

County of Santa Cruz

DEPARTMENT OF PUBLIC WORKS

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THOMAS L. BOLICH DIRECTOR OF PUBLIC WORKS

> AGENDA: NOVEMBER 7, 2000 October 3 1, 2000

SANTA CRUZ COUNTY BOARD OF SUPERVISORS 701 Ocean Street Santa Cruz, California 95060

SUBJECT: BUENA VISTA LANDFILL SOIL MANAGEMENT PROJECT

Members of the Board:

On October **3**, **2000**, your Board considered a report and staff presentation outlining project options for the Buena Vista Landfill Soil Management Project. Upon conclusion of deliberations on this matter, your Board directed Public Works to seek the opinion of local Coastal Commission staff on the most preferable project option and report our findings to your Board. On October **17**, **2000**, Public Works requested deferral of the report back on the Buena Vista Landfill Soil Management Project at the request of the Buena Vista Community Association (**BVCA**) to provide an additional opportunity for them to review the project options before your Board. Requested information was provided to BVCA and a meeting was held on October **27**, **2000**, to discuss the project options with the City of Watsonville staff, Coastal Commission **staff**, BVCA representatives and Public Works.

On October 3, 2000, your Board directed Public Works to focus discussions with the Coastal Commission on the three project options considered most feasible and cost effective.

- 1. <u>Watsonville/Imazio Properties</u>: Move soil to the Watsonville Landfill expansion site and adjacent farm property southwest of the Buena Vista Landfill, via a mile **long** conveyor belt system.
- 2. <u>Rocha Pronertv</u>: Move soil to the adjacent **farm** property west of the Buena Vista Landfill via an 1,800 foot overhead conveyor system, as originally proposed and permitted.
- 3. <u>Miyashita/Love Properties</u>: Use the Miyashita and Love properties immediately north of the Buena Vista Landfill, as previously recommended by the Buena Vista Community Association members.

Public Works was also given additional direction to seek Coastal Commission opinion relative to emission impacts for each project option. Coastal Commission **staff** indicated that air quality was not addressed in any detail within the Coastal Act and therefore is not a significant concern for the Coastal Commission. Their position is that air quality issues are better

addressed by other agencies, such as the local air district, through the environmental review process. For your Board's reference, we are providing a brief discussion of the qualitative differences between the project options relative to air quality impacts.

Air Quality

Emissions for this project come in two forms, dust from soil movement and equipment travel on dirt roads, and engine emissions from heavy equipment. While timing has not allowed for a formal air quality analysis of these alternatives, we can provide some qualitative opinion of the air quality impacts from these three project options.

The Monterey Bay Unified Air Pollution Control District (MBUAPCD) only considers permits for stationary (non-mobile) emission sources. In the case of these three project options, the conveyor systems are the only activities requiring permitting and the only constituent of concern is dust, as the conveyor systems are proposed to be electric powered. The **Miyashita/Love** project is the only project option of the three that would not require MBUAPCD permitting. Overall, the **Watsonville/Imazio** project would be slightly higher in dust emissions than the **Rocha** or **Miyashita/Love** projects, due solely to the longer conveyor system and increased number of soil transfer points along the conveyor that would generate dust.

Engine emissions from heavy earth moving equipment and trucks also have bearing on the comparative environmental impacts of these project options even though they do not require air district permitting. Engine emissions will be somewhat higher on the two conveyor based project options as heavy equipment will be necessary at both ends of the conveyor system for excavation and stockpiling activities. Earthmovers known as "scrapers" will be used to excavate soil and move it to the conveyor loading area. At the other end of the conveyor system, the soil is deposited on the ground, then pushed and compacted into the stockpile area by two bulldozers. The **Miyashita/Love** project option only requires the use of scrapers that will haul the soil directly to the stockpile area. No additional earthmoving equipment is needed with the **Miyashita/Love** project. As a result, one or two fewer pieces of large heavy equipment will be needed under this option, reducing the overall engine emissions.

Coastal Commission Staff Opinion

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On Tuesday, October 10, 2000, Public Works staff met with Dr. Charles Lester, District Manager, and Mr. Rick Hyman, Senior Project Manager of the Coastal Commission to discuss the Buena Vista Landfill Soil Management Project options, as directed by your Board. As a preface to our discussions, we reconfirmed the Coastal Commission's general ranking of priorities regarding protection of coastal resources.

- 1. Biotic Resources
- 2. Agricultural Resources
- 3. Scenic Resources

Based upon these priorities and the Coastal Commission staffs general knowledge of these project options, their opinion was the **Miyashita/Love** project appeared to have the least amount of impact to coastal resources. This opinion is based upon data from a site visit to the

Miyashita/Love properties conducted by a California Department of Fish and Game biologist and a preliminary biotic survey conducted by the County's environmental review consultant. Both parties categorized the site as having limited habitat value and no apparent presence of plant or animal species of concern. This opinion was tempered with the need for a formal and thorough biotic review of the site to confirm these preliminary findings and provide a more thorough comparison of biotic resource values for all three project options. Coastal Commission staff also indicated that due to the long history of the **Miyashita/Love** sites being fallow, agricultural value also appears to be less than that of the other sites that are currently in agricultural production. However, they did express some concern over the loss of the greenhouse facilities which also have agricultural use value. Acquisition of buffer space north of the Love property could allow for reconfiguration of the stockpile to avoid removal of the greenhouses.

The **Miyashita/Love** project may also be advantageous if the formal biological survey confirms Coastal Commission staffs opinion that no significant or protected habitats exist on-site. If this proves to be the case, the County would likely avoid several time-consuming permitting processes with California Fish and Game, Army Corps of Engineers and U.S. Fish and Wildlife Service.

Coastal Commission staff did not have a strong opinion on scenic resource impacts other than to indicate the **Miyashita/Love** project appears to be more sheltered from roadside view and therefore less of a visual impact than the Imazio and/or Watsonville project sites which sit on a hilltop within coastal and scenic view sheds.

Cost Impacts

In our October **3**, **2000**, report to your Board, we also provided you with cost estimates for the three project options.

Rocha:	\$6,400,000 - \$7,100,000
Miyashita/Love:	\$6,500,000
Watsonville/Imazio:	\$8,500,000

However, the Miyashita/Love project cost estimate was qualified as not including expenses related to impact mitigation on adjacent residents or businesses. During deliberations, your Board inquired about these expenses and impacts to adjacent property. Based on an October 1998 letter to your Board from American Sporthorse (adjacent property) regarding the use of the Miyashita/Love properties for our soil storage project, they estimated that the cost of relocating their business would range from \$1,235,000 to \$1,935,000. While this information has not been confirmed, it does provide a benchmark for your reference. We also discussed this information with Coastal Commission staff and they indicated that project cost is not a significant factor in their charge to protect coastal resources.

Joint Agency/BVCA Meeting

As directed, Public Works staff met with representatives from the City of **58** Watsonville, California Coastal Commission and BVCA on October 27, 2000. The purpose of this meeting was to provide all the interested parties with an opportunity to **further** discuss the project options your Board may wish to consider. BVCA's representative was provided all current project information in advance of this meeting and also discussed the various project options at length with Public Works staff several days prior to the meeting.

BVCA and their legal counsel had on numerous occasions provided your Board with documentation and correspondence regarding their preferred project option on the **Miyashita/Love** property. While they still support use of the **Miyashita** property, they are also interested in seeing the project developed on the Watsonville Landfill expansion site if possible. Our discussions focused primarily on the issues surrounding the use of the Watsonville site and another alternative proposed by BVCA that combined the use of both these properties.

In previous correspondence, we provided your Board with an outline of the problems associated with placing the entire soil storage project on the Watsonville Landfill expansion site. We informed you that a successful project had previously been developed entirely on the Watsonville site, but in April 2000 Watsonville staff informed us that they had updated their landfill life calculations. The result of these changes was that Watsonville's projected landfill expansion would have to occur sooner than originally anticipated, resulting in a series of conflicts with the soil storage project and both our jurisdictions' landfill development plans. For your reference, Attachment 1 is a summary of the issues associated with using the Watsonville Landfill site for the entire soil storage project.

A meeting was held with City **staff** and Supervisor Campos to discuss options for salvaging the project in light of the operational conflicts associated with the changes in Watsonville's landfill development schedule. An alternative project layout was offered by City staff and Supervisor Campos that would combine a portion of the Watsonville site with several acres of adjacent farm land. This project option would eliminate the operational and construction conflicts, avoid the need for exchanging landfill capacity, allow the maximum available time for siting a new solid waste facility, and offer a reasonable amount of flexibility to accommodate any unanticipated **future** changes in wastestream volumes. Public Works presented this project option to your Board on October 3, 2000, along with design and cost information for the soil conveyor system and a biotic evaluation and wetlands delineation report for the Watsonville property.

As we stated above, BVCA's representative, Mr. David Barlow, has suggested an alternative project structure utilizing a portion of the Watsonville Landfill expansion site and the Miyashita property. Attachment 2 is a summary of BVCA's proposed project structure, including a cost estimate, for your consideration. The cost for this alternative project is estimated at **\$9,000,000**.

<u>Summary</u>

The Coastal Commission staff was able to provide us with their qualified opinion, but not a firm guarantee, that the **Miyashita/Love** project appears to be the most favorable project option. The potential impacts to adjacent residents/businesses and the additional County costs do not rank as high on their list of resource protection priorities. If the County elects to pursue the **Miyashita/Love** project or. any variation utilizing these properties, the Coastal Commission's staff recommendation is to conduct the biological evaluation early in the environmental review process to allow the Coastal Commission staff and other resource agencies to conduct biotic **comparisons of** all project options and provide firm directions on project development. Coastal Commission staff also recommends that your Board approve holding the active permit for the Rocha project in abeyance until a final project is completed. If either the Miyashita/Love or Watsonville/Imazio project does not come to fruition or your Board elects not to pursue these project options, the County will still need to retain the right to return the Rocha project option to the Coastal Commission for final deliberation and action.

It is therefore recommended that the Board of Supervisors take the following action:

- 1. Accept and file this report on the Buena Vista Landfill Soil Management Project.
- 2. Consider the **staff report** of October 3, 2000, and the information contained in this report and provide Public Works with direction on the Board of Supervisors' preferred project structure.
- 3. Direct Public Works and the Planning Department to initiate environmental review and take all actions necessary to expedite development of the Board of Supervisors' preferred project.
- 4. If the Rocha project is not being reconsidered at this time, direct Public Works on behalf of the Board of Supervisors to request the coastal zone permit for the Rocha project continue to be held in abeyance by the Coastal Commission until a final project is completed.

Yours truly. THOMAS L BOLICH

THOMAS L. BOLICH Director of Public Works

RPM:bbs Attachments RECOMMENDED FOR APPROVAL:

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County Administrative Officer

copy to:

Rick Hyman, California Coastal Commission Brian Hunter, CA Department of Fish and Game David Koch, City of Watsonville Public Works Mark Janay, CH2M Hill Kim Tschantz, Planning Department Jonathan Wittwer Art Higaki Rosemarie Imazio Alexsandra Howard David Miyashita Walter Love Timothy Silva Carl Cole David Barlow Public Works

SUMMARY OF ISSUES REGARDING ONLY USING WATSONVILLE LANDFILL EXPANSION SITE FOR SOIL MANAGEMENT AREA

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Terminology:	
Phase IV	Watsonville Landfill's next expansion site, scheduled for 2008
Phase V	Watsonville Landfill's second expansion site, scheduled for 20 12
SMA	Soil Management Area for storage of the Buena Vista Landfill's excavated soils, this area sits on top of Watsonville's Phase IV and V landfill expansion site
BVLF	Buena Vista Landfill
WLES	Watsonville Landfill Expansion Site
Waste Exchange	If the city of Watsonville utilizes capacity in the Buena Vista Landfill, they will provide us with a comparable amount of capacity in their landfill at a later date
Closure	The Buena Vista Landfill is projected to reach final capacity and stop accepting refuse in 20 18

Background:

- Proposed SMA would encompass most of the WLES
- The WLES consists of two construction phases, Phase IV and Phase V
- The SMA was designed to place as much soil as possible on the last landfill area to be developed, Phase V, while still maintaining the required noise setback from an adjacent residence
- The SMA was designed to hold a maximum volume of 1,080,000 cubic yards with approximately 400,000 cubic yards placed on WLES Phase IV and 680,000 cubic yards placed on WLES Phase V
- WLES, Phase IV is projected to be constructed in 2008, Phase V is projected to be constructed in 20 12
- Watsonville Landfill's disposal rate (34,000 tons/yr) is approximately 25% BVLF's disposal rate (140,000 tons/yr)
- Soil balance spreadsheet, by year, is attached for reference
- Original project design with SMA on WLES only is attached for reference

ISSUE	RESOLUTION	IMPACT
When Watsonville needs to construct their Phase IV landfill expansion in 2008, approximately 180,000 cubic yards of soil will still remain in the Phase IV SMA	Allow the city of Watsonville to dispose of their refuse at the BVLF for approximately 4 years as the remaining soil is removed for BVLF operations	Landfill operations are impacted by 25% increase in waste volumes, BVLF closes approximately 1 year earlier, and waste exchange with Watsonville occurs after BVLF closure
When Watsonville needs to construct their Phase V landfill expansion in 2012 (2016 if the above waste exchange occurs), approximately 570,000 cubic yards of soil will still remain in the Phase V area	Allow the city of Watsonville to dispose of their refuse at the BVLF for approximately 4 additional years as the remaining soil is removed for BVLF operations and final closure	Landfill operations are impacted by 25% increase in waste volumes, BVLF closes approximately 1 additional year earlier, and waste exchange with Watsonville occurs after BVLF closure



ISSUE	RESOLUTION	IMPACT
Watsonville's landfill is too small and not permitted to handle all the County refuse/recycling traffic for the 2 year waste exchange period after BVLF closes, and does not have facilities for the wide range of public recycling services required by the County	County only sends franchise refuse trucks to the Watsonville Landfill during the waste exchange period and has new solid waste and recycling facility in place 2 years earlier for public self-haul refuse and recycling services	Siting of a new solid waste facility must be moved up 2 years 0
Storage of soil needed after closure for landfill capping, including imported clay and top soil (20-30% of SMA area) will require use of the WLES Phase V area for up to 2 years after BVLF closes	County has new solid waste and recycling facility in place 2 years earlier for public self-haul refuse and recycling services and Watsonville utilizes this facility until all soil is removed from their site	Siting of a new solid waste facility must be moved up 2 years
BVLF life is extended through, new recycling/waste reduction opportunities, new compaction technology, or vertical expansion	Waste exchange period with Watsonville would need to be extended for additional years to allow for extended storage of soil on the WLES	Landfill operations impacts would be extended, BVLF's extended life would be reduced some, and waste exchange with Watsonville would occur for a longer period after BVLF closure
An unforeseen increase in waste volumes, such as a natural disaster, would push all these time frames up further	Move soil to another site to free up landfill capacity to accommodate increased landfill fill rates and premature closure	Siting of a new solid waste facility must be moved up further
Allow maximum potential time frame for development of a new solid waste facility to replace BVLF and flexibility to manage any unforeseen changes in the disposal wastestream	Locate a portion of the SMA on an adjacent agricultural parcel and a portion on the WLES to provide operational flexibility and avoid all of the above issues and impacts	Temporary removal of up to 10 acres (productive agricultural land for 18 years

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				BUE	NA VISTA LAN SOIL BALANCE									
		Bu	uena Vista Soil I	lse		Ī		-						
	Daily/Inter.	Operations	Final	Watsonville	Granite	BVLF	BVLF	SMA						
Year	Cover	Liner	Cover	Cover ²	Export	Soil Volume	Excavation	Volume	Comments					
1999						1,478,000			BV: End of year soil balance estima	ate				
2000	39,000				25,000	1,414,000			BV: Excavates daily cover from Mor	dule 4 area W: Excavates daily cover from their Phase V area				
2001	39,780	44,000				444,220	886,000	886,000	BV: Module 4 excavation/constructi	ion, Module 6 full W: Begins using soil from SMA for daily cover				
2002	40,576	6,500	20,000	9,696		377,144		876,304	BV: Filling Module 4, excavate Mod	lule 5 for daily/interim cover, Module 6 final foundation cover				
2003	41,387	6,500		9,793		329,257		866,511						
2004	42,215	6,500		9,891		280,542		856,620						
2005	43,059	23,000	20,000	9,990		0	194,483	1,041,113	BV: Module 4 full, Module 5 excava	tion/construction. Module 4 final foundation cover				
2006	43,920	6,500		10,090				980,603	BV: Filling Module 5, begin returning soil from SMA					
2007	44,799	6,500		10,191				919,114						
2008	45,695	6,500		10,292				856,627	W: Phase IV construction	Watsonville needs to construct Phase IV in 2008, SMA activities will				
2009	46,609			10,395				799,623		Protection and the second seco				
2010	47,541			10,499				741,583		$\overline{\langle}$				
2011	48,492		53,000	10,604				629,487	BV: Final foundation cover Module	3 SMA: Phase IV expansion area cleared of all SMA activities				
2012	49,461			10,710				569,315	W: Phase V construction					
2013	50,451			10,818		, i i i i i i i i i i i i i i i i i i i		508,047	1					
2014	51,460			10,926				445,661		Phase V in 2012, SMA activities will				
2015	52,489			11,035				382,137		not be completed in this area until 2020				
2016	53,539			11,145				317,453						
2017	54,609			11,257				251,587						
2018	55,702			11,369				184,516	BV: All Modules filled to final elevation	n				
2019			186,000	11,483				-12,967	BV: Final Cover construction, remove	e excess soil from SMA				
2020									SMA: Phase V expansion area is o	cleared of all SMA activity				

1. Assume daily cover use increases by 2% per year. (County projection) 2. Assume daily cover use increases by 1% per year. (City projection)

Watsonville Phase IV area holds approx. 400,000 cubic yards of soil Watsonville Phase V area holds approx. 680,000 cubic yards of soil

SMA: Soil Management Area Activities BV: Buena Vista Landfill Activities W: Watsonville Landfill Operations and Expansion Activities





ALTERNATIVE SOIL STORAGE PROJECT PROPOSED BY BVCA REPRESENTATIVE DAVID BARLOW

- Use only Phase V area of Watsonville Landfill Expansion site for soil storage with a capacity of 680,000 cubic yards, per attached drawing
- Store balance of soil (400,000 cubic yards) on Miyashita property only, avoiding
- the impacts to equestrian operation on leased Love property, per attached drawing
 Approximately 330,000 cubic yards of soil would be retained on the Buena Vista Landfill
- Off-site storage volumes could be reduced further if the project permitting process is expedited, thus avoiding further landfilling on top of Modules 2 and 3 and preserving additional soil storage capacity
- Stockpile on Miyashita property could be designed with a landscaped berm to act as a noise and visual barrier to existing Buena Vista Landfill operations, per attached drawing
- Only one or two of the older greenhouses on the Miyashita property would need to be removed, keeping the newer glass and steel greenhouse for continued operation and preserving more of the property value for future resale
- Stockpile on the Miyashita property would not need to be used for about 14 years







4. WATSONVILLE AND MIYASHITA COMBINATION (BVCA Option)

Off-Site Soil Storage Volume (Watsonville): Off-Site Soil Storage Volume (Miyashita): 680,000 cubic yards 400,000 cubic yards

Excavation & Stockpiling					W	atsonville	Miyashita		
Heavy Equipment/Labor ¹		units	ho	ourly rate	est.	hours/day	est.	hours/day	
Scraper'		3	\$	230.00		8.0		8.0	
Motorgrader		1	\$	76.00		1.0		1.0	
Dozer		2	\$	152.00		8.0			
Loader		1	\$	123.00		1.0		1.0	
Water Truck		1	\$	51.00		8.0		8.0	
	V	Vatsonville			N	Iivashita			
Load Cycles									
Scraper round trip (incl. load cycle)		6.0				9.4	min	utes	
Bank yards per/scraper load		33				33	cubi	c yards	
Maximum total yards/day		7,884				5,042	cubi	ic yards/day	
Working days required		86				79	days	5	
Months (6 days/wk + 10% weather delay)		3.7				3.4	mor	nths	
Heavy Equipment/Labor Costs ³									
Scraper	\$	476,094			\$	437,929			
Motorgrader	\$	6,555			\$	6,029			
Dozer	\$	209,757			\$	-			
Loader	\$	10,609			\$	9,758			
Water Truck	\$	35,190			\$	32,369			
Contractor mark-up (15%)	\$	110,731	_		\$	72,913	_		
Equipment/Labor Totals:	\$	848,935			\$	558,998			
Capital/O&M Costs									
Land acquisition ⁴	\$				\$	2,000,000			
Land Lease'	\$	150,000			\$	-			
Conveyor system purchase (inc. bridging) ⁶	\$	2,300,000			\$	-			
Conveyor O&M (\$0.01 l/If/hour of operation)'	\$	39,467			\$	-			
Conveyor power costs (\$500/day)	\$	43,124							
Biotic mitigation (\$100,000/acre x 0.9 acres)	\$	90,000			\$	-			
Biotic monitoring (\$2,500/yr x 5 yrs)	\$	12,500			\$	-			
'rrigation (mitigation/erosion control)	\$	30,000			\$	30,000			
Agricultural mitigation (\$8000/acre)	\$	56,000	(7 a	cres)	\$	-			
Noise Mitigation (veg. sound berms)	\$	20,000			\$	20,000			
Site improvements	\$	90,000			\$	120,000			
Engineering and EIR	\$	80,000			\$	60,000			
Contractor mark-up (15%)	\$	376,500	_		\$	22.500	_		
Capital Costs Total:	\$	3,287,592	-		\$	2,252,500	-		
Total Excavation/Stockpile Costs:	S	4,136,526			\$	2,811,498		-	

\$ 6,948,025

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4. WATSONVILLE AND MIYASHITA COMBINATION (BVCA Option)

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Soil Return to Landfill			b .		Wa	atsonville	Miyashita	-
Heavy Equipment/Labor'		units	no	ourly rate	est.	nours/day	est. nours/da	<u>iy</u>
Scraper		1	\$	160.00		1.2	1.9	
Motorgrader		1	\$	76.00		0.5	0.5	
Dozer		1	\$	152.00		0.5		
Loader		1	\$	123.00		0.5	0.5	
Water Truck		1	\$	51.00		1.2	1.9	
	v	Vatsonville			N	Aiyashita		
Load Cycles								
Scraper round trip (incl. load cycle)'		6.0				9.4	minutes	
Bank yards per/scaper load		15				15	5 cubic yards	
4verage yardage needed per day		180				180) cubic yards	
4verage load out time per day		1.2				1.9	hours	
Working days to remove stockpile'		3,778				2,222	days	
Heavy Equipment/Labor Costs ¹⁰								
Scraper	\$	728,630			\$	670,222		
Motorgrader	\$	143,556			\$	84,444		
Dozer	\$	287,111			\$	-		
Loader	\$	232,333			\$	136,667		
Water Truck	\$	232,251			\$	213,633	_	
Equipment Totals:	\$	1,623,881	-		\$	1,104,967	_	
Soil Return O&M Costs								
One time cost to reverse conveyor system"	\$	220,000			\$	-		
conveyor O&M (\$0.01 1/lf/hour of operation)'	\$	260,485			\$	-		
Conveyor power costs (est. \$90/day)	\$	340,000	_		\$	-	_	
O&M Totals:	\$	820,485	-		\$	-	-	
Total Soil Return Costs:	\$	2,728,848			\$	1,104,967	-	\$ 3,833,815
Project End Cost Recovery								
Land resale value ¹²	\$				\$	(1,500,000))	
conveyor resale (20 yrs old, 10% orig. value)	\$	(230,000)			\$	-		
Total Project End Cost Recovery:	\$	(230,000)	-		\$ ((1,500,000)	=	\$ (1,731, 000)

:#2 (ye 255 TOTAL ESTIMATED PROJECT COST: \$ 9,051,839 [4. WATSONVILLE/MIYASHITA/ COMBINED]

1. Hourly rate derived from combination of Cal Trans Equipment Rental Rate Schedule and Prevailing Wage Rate Schedule.

2. Limit to 3 scrapers per Rocha project EIR, assumes no increase in total vehicle miles traveled as compared to Rocha project.

3. Assume contracted services.

4. Miyashita market offer 2000, per D Barlow.

5. \$750/acre/yr, 10 acres, 20 years

5. Low-end conveyor estimate, up to \$3.3 million per manufacturer's quote

7. \$0.01 1/lf/hour of operation based on manufacturers estimate and 5,200 lf of conveyor.

3. Average round trip haul distance from Miyashita may be slightly shorter in practice dependent upon delivery location on landfill.

7. Does not reflect unknown amount of soil taken by Granite Construction through May 2002.

IO. No mark-up, assume County crews.

11. Reverse all idler arms, move drive trains to opposite end of each section, change elevations at all transer points, and move loadout pit to Watsonville site. \$20,000 per transfer point x11

assume appreciated resale value of land, only assumes loss of two old greenhouses @ \$250,000 each. **D D**

Attachment 2