



October 22, 2015

DEPARTMENT OF THE ARMY  
LOS ANGELES DISTRICT, US ARMY CORPS OF ENGINEERS  
REGULATORY DIVISION  
ATTN: Shanti Abichandani Santulli  
5900 La Place Court, Suite 100  
Carlsbad, CA 92008

Via email to [gregorycanyoneis-spl@usace.army.mil](mailto:gregorycanyoneis-spl@usace.army.mil)

Re: Supplemental comments on EIS for Gregory Canyon Landfill and Continued Opposition to Project SPL-2010-00354-SAS

Dear Ms. Santulli:

Environmental Health Coalition (EHC) is a 35-year-old nonprofit organization. EHC builds grassroots campaigns to confront the unjust consequences of toxic pollution, discriminatory land use, and unsustainable energy policies. Through leader development, organizing and advocacy, EHC improves the health of children, families, neighborhoods, and the natural environment in the San Diego/Tijuana region.

EHC has opposed a landfill at Gregory Canyon since at least 1999, when we reviewed the first project EIR. We submitted extensive comments on the DEIS and in opposition to a USACE permit for the project on April 15, 2013. All of our comments in that letter remain valid. We reiterate our continuing strong opposition to the landfill and urge the Army Corps of Engineers to deny a permit to this project.

### **Changes Since 2013: More Landfill Space, Less Water**

Since the first comment deadline on the DEIS on April 15, 2013, trends in the San Diego region have continued in the direction of expanded landfill capacity, reduced trash volumes, and deeper drought. Since 2015, our need for new landfill capacity has diminished further, and the need for secure, local sources of clean drinking water has become more urgent than could have been predicted even 2 years ago. It has become even more apparent that Gregory Canyon landfill is NOT in the public interest.

### **Landfill Capacity Now More Than Adequate**

Miramar Landfill. Miramar Landfill capacity now extends through 2030, according to City of San Diego Mayor Kevin Faulconer, as quoted in a *San Diego Union-Tribune* article of August 5, 2015.<sup>1</sup> The article states that the City's zero waste policy, adopted in July of 2015, will divert 332,000 tons of trash each year by 2020, and has a goal of achieving zero waste by 2040. Additionally, a new trash compaction method will increase capacity by 45%.

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<sup>1</sup> <http://www.sandiegouniontribune.com/news/2015/aug/05/miramar-landfill-lifespan-zero-waste-compaction/>

Sycamore Landfill. Sycamore Landfill obtained a new permit in May 2015, and now has an estimated closing date of 2042. This landfill expansion was recommended as a less damaging alternative to Gregory Canyon in EPA's comments on the DEIS in 2013, and the expansion has now occurred.

San Diego Region. The San Diego region now has capacity of 125 million tons, according to a July 19, 2015 *Voice of San Diego* commentary that cites CalRecycle as its information source.<sup>2</sup> The six-county region that includes San Diego County has over a billion tons of landfill capacity, according to the same source.

Clearly, the region has sufficient landfill capacity for many more years, and has ample time to implement newer alternatives, including development of new markets for recycled and composted materials; continuing reductions in construction and food wastes; phasing in of bans on plastic shopping bags and excessive packaging materials; and continuing implementation of newer trash compaction technologies. **A new landfill is not needed and is not in the public interest.**

### **Drought and Water Supply**

With climate change already occurring and making California's rain and snow levels ever less predictable, the value of the San Luis Rey River as a precious local source of drinking water cannot be overstated. Currently, the river's watershed supplies approximately 8% of the drinking water for the entire city of Oceanside.<sup>3</sup> Climate scientists predict that California will experience more of its precipitation in the form of rain rather than snowfall, as the climate warms. This means that less of the region's water can be obtained from melting Sierra snow, which feeds the Bay-Delta, source of 30% percent of the region's water. Consequently, the portion of the region's water supply that will be supplied by local sources is expected to increase: according to the San Diego County Water Authority, 5,000 acre feet of water is coming from local sources in 2015, but this figure is expected to rise to 48,000 acre feet by 2020.<sup>4</sup>

Given this long-term climate picture, it is NOT in the public interest to allow a new landfill anywhere near the San Luis Rey River -- a precious embodiment of the waters of the United States, which USACE has a duty to protect.

### **Conclusion**

All of EHC's previous comments on this EIS and project, as detailed in our letter of April 15, 2013, are still valid. Since that time, the region's need for reliable sources of clean drinking water has become ever more urgent. New landfill capacity has been developed, including the expansion of Sycamore Canyon landfill -- a project listed in the DEIR as an environmentally less-damaging alternative to Gregory Canyon. At the same time, cities in the region are actively pursuing zero waste policies and technologies. There is NO solid waste crisis either now or in the next several decades. There IS a continuing crisis of adaptation to a hotter, drier climate and a need to preserve existing water supplies. It has become ever more apparent that a landfill in Gregory Canyon, on the banks of the San Luis Rey River, is not needed, is

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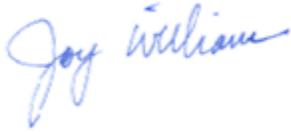
<sup>2</sup> <http://www.voiceofsandiego.org/topics/land-use/running-out-of-landfill-space-thats-garbage/>

<sup>3</sup> [http://www.ci.oceanside.ca.us/gov/water/services\\_programs/clean/mass/sanluis.asp](http://www.ci.oceanside.ca.us/gov/water/services_programs/clean/mass/sanluis.asp)

<sup>4</sup> <http://www.sdcwa.org/sites/default/files/images/piechart.jpg>

not in the public interest, and constitutes a threat to the waters of the United States. We urge USACE to deny this project a permit.

Sincerely,

A handwritten signature in blue ink that reads "Joy Williams". The signature is written in a cursive style with a large initial "J" and a long, sweeping underline.

Joy Williams  
Research Director

