with the exception that it would raise the final grade by a maximum 25 feet. No additional impacts were found with the proposed project.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in a new significant impact nor a substantial increase in the severity of impacts from that described in the EIR.

Water Quality/ Hydrology

FEIR

Water Quality/Hydrology impacts were analyzed in Section 4.1.14. As well, a separate Water Quality/Hydrology report was created for the MLSLE FEIR that was prepared by the City of San Diego. The report identified that the existing drainage system would be modified to drain the runoff associated with the slightly higher slopes. Additionally, the report stated that as the landfill is constructed, the system must be continually modified to ensure that the system provides effective collection of all site runoff even as the topography changes.

The MLSLE FEIR identified that because the runoff from the slope would be controlled in the detention basin, no change in the eventual discharge would occur – the amount of rain hitting the area would be identical, and the increase in velocity caused by the taller slopes would be addressed by the basins.

The MLSLE FEIR concluded that it would continue the existing drainage control features ground water protection measures, modifying them where appropriate to ensure that no changes to the existing conditions would occur. There would be no additional impacts to water quality. Velocity dissipaters continue to be used at the exit from the sedimentation basin to provide discharge rates that do not produce excessive scour; however, modification to these facilities may be required at any point under the existing conditions by the Regional Water Quality Board (RWQCB). The RWQCB may require changes to ensure that the sedimentation basins continue to serve their purpose, and there is no increase in runoff rates. To avoid erosion of the cover by these concentrated flows, shallow swales protected with soil containing gravel- and cobble-sized stone would be located along the valleys. BMPs would be slightly modified as described above to ensure that the height increase would not result in any change in the short- or long-term on regional water quality. The landfill also practices water conversation with recycling leachate for use as a dust suppressor and by using reclaimed water for compost production.

Proposed Project

The proposed project is consistent with the findings of the MLSLE FEIR. Runoff from the slope would be controlled pursuant to Regional Water Quality Control Board requirements. Current basin design is adequate for landfill purposes, but the co-located composting operation, the Greenery, imposes additional challenges. Operations at the Greenery are also challenged because the landfill surface is not suitable for structures, and recent changes in State law will require that a larger portion of the

feedstocks will be food waste. In order to minimize odor impacts associated with this future change in composting operations, it is planned that the Greenery will move to a location where a structure to receive incoming materials can be constructed. The Regional Water Quality Control will continue to assure that the landfill's Industrial General Permit provides sufficient storm water management, but, in the future, when the Greenery is no longer co-located, it will be much easier to comply with Industrial General Permit requirements. The proposed project includes no increase in impervious surfaces and associated runoff.

The existing drainage control system for WML consists of drainage channels, berms, down drains, energy dissipaters, and detention basins. Drainage control systems for the proposed project would be similar to the existing drainage control system, but would be modified, to the satisfaction of the Regional Water Quality Control Board, to differ slightly in contour, since the proposed project would have a higher ultimate elevation.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in a new significant impact nor result in a substantial increase in the severity of impacts from that described in the EIR.

Energy Conservation

FEIR

The Energy Conservation section 4.1.15 of the MLSLE FEIR determined that the current energy consumption of the landfill operations would not change. Energy use of the portable ancillary structures is far less that the amount of green energy produced by collection of landfill gas. Because the landfill results in a net generation of energy and the proposed height increase only increases this potential, only beneficial impacts are associated with the landfill.

Proposed Project

The proposed project is consistent with the MLSLE FEIR. The current energy consumption associated with landfill operations would not change. The landfill results in a net generation of energy, and the proposed height increase only increases the potential, only beneficial impacts are associated.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in a new significant impact nor a substantial increase in the severity of impacts from that described in the EIR.

VI. MITIGATION, MONITORING, AND REPORTING PROGRAM (MMRP) INCOPORATED INTO PROJECT

No project-specific mitigation measures are required for this project.

VII. SIGNIFICANT UNMITIGATED IMPACTS

The **Miramar Landfill Service Life Extension/Height Increase EIR No.122833/ SCH No.2006051004** indicated that there were no significant unmitigated impacts related to the project. The only direct impact would be the less than significant increase in visibility of the landfill. There were no cumulative impacts identified and no mitigation measures were incorporated.

The proposed project would not result in any additional significant impacts nor would it result in an increase in the severity of impacts from that described in the previously certified EIR.

VIII. CERTIFICATION

Copies of the addendum, the certified EIR, and associated project-specific technical appendixes, if any, may be reviewed by appointment in the office of the Development Services Department, or purchased for the cost of reproduction.

Mark Brunette, Senior Planner
Development Services Department

8/19/19
Date of Final Report

Attachments:

- Figure 1: Vicinity Map
- Figure 2: Project Location Map
- Figure 3: Landfill Lease Boundary with Land Use
- Appendix 1: Biological Resources Report
- Appendix 2: Cultural Letters Report
- Appendix 3: Transportation Assessment
- Appendix 4: Visual Report

Distribution:

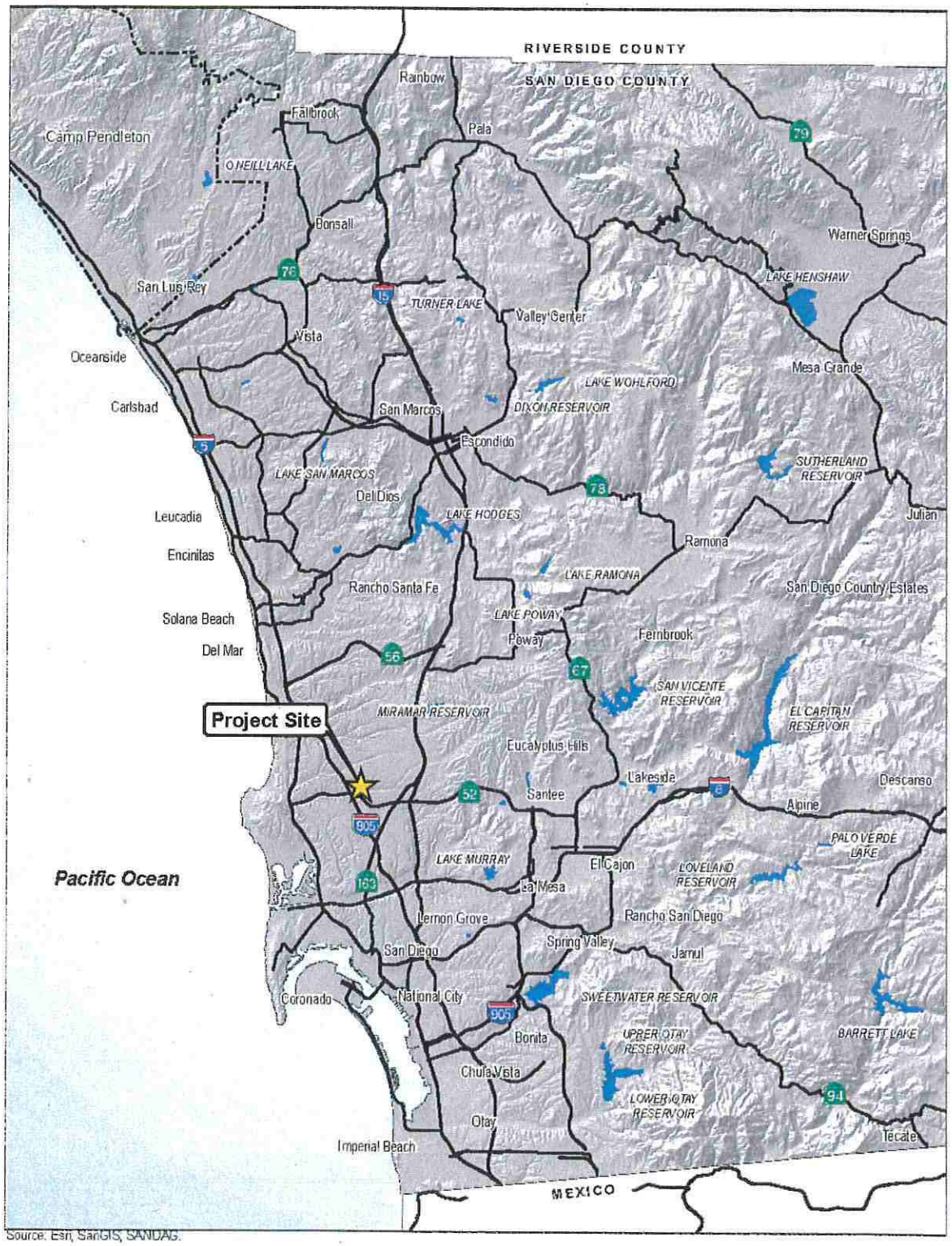
- City Attorney
- Mark Brunette, EAS
- Helene Deisher, Project Management
- Lisa Wood, Environmental Services
- Brian Panther, LEA

IX. REFERENCES

City of San Diego, 2008. Miramar Landfill Service Extension/ Height Increase Final Environmental Impact Report (Project No. 122833/SCH No. 2006051004). San Diego, California.

X. ACRONYMN LIST

ALUCP	Airport Land Use Combability Plan
BMPs	Best Management Practices
CEQA	California Environmental Quality Act
DOD	Department of Defense
EIR	Environmental Impact Report
EMS	Environmental Management System
ESD	Environmental Service Department
FAA	Federal Aviation Administration
FEIR	Final Environmental Impact Report
I-805	Interstate 805
INRMP	Integrated Natural Resources Management Plan
ISO	International Organization for Standardization
IWMB	Integrated Waste Management Board
LFGs	landfill gases
LLG	Linscott Law & Greenspan Engineers
MCAS	Marine Corps Air Station
MHPA	Multi-Habitat Planning Areas
MLSLE	Miramar Landfill Service Life Extension/Height Increase
MMRP	Mitigation Monitoring and Reporting Program
MSCP	Multiple Species Conservation Program
MSL	mean sea level
NOX	nitrous oxides
O_3	ozone
RWQCB	Regional Water Quality Board
SO_X	sulfur oxides
SR 52	State Route 52
TAC	toxic air contaminants
the City	City of San Diego
VOCs	volatile organic compounds
WDRs	waste discharge requirements
WML	West Miramar Landfill



Source: Esri, SanGIS, SANDAG.

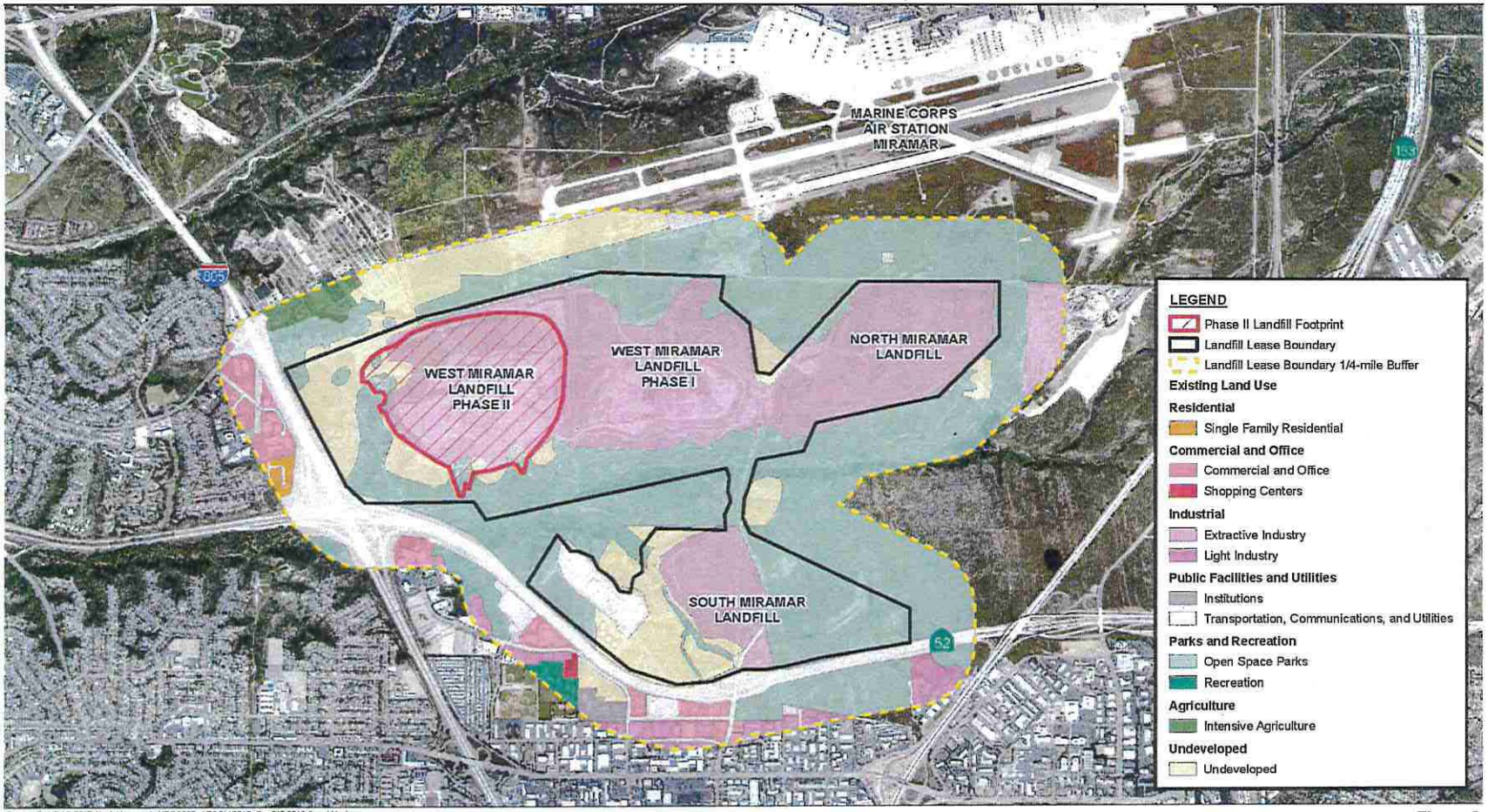
Figure 1
Vicinity Map

Source: SANDAG 2017 (Aerial Imagery); URS 2007; AECOM 2019.

2,000 1,000 0 2,000 Feet

Scale: 1:24,000; 1 inch = 2,000 feet

Figure 2
Project Location Map
West Miramar Landfill Phase II Height Increase



Source: SANDAG 2017 (Aerial Imagery); URS 2007; AECOM 2019; SanGIS 2019 (Land Use).

2,000 1,000 0 2,000 Feet

Scale: 1:24,000; 1 inch = 2,000 feet

Figure 3
Landfill Lease Boundary with Land Use
West Miramar Landfill Phase II Height Increase

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