

4.5 Resource Recovery and Solid Waste Management

This section addresses potential impacts associated with resource recovery and solid waste management resulting from the implementation of the proposed ordinance amendments and corresponding use of crop protection structures for agricultural operations.

4.5.1 Existing Conditions

a. Characterization of Existing Waste Stream

Hoop structures typically consist of galvanized steel covered with a plastic material. Shade structures also are supported by galvanized steel but use a mesh material that is semi-permeable and more typically darker in color than hoop structure plastics, which are typically white.

Information regarding the longevity of crop protection structure material and handling and disposal of materials after their useful lifespan was obtained from a number of sources, including the following personal communications:

- Ari Tremblay, Ferrari Metals (manufacturer of crop protection structures)
- Jeff Clarin, City of Santa Maria Utilities Department Manager/Deputy Director
- John De Friel, Farmer

The galvanized steel has a variable lifetime span, usually ranging from 10 to 25 years depending on weather and microclimate conditions, as the steel can rust in higher moisture areas, reducing its lifespan (Ari Tremblay, pers. comm. 2017). Thus, galvanized steel will typically last longer in inland areas. Once the steel frame lifespan is complete, it can be readily recycled.

The plastic covering used for hoop structures typically has a lifespan of three years. Based on personal communication with local Santa Barbara farmers (Andrew Rice and John De Friel, personal communication, October 26, 2017), City of Santa Maria staff (Jeff Carlin, personal communication, December 4, 2017), and a crop protection structure manufacturer (Ari Tremblay, personal communication, October 26, 2017 and December 13, 2017), the ability to recycle the hoop structure plastic tends to be variable, as the plastic used for the structures is currently not accepted by recycling programs within the United States. Rather, the only available market for recycling hoop structure plastic is located in China; however, the market for plastics recycling in China tends to be variable, as there are periods where China does not accept plastic waste for recycling. As such, there is no consistently available recycling market for farmers to recycle the plastic material. Shade cloth material, while having different properties, is made of polyethylene, similar to hoop structure plastic, and thus the recycling opportunities for this material are assumed to be similar.

Based on comments from farmers made at the scoping meeting for the Hoop Structures Ordinance Amendment (Project), some farmers stockpile their expended plastic in

warehouses until such time as there is a market for accepting the plastic waste. Farmers have an incentive to recycle or store plastic until there is a recycling market available to accept the plastic as it is expensive to have the plastic hauled off the farm, and there are fees to bring it to the landfill.

~~The only landfill to accept agricultural plastic for recycling in the County is the Santa Maria Regional Landfill recently had a program to collect agricultural plastic waste for recycling; however, as of May 1, 2018, Central Coast Remedial Resources, Inc. operates the City of Santa Maria's Agricultural Plastic Recycling Program at the Santa Maria Regional Landfill. The program has ended due to a lack of recyclers that will accept the plastic waste for recycling. Prior to the program's closure, the plastic waste is accepted at the landfill for a fee and the used agricultural plastic is baled and offered for sale to recyclers. A significant majority of the used agricultural plastic brought to the landfill is stored in warehouses. Historically, the recycling market came from until a time when the plastic is purchased for recycling, typically from recyclers in China, and prior to 2017, not much, if any, plastic ended up in the landfill. However, more recently, a significant majority of the used agricultural plastic brought to the Santa Maria Regional Landfill for recycling was being has been stored in warehouses as the recycling market has been unavailable. Storage capacity for the baled agricultural plastic has been running out due to the lack of a recycling market for plastics was limited, resulting in disposal of some plastics in the landfill. As of May 1, 2018, the Santa Maria Regional Landfill agricultural plastic waste recycling program is no longer active due to a lack of recyclers that will accept the plastic waste for recycling. Thus, agricultural plastic waste that is hauled to area landfills is disposed of and buried along with municipal solid waste.~~

Based on communication with a crop protection structure manufacturer, the average weight of the plastic utilized for crop protection structures is approximately 1,900 pounds per acre, or 0.95 tons per acre (Ari Tremblay, pers. comm. 2017). Shade structure mesh likely weighs less than hoop structure plastic, as the shade material is a netted, somewhat porous material; however, for purposes of discussion its weight is assumed to be the same as the hoop structure plastic material.

In 2015, it was estimated through aerial photography analysis that there were approximately 1,480 acres of installed crop protection structures throughout the county, which equates to approximately 1,406 tons of crop protection structure plastics used in 2015. Given the three-year lifespan of the plastics, it can be assumed that one-third of the total crop protection structure material would need to be disposed of per year. Thus, in 2015, it is estimated that one-third of the 1,406 tons of material would need to be disposed of, equating to approximately ~~496~~ 469 tons per year of crop protection structure waste that would need to be disposed, stored, or recycled.

b. County Resource Recovery & Waste Management Division

The County Public Works Department Resource Recovery & Waste Management Division (RRWMD) is responsible for planning and implementing waste collection and recycling programs throughout the unincorporated County. The RRWMD provides an integrated waste management system consisting of recycling programs for commingled recyclables and green-waste collection, programs for residential and small business hazardous waste, sharps and pharmaceutical collection, electronic waste collection and recycling, education, operation of four recycling and transfer stations, one household hazardous waste collection center, and the Tajiguas Landfill and management of 10 closed landfills. In addition, the RRWMD is responsible for administering the franchise agreements for the collection of solid waste materials from residents and businesses in the unincorporated areas of the County by private solid waste collection firms, as well as the enforcement of local solid waste management ordinances. There are no waste collection services on agricultural lands unimproved with a residence or business.

c. Waste Processing and Disposal Facilities

There are three active landfills within the County, which include the County-owned and operated Tajiguas Landfill, the City of Santa Maria Regional Landfill, and the City of Lompoc Landfill. ~~As of May 1, 2018, the only landfill that accepts used agricultural plastic waste for recycling is the Santa Maria Regional Landfill. agricultural plastic waste recycling program is no longer active due to a lack of area recyclers that accept the plastic waste for recycling. Thus, the other area landfills do not have any agricultural plastic waste hauled to area landfills is disposed of and buried along with municipal solid waste recycling programs, but would accept the agricultural plastic waste for disposal in the landfill, for a fee.~~

TAJIGUAS LANDFILL

The Tajiguas Landfill is the only active landfill that the County owns and operates. The landfill accepts municipal solid waste generated by the cities of Santa Barbara, Goleta, Buellton, and Solvang, the unincorporated areas of southern Santa Barbara County, and the Santa Ynez and Cuyama valleys. While the general public and residents cannot bring material to the landfill (only official residential waste haulers), local businesses including ranchers and farmers can bring waste to Tajiguas Landfill with an account. The landfill has a maximum permitted capacity of 23,300,000 cubic yards (cy), a maximum permitted throughput of 1,500 tons per day, and as of September 2013, had a remaining capacity of 4,867,490 cy (California Department of Resources Recycling and Recovery [CalRecycle] 2017a). The landfill accepts agricultural plastics and drip tape for a \$150 fee per ton of material (County of Santa Barbara 2017e).

CITY OF SANTA MARIA REGIONAL LANDFILL

The City of Santa Maria Regional Landfill occupies a 290-acre site within the City of Santa Maria, has a maximum permitted capacity of 13,998,400 cy, and serves the City of Santa

Maria and the unincorporated areas of the Santa Maria Valley. The landfill has a maximum permitted throughput of 858 tons per day, and as of December 2012, had a remaining capacity of 3,030,720 cy (CalRecycle 2017b). In 2010, the City of Santa Maria approved a final EIR for the Santa Maria Integrated Waste Management Facility Project, which involves the phase out of use and closing of the existing facility and replacement with a new modern Class III lined landfill on a 1,774-acre site. The proposed landfill would provide approximately 131 million cy of net airspace capacity or approximately 90 years of capacity. The proposed facility would accommodate the long-term non-hazardous solid waste disposal and recycling demands for the regional service area as required by CalRecycle (City of Santa Maria 2010). ~~The City of Santa Maria Regional Landfill accepts used agricultural plastic for recycling purposes through the Agricultural Plastic Recycling Program operated by Central Coast Remedial Resources, Inc.~~

CITY OF LOMPOC SANITARY LANDFILL

The City of Lompoc Sanitary Landfill occupies a 115-acre site, owned by the City of Lompoc, and serves the City of Lompoc and the unincorporated areas of the Lompoc Valley. The landfill allows for the acceptance of solid waste, refuse, non-hazardous bulky waste, household waste for recycling, non-friable asbestos, treated medical waste, dewatered water treatment sludge, and wastewater grit. The landfill has a maximum permitted capacity of 7,970,000 cy, a maximum permitted throughput of 400 tons per day, and as of January 2006, had a remaining capacity of 2,146,779 cy (CalRecycle 2017c).

TRANSFER STATIONS

The County owns and the RRWMD operates each of the waste processing/disposal facilities. Of these facilities, only the South Coast Recycling and Transfer Station and the Santa Ynez Valley Recycling and Transfer Station accept agricultural plastic waste, for a fee.

South Coast Recycling and Transfer Station

The South Coast Recycling and Transfer Station is located at 4430 Calle Real in Santa Barbara, California. The facility opened in 1967 and can process up to 550 tons of waste per day. This transfer station serves as a central collection point for a large portion of the non-hazardous waste generated on the South Coast. The station receives commercial roll-off containers, as well as waste brought in by residents and small, non-franchised haulers (e.g., landscapers). Agricultural plastics and drip tape are accepted at this facility for a \$150 fee per ton of material (CalRecycle 2017f).

This facility has a recycling center that processes approximately 200 tons per day of recyclable materials including commingled recyclables, electrical appliances, automobile batteries, bicycles, Christmas trees, construction and demolition debris, electronic items, used tires, and wood and yard waste.

Santa Ynez Valley Recycling and Transfer Station

The Santa Ynez Valley Recycling and Transfer Station is located at 4004 Foxen Canyon Road in the Santa Ynez Valley Project region. This facility accepts a wide range of materials from households and businesses in the Santa Ynez Valley. Agricultural plastics and drip tape are accepted at this facility for a \$150 fee per ton of material (CalRecycle 2017e).

New Cuyama Transfer Station

The New Cuyama Transfer Station is located at 5073 State Route 166 in New Cuyama. The facility can process up to 99 cy of solid waste during each day that it is open. This facility also accepts old electronics and appliances, which are transported to the County South Coast Recycling and Transfer Station, where they are consolidated and shipped to a certified recycler. An estimated 50 percent of the waste generated at New Cuyama is recovered and recycled (CalRecycle 2017d).

Ventucopa Transfer Station

The Ventucopa Transfer Station is located on State Route 33 in Ventucopa, within the Cuyama Valley Region. The Ventucopa Transfer Station can process up to 80 cy of waste during each day that it is open. This facility also accepts old electronics and appliances, which are also transported to the South Coast Recycling and Transfer Station, where they are consolidated and shipped to a certified recycler. An estimated 50 percent of the waste generated from Ventucopa is recovered and recycled through these efforts (CalRecycle 2017g).

The permitted capacity, maximum throughput, average throughput, and remaining capacity for the facilities described above are listed in Table 4.5-1 below.

Table 4.5-1: Solid Waste Facilities, Santa Barbara County

Waste Facility	Permitted Capacity	Maximum Throughput	Remaining Capacity	<u>Accepts Agricultural Plastic?</u>
Tajiguas Landfill	23,300,000 cy	1,500 tpd	4,867,490 cy	<u>Yes: \$150/ton</u>
City of Santa Maria Landfill	13,998,400 cy	858 tpd	3,030,720 cy	<u>Yes: \$105.85 prorated/ton</u>
City of Lompoc Landfill	7,970,000 cy	400 tpd	2,146,779 cy	<u>Yes: \$242.34/ton</u>
South Coast Recycling and Transfer Station	595 tpd	550 tpd	224 tpd	<u>Yes: \$150/ton</u>
Santa Ynez Valley Recycling and Transfer Station	320 tpd	212 tpd	124 tpd	<u>Yes: \$150/ton</u>
New Cuyama Transfer Station	206 cy	8 tpd	6.4 tpd	<u>No</u>
Ventucopa Transfer Station	260 cy	7 tpd	6.8 tpd	<u>No</u>
Source: CalRecycle 2017a, 2017b, 2017c, 2017d, 2017e, 2017f, 2017g, County of Santa Barbara 2016g. cy = cubic yards; tpd = tons per day				

4.5.2 Regulatory Framework

a. State

CALIFORNIA INTEGRATED SOLID WASTE MANAGEMENT ACT (ASSEMBLY BILL 939)

In September 1989, the California Integrated Solid Waste Management Act (also known as Assembly Bill [AB] 939) was enacted into law. It required each municipality in the state to divert at least 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting by 2000. This 50 percent requirement also includes the waste stream that comes exclusively through construction and demolition of buildings and homes in the County. The act directs counties and regional agencies to prepare a Countywide or Regional Agency Integrated Waste Summary Plan (CIWSP) to aggregate all of the elements of the countywide or regional solid waste management planning process. The County of Santa Barbara Final CIWSP (June 1998) identifies countywide goals and objectives for integrated waste management planning. The CIWSP further directs the cities and the County to collectively provide 15 years of countywide disposal capacity for those materials that cannot be recycled or composted. Future disposal capacity is addressed in Public Resources Code Sections 414700 through 41721.5, which require preparation of a Countywide Siting Element that identifies areas that may be used for developing new disposal facilities, including provision of an estimate of the total permitted disposal capacity needed for a 15-year period.

CALIFORNIA DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

CalRecycle is responsible for overseeing the state's recycling and waste management programs and responsible for permitting landfills, recycling facilities, and composting operations pursuant to Title 27 of the California Code of Regulations. Under its Strategic Directive 6.1, CalRecycle seeks to reduce by 50 percent the amount of organic waste disposed in the state's landfills by 2020. In addition to helping conserve limited landfill capacity, this CalRecycle policy recognizes that organic wastes are a resource, not just solid wastes that must be disposed. The development of Anaerobic Digestion facilities is one of CalRecycle's charges under the AB 32 Climate Change Scoping Plan. The AB 32 Climate Change Scoping Plan estimates that Anaerobic Digestion facilities in California could reduce methane emissions from landfills at a level of 2 million metric tons of carbon monoxide equivalent per year by 2020 (California Air Resources Board [CARB] 2008).

ASSEMBLY BILL 341

In 2012, AB 341 was enacted establishing a goal from 50 percent to 75 percent waste diversion by the year 2020. Instead of focusing primarily on local diversion, the law calls for the state and CalRecycle to take a statewide approach to decreasing reliance on landfills. CalRecycle has been tasked by the Legislature to examine how extensions of existing efforts, as well as new strategies, can be combined to reach that policy goal. AB 341 specifically targets the millions of tons of recyclables that the commercial sector and multi-family residential complexes send to landfills every year by setting mandatory recycling requirements for these land uses. Therefore, the state's regulatory framework has an influence on current local jurisdiction efforts while supporting state solid waste reduction goals.

THE CALIFORNIA GLOBAL WARMING SOLUTIONS ACT OF 2006

The California Global Warming Solutions Act of 2006 (AB 32) sets a goal of reduction of all greenhouse gases (GHGs) generated in the state to 1990 levels by year 2020. CARB has adopted a scoping plan that includes recycling and landfill methane capture as key components to achieve reductions in GHGs.

b. Local**COUNTY OF SANTA BARBARA SOURCE REDUCTION AND RECYCLING ELEMENT**

In February 1992, the Santa Barbara County Board of Supervisors adopted the County's Source Reduction and Recycling Element (SRRE), consistent with the 1989 California Integrated Solid Waste Management Act. The goal of the SRRE is to reduce the amount of solid waste entering landfills by implementing, in order of priority, source reduction, recycling and composting, and environmental transformation (incineration, pyrolysis, or biological conversion), with the final option being land disposal of waste.

COUNTY OF SANTA BARBARA COMPREHENSIVE PLAN

The County Comprehensive Plan includes several policies and programs that promote landfill diversion. This includes recycling or reuse of construction waste, and the provision of adequate areas for recycling bins and recycling collection activities.

- Energy Goal 4: Water Use and Solid Waste – Increase the efficiency of water and resource use to reduce energy consumption associated with various phases of using resources (e.g., pumping, distribution, treatment, heating).
- Energy Policy 4.2: Recycled Materials – The County shall require adequate areas for collecting and loading recyclable materials in development projects and shall further address recycling logistics in its zoning ordinance.
- Energy Policy 4.5: Waste Collection and Recycling Programs – The County shall continue to support the programs associated with efficient waste collection and recycling, public school education, and composting.

4.5.3 Thresholds of Significance and Methodology

a. California Environmental Quality Act Guidelines

According to California Environmental Quality Act (CEQA) Guidelines Appendix G, implementation of the Project would have significant environmental impacts associated with solid waste if it would not:

- Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs; and/or
- Comply with federal, state, and local statutes and regulations related to solid waste.

b. County Environmental Thresholds

The County guidelines (County of Santa Barbara 2015a) provide project-specific guidance in determining the significance related to solid waste:

1. Construction and demolition. Construction and demolition waste accounts for 31 percent of all waste generated by residents of the County. In order to comply with AB 939 requiring a minimum of 50 percent of all waste to be diverted from landfills, the particular source of waste has been targeted.

Any construction, demolition, or remodeling project of a commercial, industrial, or residential development that is projected to create more than 350 tons of construction and demolition debris is considered to have a significant impact on public services. Although amounts of waste generated vary from project to project, the following are estimates of projects that will reach the threshold of significance. These estimates are based on the U.S. Environmental Protection Agency's 1998 construction and demolition study (Document: EPA530-R-98-010; June 1998) and

data gathered by the San Luis Obispo Integrated Waste Management Authority in 2005 and 2006.

- a. Remodeling projects over 7,000 square feet for residential projects and 17,500 square feet for commercial/industrial projects.
- b. Demolition projects over 11,600 square feet for residential buildings and 7,000 square feet for commercial/industrial buildings.
- c. New construction projects over 47,000 square feet for residential buildings and 28,000 square feet for commercial/industrial buildings.

2. Operations/Occupancy

- a. Project-specific thresholds: The following thresholds are based on the projected average solid waste generation for the County from 1990–2005. The goals outlined in the SRRE assume a 1.2 percent annual increase, which equates to approximately 4,000 tons per year increase in solid waste generation over the 15-year period. A project is considered to result in a significant impact to landfill capacity if it would generate 5 percent or more of the expected annual increase in waste generation thereby using a significant portion of the remaining landfill capacity. Based on the analysis conducted, the numerical value associated with the 5 percent increase is 196 tons per year. As indicated above, source reduction, recycling and composting can reduce a project's waste stream (generated during operations) by as much as 50 percent. If a proposed project generates 196 or more tons per year after reduction and recycling efforts, impacts would be considered significant and unavoidable. Project approval would then require the adoption of overriding considerations. A typical single-family residential project of 68 units or less would not trigger the threshold of significance.
- b. Cumulative thresholds: Projects with a specific impact as identified above (196 tons/year or more) would also be considered cumulatively significant, as the project-specific threshold of significance is based on a cumulative growth scenario. However, as landfill space is already extremely limited, any increase of 1 percent or more of the estimated increase accounted for in the SRRE, mitigation would be considered an adverse contribution to regional cumulative solid waste impacts. One percent of the SRRE projected increase in solid waste equates to 40 tons per year (in operational impacts). To reduce adverse cumulative impacts and to be consistent with the SRRE, mitigation should be recommended for projects that generate between 40 and 196 tons of solid waste per year. Projects which generate less than 40 tons per year of solid waste would not be considered to have an adverse effect due to the small amount of solid waste generated by these projects and the existing waste reduction provisions in the SRRE. A typical single-family residential project of 14 units or less would not trigger this adverse impact level.

4.5.4 Impact Analysis

a. Impact RR-1 Solid Waste

The Project would not directly result in the generation of solid waste, as the LUDC amendment in itself does not involve any construction, demolition, or other waste-generating activity. However, it is anticipated that implementation of the Project would result in the increased use of crop protection structures throughout the County on lands zoned Agricultural I (AG-I) and Agricultural II (AG-II).

As detailed in Section 4.5.1.a, the galvanized steel used for the support of crop protection structures has a variable lifetime span, usually ranging from 10 to 25 years. Once the steel frame lifespan is complete, it can be readily recycled. As such, any increase in use of crop protection structures is not anticipated to result in an adverse impact associated with the disposal of steel or other metals as these metals have a long lifespan, would be recycled, and would not end up in the landfill.

As detailed in Section 4.5.1.a, the agricultural plastics used for crop protection structures typically have a lifespan of approximately three years, and once this lifespan is complete, there is the potential that a recycling market for the plastic may not be readily available. As such, this may cause farmers and/or waste disposal facilities to stockpile the plastic until a recycling market becomes available, or dispose of the plastic in landfills.

Based on the estimated weight of agricultural plastic of 1,900 pounds or 0.95 tons per acre and assuming the 2015 acreage of crop protection structures, it is estimated that approximately ~~496~~ 469 tons per year of crop protection structure material would need to be disposed of annually. As shown in Table 4.5-2, a majority of the agricultural plastic would be generated in the Santa Maria Valley. Based on the increasing cost of hauling with distance, it is assumed that plastics would be hauled to the nearest area landfill. Thus, a majority (89 percent) of agricultural plastic waste would be disposed of at the Santa Maria Regional Landfill. This estimate is consistent with personal communications with area landfill operators indicating that the majority of agricultural plastic waste is disposed of at the Santa Maria Reginal Landfill.

Table 4.5-2: Estimated Agricultural Plastic Disposal by Region

<u>Region</u>	<u>Crop Protection Structure Acreage (2015)¹</u>	<u>Estimated Annual Plastic Disposal (tons)²</u>	<u>Percentage</u>	<u>Area Landfill</u>
<u>Santa Maria Valley</u>	<u>1,320.6</u>	<u>418</u>	<u>89%</u>	<u>Santa Maria Regional Landfill</u>
<u>Lompoc Valley</u>	<u>119.4</u>	<u>38</u>	<u>8%</u>	<u>City of Lompoc Landfill</u>
<u>Santa Ynez Valley</u>	<u>24.3</u>	<u>9</u>	<u>2%</u>	<u>Tajiguas Landfill</u>
<u>South Coast/Gaviota</u>	<u>16.0</u>	<u>5</u>	<u>1%</u>	<u>Tajiguas Landfill</u>
<u>Total</u>	<u>1,480.4</u>	<u>469</u>	<u>100%</u>	
<u>¹Existing crop protection structure acreage based on aerial photography analysis for the year 2015. No crop protection structures were identified in the Cuyama Valley Region.</u>				
<u>²Totals do not add due to rounding</u>				

Based on the extent of crop protection structure use in 2015, the amount of material that would need to be disposed would exceed the County's significance threshold of 196 tons of waste generation per year. Thus, with the potential expansion in use of crop protection structures associated with the Project, additional waste generation could result, which would be in excess of the County's significance thresholds. Therefore, future use and potential expansion of crop protection structures are anticipated to result in waste generation rates that exceed the County's significance threshold of 196 tons per year, resulting in a significant impact.

4.5.5 Cumulative Impacts

The Project area includes most of the potential agricultural production areas within the County with the exception of agricultural lands within the Coastal Zone. Cumulative impacts would result from projects that would have the potential to increase the use of crop protection structures and generate increased agricultural plastic waste within the broader County. In addition to agricultural plastics waste, individual development projects would have the potential to contribute to the solid waste stream. Potential cumulative projects are listed in Table 3-5 and Table 3-6. Of the projects listed in those tables, the majority of the projects would generate some amount of solid waste that would increase waste to area landfills.

With regard to cumulative resource recovery and solid waste impacts, the Project is expected to result in the installation and operation of additional crop protection structures within the County, which in turn may result in increased agricultural waste due to the disposal of materials associated with the crop protection structure plastics. In addition, the cumulative projects listed in Tables 3-5 and 3-6 would contribute to the existing waste

stream within the County. There is greater potential to reduce the solid waste impacts from residential projects given that recycling markets are more readily available for a substantial portion of residential construction and operational waste. However, overall residential waste would still contribute waste to area landfills. Combined waste generation associated with cumulative projects in combination with the Project would result in a significant solid waste impact. Since the Project would result in a significant impact related to solid waste by increasing the existing waste stream directed to landfills potentially in excess of the County's significance threshold, the Project's contribution to the cumulative impact would be cumulatively considerable based on the County's threshold for cumulative solid waste impacts. Thus, the Project would contribute to a cumulatively considerable impact associated with resource recovery and solid waste.

4.5.6 Mitigation

a. Impact RR-1: Solid Waste

The Project would result in a significant and unavoidable impact due to Project waste generation rates that exceed the County's significance threshold of 196 tons per year (Class I). Mitigation to reduce this impact to a less-than-significant level was considered; however, no feasible measures were identified. The major barrier to agricultural plastics recycling is the lack of a consistent recycling market for the plastics. ~~Under existing conditions~~ When a recycling market is available, it offers an incentive to farmers ~~are already incentivized to recycle plastic when there is a market available because they~~ farmers stand to earn money from their plastic waste versus instead of spending money to have it hauled and deposited in a landfill. Thus, additional ordinance requirements to recycle agricultural plastics would have no effect on actual practice.

b. Cumulative Impacts

The Project's contribution to the cumulative impact associated with resource recovery and solid waste would be cumulatively considerable.

4.5.7 Residual Impacts

Residual project-specific and cumulative impacts would be significant and unavoidable (Class I).