Response to Comments
Table 1
URS Review of JTD (Including PCPMP) and CEQA

ORIGINAL

Table 1

Item #	JTD (Section, Page)*	JTD Text	EIR 2003 (Section, Page)	EIR 2003 -Text	Comment (JTD v. EIR 2003)	EIR 2007 (Section, Page)	EIR 2007	Comment (re: EIR 2007)	"Other" documents	Response/Discussion
1	A.2.1, p. A.2-1	1,770 acres	3.1, p. 3-1	1,770 acre	N/A	N/A	N/A	N/A	SWFP (Habitat Restoration Plan) 2.2, p. 2-1 -1,783 acres (discrepancy in acreage)	EIR p. 3-1describes the 1,770 cares owned by GCL and the approximately13 acres (rounded) owned by SDG&E that are proposed to be acquired. JTD text revised to refer to the 13.43 acres to be acquired from SDG&E.
2	A.2.1, p. A.2-1	308 acres	3.2, p. 3-5	Approximately 308 acres; Table 3-1 = 307.8	Minor acreage inconsistency	4.9, p. 4.9-14	308.6 acres	Minor acreage inconsistency	SWFP (Habitat Restoration Plan) 2.3, p. 2-1 -308.6 acres	JTD text revised to state 308.6 acres.
3	A.2.1, p. A.2-1	Two dairies (the Lucio and Verboom properties) were operated for a number of years within the property limits though neither operated within the proposed disposal area footprint	3.1, p. 3-4	...one dairy is operational on the site	Minor inconsistency (also see EIR 2003 Land Use section)	N/A	N/A	N/A	N/A	The discussions are not inconsistent. The JTD describes the historic uses, while the EIR describes the condition as of 2002 (the Lucio Diary had closed).
4	A.2.1, p. A.2-1	183 acres will be used for refuse disposal	3.1, p. 3-5	Table 3-1: landfill footprint 196.3 acres	Different numbers (global -196 figure seen thru EIR 2003). The EIR evaluation of a larger site is conservative.	N/A	N/A	N/A	N/A	The disposal area is 183 acres. The additional 13.1 acres is for the pads to be constructed for the relocated SDG&E power line right of way.
5	A.2.2, p. A.2-3	Gregory Canyon Limited will also be shown as the operator of record on all permits and approvals. Actual day-to-day operations at the site will be conducted by a contract operator.	N/A	N/A	EIR 2003 speaks generally of "an operator", no mention of "contract operator" for day-to-day operations in Project Description	N/A	N/A	EIR 2007 speaks generally of "an operator", no mention of "contract operator" for day-to-day operations in Project Description	NA	GCL will be listed as the operator under the SWFP and has compliance responsibility. Some functions, such as "cut and cover," are proposed to be contracted out.
6	A.2.2, p. A.2-3	Gregory Canyon Limited Certificate of President and Presiding Member of Gregory Canyon, Ltd. LLC (A.5)	3.1, p. 3-4	Gregory Canyon, Ltd.	Discrepancy in name	N/A	N/A	EIR 2007 uses Gregory Canyon, Ltd. In appendices	SWFP (Habitat Restoration Plan) 2.1, p. 2-1 -Gregory Canyon Ltd, LLC (Discrepancy in name used throughout doc (however, cover says Gregory Canyon Ltd.))	The official name of the entity is "Gregory Canyon, Ltd., a limited liability company. " While some abbreviations are used, there is no question that this is the entity that will own and operate the facility.
7	A.2.3, p. A.2-5	The proposed disposal area will provide approximately 30.731.1 million tons of refuse capacity	3.6.1, p. 3-60 ES3.2, p. ES-3	It is anticipated that an average of approximately 3,200 tpd, or 1.0 million tons annually, of waste will be deposited at the landfill over its site life with maximum peaks of 5,000 tpd experienced occasionally, based on the waste stream projections for North County. Accounting for the volume occupied by the containment system, daily, intermediate, and final covers, the estimated site life is approximately 30 years. ...with a 30-million ton capacity	JTD = 30.7 million tons, EIR 2003 implies 30.0 million tons in EIR Project Description (PD), indicates 30 million in ES	4.5.3.2, p. 4.5-9	N/A	JTD = 30.7 million tons, EIR 2007 also implies 30.0 million tons	N/A	EIR p. 3-60 provides for disposal capacity of 33.43 million tons; the JTD estimate is lower. Narrative discussions in the EIR provide approximations only. Latest capacity estimate dated January 2011 is 30.8 million tons; JTD to be revised accordingly.
8	A.2.3, p. A.2-5, Appx B-2	The project described in the JTD was downsized from the "proposed project" in the FEIR and as a result has less potential impacts than would occur from the "proposed project" in the FEIR. Appendix B-2 presents comparison information contained in the FEIR and JTD to show these changes. JTD App. B-2 indicates 49.44 mcy or 33.43 million tons (FEIR "Proposed Project")	3.6.1, p. 3-60	The total estimated refuse volume, based on a refuse to daily and intermediate soil cover volume ratio of 4:1, is approximately 49.44 49.52 mcy or 33.43 million tons based on an in-place refuse density of 1,350 lbs/cy	The extra digits in the EIR 2003 are a typo.	N/A	N/A	N/A	N/A	The JTD provides the most up to date information related to disposal capacity, which is less than the 33.43 million tons analyzed in the EIR.
9	A.2.4, p. A.2-6	Total PGM accepted as ADC may not exceed 20% of the amount of waste accepted for disposal each day	N/A	N/A	Info not included in EIR 2003 PD	N/A	N/A	Info not included in EIR 2007	N/A	JTD Section B.4.5.5.1 has been revised to reflect newer Title 27 regulations governing use of PGM as ADC; anticipated volume of ADC is now expected to be substantially less than the prior estimate of up to 20% of waste received. JTD text revised to delete last bullet in Section A.2.4.
10	B.1.2, p. B.1-3	A sand and gravel extraction operation was formerly located south of SR76 approximately 3,000 feet north of the proposed landfill footprint, but is now inactive.	3.1, p. 3-4 4.1, p. 4-4	H.G. Fenton Materials...a sand and gravel operation...located to the northeast The H. G. Fenton Materials, Inc. (formerly known as Fenton) sand and gravel mining operation is located south of SR 76 about 3,000 feet north of the proposed landfill footprint.	Contradicts (also see EIR 2003 Land Use section)	4.12, p. 4.12-2	Fenton Material currently used for sand and gravel operations	Contradicts	N/A	The JTD provides updated information that the Fenton Materials quarry is no longer operational.
11	B.1.4, p. B.1-3	13 acres for power pole pads.	3.1, p. 3-5	Table 3-1: Footnote a: includes 13.1 acres for the three SDG&E transmission pads	Minor -JTD rounds number	N/A	N/A	N/A	N/A	JTD text revised to state 13.1 acres.
12	B.1.4, p. B.1-3	The remaining 25 acres will be utilized for the main access roads and bridge, desilting basins, stockpile/borrow area, haul road and the ancillary facilities discussed in Section B.3. (stockpiles = to 87 acres -should not be included in this sentence; delete)	3.1, p. 3-5	Table 3-1: Ancillary Facilities Area (11.9 ac), access road and bridge (4.1 ac), borrow/stockpile haul road (3.1 ac), desilting basin E (1.8 ac), desilting basin W (3.7 ac) = 24.6 acres	Typo in JTD; Minor - JTD rounds number	N/A	N/A	N/A	N/A	JTD has more detail; JTD text revised to state 24.6 acres.

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13	B.1.4, p. B.1-4	Two additional parcels, totaling 13.43 acres, are within the overall project boundary but are owned and maintained by San Diego Gas and Electric (SDG&E).	3.1, p. 3-1	SDG&E owns two parcels totaling 13 acres	Minor -EIR 2003 rounds number	N/A	N/A	N/A	N/A	JTD has more detail and does not round; see response to Comment 1.
14	B.1.4, p. B.1-4	~~The landfill owner is in the process of acquiring these parcels.~~	3.1, p. 3-1	These parcels will be incorporated into the site area...resulting in a total size of approx. 1,766.5 acres	Info deleted from JTD	N/A	N/A	N/A	N/A	Property acquisition not included in regulatory requirements addressed in SWFP or WDR's, therefore discussion not needed for JTD. LEA had recommended deletion.
15	B.1.5.1, p. B.1-5	Though the service area has not been determined, it is anticipated that the GCLF will serve the North County area of San Diego County.	2.1, p. 2-1	(Objective) Provide a Class III solid waste disposal facility that is locally available, cost effective, and provides a long-term solution (i.e., 25 years) for disposal of waste generated in North County jurisdictions.	EIR more definitive that the objective is to serve North County	N/A	N/A	N/A	N/A	No inconsistency - the primary market area is expected to be North County, but other areas may also be served. EIR discussion is a statement of general intent in the project description and the JTD is a description of anticipated operations.
16	B.1.6, p. B.1-11	Site Capacity Section.	3.6.1, p. 3-60	Wastestream Characteristics and Volumes	Conflicting numbers (But JTD App. B-2 updates these)	N/A	N/A	N/A	N/A	The JTD provides the most up to date information related to disposal capacity - 30.8 million tons, which is less than the 33.43 million tons analyzed in the EIR.
17	B.1.8, p. B.1-13	Bullet list of vehicles includes 3 types of water trucks.	3.4.2, p. 3-32	Table 3-3: Bullet list on p-32 lists no water trucks; Table 3-3 lists only 5,000 Gallon Water Truck;	Consistency	4.5.3.2, p. 4.5-12	in contrast to previous traffic studies for the project, implementation of water trucks...	consistent with JTD in that water trucks are noted; however, not updated in Project Description	N/A	The JTD provides greater detail. Trip limits in EIR MM's are per vehicle (e.g. 675 trips per day) with no distinction between vehicle size.
18	B.1.8, p. B.1-14	Mitigation measures related to the early warning system for both daily and hourly traffic restrictions are contained in Mitigation Measures 4.5-2 and 4.5-3 of the EIR.	Section 3, 4.5	N/A	Example of Different MM #s between 2003 and 2007 EIRs	N/A	N/A	JTD intended to use 2007 MMs numbering in JTD	N/A	The MMRP as updated in the 2007 RFEIR is utilized for the JTD, since it is the most recent compilation of MM's.
19	B.1.8, p.B.1-13, 15	Implementation of the daily traffic restriction is set forth in Mitigation Measure MM 4.5-2 of the EIR...4.5-3 of the FEIR.	MM 4.5-2	MM 4.5-3	Example of different MM #s	N/A	N/A	JTD intended to use 2007 MMs numbering in JTD	N/A	The MMRP updated in the 2007 RFEIR is utilized for the JTD, since it is the most recent compilation of MM's.
20	B.1-7	14 CCR, Section 17354	Ch. 4-15, p. 15	EIR states "14 CCR, Section 1354" instead of "14 CCR, Section 17354" for tire storage on site.	Apparent typo in EIR					JTD has correct citation.
21	B.2.2.3, p. B.2-4	A revised Siting Element was prepared and approved by the County of San Diego on January 5, 2005 and approved by the CIWMBCalRecycle on September 20-21, 2005.	4.1, p. 4.1-16	The CIWMP (approved and adopted September 16, 1996 by the County Board of Supervisors) The County Siting Element, which is part of the CIWMP.	Updated siting element	4.1.3.9, p. 4.1-1	CIWMB approved the CIWMP for SDCo. On Feb. 12, 1997...Countywide Siting Element...approved by the CIWMB on September 21, 2005	consistency	N/A	The JTD provides updated information. The 2005 Siting Element is noted in the 2007 RFEIR and is contained in the administrative record compiled in support of the 2007 RFEIR.
22	B.3.1, p. B.3-1	The temporary facilities, such as scales and structures, will be replaced with permanent facilities within three years of the initial receipt of waste.	N/A	N/A	Not ID'ed in PD	N/A	N/A	N/A	N/A	The JTD provides greater detail.
23	B.3.1.1, p. B.3-1	In addition, the improvements will widen the roadway from 52 to 64 feet to provide for an eastbound deceleration lane and a westbound turn lane into the GCLF. The proposed access road from SR 76 will be two to three lanes, approximately 32-36 feet wide and will include a bridge over the San Luis Rey River.	ES3.2, p. ES-5	The improvements include an increase in pavement width west of the access road to 48 feet to provide for an eastbound deceleration lane, and pavement improvements east of the access road to a width of 36 feet to accommodate a westbound left turn lane. The proposed access road from SR 76 to the ancillary facilities area is a two to three lane paved road, 32 to 44 feet wide.	Minor inconsistency in Road lengths	N/A	N/A	Consistent with JTD	N/A	The JTD provides greater detail. The wider right of way on SR 76 is accounted for within the 308.6 acre disturbance from the project, which was verified in the 2007 RFEIR.
24	B.3.1.1, p. B.3-2	A bridge, approximately 681 feet in length, supported by five large diameter piers.	3.2.3, p. 3-14	A bridge, approximately 640 feet in length, with five sets of two piles each (for a total of ten piles).	Minor inconsistency	N/A	N/A	N/A	N/A	The longer bridge span was adopted to avoid any requirement for permanent dredge and fill in the San Luis Rey River channel, beyond the support pillars, reducing the environmental impacts to riparian areas analyzed in the EIR. The acreage of permanent fill for the bridge pillars is the same under both pillar configurations, less than .01 acres, which was confirmed in the 2010 Addendum.
25	B.3.1.4, p. B.3-4	A 10,000-gallon water tank will be constructed within Borrow-Stockpile Area B to provide water for dust control related to excavation or placement of soil at this location. The water tank would be continuously refilled from proposed percolating groundwater wells located at the western edge of Borrow/Stockpile Area B.	N/A	N/A	Not ID'ed in PD	N/A	N/A	N/A	Addressed in 2009 addendum	The JTD provides greater detail. Potential impacts were analyzed in the 2009 Addendum.

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26	B.3.1.4.1, p. B.3-5	Based on a more recent evaluation of water needs, the operator has determined that it can purchase clay liner material pre-conditioned at the clay mine, eliminating the requirement for the 125,000 gallons per day of water. In addition, the operator will implement the widespread use of chemical dust suppressants for unpaved roads on the landfill site.	N/A	N/A	Not ID'ed in PD or 4.3	N/A	N/A	N/A	Addressed in 2009 addendum	The JTD provides greater detail. Potential impacts were analyzed in the 2009 Addendum.
27	B.3.1.5, p. B.3-6	The operations support facilities will consist of an office building to be used for administrative functions, a maintenance building, an equipment and storage area, a parking area for employees and visitors, a water tank, portable toilets, and a concrete pad used for temporary storage of source separated recyclable goods, which will be transported off-site periodically.	N/A	N/A	PD mentioned a recyclable area with bins for drop-off -minor inconsistency.	N/A	N/A	N/A	N/A	The JTD provides greater detail.
28	B.3.1.8, p. B.3-7	At this location, the LCRS outfall will discharge into one of two 10,000-gallon leachate storage tanks. The outfall pipe is connected to up to two 10,000-gallon leachate collection storage tanks located in the southwest corner of the ancillary facilities area. (B.5.1.1.2, p. B.5-3). The outfall pipe will discharge to two 10,000-gallon leachate collection storage tanks located in the southwest corner of the ancillary facilities. (C.2.5.4, p. C.2-12). Leachate will flow from the outfall to two above ground tanks with a minimum storage capacity of 20,000 gallons (C.2.5.4.1, p. C.2-13).	3.2.4, p. 3-19	Two 10,000-gallon leachate holding tanks and one 10,000-gallon subdrain water tank will be located in the southwestern corner of the ancillary facilities area.	Minor inconsistency. JTD reasonably assumes that the EIR language intent is that the two tanks are the maximum, not minimum.	N/A	N/A	N/A	N/A	The JTD provides greater detail. The need for a second leachate holding tank will be determined based on actual leachate generation. Construction may be less than assumed for the EIR impacts analysis.
29	B.4.1, p. B.4-1	Traffic coming to the site before the hours of operation will be queued on the access road up to the fee booths/scales to prevent stacking of vehicles on SR76. To accommodate the queuing, the gates located at the north side of the bridge will be opened one hour prior to the hours of operation. Therefore, the entrance gates will be opened at 6:00 a.m. Monday through Friday, and 7:00 a.m. on Saturday. (B.5.5, p. B.5-43).	N/A	N/A	Minor inconsistency. It is reasonable to assume that opening the gate is not considered "operating".	N/A	N/A	N/A	N/A	Agreed, under 27 CCR 20164 "operating" refers to the placement of waste in a waste management unit
30	B.4.2.1, p. B.4-2	Actual staffing is dependent on the waste inflow rate. This level of staffing is based on handling the average (3,200 TPD) to peak (5,000 TPD) tons per day received.	3.4.9, p. 3-39	The number of employees needed to operate and maintain a sanitary landfill is dependent on the hours a facility is open, the daily tonnage received, and the overall areas to be maintained.	Minor inconsistency	N/A	N/A	N/A	N/A	JTD text revised to be consistent with EIR discussion.
31	Table 6, p. B.4-2	Traffic Director/Spotter = 2; Recycled Water Supervisor = 1; Total = 22	Table 3-2, p. 3-40	Traffic Director/Spotter = 1; Total = 20	Minor inconsistency	N/A	N/A	N/A	N/A	The JTD provides greater detail. The use of recycled water was not incorporated into the project until the 2007 RFEIR. Recycled water supervisor is included as a project design feature. The additional traffic spotter will better facilitate movement on internal roads. Additional traffic trips from additional employee vehicles must still stay within daily and hourly limits.
32	B.4.4.1.1, p. B.4-7 B.5.3.1, p. B.5-37	Excavated rock will be stored on-site for future use, or ground for use as daily or intermediate cover., or used as base material for the internal haul roads. Any excess material may be exported offsite. Most unpaved haul roads will be constructed with a non-toxic soil sealant, which is thoroughly mixed into the uppermost six inches of the road, and then maintained periodically with a topical application of soil sealant.	3.4.6, p. 3-38	Crushed rock will be stored for future use, ground for use as daily or intermediate cover or for use on the internal haul roads, and any excess material could be exported off site for sale if a MUP is obtained.	EIR analysis includes the potential to export rock and to use crushed rock for roads. This is has been removed from the JTD.	N/A	N/A	N/A	N/A	Even though analyzed in the EIR, GCL does not intend to export rock off-site for sale.
33	B.4.4.5.1, p. B.4-15	The use of ADC has been shown to reduce refuse-to daily/intermediate cover ratios from 4:1 to 7:1. The use of ADC has been shown to reduce refuse-to daily cover ratios from 4:1 to at least 7.5:1 (C.2.2.2, p. C.2-3 & Table 9A, p. C.2-4).	3.4.5.1, p. 3-38	The use of ADC has been shown to reduce refuse-to-daily cover ratios from 4:1 to 7:1.	7:1 v 7:5.1 (conflict between JTD sections, and JTD and EIR 2003)	N/A	N/A	N/A	N/A	The JTD provides greater detail, and the discussion is based on a recent detailed review of soil balance, and incorporation of modern techniques to reduce cover use. URS found the assumptions and conclusions reasonable.
34	B.4.4.8, p. B.4-17 JTD Appx. B-2	Assuming a 4:1 cover ratio, approximately 11.5 4 million cubic yards (mcy) would be needed for daily operations during the life of the landfill. An additional 1.21 52.7 mcy of material will be necessary to provide for canyon shaping, the operations layer and final cover over for the site. The total anticipated soil requirement, including cover, would be 12.914.1 mcy. The proposed landfill development will include the excavation of approximately 7.9 mcy within the landfill footprint, of which approximately 4.9 mcy consists of topsoils, alluvium/colluvium, or weathered bedrock and rippable hard rock that would be suitable for cover material with limited processing required, primarily crushing of the rippable hard rock.	6.7.2.1, p. 6-76	The quantity of excavated rock and soil material would be about 7.93 million cubic yards (mcy), of which 1.48 mcy would be used in the formation of the landfill bottom prior to placement of the containment system. This alternative would reduce total excavation for the project by approximately 3.5 mcy in comparison to the proposed project. Approximately 6.44 mcy of rock and soil material would be available from the refuse footprint area and 4.5 mcy would be available from the stockpile/borrow areas for use as final, intermediate and daily cover soil. The amount of cover material needed for daily, intermediate, and final cover is estimated at 12.7 mcy.	Inconsistency and rounding.	N/A	N/A	N/A	N/A	The JTD provides an updated, broader and more detailed discussion of soil availability and uses. The updated estimate of soil needs is less than assumption analyzed in EIR (EIR assumed 14.2 mcy for cover and canyon shaping, while JTD estimate is 14.1 mcy for cover, canyon shaping and operations layer). URS found the assumptions and conclusions reasonable, and concurred that adequate soil for all purposes would be available on-site. Estimated capacity of soil stockpile areas in EIR and JTD is the same.

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35	B.4.4.8, p. B.4-18	Based on drilling conducted on the site, approximately 60 percent of the material excavated from the landfill footprint, or 3.9 mcy, could be used directly as cover material.	3.4.5.1, p. 3-37	Based on drilling conducted on the site, approximately 40 percent of the stockpiled 9.8 mcy of material excavated from the landfill footprint, or 3.9 mcy, could be used directly as cover material.	Deleted from JTD	N/A	N/A	N/A	N/A	Discussion deleted to reflect updated solid balance analysis. Weathered bedrock and rippable bedrock is considered suitable for use directly as cover material. Material from landfill excavation that could be used directly for cover, 4.9 mcy of 7.9 mcy, as discussed in the JTD, is consistent with the 60% assumption based on drilling. 9.8 mcy excavation discussed in EIR was for the proposed project, not the selected project alternative which provided for reduced excavation. Deeper excavation for proposed project analyzed in the EIR would produce higher percentage of rock.
36	B.4.4.8, p. B.4-18 JTD Appx. B-2	Therefore, approximately 89.4 mcy of material will be available on-site for cover, leaving a shortfall of readily useable material over the life of the project of 3.54.7 mcy.	6.7.2.1, p. 6-76	Approximately 6.44 mcy of rock and soil material would be available from the refuse footprint area and 4.5 mcy would be available from the stockpile/borrow areas for use as final, intermediate and daily cover soil.	Inconsistency between JTD text, Appx B-2 and EIR.	N/A	N/A	N/A	N/A	The JTD provides greater detail, and the discussion is based on a recent detailed review of soil balance. URS found the assumptions and conclusions reasonable. See comments 33, 34 and 35.
37	B.4.6.3, p. B.4-20	Two-way handheld radios will be used for communication purposes at the ancillary facilities to the staff located at the working face or other locations around the landfill property boundary.	N/A	N/A	Not ID'ed in PD	N/A	N/A	N/A	N/A	The JTD provides greater detail.
38	B.4.6.4, p. B.4-20	All lighting at the GCLF will comply with the County Light Pollution Code.	4.1, p. 4.1-15	San Diego County Light Pollution Ordinance.	Minor consistency	N/A	N/A	N/A	N/A	JTD text revised to use "Ordinance."
39	B.4.6.4, p. B.4-21	Lighting will be low impact, focused, and shielded to minimize spill light into the night sky or adjacent properties and to avoid significant impacts to biological resources.	3.2.4, p. 3-21	Lighting will be low impact, focused, and shielded to minimize spill light into the night sky or adjacent properties.	Additional info added to JTD text.	4.9, p. 4.9-6	N/A	consistent with JTD	N/A	The JTD provides greater detail, and would be more protective of biological resources.
40	B.5.1.3, p. B.5-15	If a new non-constituent is identified in any sample, the LCRS will be resampled in April of the following year for each non-COC.	3.5.2.3, p. 3-53	Any constituent identified in the October leachate sample that is not currently included as a water quality monitoring parameter and is confirmed to be present by a retest sample collected and analyzed in April of the following year will be added to the list of routine (quarterly) water quality monitoring parameters.	April deleted in JTD text	N/A	N/A	N/A	N/A	Revised JTD text would provide for more prompt action to confirm discovery of a new constituent in the LCRS, and if confirmed the constituent would be added to the parameters for quarterly groundwater monitoring.
41	B.5.1.3.1, p. B.5-13	The water quality monitoring program will also include monitoring in the San Luis Rey River valley from an upgradient replacement well Lucio #2R located at the Lucio Dairy near the eastern property boundary and three wells downgradient of the project area including wells GMW-3; SLRMWD #34R, a replacement well adjacent to and slightly south of existing well SLRMWD#34 (SLRMWD designation); and well GLA-16 within the San Luis Rey River valley.	4.3, p. 4.3-27	The water quality monitoring program will also include monitoring in the San Luis Rey River valley from existing Lucio Dairy well #2 and well GMW-3, located upgradient of the project area, and wells #34 (SLRMWD designation), and GLA-16 downgradient of the facility relative to groundwater flow direction.	Contradicts	N/A	N/A	N/A	N/A	JTD is correct, GMW -3 is a downgradient well.
42	B.5.1.3.1, p. B.5-13	The groundwater monitoring system at the GCLF was initially designed to include a total of 20 wells, 16 of which monitor the bedrock fractured flow system...Additional groundwater monitoring wells have been proposed to reflect Dr. Huntley's recommendations (Appendix C-2), and the revised workplan is included in Appendix C-2. The water quality monitoring program will also include monitoring in the San Luis Rey River valley from an upgradient replacement well Lucio #2R located at the Lucio Dairy near the eastern property boundary and three wells downgradient of the project area including wells GMW-3; SLRMWD #34R, a replacement well adjacent to and slightly south of existing well SLRMWD#34 (SLRMWD designation); and well GLA-16 within the San Luis Rey River valley.	Table ES-1, p. ES-12	in addition to the 13 monitoring wells surrounding the landfill, the water quality monitoring shall include at a minimum monitoring of two production wells (downgradient SLRMWD well #34 and upgradient Lucio well #2), upgradient alluvial monitoring well GMW-3, and downgradient alluvial monitoring well GLA-16 located within the project boundary).	Consistency	N/A	N/A	N/A	N/A	The JTD provides for an expanded groundwater monitoring system. GMW -3 is a downgradient well.
43	B.5.1.8, p. B.5-25	If necessary, the effluent (clean water) will be stored in a tank and then discharged into the San Luis Rey River or used on site and would meet a standard of 500 parts per million (ppm) of TDS or a standard as set by the RWQCB for discharge to the San Luis Rey River.	5.3.2.3, p. 3-54	If necessary, the effluent (clean water) will be stored in a tank and then used for dust control onsite, or with approved permits, discharged to re-injection wells, or discharged into the San Luis Rey River. The water would meet a standard of 500 parts per million (ppm) of TDS.	Minor inconsistency.	N/A	N/A	N/A	N/A	The JTD reflects updated information regarding standard setting by RWQCB for TDS, which reflects existing conditions in the water basins and sets levels that will preserve existing ambient levels. This is an issue unrelated to both the SWFP and WDR's.
44	B.5.2.3.1, p. B.5-29 Figure 10D	The gas migration monitoring system at GCLF will ultimately consist of 14 probes spaced at approximately 1,000-foot centers around the entire refuse prism.	3.5.3, p. 3-42 Exhibit 3-3	As required in 27 CCR Section 20925(b), a system of landfill gas migration monitoring probes will be installed on 1,000-foot centers around the entire refuse prism to detect gas migration at the property boundary...The 15 probes.	Inconsistent. However, even with fewer probes, the JTD presents a more conservative design as the probes closer to the landfill boundary and will allow earlier detection of landfill gas migration.	N/A	N/A	N/A	N/A	JTD text, Sections B.5.2.3.1 and C.2.7.3, and Figure 10D, have been revised to indicate that 14 probes and two temporary probes are proposed. No significant difference from design analyzed in EIR, and more protective.

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45	B.5.3, p. 5-33	Mitigation Measures included in the MMRP from the Certified FEIR are included in Appendix D-2 of the JTD.	N/A	N/A	Suggest consolidation, as multiple sets of varying MMs in several places	N/A	N/A	N/A	N/A	The MMRP's are in both the SWFP application and JTD Appendix D-2. A copy will remain in each document as they are considered separate and not companion documents. This was the "significant" issue raised by URS in the narrative portion of its report.
46	B.5.3.1, p. B.5-36	Traffic speeds of no more than 15 miles per hour will be maintained on all on-site, unpaved road surfaces.	3.5.8, p. 3-59	Traffic speeds of no more than 10 miles per hour will be maintained on all on-site, unpaved road surfaces.	15 v. 10	N/A	N/A	N/A	N/A	JTD text revised to provide for speed limit of 10 mph on unpaved roads.
47	B.5.3.1, p. B.5-36	The main access road will be paved and swept regularly with a wet sweeper.	3.5.8, p. 3-59	The main access road will be paved until the last 500 feet of the road and will be swept regularly.	EIR 2003 has 500'	N/A	N/A	N/A	N/A	JTD text revised to state that main access road is to be paved up to the last 500 feet.
48	B.5.3.1, p. B.5-36	In addition, wheel wash trackout controls may also be installed as needed to meet APCD requirements. Most unpaved haul roads will be constructed with a non-toxic soil sealant, which is thoroughly mixed into the uppermost six inches of the road, and then maintained periodically with a topical application of soil sealant. Topical application would occur as needed, at an estimated frequency of between quarterly and biennially.	FN1, p. 3-5	Proposition C identified a truck wash and wash water treatment area, which was originally proposed in the ancillary facilities area, but has been removed. Rather than use a water dependent approach for tire wash, thereby increasing runoff, dry best management practices (BMPs), such as sweeping, the physical removal of loose impediments (i.e., good housekeeping practices), and the use of absorbents will be incorporated. Other features, such as berms around the fueling area and hazardous waste storage area will remain. Equipment maintenance will be conducted within an enclosed building. A Hazardous Waste Exclusion Program will be implemented on the site.	Suggest revision as follows to be consistent with EIR "...wheel wash trackout controls with appropriate runoff BMPS...".	N/A	N/A	N/A	N/A	JTD text revised consistent with suggested language.
49	B.5.3.3, p. B.5-38	Litter migrating off-site will be minimized by perimeter fencing. The operator has also proposed the installation of a 12-foot high litter fence along the bridge deck to control litter from waste collection vehicles from reaching the San Luis Rey River (a memorandum providing litter fence detail is included in Appendix T).	N/A	N/A	Minor inconsistency. Information/level of design detail not included in the EIR PD.	N/A	N/A	N/A	N/A	The JTD provides greater detail. These additional project details will minimize impacts from litter.
50	B.5.3.4, p. B.5-39	Such as berms or acoustical curtains, are used to reduce combined landfill noise levels to below the County Noise Ordinance limit.	4.6, p. 4.6-38	A 15-to 20-foot high berm will be constructed and maintained along the northern boundary of Borrow/Stockpile Area A from the haul road westward wrapping around the western boundary of Borrow/Stockpile Area A. Five-foot high berms will be constructed along the southern edge of the Borrow/Stockpile Area B and the landfill working face, which face the residential zoned property south of Gregory Canyon Landfill. A 10-to 16-feet high sound wall will be constructed along the northern edge of the facilities.	Level of specificity	N/A	N/A	N/A	N/A	Noise control is not a matter addressed in the SWFP or WDR's, and for that reason is not discussed at the same level of detail in the JTD as it was in the CEQA documents.
51	B.5.4, p. B.5-41	The drainage control system for the GCLF will consist of a variety of treatment BMP's, which may include perimeter drainage systems for the open channels (for adjacent area run-on) and buried pipe (for run-off from the landfill footprint), drainage berms, downdrains, energy dissipaters, desilting basins, drainage swales, structural media filtration, bio-treatment swales and percolation areas.	3.5.2.2, p. 3-47	This system will consist of a buried drainage pipe, engineered grading, drainage berms, downdrains, and energy dissipaters, and two desilting basins.	Minor inconsistency	N/A	N/A	N/A	N/A	The JTD provides greater detail. These additional project details will provide for greater protection of water quality and avoid hydromodification (see JTD Appendix I-1).
52	B.5.4, p. B.5-41	The surface water drainage control system for the GCLF is designed to accommodate a 100-year, 24-hour storm event run-off volumes and the volume of water caused by a simultaneous rupture of the existing Pipeline 1 and 2 and the future Pipeline 6.	3.5.2.2., p. 3-44	The surface water drainage control facilities are designed to carry 100-year, 24-hour storm event runoff volumes.	Inconsistency but JTD design is more conservative.	N/A	N/A	N/A	N/A	The JTD provides greater detail, its description is correct, and design is more conservative. URS found design assumptions for perimeter drainage system were reasonable.
53	C.2.1, p. C.2-1	All of the engineering plans reflecting the landfill are conceptual in nature and subject to change.	N/A	N/A	Minor inconsistency. "conceptual" used in EIR PD; however, "subject to change", though implied is not stated.	N/A	N/A	N/A	N/A	"Conceptual" clearly implies "subject to change."
54	C.2.2.1, p. C.2-1	The excavation plan shown on Figure 12 presents final subgrade contours and limits of excavation. The overall interior slope gradient will be 2:1 and the flatter bottom areas will have a minimum gradient of 5 percent.	3.2.1, p. 3-10	The bottom area of the footprint will be graded to drain northerly at a minimum gradient of three percent	Minor inconsistency. JTD more conservative.	N/A	N/A	N/A	N/A	The JTD provides greater detail, and as noted is more conservative.
55	C.2.2.4, p. C.2-4	Stockpile Area A = ~22 acres, Stockpile Area B = ~65 acres = 87 acres total.	3.1, p. 3-5	Table 3-1: Stockpile Area A = 22.4 acres, Stockpile Area B = 64.5 acres = 86.9 acres total	Minor -JTD rounds number	N/A	N/A	N/A	N/A	JTD text revised to use 22.4 and 64.5 acres, respectively.
56	C.2.2.4, p. C.2-4	The maximum height of the Borrow/Stockpile Area B ranges from about 940 to 1,020 feet amsl.	3.2.2, p. 3-13	Borrow/Stockpile Area B will have two decks, with a maximum elevation of 1,020 feet.	Minor inconsistency	N/A	N/A	N/A	N/A	The JTD provides greater detail, and reflects that the height of Borrow-Stockpile Area B will change as material is utilized. The maximum height is consistent.
57	C.2.2.4, p. C.2-5	Borrow/Stockpile Area A will be used for stockpiling or excavated material during the initial construction after which the area will be graded to promote proper drainage, and then revegetated with native plant species. Borrow/Stockpile Area A will then not be used again until the last few years of landfill operations about year 25 at which time material will be removed from Area A and utilized for cover.	3.2.2, p. 3-13	Borrow/Stockpile Area A will be used for stockpiling during the initial construction after which the area will be revegetated with native plant species. Area A will not be used again until about year 25 at which time material will be used from Area A for cover.	Minor inconsistency	N/A	N/A	N/A	N/A	The JTD clarifies that use of Borrow/Stockpile Area A is not tied to a specific operating year, which is not inconsistent with the EIR since the term used was "about year 25."

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58	C.2.5.3.1, p. C.2-12	Modeling indicates that the leachate generation will peak at approximately 9,250 gallons per day.	4.3, p. 4.3-21	The peak daily leachate generation is estimated to be 142 ft3 (1,062 gallons) for the floor areas and 1,094 ft3 (8,184 gallons) for the slope areas during the 16th year	Minor -JTD rounds number	N/A	N/A	N/A	N/A	JTD text revised to state 9,246 gallons.
59	C.2.8.3.4, p. C.20-20	Revised Universal Soil Loss Equation (RUSLE).	3.5.2.2, p. 3-48	Universal Soil Loss Equation (USLE)	Typo in EIR 2003	N/A	N/A	N/A	N/A	JTD reference to RUSLE is correct.
60	C.2.8.3.4, p. C.20-21	J. Ateshian...The equation (R=16.55xP2.2) utilizes 2-year, 6-hour rainfall data (P), and the product R is used in the RUSLE equation to estimate potential silt volumes sediment loading.	FN22, p. 3-48	J. Ateshian...The equation (R=16.55xP2.2) uses two-year, six-hour rainfall data (P), and the product R is used in the USLE equation to estimate potential silt volumes.	Minor inconsistency	N/A	N/A	N/A	N/A	JTD reference to RUSLE is correct.
61	C.2.9.2.2, p. C.2-29	It is anticipated that the initial excavation will be completed in an area of approximately 50 acres with approximately 34 acres lined to accommodate the first million tons of refuse received at the CCLF.	3.3.1, p. 3-27 3.6.2.1, p. 3-61	The EIR includes the following for the Proposed Project, but no details are presented related to the phasing for the Alternative that was selected. The initial construction of the project includes: Excavation of approximately 25 acres of Phase I of the landfill footprint. The Phase I area will be divided into three smaller stages (Stages IA, IB, and IC).	Level of detail	N/A	N/A	N/A	N/A	The JTD provides updated and more detailed phasing information. The phasing in the EIR was for the proposed project, not the selected alternative.
62	C.2.9.3.2, p. C.2-32	Phase II will be excavated to a depth of approximately 525 feet amsl or 25 feet below ground level during filling of Phase I. The total Phase II excavation is approximately 3.7 mcy. .Phase II gross fill capacity is approximately 6.3 mcy.	3.6.2.2, p. 3-64	The EIR includes the following for the Proposed Project, but no details are presented related to the phasing for the Alternative that was selected. The total Phase II excavation is approximately 6.4 mcy as shown on Exhibit 3-20. Phase II gross capacity will be approximately 10.8 mcy.	Level of detail	N/A	N/A	N/A	N/A	The JTD provides updated and more detailed phasing information. The phasing in the EIR was for the proposed project, not the selected alternative.
63	C.2.9.4.2, p. C.2-33	Once the Phase II excavation is complete two small final phases of excavation (Phases III and IV) are proposed prior to and in conjunction with Phase III fill operations	3.6.2.3, p. 3-64	During filling of Phase II, excavation of Phases III and then IV will begin.	Minor inconsistency	N/A	N/A	N/A	N/A	The JTD provides updated and more detailed phasing information. The phasing in the EIR was for the proposed project, not the selected alternative.
64	C.2.9.4.4, p. C.2-34	Phase III will provide approximately 43.1 mcy of gross airspace	3.6.2.3, p. 3-64	The EIR includes the following for the Proposed Project, but no details are presented related to the phasing for the Alternative that was selected. Phase III and IV fill sequences will provide approximately 43.6 mcy of gross capacity.	Level of detail	N/A	N/A	N/A	N/A	The JTD provides updated and more detailed phasing information. The phasing in the EIR was for the proposed project, not the selected alternative.
65	D.3.3, p. D.3-2	Figure 28 shows the annual wind speed and directions as recorded at the nearest meteorological station. As indicated, predominant winds are from the west quadrant with an annual mean speed of 6.60 miles per hour (see Figure 28). Winds from the southwest and west-northwest are also common. Weather data is recorded at the McClellan-Palomar Airport...The land/sea breeze is primarily easterly/westerly while the canyon topography is oriented north/south. Winds within the canyon are predicted to be light due to the conflicting perpendicular flow regimes. Wind directions in the canyon normally follow a pattern of weak south to north drainage at night, a light sea breeze from the south-southwest during the morning, and a strengthening onshore flow from the northwest beginning midday and continuing until late evening. The ridgeline east of Gregory Canyon also protects the canyon from the occasional Santa Ana winds that blow from the northeast.	4.7.1.1, p. 4.7-1	Weather data, including surface and upper air measurements, are routinely recorded at Miramar Marine Corps Air Station, the meteorological station nearest the project site....predominant winds at Miramar are from the northwest quadrant...	consistency-McCellan-Palomar data in JTD v. Miramar data in EIR 2003 –different wind roses shown of figures in JTD and EIR – different predominant winds, etc. Also note Exhibit 4.7-1 in EIR 2003 displays the Miramar wind rose. Miramar is over 10 miles further from the landfill site than McCellan-Palomar.	N/A	N/A	N/A	N/A	N/A	The JTD included more recent meteorological data from a monitoring station closer to the site, which would provide a more accurate representation of site conditions.
66	D.4.2.1, p. D.4-7	Table: References GLA (1998)	Table 4.2-1, p. 4.2-12	References GLA (1997)	consistency (Note -did not check all references, simply noticed this one)	N/A	N/A	N/A	N/A	JTD text revised to use consistent date.
67	D.5.1.2, p. D.5-6	There are 26 bedrock monitoring wells within the proposed landfill footprint and along the periphery of the site.	4.3.1.3, p. 4.3-8	There are 20 bedrock monitoring wells within the proposed landfill footprint and along the periphery of the site.	Consistency	N/A	N/A	N/A	N/A	The JTD provides for an more robust and extensive groundwater monitoring program than analyzed in the EIR.

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68	D.5.2, p. D.5-17	Regional Groundwater Quality. Water quality data for wells in the Pala Hydrologic Subarea are sparse. One key indicator of groundwater quality is the total dissolved solids (TDS) concentration. As a result, for aesthetic reasons (i.e., taste, odor, appearance), the state has recommended that the TDS concentration be no greater than 500 mg/l in drinking water supplies. Currently, TDS concentrations in SDCWA imported supplies range from about 500 to 700 mg/l (SDCWA, 1997). Based on available groundwater quality data, the alluvial aquifer in the Pala Basin is good, with groundwater concentrations of TDS estimated in the range of 200 to 860 mg/l (J.A. Moreland, 1974) compared with 600 to 3,400 mg/l TDS for the Bonsall Basin. The average TDS concentration for the Pala Basin is estimated to be 600 mg/l (NBS Lowry, 1995)...Then, beginning in December 2000, samples were collected quarterly for one year from 15 bedrock wells and four alluvial wells, and analyzed for the full suite of "constituents of concern" (COCs) as defined by the Code of Federal Regulations	N/A	N/A	The JTD information is more robust as a majority of detail from this section not in not in 4.3	N/A	N/A	N/A	N/A	The JTD provides greater detail.
69	Figure 12	Excavation contours between 380 and ~925 feet	6.7.2.1, p. 6-76	The lowest depths of excavation for the Prescriptive Design with a Double Liner Alternative range from between approximately 400 feet above mean sea level (amsl) at the northern toe of excavation to approximately 700 feet amsl at the southern toe.	Minor inconsistency	N/A	N/A	N/A	N/A	The JTD provides greater detail. Liner construction will maintain the required 5-foot separation from groundwater. 380 feet amsl and approximately 400 feet amsl for excavation at lower end of canyon is not significantly different. JTD reflects less excavation at upper end of canyon.
The following inconsistencies between the various CEQA documents were observed during the JTD/CEQA consistency review:										
A	N/A	N/A	MM 4.5-1, p. 10-13	...This analysis shall not be extended west...	N/A	MM 4.5-1, p. 10-6	This analysis shall be extended west...	Discrepancy bet MMs, however, no highlight/underline in 2007 document to ID this. Consolidate MMs to eliminate transcription errors?	N/A	This was the "significant" issue raised by URS in the narrative portion of its report. The MMRP as updated in the 2007 RFEIR is utilized for the JTD, since it is the most recent compilation of MM's. The 2007 revision provides for a potentially expanded scope of structural analysis if the Palomar Quarry did not become operational. This is now moot, as the quarry is currently operating.
B	N/A	N/A	MM 4.5-2, p. 10-3	At the commencement of operation, the project applicant shall make a fair-share contribution for the addition of an eastbound left turn lane and westbound through lane on the I-15 overcrossing.	N/A	MM 4.5-5, p. 10-8	At the commencement of operation, the project applicant shall make a fair-share contribution for the addition of an eastbound left turn lane and westbound through lane on the I-15 overcrossing.	MMs same; however different number between 2003 and 2007	N/A	This was the "significant" issue raised by URS in the narrative portion of its report. The MMRP as updated in the 2007 RFEIR is utilized for the JTD, since it is the most recent compilation of MM's.
C	N/A	N/A	MM 4.5-3, p. 10-13	The Project applicant shall make an irrevocable offer of dedication for right-of-way to 108 feet in width within the Project boundary for the widening of SR 76 to four lanes per the County of San Diego Circulation Element, including a designated bike route. In addition, the project applicant shall provide a fair share contribution for the cost to provide four lanes on SR 76 from the western boundary of the project site to the project access road.	N/A	MM 4.5-6b, p. 10-9	The Project applicant shall make an irrevocable offer of dedication for right-of-way to 108 feet in width within the Project boundary for the widening of SR 76 to four lanes per the County of San Diego Circulation Element, including a designated bike route.	MMs same; however different number between 2003 and 2007 (note how this one is underlined); portion missing from 2007	N/A	This was the "significant" issue raised by URS in the narrative portion of its report. The MMRP as updated in the 2007 RFEIR is utilized for the JTD, since it is the most recent compilation of MM's. The fair share contribution is addressed through payments to the TIF as required by MM 4.5-4 and 4.5-6a.
D	N/A	N/A	N/A	N/A	N/A	MM 4.5-2, p. 4.5-36	New MMs (4.5-2, 4.5-3, 4.5-4, 4.5-6a, 4.5-7, 4.9b, 1g, 1h, 4.9-20)	New MMs; however, some re-use other MM numbers from 2003 EIR (confusing)	N/A	This was the "significant" issue raised by URS in the narrative portion of its report. The MMRP as updated in the 2007 RFEIR is utilized for the JTD, since it is the most recent compilation of MM's.

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E	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Appendix in SWFP: Biological Assessment for the Gregory Canyon San Luis Rey River Bridge Replacement (August 2006); Section 5 - Note that SWFP contains MMs. Most are in line with the 2007 EIR; however, there are some that contain inconsistencies (e.g., MM 4.9-1d, 1e, etc.)	This was the "significant" issue raised by URS in the narrative portion of its report. The MMRP as updated in the 2007 RFEIR is utilized for the JTD, since it is the most recent compilation of MM's. The 2006 Biological Assessment pre-dated the 2007 RFEIR.
F	N/A	N/A	MM 4.9-1a, p. 10-18	N/A	Revised between 2003 and 2007	MM 4.9-1a, p. 4.9-20	Revised/New MMs (4.9-1a, 1b, 1c, 1d, 1e, 1f, 4.9-2, 3a 4.9-, 4.9-5a, 4.9-14, 4.9-18, 4.9-19b, 4.9-19c; p.10-10)	Revised/new MM; however, some re-use other MM numbers from 2003 EIR (confusing)	N/A	This was the "significant" issue raised by URS in the narrative portion of its report. The MMRP as updated in the 2007 RFEIR is utilized for the JTD, since it is the most recent compilation of MM's.
G	N/A	N/A	N/A	N/A	N/A	MM 4.9-3b, p. 4.9-22	N/A	EIR 2007 indicates change but no change is apparent.	N/A	Should not have been underlined (no change), but nonetheless still fully enforceable. The shading of the word "dispersing" was correct.