

**MOORPARK CITY COUNCIL
AGENDA REPORT**

TO: Honorable City Council

FROM: David A. Bobardt, Community Development Director
Prepared By: Joseph R. Vacca, Principal Planner



DATE: November 16, 2010 (CC Meeting of 12/01/2010)

SUBJECT: Consider an Update on the Simi Valley Landfill and Recycling Center Expansion Project, Located on the Waste Management Property in the County of Ventura, Adjacent to the City of Simi Valley's Western City Boundary

BACKGROUND

On November 3, 2010, Mayor Pro Tem Mikos requested that staff prepare a report to the City Council regarding the status of the environmental and entitlement application for the Simi Valley Landfill and Recycling Center, which is proposed on the existing Waste Management property, located adjacent to the City of Simi Valley's western City boundary.

DISCUSSION

On November 6, 2007, staff sent Becky Linder, of the County of Ventura Resource Management Agency – Planning Division, a letter commenting on the proposed Major Modification to CUP-3142 – Simi Valley Landfill expansion, (Attachment 1). Staff indicated that a project of this scale could impact the residents and businesses in Moorpark, based on the potential for additional truck trips through the City. The traffic analysis for this project should use actual current truck trips as a baseline, not permitted truck trips, and it should analyze impacts for the entire distance of the generated truck trips, not just the truck trips in the vicinity of the landfill. A realistic passenger car equivalency (PCE) value should also be used for the trucks in the analysis. Cumulative impact analysis should consider the traffic, noise, and air pollution (including odor) increases from the trucks in the context of other proposed projects that would also increase truck traffic through Moorpark, notably the sand and gravel mines and organics processing operations, which have applications on file with the County, as well as any planned expansion of activities at the Port of Hueneme.

Honorable City Council
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Subsequently, on January 18, 2008, staff sent a letter to Dan Klemann, Senior Planner, Ventura County Resource Management Agency, Planning Division, regarding the City's receipt of a Notice of Preparation of the Draft EIR on the proposed landfill expansion, (Attachment 2). Once again, the letter reiterated that a project of this scale could impact the residents and businesses in Moorpark, based on the potential for additional truck trips through the City. Staff also stated that additional comments will be provided by the City on the Draft EIR for this project when it is available and requested that the County include the Moorpark Community Development Department on the notification list for environmental review and for any hearings regarding this project proposal.

On December 28, 2009, staff sent Becky Linder, Ventura County Resource Management Agency, Planning Division, a comment letter on the Draft Environmental Impact Report (EIR) for the proposed expansion of the Simi Valley Landfill and Recycling Center. The comments were specific to Chapter 3.6 – Visual Resources/Glare and Chapter 3.11 – Traffic and Circulation, (Attachment 3). The comments were intended to raise issues that should be addressed in the Final EIR.

On July 27, 2010, new and revised sections of the Draft EIR for the Simi Valley Landfill expansion were recirculated for public comment with comments due September 9, 2010. The recirculation was limited to new and revised sections of the EIR that addressed some changes to the operations, air quality calculations (including greenhouse gas analysis), impact on housing needs from additional employees, and infeasibility of mitigation related to park/recreation in-lieu fees. Staff did not find that these issues have a direct effect on the City of Moorpark and staff did not add to previous comments, originally sent on December 28, 2009. Staff also indicated that the City would provide comments on the proposal itself after the Final EIR was reviewed. Based on the recirculation, the Final EIR will most likely not be available until early 2011.

The County still needs to complete the Final Environmental Impact Report. Once it is complete, a draft of the Final Environmental Impact Report (FEIR) will be presented to the County's Environmental Report Review Committee (ERRC) to review the adequacy of the FEIR and make a recommendation for certification on only the environmental analysis, not the merits of the project, to the County Planning Commission.

On November 15, 2010, staff contacted Peter Lyons, Director of Simi Valley Planning Division under the Department of Environmental Services to discuss the status of Simi Valley's review and commenting on the Draft EIR for the – Simi Valley Landfill expansion. Mr. Lyons indicated that the City of Simi Valley created an extra territorial review process for review of the Draft EIR for the landfill expansion. The extra territorial review process was created by the Simi Valley City Council to facilitate and enhance the review process outside of Simi Valley's City limits, understanding that the project has the potential to affect the City. The extra territorial review process included the presentation of the Draft EIR to all four of Simi Valley's Neighborhood Councils, the Planning Commission and the City Council for review and comment. On December 9, 2009 the City of Simi Valley sent Becky Linder, Ventura County Resource Management

Agency, Planning Division, a comment letter on review of the Draft Environmental Impact Report (EIR) for the proposed expansion of the Simi Valley Landfill and Recycling Center, (Attachment 4). On December 18, 2009, Simi Valley staff sent the County a comment letter on behalf of the extra territorial review of the Draft Environmental Impact Report (EIR) for the proposed expansion of the Simi Valley Landfill and Recycling Center, (Attachment 5). On September 7, 2010, Simi Valley staff sent the County a comment letter on review of the Recirculated Draft Environmental Impact Report (EIR) for the proposed expansion of the Simi Valley Landfill and Recycling Center, (Attachment 6).

In speaking further with Mr. Lyons, he also indicated that there has been the creation of a citizen advocacy group known as the Simi Valley Landfill Task Force, who believes the Draft EIR is inadequate in many respects. Three documents from the Simi Valley Landfill Expansion Task Force (Attachment 7) demonstrate their position on the adequacy of the Draft EIR and Recirculated Draft EIR.

Copies of the original Executive Summary of the Draft EIR, dated September 9, 2009 and the Executive Summary of the Recirculated Draft EIR, dated July 2010, are also provided, (Attachment 8).

Staff recommends that if the City Council wishes to provide comments on the project at this time, that the comments be provided as preliminary comments with the ability for City Council to provide additional comments once the Final EIR has been prepared.

FISCAL IMPACT

None

STAFF RECOMMENDATION

Direct Staff as deemed appropriate.

ATTACHMENTS:

1. November 6, 2007, staff letter to Ventura County, Planning Division, on the Simi Valley Landfill
2. January 18, 2008, staff letter to Ventura County, Planning Division on the Notice of Preparation of the Draft EIR for the Simi Valley Landfill
3. December 28, 2009, staff comment letter to Ventura County, Planning Division on the Draft EIR for the Simi Valley Landfill
4. December 9, 2009, Simi Valley letter to Ventura County, Planning Division, on review of the Draft EIR for the Simi Valley Landfill

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5. December 18, 2009, Simi Valley letter to Ventura County, Planning Division, on behalf of the extra territorial review of the Draft EIR for the Simi Valley Landfill
6. September 7, 2010, Simi Valley letter to Ventura County, Planning Division, on review of the Recirculated Draft EIR for the Simi Valley Landfill
7. Task Force key points on the Draft EIR; Task Force comments to Draft EIR; and Task Force comments to Recirculated Draft EIR
8. Original Executive Summary of the Draft EIR, dated September 9, 2009 and the Executive Summary of the Recirculated Draft EIR, dated July 2010



City of Moorpark

COMMUNITY DEVELOPMENT DEPARTMENT: PLANNING – BUILDING AND SAFETY – CODE COMPLIANCE

799 Moorpark Avenue, Moorpark, California 93021 (805) 517-6200 fax (805) 532-2540

November 6, 2007

Becky Linder
County of Ventura
Resource Management Agency – Planning Division
800 South Victoria Avenue, L #1740
Ventura, CA 93009

RE: Major Mod. To CUP-3142 – Simi Valley Landfill (Case No. LU07-0048)

Dear Ms. Linder,

Thank you for requesting comments from the City of Moorpark on the proposed CUP modification. A project of this scale could impact the residents and businesses in Moorpark, based on the potential for additional truck trips through the City. Moorpark is already significantly impacted by truck traffic on State Routes 118 and 23. The traffic analysis for this project should use actual current truck trips as a baseline, not permitted truck trips, and it should analyze impacts for the entire distance of the generated truck trips, not just the truck trips in the vicinity of the landfill. A realistic passenger car equivalency (PCE) value should also be used for the trucks in the analysis. Cumulative impact analysis should consider the traffic, noise, and air pollution (including odor) increases from the trucks in the context of other proposed projects that would also increase truck traffic through Moorpark, notably the sand and gravel mines and organics processing operations, which have applications on file with the County, as well as any planned expansion of activities at the Port of Hueneme.

Additional comments will be provided by the City on the draft Environmental Impact Report for this project. Please include the Moorpark Community Development Department on the notification list for environmental review and for any hearings regarding this project proposal. Thank you for your consideration of these comments.

Sincerely,

David A. Bobardt
Planning Director

C: Honorable City Council
Honorable Planning Commission
Steven Kueny, City Manager
Barry K. Hogan, Deputy City Manager
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PATRICK HUNTER
Mayor

KEITH F. MILLHOUSE
Mayor Pro Tem

ROSEANN MIKOS
Councilmember

JANICE PARVIN
Councilmember

MARK VAN DAM
Councilmember

CC ATTACHMENT 1



City of Moorpark

COMMUNITY DEVELOPMENT DEPARTMENT: PLANNING – BUILDING AND SAFETY – CODE COMPLIANCE

799 Moorpark Avenue, Moorpark, California 93021 (805) 517-6200 fax (805) 532-2540

January 18, 2008

Dan Klemann, M.A.
Senior Planner
Ventura County Resource Management Agency, Planning Division
800 South Victoria Avenue, L #1740
Ventura, CA 93009

RE: *Notice of Preparation of a Draft EIR
Simi Valley Landfill Expansion (Case No. LU07-0048)*

Dear Mr. Klemann,

Thank you for sending a Notice of Preparation of a Draft EIR to the City of Moorpark on the proposed landfill expansion. It does not appear at this time that the City is a responsible agency with permitting authority for this project. Nonetheless, as noted in previous comments sent to Becky Linder in your department, a project of this scale could impact the residents and businesses in Moorpark, based on the potential for additional truck trips through the City. Moorpark is already significantly impacted by truck traffic on State Routes 118 and 23. The traffic analysis for this project should use actual current truck trips as a baseline, not permitted truck trips, and it should analyze impacts for the entire distance of the generated truck trips, not just the truck trips in the vicinity of the landfill. A realistic passenger car equivalency (PCE) value should also be used for the trucks in the analysis. Cumulative impact analysis should consider the traffic, noise, and air pollution (including odor) increases from the trucks in the context of other proposed projects that would also increase truck traffic through Moorpark, notably the sand and gravel mines and organics processing operations, which have applications on file with the County, as well as any planned expansion of activities at the Port of Hueneme.

Additional comments will be provided by the City on the Draft EIR for this project when it is available. Please include the Moorpark Community Development Department on the notification list for environmental review and for any hearings regarding this project proposal. Thank you for your consideration of these comments.

Sincerely,

David A. Bobardt
Planning Director

C: Honorable City Council
Honorable Planning Commission
Steven Kueny, City Manager
Barry K. Hogan, Deputy City Manager
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PATRICK HUNTER
Mayor

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Councilmember

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MARK VAN DAM
Councilmember

CC ATTACHMENT 2



City of Moorpark

COMMUNITY DEVELOPMENT DEPARTMENT: PLANNING – BUILDING AND SAFETY – CODE COMPLIANCE

799 Moorpark Avenue, Moorpark, California 93021 (805) 517-6200 fax (805) 532-2540

December 28, 2009

Ventura County Resource Management Agency, Planning Division
Attn.: Ms. Becky Linder
800 South Victoria Avenue, L#1740
Ventura, CA 93003-1740

RE: **Draft Environmental Impact Report
Major Modification Application Case No. LU07-0048
Simi Valley Landfill and Recycling Center Expansion**

Dear Ms. Linder,

Thank you for the opportunity to review the Draft Environmental Impact Report (EIR) for the proposed expansion of the Simi Valley Landfill and Recycling Center. The Community Development Department of the City of Moorpark has the following comments on this Draft EIR that we would like to see addressed in the Final EIR.

1. Chapter 3.6 – Visual Resources/Glare

This chapter includes visual simulations from several viewpoints that help the reader to understand the significance of the visual impact of the landfill expansion. Although the EIR rightfully concludes that visual impacts would be significant even after mitigation, a map showing the areas from which the landfill expansion would be visible (i.e. near views, middle view, distant views) would be helpful to understand the full scale of the visual impact. Mitigation should include contour grading techniques along with the landscaping to make the fill slope appear more natural. This chapter should also clarify that the North Park Village Planned Residential Development from which views were analyzed was voted down by the Moorpark electorate before the Notice of Preparation was circulated, and no other development proposal is being considered for this site at this time.

2. Chapter 3.11 – Traffic and Circulation

In two prior letters to County staff (November 6, 2007 and January 18, 2008), Moorpark Community Development Department staff requested an analysis of truck traffic through Moorpark. The traffic analysis in the Draft EIR did not address this issue. Instead, it focused on traffic impacts at intersections in close proximity to the landfill. With the upcoming closing of Toland Landfill, an expanded Simi Valley Landfill would likely be handling municipal waste from the entire county. Waste haulers from the west county would likely be using the SR-118 (Los Angeles Avenue) to access the landfill as it would be the most direct route. This State highway through Moorpark's commercial corridor is already heavily impacted with heavy truck traffic, which, during a typical midday make up 20-25 percent of all vehicles. Understanding the number of

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KEITH F. MILLHOUSE
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CC ATTACHMENT 3

Ms. Becky Linder
December 28, 2009
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additional waste haulers on Los Angeles Avenue is important not only to the traffic analysis, but to the air quality analysis as well, particularly for odorous emissions and cumulative emissions from diesel trucks. The Draft EIR (Section 3.2) only addresses odorous emissions at the landfill itself, not along waste hauling routes, which would change as a result of the landfill expansion.

Please let me know if you have any questions on these comments. Comments on the proposal itself will be provided after review of the Final EIR.

Sincerely,

A handwritten signature in black ink that reads "David A. Bobardt". The signature is written in a cursive, flowing style.

David A. Bobardt
Planning Director

CC: Honorable Mayor and City Council
Honorable Planning Commission
Steven Kueny, City Manager
Jennifer Mellon, Senior Management Analyst
Chron
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CITY OF SIMI VALLEY

Home of The Ronald Reagan Presidential Library

December 9, 2009

County of Ventura
Resource Management Agency
Attn: Becky Linder
800 S. Victoria Avenue
Ventura, CA 93009

SUBJECT: COMMENTS ON THE ADEQUACY OF THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE SIMI VALLEY LANDFILL AND RECYCLING CENTER EXPANSION PROJECT

Dear Ms. Linder:

City staff has reviewed the Draft Environmental Impact Report (DEIR) for the Simi Valley Landfill and Recycling Center Expansion project. Based on that review, the following comments regarding the adequacy of the DEIR are being provided for your consideration and response. It should be noted that additional comments from the City Council, Planning Commission, and community, collected through the City's extra-territorial review process, will be sent to you separately.

Section 3.1 Land Use/General Plan Goals, Policies, and Programs

- 1. Page 3.1-6** The discussion of Community Character impacts lacks a discussion of the Simi Valley General Plan land use designations for the surrounding areas. The Ventura County General Plan identifies the project site and vicinity as Open Space-Urban Reserve, thereby acknowledging the area as future incorporated area.
- 2. Page 3.1-8** Mitigation Measure LU-1 fails to identify a formula for determining the amount of the housing impact fee. Due to the lack of information, it is not possible to evaluate the potential effectiveness of the mitigation measure.
- 3. Page 3.1-12** The discussion of consistency with Policy 2.10.2-4 refers to Mitigation Measure WR-4, which improperly defers the mitigation of downstream flooding and erosion along Alamos Canyon Creek. More detail needs to be provided in the EIR to allow an evaluation of the potential effectiveness of the mitigation.
- 4. Page 3.1-22** The discussion of consistency with the Simi Valley General Plan fails to adequately support the conclusion that Alamos Canyon Road would not be needed for areas other than the Canyons Project.

CC ATTACHMENT 4

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5. **Page 3.1-22** Under the City of Simi Valley General Plan Consistency Analysis, it is stated that the Simi Valley General Plan should be amended to remove Alamos Canyon Road from the Circulation Element as a condition of this project's approval. The proposed condition cannot be legally required of the project, as it requires a third party discretionary action by other than the applicant.

Section 3.2 Air Quality

6. **Page 3.2-5** The DEIR makes the following statement: "sensitive receptor land use types include residences", yet the analysis of impacts excludes numerous residences within one mile of the landfill project site. The EIR should disclose potential air quality impacts to all sensitive receptors, including residences within one mile of the landfill site.
7. **Page 3.2-12** "in the absence of an adopted...CEQA significance threshold for GHGs" the EIR does not judge significance of GHG emissions. Under CEQA, the absence of an adopted threshold does not preclude evaluation of significance. It is reasonable to assume that if the project will have significant air quality impacts regarding Criteria pollutants there will be significant impacts related to GHGs. Therefore, the EIR should include an analysis and mitigation measures for potentially significant GHG emissions.
8. **Page 3.2-16** Mitigation measure AQ-1, the five requirements listed within this mitigation measure are open-ended and unverifiable, and cannot be enforced as written. Enforceable language or performance standards are necessary for mitigation measures to meet CEQA requirements. Consequently it is not possible to determine the effectiveness of the proposed emission reduction measures, which are cited as mitigation for all construction-related impacts from the project and whether the construction-related impacts will be adequately mitigated.
9. **Page 3.2-17** Mitigation measure AQ-2, all listed dust controls require a designated monitor and plan to be effective. Clarification on monitoring and frequency of control measure application is necessary to determine the effectiveness of the mitigation.
10. **Page 3.2-21** Mitigation measure AQ-3, listed emission control measures require permanent monitoring and a plan to be effective. Clarifications on monitoring and performance standards for mitigation are necessary to determine the effectiveness of the mitigation measures.
11. **Page 3.2-21** Table 11 is incomplete, consequently it is not possible to evaluate anticipated impacts or determine if proposed mitigation measures are effective or sufficient. The "existing" and "existing plus project" emissions should be placed in the same table or in tables that are located together in the document.
12. **Page 3.2-23** Mitigation measure AQ-5 describes the establishment of an Emissions Reduction Program, which would contribute fees to fund emission reduction projects

throughout Ventura County. However, based on the project description, roughly 65% to 70% by weight of Municipal Solid Waste (MSW) brought to the Landfill would be from sources outside Ventura County. Given the increasingly limited options for disposal of MSW in the greater Los Angeles area, it is reasonable to conclude that the majority of MSW brought to the Landfill with proposed increased daily limits will originate in Los Angeles and travel through Simi Valley to reach the Landfill. The document does not adequately disclose or mitigate the operational impacts from truck traffic and emissions on Simi Valley.

13. **Page 3.2-26** Cancer risk levels are stated to be greatest at Moorpark College based on prevailing winds. However, earlier in the section it was stated that prevailing winds are from the west. If that is the case, the EIR should clarify why the projected health risks will occur in Moorpark, nearly 2 miles away to west, rather than affect sensitive receptors much closer to, and downwind of, the facility.
14. **Page 3.2-28** Residents two miles to the east of the existing landfill have recently reported to the City that odorous emissions are currently an issue. The proposed expansion will bring disposal activities closer to the residential area that is east, or downwind, from the landfill. The document provides no factual or scientific data to support the conclusion that odors will not be a significant impact other than referencing a previous Odor Control Plan and stating that there are few complaints. An odor impact analysis, such as the EPA's SCREEN3 model, addressing potential impacts from the expanded perimeter of the landfill on sensitive receptors east of the landfill is necessary to adequately identify and mitigate potentially significant impacts from odors.

Section 3.3 Water Resources

15. **Page 3.3-1** Under Section 3.3.1.1, Area of Influence, it is stated that "The area of influence with respect to groundwater quality and quantity would be the area overlying groundwater basins affected by the proposed project, which includes the Simi Valley Groundwater Basin, that underlies the proposed project site...." Under Section 3.3.1.2.2, Surface Water and Groundwater Conditions, it is stated that "With the importation of State Project water...virtually all of these wells have now been abandoned or destroyed...most of the alluvial wells along the Arroyo Simi have been abandoned due to excessive mineral content and availability of better quality imported State Project Water...Local dewatering wells operated by the City of Simi Valley....flow directly to the Arroyo Simi....The concentration of total dissolved solids (TDS) from these wells are on the order of 1,000 to 1,500 mg/L..."

The Ventura County Waterworks District No. 8 (District) has plans to develop a pump-and-treat system for the groundwater from the existing dewatering wells located within the Simi Valley Groundwater Basin (Basin) to produce potable water supply to supplement its imported water supply purchased from the Calleguas Municipal Water District. The pump-and-treat system will rely on the regional brine line that is currently under construction and that will ultimately extend to the Simi Valley Water

Quality Control Plant. The DEIR should acknowledge these plans in its impact analysis and provide mitigation measures that ensure that leachate or surface water collecting within or passing through the landfill does not enter into the Basin.

Section 3.4 Biological Resources

- 16. Page 3.4-31** The CUP boundary and proposed expansion area could provide habitat for Burrowing Owls. Protocol surveys for the owls should be completed prior to any grading activity on the site, and this requirement should be incorporated into the mitigation measures for the project.
- 17. Page 3.4-31** Mitigation measure BIO-3 should be clarified so that nesting bird surveys would be conducted no more than seven days prior to the commencement of any clearing or grading activity scheduled between February 1 and August 15, and if ground disturbance activities are delayed for more than seven days past the date of the first pre-construction survey, then additional pre-construction surveys will be conducted so that no more than seven days will elapse between the survey and the ground disturbance activity.
- 18. Page 3.4-32** Impact BIO-2: Due to the documented occurrence of the Spadefoot Toad within the project's affected area (a California Department of Fish and Game Species of Special Concern as well as a Locally Important Species meeting Ventura County Criteria), a mitigation measure requiring focused surveys for the Spadefoot Toad prior to removal of any wetland habitat should be incorporated into the project.

Section 3.6 Visual Resources/Glare

- 19. Page 3.6-2** The project site is visible from the Ronald Reagan Presidential Library. The Library is a very popular location with the public and should be included as a view location for the visual simulations and discussion of visual impacts.
- 20. Figures 3.6-4, 3.6-5, and 3.6-6 (incorrectly labeled as 3.5-6)** lack views of the Buildout under Existing CUP as the other simulations provide. All visual simulations should compare the same scenarios to allow a meaningful comparison of impacts.

Section 3.8 Cultural Resources

- 21. Page 3.8-12** Mitigation Measure CUL-1 contains conflicting language. The first sentence states that: "Construction and operation of the proposed project shall avoid Wharton Ranch." However, the next sentence states that: "If avoidance is not possible, Phase II testing and evaluation of potential archaeological deposits within the Wharton Ranch shall be conducted prior to any surface disturbance in the vicinity of the ranch." It should be determined whether the Wharton Ranch will be preserved in place at this time so that the public has a chance to review the decision. If the decision is made to preserve the site as the first sentence indicates, then the mitigation should include a requirement to fence the area.

Section 3.9 Hazards

- 22. Page 3.9-12 Household Hazardous Waste Collection Facility:** The discussion of this facility and its operation should be expanded to include anticipated quantities of wastes, the intended service area, the resulting traffic volume and plans for separation/isolation of HHW traffic from Commercial Waste Hauler traffic, and collection days and hours of operation. In addition, the discussion should include the hazardous waste temporary holding/storage periods and transportation loading and shipping to offsite recyclers. Without this information, it is not possible to determine if the potential impacts of the facility are adequately mitigated.
- 23.** The EIR lacks details regarding the Material Recovery Facility/Recyclables Transfer Facility. The EIR should include a conceptual floor plan of the facility showing areas for collection and storage of non-hazardous recyclables, hazardous waste, and universal waste. In addition, the foundation features of MRF/RTF should include surface spill protection features and groundwater protection features. Due to the lack of information, the potential impacts of the facility cannot be adequately understood.

Section 3.10 Noise

- 24. Page 3.10-9** The discussion of the Simi Valley General Plan is not correct. It refers to the technical background report that was prepared for the General Plan Update that is currently being processed. This document is not the City's General Plan. The City's current General Plan Noise Element does contain noise level standards for noise sensitive land uses. Table 10.1 provides the noise standards which are 63 dB(A) Ldn for exterior and 45 dB(A) Ldn for interior.

Section 3.11 Traffic and Circulation

- 25. Page 3.11-5 Figure 3.11-3** This figure should be revised to show the correct lane configurations for intersections 9 and 12 and to provide a label for intersection 15. These corrections will require adjustments to the capacity calculations and possible corrections to the LOS tables and figures.
- 26. Page 3.11-12 Policy 4.2.2-6** The words "including reciprocal agreements," should be added after the word "Ordinance".
- 27. Page 3.11-15 Method For Calculating Level of Service Under the LOS threshold definition:** this is actually referring to the V/C ratio calculation. This heading should be changed to V/C ratio. There should be an additional definition for LOS threshold referring to the letter grades such as A, B, C, etc. Also note that all calculation sheets should be revised to show only two decimal places as defined above and not three as currently presented.

- 28. Pages 3.11-26, 3.11-30, 3.11-31, and 3.11-32** Existing and Existing With Project Scenarios-Roadway Segments with Tables 3.11-15 and 3.11-17: The narrative and tables show and discuss analyses of City street segments. Roadway segment analyses of city streets within the City of Simi Valley are not required. The City of Simi Valley does not have any threshold requirements to roadway segments and those are not used in the City for traffic impact analyses. This shows City streets to be at unacceptable LOS for different segments and this discussion should be removed. However, if this EIR analysis wishes to perform the segment analyses on the city streets, then it should be made clear that the methodology, criteria, and thresholds are based on Caltrans' requirements and are not the City of Simi Valley's.
- 29. Pages 3.11-27, 3.11-28, and 3.11-29** Figures 3.11-9 and 3.11-10 and Table 3.11-14 must be revised to show the correct LOS level of C where there are currently shown LOS Ds. The V/C calculation is at 0.80 per the two-decimal requirement previously defined and the LOS for 0.80 is C and not D. This affects intersections 7, 9, and 14.

Section 3.12 Water Supply

- 30.** Under Sections 3.12, Water Supply, and 4.3.12 Water Supply, it should be indicated that Waterworks District No. 8, which will serve the proposed landfill expansion, will continue to require the use of recycled water from the Simi Valley Water Quality Control Plant for all non-potable uses.
- 31. Page 3.12-2 line 1, 2 and 3:** "Policy 4.3.2-3: Discretionary development shall be conditioned to incorporate water conservation techniques and the use of drought resistant native plants pursuant to the County's Guide to Landscape Plans." This statement should be revised to add: *including the provisions of AB 1881 - the California Department of Water Resources - Updated Model Water Efficient Landscape Ordinance (approved by OAL on 9/10/09, effective January 1, 2010).*
- 32. Page 3.12-3 line 6:** "The annual water demand for the proposed project would be 174 acre-feet per year (Psomas 2007b)."

The EIR should provide detailed water use calculations for projected water requirement estimates. The Psomas report assumption is simply that total water use is proportional to the amount of material deposited daily. The assumption is that the maximum amount of projected water required could potentially double or be approximately 180 acre feet/year. The Psomas report cites 174 acre-feet per year. The report states that the Landfill water consumption during 2004 was approximately 28.5 million gallons or 78,080 gpd. Recycled water comprised eleven million gallons, potable water comprised 16.3 million gallons and 0.8 million gallons of leachate was collected and used for dust suppression. Per the Psomas report, dust control represents approximately 20% of water use and irrigation, construction, and domestic combined are approximately 80%. What is the actual breakdown or percentage of total water use projected for irrigation, construction and domestic uses? How much, if any potable

versus recycled water use is projected for dust control and/or irrigation? Per the Psomas report, an important assumption is that if on-site wastewater treatment is used for domestic sewage disposal from the proposed expansion facilities, then treated effluent may be combined with the treated leachate and used for dust control or irrigation. The EIR should discuss how this change might impact Waterworks District No. 8's recycled water goals.

Per the Psomas report, "According to the Ventura County Initial Study Guidelines, a proposed project that currently obtains water from the Calleguas Municipal Water District shall be determined to have an insignificant impact." This statement is outdated and/or inaccurate because of mandated Calleguas and MWD water use allocations, effective July 1, 2009.

- 33. Page 3.12-3 line 8, 9 and 10:** "A water availability letter from Ventura County Waterworks District No. 8 has been submitted by CMWD with the proposed project application, verifying that adequate water supplies are available." The water availability letter issued by the Ventura County Waterworks District No. 8 for the subject project also stated that the applicant is required to install all onsite facilities and any off-site improvements which may be required to connect to the Waterworks District's water system; have them dedicated to and accepted by the District, and complete all financial arrangements relative to obtaining water service. The issuance of this water availability letter does not constitute the District's guarantee that water will be available at the time the applicant may apply to the District for water service (Will Serve letter).
- 34. Page 3.12-3 line 10, 11, 12, 13, 14, 15 and 16:** "In addition, similar to Condition #14 (Master Development Plan) of CUP-3142-7, imposed by Ventura County for the current phase of landfill expansion, an updated water supply plan would be included as part of a Master Development Plan, which is designed to ensure that the landfill is operated in an environmentally safe manner and to mitigate any significant avoidable environmental impacts identified in the EIR. The water supply plan would describe improvements to be made to assure adequate potable and non-potable water for landfill operations, dust control, fire protection, landscaping, human consumption, and hygiene. Therefore, impacts would be less than significant." This statement or conclusion can not be made until the updated Water Supply Plan is completed and evaluated.
- 35. Page 3.12-3 line 22:** "Impacts on water supply would be less than significant" Again, this statement or conclusion can not be made until the updated Water Supply Plan is completed and evaluated.

Cumulative Analysis

- 36. Page 4-2** The County of Ventura Related Project list appears to exclude the proposed residential subdivision located on the Butler Ranch in the Tierra Rejada Valley (SD09-0025).
- 37. Page 4-3** The North Canyon Ranch project includes a 30-unit multi-family residential, and a residential care facility, as well as a church and school.

Section 5 Alternatives

- 38. Page 5-2** The rejection of location alternatives is not fully explained or justified other than the implication that the locations aren't available to the project applicant. Typically, factors that are used to eliminate alternatives from detailed consideration are that the alternative (location) cannot meet the most basic project objective (increased landfill capacity), infeasibility (within the rule of reason), and inability to avoid significant impacts. The location alternatives are so quickly dismissed that there is no indication other than a general assurance by the EIR preparer that these three factors are indeed present. Simply that another entity has not applied for a permit or that it is inconvenient does not validate the rejection of these location alternatives.
- 39. Page 5-17** The discussion of the land use impacts of Alternative 1 should include a discussion of the potential reduction of impacts on planned land uses as defined in the Simi Valley General Plan. Implementation of the project as proposed has the potential to conflict with buildout of the Simi Valley General Plan (See comment 1, above).
- 40. Page 5-38** A review of the proposed timeline for Alternative 3 indicates that this alternative does not differ significantly from the proposed project. The discussion of potential landfill closures shows that even with approval of the project as proposed, the increase in tonnage accepted at the Simi Valley Landfill and Recycling Center will increase gradually. Table 5.5-7 confirms that the impacts of this alternative are no different than the project.
- 41. Page 5-46** Alternative 4, Differential Surcharge Alternative: The discussion of this alternative concludes that it would not significantly reduce trips to the Landfill. However, it would be feasible to use the funds collected for mitigation of other environmental impacts of the project. Therefore, this alternative would be more appropriately classified as a mitigation measure.
- 42. Page 5-56** The analysis of the land use impacts of Alternative 5, the no project alternative, should include discussion of the reduced impacts on the planned land uses defined in the Simi Valley General Plan. Implementation of the project as proposed has the potential to conflict with buildout of the Simi Valley General Plan (See comment 1, above).

Thank you for the opportunity to comment on the Draft EIR. We look forward to reviewing the responses to the above comments. Again, comments from the City's extra-territorial review process will be forwarded to you separately.

Sincerely,



Peter Lyons, Director
Department of Environmental Services

cc: City Council
City Manager
Director of Public Works
Senior Planner, L. Funaiolo



CITY OF SIMI VALLEY

Home of The Ronald Reagan Presidential Library

December 18, 2009

County of Ventura
Resource Management Agency
Attn: Becky Linder
800 S. Victoria Avenue
Ventura, CA 93009

**SUBJECT: EXTRA-TERRITORIAL REVIEW OF THE DRAFT ENVIRONMENTAL
IMPACT REPORT FOR THE SIMI VALLEY LANDFILL AND
RECYCLING CENTER EXPANSION**

Dear Ms. Linder:

The City of Simi Valley has reviewed the Draft Environmental Impact Report (DEIR) for the Simi Valley Landfill and Recycling Center Expansion through its Extra-territorial review process. This process was created by the Simi Valley City Council to facilitate and enhance the review of projects outside of our City limits, but having the potential to affect the City.

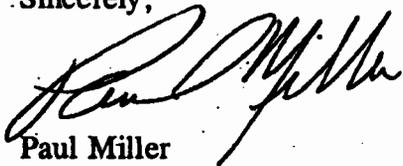
The DEIR was presented to all four of our Neighborhood Councils, the Planning Commission, and the City Council for review and comment. Based on that review, the attached comments were received and are being provided for your consideration and response. On December 14, 2009, the City Council listened to testimony from residents regarding the DEIR. Most of the comments on the DEIR reiterated the concerns contained in the attached documents. However, one resident expressed an additional concern that potential risks due to methane explosions caused by earthquakes are not disclosed adequately in the document. Another resident stated that potential impacts on the nighttime sky were not addressed. At the conclusion of the hearing, the City Council emphasized the following concerns and requested that they be addressed in the DEIR:

1. The City submitted numerous comments during the public scoping period. Table 1-2 of the DEIR sets forth the location where the comment is purportedly addressed in the DEIR, however, it is not clear how these comments were addressed. Please provide a better explanation of where the comments made during the scoping period are addressed.
2. The visual impacts of the "No Project" alternative does not adequately analyze potential impacts from all viewpoints, including impacts to the front area of the property if the Landfill was to continue operating under its existing permit.
3. Potential air quality impacts are not adequately mitigated. All trucks serving the Landfill should be converted to natural gas or some other low emissions energy source. The DEIR also does not adequately address emissions from trucks coming

- from other jurisdictions other than Waste Management trucks that may not be low emissions vehicles.
4. The current and potentially increased odor impacts are not adequately described or mitigated. For example, as the Landfill expands to the back of the property, it will be located closer to residential areas. The odors will get significantly worse as the expansion occurs.
 5. The discussion of project alternatives rejects alternatives such as the expansion of the Toland Landfill or the use of Anaerobic Bioreactor Technology without adequately exploring their feasibility. For example, recycled water could be used to support the Anaerobic Bioreactor alternative. Other technology could be used to reduce the height of the Landfill. These alternatives were not adequately addressed.
 6. The DEIR fails to adequately discuss the impacts on the buildout of the Simi Valley General Plan and the corresponding loss of a potential industrial job base.
 7. Flooding impacts caused by the filling of the Alamos Canyon tributary are not adequately mitigated in the DEIR.
 8. The DEIR should have considered how limitations on out-of-County waste disposal may mitigate some of the impacts created by the project, such as air quality and traffic. Many of the out-of-County trucks may be diesel trucks.

The City Council appreciates that the County of Ventura accommodated our Extra-territorial review process by providing additional time for review and comment on the DEIR. We look forward to reviewing the responses to our comments and those from the community.

Sincerely,



Paul Miller
Mayor

Attachments

cc: City Council
City Manager
Director of Environmental Services
Senior Planner, L. Funaiole



CITY OF SIMI VALLEY

Home of The Ronald Reagan Presidential Library

September 7, 2010

County of Ventura
Resource Management Agency
Attn: Becky Linder
800 S. Victoria Avenue
Ventura, CA 93009

**SUBJECT: REVIEW OF THE RECIRCULATED DRAFT ENVIRONMENTAL
IMPACT REPORT FOR THE SIMI VALLEY LANDFILL AND
RECYCLING CENTER EXPANSION**

Dear Ms. Linder:

The City of Simi Valley has reviewed the revised sections of the Recirculated Draft Environmental Impact Report (RDEIR) for the Simi Valley Landfill and Recycling Center Expansion. The document was reviewed by City staff and discussed by the City Council at its August 30, 2010 meeting. The following comments on the document are provided for the County's consideration and response.

1. The executive summary states that the purpose of the project is to "provide waste disposal capacity within Ventura County to meet the County's current and projected waste diversion and disposal needs consistent with the goals and policies of the Ventura County General Plan, Ventura County Integrated Waste Management Plan, the requirements of Assembly Bill (AB) 939, and other California waste management laws and regulations." However, in the main body of the DEIR on page 1-1, the document states that:

"The purpose of the proposed project is to provide long term waste management capability within the Ventura County. Communities within the counties of Ventura and Los Angeles that comprise the major customers of the SVLRC are expected to experience population increases during the planning period of the proposed project (to 2054). According to the California Department of Finance, Ventura County could grow by approximately 44 percent between 2010 and 2050. In the same time period, Los Angeles County is expected to expand by up to 24 percent... The SVLRC currently serves the residential, commercial, and industrial MSW needs of much of the population of Ventura County, including portions of the cities of Oxnard, Simi Valley, Thousand Oaks, Moorpark, Camarillo, Ventura, Port Hueneme, Santa Paula, Ojai, Fillmore, and other unincorporated area of Ventura County. The SVLRC also receives waste from the Calabasas and San Fernando Valley area of Los Angeles County as well as Santa Barbara County and occasionally from more distant counties. Waste collection areas change as market conditions change (e.g. other landfill open or close). Under the current CUP-3142-7 limits, the SVLRC will close in 2034. Consequently, WMC seeks, via this proposed project, to extend the site life and to continue providing a solid waste disposal facility that would adequately serve the area beyond 2050."

The project purpose stated in the executive summary should be consistent with that stated in the body of the EIR, as it discloses the intent to serve the Los Angeles County and other counties.

CC ATTACHMENT 6

2. Mitigation Measure AQ-4 provides for the establishment of an Emissions Reduction Program to reduce air pollution. The mitigation measure states that fees collected would be used to fund emission reduction projects in Ventura County. This mitigation measure should be revised to state that the program would be directed towards projects that would reduce emissions in the Simi Valley area since it would be the portion of Ventura County most severely affected by pollutants from the project.
3. Deletion of the mitigation measures for impacts on housing and recreation facilities is a concern to the City. The RDEIR states that the impacts on these areas will remain significant without implementation of the mitigation measures that were formerly proposed. While it may be true that the County cannot legally require these particular mitigation measures, the lack of mitigation for these significant impacts raises new concerns regarding the project and its impacts on our community. The County should explore other methods of mitigating these impacts.
4. The Simi Valley General Plan designates the Alamos and Brea Canyon areas as Light Industrial. When reviewing the Draft EIR, the City commented that the document failed to adequately analyze the potential impacts of the project on buildout of the Simi Valley General Plan. The land use chapter included in the RDEIR still fails to address this issue. The City requests that the project include an economic impact assessment to determine the potential impacts that could result from the loss of potential employment within the Alamos and Brea Canyon areas.

As it currently stands, the County will have to make a statement of overriding considerations if it approves the Landfill expansion. The City of Simi Valley will be very interested to learn what benefits the project would have to our community that would outweigh the significant impacts of the project. The comments provided in this letter are related only to the RDEIR and supplement the comments made regarding the Draft EIR on December 9 and 18 of 2009. The City Council will be taking a position on the project itself at a later date.

In addition to the above comments, please consider the concerns expressed in the attached letter from the Simi Valley Landfill Expansion Task Force. We look forward to reviewing the responses to our comments and those from the community that were sent in December 2009. In order to allow the City adequate time to review the responses and the staff report for the project, I request that you send them to the City as soon as possible.

Sincerely,



Paul Miller
Mayor

Attachment

cc: City Council
City Manager
Director of Environmental Services
Senior Planner, L. Funaiolo

Simi Valley Landfill Expansion Task Force

30 August 2010

Mayor Paul Miller
City of Simi Valley
2929 Tapo Canyon Road
Simi Valley, CA 93063

**RE: Simi Valley Landfill and Recycling Center Expansion Project
Recirculated Draft Environmental Impact Report, July 2010**

Dear Honorable Mayor Miller:

The Simi Valley Landfill Task Force respectfully submits to you and fellow members of the City Council our concerns on Waste Management's request for a substantial expansion to the Simi Valley Landfill which is tentatively scheduled to be presented to the Ventura County Board of Supervisors in early 2011.

Tonight, the City Council will consider sending a response to the County of Ventura on new information presented in the project's Recirculated Draft Environmental Impact Report (RDEIR). The Task Force finds the draft response woefully insufficient in expressing the magnitude of the environmental damage that will be inflicted on this community if the County approves the project as proposed. As is substantiated by the RDEIR, the Task Force implores the City Council to declare in fervent terms its desire to protect Simi Valley from the numerous negative individual and cumulative environmental impacts the landfill expansion will cause and to demand that the County safeguard the interest of Simi Valley, a community that borders the landfill.

The following findings reflect the Task Force's position on this matter. In submitting our comments, the Task Force calls to your attention that insufficient time was afforded for a thorough review of the substantial changes contained in the RDEIR, such as in the Air Quality Report (Appendix B – Volume II) which is 730 pages in length and is replete with highly technical graphs, charts, tables and calculations related to air pollutants, toxic emissions and global climate change impacts. Challenges in reviewing this report were exacerbated by the inclusion of tables without labels, missing tables and tables included that are not listed in the Index. The RDEIR contains nearly 1,000 pages.

Significant Environmental Impacts per CEQA

In reviewing the project documents, the Task Force finds no less than 24 areas of significant impact including air quality, demand for housing, water quality, flooding, migration corridors, scenic areas, local parks and cultural resources (see summary table

Simi Valley Landfill Expansion Task Force

Attachment A). In the strongest terms, the City Council should express in its response to the County that it finds particularly distressing and detrimental to Simi Valley the impacts on housing demand, local parks and scenic highways as the RDEIR states these impacts cannot be mitigated and are deemed "unavoidable."

CEQA Statement of Overriding Consideration:

As cited above, the Simi Valley Landfill and Recycling Center Expansion Project will cause significant environmental damage. When a project will cause one or more significant environmental effects, CEQA requires the lead agency, the County in this case, to prepare a statement of overriding considerations IF it considers approval of the project. The County must express its views in writing as to how the merits of approving the project, despite the environmental damage, is balanced by competing community objectives (including environmental, legal, technical, social, and economic factors). The statement must be substantiated by specific reasons based on the final EIR or other substantial evidence in the record.

The Task Force stands by its comments presented on December 8, 2009 to the City Council that the DEIR is unable to make a compelling reason or matter of urgency supporting an expansion at this time, moreover new information in the RDEIR further supports our position in that there are additional areas of significant impact not previously identified and not therein properly addressed.

Substantial Deficiencies of the RDEIR:

Discussion of project-related social or economic damage is not required under CEQA, unless social and economic issues will potentially cause specific damage. For example, if a roadway project will ruin access to a business area, and the resultant loss of taxes would reduce an agency's ability to maintain environmental protection, economic impacts must be discussed in an EIR. While not required by CEQA, public costs and revenues of a project may be analyzed concurrently with environmental review.

Recalling several years ago when Walmart applied to Simi Valley to join our community, the City had the foresight to demand that the applicant prepare an economic impact assessment report in order for the City Council to effectively consider the potential blight on our community. In that instance, our City leaders showed vision.

With the forthcoming loss of Farmers Insurance from our community, it may appear that the City had no prior knowledge or plan to minimize the imminent economic hardship. Would not prior knowledge of the potential loss and a review of alternative mitigation measures been in the City's best interest?

Speaking specifically to the landfill expansion before you tonight, staff has not opined that potential economic impacts on our community are at issue. Yet, we are all aware of

Simi Valley Landfill Expansion Task Force

our West End Specific Plan and the thousands of potential jobs and related revenue that may be negatively impacted by the landfill expansion. The landfill expansion will usurp the land that in the past was highly marketed as a future site for local clean jobs without the hazard and complications of the landfill. Because the designation of Simi Valley as a bedroom community it has proposed areas in its General Plan to prevent urban decay by providing local jobs for its residents and increased tax revenue by new businesses that will employ them. Replacing the West End Specific Plan with the landfill expansion plan must offset this economic loss. The RDEIR does not address this blatant area of potential damage to our community.

Two recent cases stand out, as testament to the need for economic review under CEQA under certain circumstances, and go so far as to require that when there is evidence that the social and economic effects caused by a project could result in a reasonably foreseeable environmental impact, such as urban decay, this indirect effect must be analyzed by CEQA.

In the case of Bakersfield Citizens of Local Control v. City of Bakersfield, the 5th District Court of Appeals rejected the EIR because it failed to evaluate potential urban decay impacts that may have resulted from a single commercial project. In Anderson First Coalition v. City of Anderson, the 3rd District took a different approach in determining what a lead agency must do to evaluate urban decay impacts in order to satisfy CEQA; substantiation that review of economic impact is paramount. The Task Force therefore urges the City Council response to the RDEIR to incorporate your concerns on the potential negative impacts to the West End Specific Plan and to the community including the causation of future economic blight particularly from the loss of forecasted local jobs.

Mitigation Measures:

The RDEIR contains a laundry list of mitigation measures which supposedly will lessen the severity of the environmental impacts. These measures include complex plans, multiple agency reviews, collection of fees, cooperative agreements with the applicant, numerous permits, good-faith-efforts on the applicant's part, periodic reviews, submission of samples, construction activities, completion of surveys, and implementation of control measures to name a few. The RDEIR also cites areas where the impact is significant but unavoidable because there is no 'feasible' mitigation measure.

Under Air Quality, the RDEIR provides a long list of features to include in an emissions reduction program, but states as a conclusion that it is uncertain the extent to which the program would offset overall projected related vehicular emissions and it is not possible to calculate what those reductions might be because the specific emissions mitigation projects are unknown at this time. It shall be noted that this program includes a provision that funds be collected for a countywide lawn mower replacement program as a mitigation measure for the fouling of Simi Valley's air quality by the landfill project.

Simi Valley Landfill Expansion Task Force

The Task Force is deeply troubled by the faith the County appears to place in the applicant in adhering to each and every mitigation measure. The Task Force is not at all confident that the County will direct mitigation fees and efforts specifically to Simi Valley where the brunt of the environmental damage will be sustained.

Project Purpose and Project Objectives:

The RDEIR includes yet another version of the project purposes and project objectives including "to provide waste disposal capacity within Ventura County" which supposedly addresses disposal capacity and long-term availability of Ventura County's landfill needs. This has yet to be proven by substantiating demographics and population trends; addressing Ventura County's 15-year disposal capacity; citing increased waste diversion goals; and improved waste disposal technologies. The Task Force questions why a project of this size and scope has three versions of the project description and objectives (1 - application for expansion, 2 - DEIR and 3 - RDEIR) yet continues to leave out the most obvious purpose - namely to increase its profits by accommodating Los Angeles County's waste disposal needs.

The RDEIR (Volume II Appendix B – Air Quality, Table B-1-B-17) contains a table with data for trucks entering the Simi Valley Landfill in 2008. The table paints a picture of where the trucks are coming from and how even at the current permitted waste disposal allowances, an inordinate number of trucks come from outside the County limits -- a few examples follow:

LA County 1,337
Sun Valley 168
Anaheim 788

Van Nuys 390
Pacoima 171
Granada Hills 144

Play del Rey 157
Huntington Beach 89

Truck loads come from as far as Hemet and San Bernardino and this will only increase if the project is approved yet this does not improve waste disposal capacity for Ventura County as is inferred in the project purpose. The City in its response to the County should pointedly demand an explanation as to why increasing the landfill waste disposal to accommodate agencies outside of Ventura County is not expressly included in the project purpose.

Greenhouse Gas Emissions

As previously mentioned, the RDEIR includes a newly revised Air Quality Report. This substantial re-write was necessary to address the significant greenhouse gas (GHG) emissions caused by the project construction, operation and expansions to the liquefied natural gas processing facility (LFGTLNG). The RDEIR concludes that the GHG emissions will exceed annual thresholds suggested by the state and the County (10,000 CO₂e metric tons a year) therefore they are a significant impact.

Simi Valley Landfill Expansion Task Force

Operation of the proposed landfill expansion will significantly contribute to GHG in the order of 520,270 metric tons by 2041 or nearly three times the current landfill GHG emissions estimated at nearly 178,000 metric tons or 17 times the stated threshold. Not surprising, the mitigated project emissions (519,559 metric tons) are only slightly less than the unmitigated project emissions. Furthermore, the Air Quality section of the RDEIR contains no summary calculations for the project alternatives so no comparison can be made to ascertain whether alternatives would pose less than a significant impact.

The estimated GHG emissions currently caused by the gas flares represent 50,926 metric tons of carbon (CO₂e) and account for 29% of the total landfill existing GHG emissions. Putting this into perspective, it is about the amount of GHG generated by the annual electricity used by 6,200 homes – or 5,729,856 gallons of gasoline. This is a phenomenal disclosure. So significant is the GHG emissions attributed to the landfill flares that the project was revised to increase the LFGTLNG facility to accommodate landfill gas diverted from the flares. The Task Force finds this existing condition caused by the gas flares of particular concern and the City Council should demand that this existing environmental impact be addressed by the County - Immediately.

Landfill Liners

In the past, the Task Force has raised concerns over the efficacy of liners used in landfills. The RDEIR states the following:

The Los Angeles Regional Water Quality Control Board (LARWQCB) recently concluded that geosynthetic clay liners (GCL) "would not afford the same protections to groundwater as the prescriptive liner system" (two feet of clay overlaid by HDPE) due to "recently observed deficiencies on GCL at several landfills ... and the concerns that certain mechanical and chemical properties of GCL may not be as reliable as a compacted clay liner" (LARWQCB 2009). Therefore, unless the LARWQCB approves an alternative, a prescriptive liner would be necessary in future expansions of the existing landfill.

An additional two feet of soil will need to be excavated to mitigate this mechanical deficiency. The Task Force cites this as a further example as to why hasty approval of the project proposal could have severe consequences in future years.

Alternatives Not Addressed

The Task Force eagerly anticipated that previously raised concerns on the inadequacies of evaluating viable project alternatives, a major component in CEQA, would be included in the RDEIR. Unfortunately, this is not the case and the Task Force remains skeptical as to the County's diligence in providing full disclosure on this critical EIR component. Approval of the proposed business-as-usual landfill project is not

Simi Valley Landfill Expansion Task Force

warranted in the absence of disclosure on project alternatives such as advanced waste conversion technologies, aggressive waste diversion goals and programs, and voluntary establishment of a watershed boundary.

Sustainable Simi Valley

On tonight's agenda, the City Council will consider adopting a Green Community Action Plan that sets forth a framework for action to increase the community's resiliency in meeting future demands on our natural resources and our economic well being. The first action this City Council can take to demonstrate its commitment to environmental stewardship for the long-term viability of this community is to send a resounding, strong and clear message to the County that the Simi Valley Landfill and Recycling Center Expansion Project as presented and depicted in the RDEIR is of meritless value to this community. Furthermore, the City Council should state that it would consider it a dishonor, a disgrace and an infringement on present and future generations' quality of life if the County approves profit over community standards.

A modified landfill expansion project may be a project we can one day support but for now we must remain vigilant in protecting this community, in which we live, work and play, for ourselves, our families, and for generations to come.

On behalf of the Task Force, thank you for the opportunity to share our views with you.

Sincerely,

Louis Pandolfi, Task Force Member

cc: Councilmembers Williamson, Foster, Sojka, and Becerra

Attachment A -- Summary of Significant Impacts Table

Simi Valley Landfill Expansion Task Force

**Simi Valley Landfill and Recycling Center Expansion
DEIR (September 2009) and Recirculated DEIR (July 2010)**

The DEIR and RDEIR contain 24 impacts of significance before mitigation including 13* impacts of significance after mitigation. Seven significant impact issues having no feasible mitigation measures and are deemed "unavoidable."

Table 1: Summary of Environmental Issues with Significant Impacts Before Mitigation¹

#	Environmental Impact Issue
1*	Impact LU-3: Demand for Housing. Increase the demand for housing due to construction or operation.
2*	Impact AQ-1p: Air Quality. Project operations would produce emissions that exceed VCAPCD daily ROC and NOx emission significance thresholds.
3	Impact AQ-1c: VCAPCD Daily Emission Significance Criteria. Project construction would produce emissions that exceed VCAPCD daily ROC and NOx emission significance thresholds.
4	Impact AQ-2c: Air Quality. Project construction would result in offsite ambient air pollutant concentrations that would contribute to an exceedance of an ambient air quality standard.
5*	Impact AQ-2o: Air Quality. Project construction and operation would result in offsite ambient air pollutant concentrations that would contribute to an exceedance of an ambient air quality standard.
6*	Impact AQ-7o: Air Quality. Proposed operational emissions of GHGs would cause a significant impact on the environment.
7	Impact WR-4: Surface Water Quality. Degrades the quality of surface water and causes it to fail to meet surface water quality objectives for a hydrologic unit defined in the most recent Water Quality Control Plan.
8	Impact WR-5: Flooding. Flooding hazards are ubiquitous throughout Ventura County and are accommodated by the Ventura County Building Code and the Ventura County Watershed Protection District Standards and Specifications Design Manual. The effects of flooding hazards are required to be considered within the existing framework of grading and building code ordinances which apply to all projects.
9	Impact BIO-1: Endangered, Threatened or Rare Species and Nesting Birds. Directly or indirectly: reduce species population; reduce species habitat; or restrict reproductive capacity.
10	Impact BIO-2: Wetland Habitat. Direct reduction of, or a substantial indirect impact to, a significant Wetland Habitat. All wetlands are potentially significant.
11	Impact BIO-3: Migration Corridors. Substantially interfere with the use of said area by fish or wildlife. This could occur through elimination of native vegetation, erection of physical barriers, or intimidation of fish, or wildlife via introduction of noise, light, development, or increased human presence.
12	Impact BIO-4: Locally Important Plant and Wildlife Species/Communities. Directly or indirectly cause a substantial reduction in population numbers, habitat area, or reproductive capacity. For locally important communities or habitats a significant impact would result if the Project caused a substantial reduction in area or impairment in quality or function.
13*	Impact AG-1: Soils. Direct and/or indirect loss of soils designated Prime, Statewide Importance, Unique or Local Importance or agricultural soils meeting or exceeding the acres

¹ Information from Simi Valley Landfill and Recycling Center DEIR Table ES.7-1. and ESR.2

Simi Valley Landfill Expansion Task Force

	lost criteria.
14	Impact AG-2: Dust. Result in a ten percent or greater increase in dust on agricultural parcels within one-half mile of the proposed project.
15*	Impact VIS-1: Scenic Highways. Change or obstruct important visual resources as experienced from a scenic highway during construction or operation.
16*	Impact VIS-2: Scenic Areas/Features. Degrade scenic areas or features or significantly alter them during construction or operation.
17	Impact VIS-3: Glare. Create substantial sources of light or glare.
18*	Impact Geo-8: Paleontological Resources. Direct impacts to fossil sites including grading and excavation of fossiliferous rock, which can result in the loss of scientifically important fossil specimens and associated geological data. Indirect impact including increased access opportunities and unauthorized collection of fossil materials.
19	Impact CUL-1: Cultural Resources. Cause a substantial adverse change in the significance of an archaeological or historical resource.
20	Impact HAZ-4: Petroleum Wastes. Exposure of soils (or associated soil gas) containing toxic substances and petroleum hydrocarbons, associated with prior oil field operations, would be deleterious to humans, based on regulatory standards established by the lead agency for the site.
21*	Impact REC-1: Local Parks/Facilities. Cause an increase in the demand for recreation when measured against the following standard: five acres of developable land (less than 15 percent slope) per 1,000 population.
22*	Impact REC-2: Regional Parks/Facilities. Cause an increase in the demand for recreation when measured against the following standard: five acres of developable land per 1,000 population.
23*	Impact REC-3: Regional Trails/Corridors. Cause an increase in the demand for recreation when measured against the following standard: two-and-a-half miles per 1,000 population.
24*	Impact REC-4: Future Development. Cause an increase in the demand for recreation when measured against the following standard: Impede future development of Recreation Parks/Facilities and/or Regional Trails/Corridors.

Simi Valley Landfill Expansion Task Force

EXECUTIVE SUMMARY

Simi Valley Landfill and Recycling Center Expansion Project Recirculated Draft Environmental Impact Report, July 2010

The Simi Valley Landfill Task Force respectfully requests the City Council add the following paragraph to the Simi Valley City Council's response to the Recirculated Draft Environmental Impact Report (RDEIR):

There are 24 areas of significant impact identified in the RDEIR including air quality, demand for housing, water quality, flooding, migration corridors, scenic areas, local parks and cultural resources. Many of these impact areas cannot be mitigated and are deemed "unavoidable." The RDEIR is deficient to date due to the lack of information detailing the overarching economic, environmental and social benefits this project would produce for the local community.

- **Negative Impacts on Local Community**
 - Air Quality
 - Housing
 - Groundwater Quality
 - Flooding
 - Migration Corridor
 - Scenic Highways
 - Recreation
 - Cultural Resources

- **Local Economic Impacts**
 - Local Job Creation
 - Increment Tax Revenue
 - Sales Tax Revenue
 - Negative Impacts on the West End Specific Plan Area
 - Affordable Housing

- **Overriding Considerations**
 - Project is of no immediate need to the effected community

Comments to the Draft Environmental Impact Report, September 2009 Simi Valley Landfill Expansion		Simi Valley Landfill Expansion Task Force (SVLETF)	
Page/Lines	DEIR	SVLETF Comments	
ES-1/19-20	<p>EXECUTIVE SUMMARY - ES</p> <p>Provide a minimum of 15 years of waste diversion and disposal capacity to meet state-mandated waste diversion goals.</p>	<p>According to the Ventura County Countywide Siting Element component submitted to the California Integrated Waste Management Board in August 2009 for the 2008 reporting year (calendar), it states that based on the best available estimates of current and future disposal Ventura County has "21 years" of disposal capacity. Projecting 21 years from the 2008 base year gives a disposal capacity to the year 2029. This is seven years beyond the 15 required. A revision to the Siting Plan Assessment is not required as the disposal capacity exceeds 15 years. Although the Simi Valley Landfill Expansion Task Force strongly supports Ventura County landfill disposal capacity be met, the previously referenced CSE proves that the</p>	
ES-1/10-24	Project Purpose and Need and Project Objectives	Waste Management staff, in public meetings, has stated that an objective of the expansion is to divert landfill waste in the permitted area along the 118 Freeway to a location in the expanded area. This objective could not be found in	
ES-1/21-22	Provide an environmentally waste disposal and diversion operation that complies with local, state, and federal regulations and plans.	The current landfill division operation must comply with local, state, and federal regulations and plans. The stated objective of the proposed project does not support the	
ES-1/23	Minimize adverse impacts to environmental resources.	The proposed project does not support the stated objective. As shall be noted frequently in these comments, the project negatively impacts the environment, especially scenic resources, and as stated in the DEIR, the impacts	
ES-1/24	Provide harmony between the project and adjacent land uses.	The proposed project does not support the stated objective, indeed, as will be elaborated on, the project diminishes the harmony of adjacent land uses and future	
ES-2/10-13	..to encompass 186 acres of additional waste disposal area and to increase the total capacity of the landfill from 43.5 to 130.2 million cubic yards. The amount of MSW that could be received per day is proposed to increase from 3,000 tons to 6,000 tons and the amount of recycling to be reduced from 6,260 tpd to 3,250 tpd	The need for the proposed three-fold increase in landfill volume is not supported by facts or urgent community needs. It does support the applicant's economic bottom-line at the expense of the environment. Reducing recycling capacity does not support a sustainable future in which waste reduction, landfill waste diversion, and recycling is a necessity to address continued natural resource depletion	
ES-2/23-24	The proposed project would require a major modification to the existing SVLRC CUP (CUP3142-7) issued by the County of Ventura.	The proposed project DOES require a major modification to the existing CUP.	

Page/Lines	DEIR	SVLETF Comments	
ES-23	<p>Currently, SVLRC is permitted for a maximum limit of 822 roundtrips per day. Based on analysis of the current average waste delivery, the SVLRC currently receives approximately 470 truck round trips. This includes approximately 178 vehicle round trips hauling MSW and 292 vehicles round trips delivering recyclables. As part of the proposed project, SVLRC is project to generate up to a total of 892 vehicle trips (roundtrips) per day. This number involves up to 6,000 tpd of solid waste (547 round trips) and up to 3,250 tpd of recyclable materials (345 round trips).</p>	<p>How were the proposed recyclable round trips calculated if the current recyclables approved at 6,250 tpd generates 292 roundtrips and the proposed expansion with a reduced recyclables capacity of 3,250 is projected to generate 345 round trips? Less recyclables and more trips?</p>	
ES-3	<p>...bringing the total maximum projected vehicle trips (roundtrips) to 1,297 per day. Thus, the proposed SVLRC Expansion Project would result in a net increase of 475 vehicle roundtrips per day above SVLRC's permitted limit and 786 vehicle round trips above the baseline.</p>	<p>The projected daily trips per day of 1,297 is a 61% increase above the permitted limit and is a tremendous impact on the local area and air quality.</p>	
ES-3/29	<p>Municipal solid waste and recyclables from the local community....</p>	<p>Define "from the local community"</p>	
ES-6 Table ES-3-1	<p>States that the Proposed Project (Column 2) will have a total capacity of (million yd3) of 123 (row 5). Page ES-2 line 11 states 130.2 million cubic yards.</p>	<p>Which is correct, 123 million cubic yards or 130.2 million cubic yards at capacity?</p>	
ES-6 Table ES-3-1	<p>The landfill height (above MSL) for the Proposed Project is stated at 1,270. The existing permitted height is 1,118.</p>	<p>The differential between the proposed project and the existing project is 152 vertical feet or the height of a 15 story building over the proposed 371 acre landfill area. Specifics to be in the referenced letter need to be disclosed to ascertain water source and supply impacts. The CMWD Urban Water Management Plan (2005) does not include the court ordered protection of the Delta environment and reduced long-term draws on this water supply. The 2005 UWMP is required to be updated every 5 years therefore, this document is inadequate as a reference of water source and supply.</p>	
ES-11/22-25	<p>...the main source of water would be imported State San Joaquin Delta water. Because a water availability letter would be submitted by CMWD with the proposed project application, verifying that adequate water supplies are available; an updated water supply plan would be included as part of a Master Development Plan; and the CMWD is considered a permanent source of water.</p>	<p>Provide a full description of "baseline condition." More waste will be placed into an expanded area, not just into the landfill. This increases risks to the groundwater.</p>	
ES-11/31	<p>In addition, groundwater quality impacts due to landfill gas, pesticides, oil field impact, and laboratory contaminants would not become incrementally greater than the baseline condition as more waste is placed into the landfill.</p>		

Page/Lines	DEIR	SVLETF Comments					
ES-12/12-16	<p>However, recent on-site sampling data indicated that surface water quality objectives were exceeded for nitrates, nitrites, sulfate, total dissolved solids, total suspended solids, specific conductance, and several metals, including iron, lead, and mercury. Because 1) existing surface water quality at the SVLRC exceeds Basin Plan and Federal EPA benchmark water quality objectives, thus contributing to impairment of the Calleguas Creek watershed; 2) there is no indication that future landfill operations would be different from existing landfill operations; 3) currently contaminated runoff from the existing landfill would be co-mingled with liquids from the landfill, possible containing groundwater-based pollutants, would continue to be used for dust control surface water quality impacts are considered significant.</p>	<p>As stated, the existing landfill operations contribute to water pollutants and the proposed landfill operations will co-mingle more pollutants in an amount not known or reported therefore the impact is significant and a toe-barrier will not mitigate these unquantified pollutant discharges. How is the current situation being addressed as this is a great community concern?</p>					
ES-12/26-28	<p>The proposed landfill expansion would fill the Alamos Canyon tributary creek and substantially change the drainage performance of the drainage area., effectively eliminating the existing 100 year flood storage capacity of the tributary creek.</p>	<p>Filling a tributary and substantially changing the drainage performance is a significant impact to the environment and with unknown long-term impacts. The project expansion does not support this significant impact.</p>					
ES-12/33-25	<p>The structural integrity of the detention basin could be undermined by erosive floodwaters along Alamos Canyon Creek, resulting in significant flooding impacts.</p>	<p>This statement speaks for itself and is reason for not approving the project.</p>					
ES-13/23-24	<p>Construction and operational activities could adversely affect wildlife migration in Breas and Alamos canyons in a variety of ways.</p>	<p>This statement speaks for itself and is reason for not approving the project.</p>					
ES-13/30-31	<p>Construction and operational activities would result in a substantial direct reduction in population and direct long-term loss and degradation of habitat of two locally important plant species</p>	<p>This statement speaks for itself and is reason for not approving the project.</p>					

Page/Lines	DEIR	SVLETF Comments
ES-13/40-45	Direct loss of (habitats) as a result of landfill expansion represent a substantial reduction in these locally important communities, a long-term impact. In addition to direct loss of these locally important communities, expansion of the landfill would contribute to the degradation of habitat quality in adjacent areas due to off-site effects as well as introduction and spread of invasive non-native species in the project vicinity of the landfill.	This statement speaks for itself and is reason for not approving the project.
ES-14/5-6	However, the conversion and loss of locally important agricultural soils to industrial/commercial uses would be a significant impact on agricultural resource.	This statement speaks for itself and is reason for not approving the project.
ES-14/13-17	fugitive dust emissions would occur within the farmlands of local importance directly west of the project site in Los Alamos Canyon.	This statement speaks for itself and is reason for not approving the project.
ES-14/30-31	The proposed landfill footprint and elevations would be visible to individuals traveling eastbound on SR-118 and thus obstruct important visual resources experienced from SR-118, resulting in a significant impact to a scenic highway.	This statement speaks for itself and is reason for not approving the project.
ES-14/39-41	However, as the final landfill contour would extend above the existing horizon defined by the Santa Susana Mountain ridgelines and due to the proximity of the viewer, impacts on visual resource from the Alamos Canyon Trail vantage point would be significant.	This statement speaks for itself and is reason for not approving the project.
	As such, the project would introduce a substantial amount of new night light and glare, representing a significant change in the level of night light illumination when compared to what is presently generated over the project site.	This statement speaks for itself and is reason for not approving the project.
ES-15/27-30	In addition, the alluvial areas in canyon bottoms of the project areas would be subject to liquefaction in the event of severe seismically induced ground movement, potentially resulting in damage to site structures such as buildings, containment structures, leachate and gas collection facilities, and surface drainage facilities during project operations.	Define severe. This statement speaks for itself and is reason for not approving the project.
ES-16/34-35	the overall impact of the proposed project on paleontological resources would still be considered significant	This statement speaks for itself and is reason for not approving the project.

Page/Lines	DEIR	SVLETF Comments
ES-17	The SLVRC is located in a high wildfire hazard area, as it is surrounded by uncultivated, flammable vegetation in the form of (vegetation). Additionally, sufficient water pressure is available for fire fighting purposes a the SVLRC.	Water pressure is not the only determinant in fire suppression by local water supply. This is an inadequate response to a potentially perilous, and all to frequent, occurrence.
ES-17	...as well as all other relevant ...	Cite relevant codes, etc. How does the public know the relevancy and environmental impact if they are not cited?
ES-19/6	The Existing with project peak hour...	Sentence missing subject.
ES-19	The total new trips from the proposed expansion is 562 am peak hour PCE trips (246 inbound and 316 outbound) and 148 pm peak hour PCE trips (49 inbound and 99 outbound).	This is a substantial impact on air quality and traffic. As the inbound trips have one destination, the landfill, what is the queuing in distance projected for these peak hour transfer and packer trucks on the freeway and coming into the site? The queuing and slow approach to the landfill on approving the project.
ES-19/22-24	...all of the study freeway segments are project to continue to operate at unacceptable LOS D and E during the am peak hour and two of the three study segments are projected to continue to operate at unacceptable LOS D and E during the pm peak hours.	
ES-19/31-40	... Caltrans is currently in the process of environmental review.... A separate project....anticipated to improve the LOS....should improve LOS.	Relies on an incomplete project in the process of environmental review and without known funding as a mitigation measure.
ES-20/7-17 assure adequate potable and non-potable water for landfill operations....	Refer to comment on water supply and sources. The state mandate to reduce per capita water consumption 20% by 2020 will put greater pressure on existing water sources and reclaimed water for other projects throughout the service area, including using reclaimed water for large community benefit projects such as for parks. Information
ES-20/30-35	The Ventura County Environmental Health Division determined that because the public sewer system with capacity for additional wastewater load is not available within one-half mile of the SVLRC the proposed project is expected to meet the remaining two Sewer Policy exception conditions. Due to the size of the facility, the proposed project is expected to meet exception conditions #1. The proposed project would be expected to meet the three Ventura County Sewer Policy exception conditions and would not be required to connect to a public sewer system.	In reference to waste treatment/disposal the comments reflect expectations that exception conditions to the Ventura County Sewer Policy WOULD be met, however an expectation is not a reasonable basis without sufficient evidence supporting the claim, especially if this is a discretionary entitlement. No information is provided in this section about the exception condition process.

Page/Lines	DEIR	SVLETF Comments							
ES-20/39-39	... the Board would likely take jurisdiction over permitting the proposed on-site wastewater treatment plant under an individual Waste Discharge Requirements (WDR) permit.	Why isn't it known if the Board is likely to take jurisdiction over permitting? Why isn't there an affirmative statement and clarity as to the authority on the permit issuance?							
ES-21/5	A capacity study was completed to assess the future landfill capacity in Ventura County as it would be affected by the proposed project.	When was the study performed and what is the name of the study? Is the study provided in the Appendices and if so cite.							
ES-21/7-9	The results of the capacity indicated that the SVLRC would result in the County reaching its 15 year capacity in approximately 2060 based on the assumptions used in the model.	From 2009 to 2060 is a period of 51 years, not an insignificant amount of time or supporting a sense of urgency in the need for additional landfill capacity in the County at this time.							
ES-21/36-38	..., the proposed development would impede future development of recreation parks/facilities and regional trails resulting in a significant impact on recreational resources.	This statement speaks for itself and is reason for not approving the project							
Es-22/20-33	These pollutant nonattainment conditions within the project region are considered to be cumulatively significant. Impacts of multiple construction projects along with the proposed project could be cumulatively considerable. In addition, project construction and operations would produce emissions that would exceed the VCAPCD daily ROC and NOx emission thresholds for each modeled year. However, all other criteria pollutant impacts identified above would remain significant and unavoidable. Existing future project construction and operational activities would add additional air emission burdens to these significant levels of project emissions. Thus, the proposed project with mitigation would produce cumulatively considerable and unavoidable contributions to O3, No2, PM10, and PM2.5 levels.	This statement speaks for itself and is reason for not approving the project.							

Page/Lines	DEIR	SVLETF Comments	
ES-23/12-18	<p>Thus, the issue of global climate change is a cumulative impact and an appreciable impact on global climate change would occur when GHG emissions from a project combine with GHG emissions from other man-made activities on a global scale. The proposed project would produce GHG emissions that would exceed levels of GHG emissions produced from the existing SVLRC. The significance of the impacts in the absence of established criteria is not determined.</p>	<p>Explain why the EPA WARM model was not selected for the DEIR greenhouse gas emissions calculations. The EPA created the Waste Reduction Model (WARM) to help solid waste planners and organizations track and voluntarily report greenhouse gas emissions reductions from several different waste management practices. WARM is available both as a Web-based calculator and as a Microsoft Excel spreadsheet (317K WinZip archive). WARM calculates and totals GHG emissions of baseline and alternative waste management practices—source reduction, recycling, combustion, composting, and landfilling. The model calculates emissions in metric tons of carbon equivalent (MTCCE). Explain why the Climate Action Reserve Landfill Project Protocol was not used for calculations of the project landfill gas capture and destruction technologies. The protocol is designed to ensure the complete, consistent, transparent, accurate and conservative quantification of GHG emission reductions associated with a landfill project. Is this project controlled under other regulations. Projects registered with the CAR receive annual independent verification by ISO accredited and Reserve approved bodies. Guidance for verification bodies to verify approved bodies. This statement speaks for itself and is reason for not approving the project.</p>	
ES-23/23-32	<p>CMWD intends to initiate groundwater pumping from this basin. Because a water availability letter would be submitted by CMWD with the proposed project application, verifying that adequate water supplies are available; an update water plan would be included as part of a Master Development Plan... However, because of the uncertainty associated with future groundwater withdrawals by other users within the already over drafted Los Posas basin, the project's contribution to cumulative effects would potentially result in significant cumulative impact on groundwater quantity.</p>		<p>3.4.2.1 Federal Regulations There are several EPA regulations for MSW landfills that have a bearing on the eligibility of methane collection and destruction projects as voluntary GHG reduction projects. These regulations include:</p> <ul style="list-style-type: none"> • New Source Performance Standards (NSPS) for MSW Landfills, codified in 40 CFR 60 subpart WWW – Targets landfills that commenced construction or made modifications after May 1991 • Emission Guidelines (EG) for MSW Landfills, codified in 40 CFR 60 subpart Cc. – Targets existing landfills that commenced construction before May 30, 1991, but accepted waste after November 8, 1997 • The National Emission Standards for Hazardous Air Pollutants (NESHAP), codified in 40 CFR 63 subpart AAAAA – Regulates new and existing landfills
ES-24/15-17	<p>.... Calleguas Creek watershed, which is considered an impaired water body due to water column and sediment toxicity, organophosphate pesticides in water, and chlorophytos in fish tissue. The cumulative impact is significant and the contribution of the proposed project is cumulatively considerable.</p>	<p>Is "cumulatively considerable" equivalent or more severe than "significant" under CEQA?</p>	

Page/Lines	DEIR	SVLEITF Comments
ES-25/12-16	Together with past development, they would incrementally contribute to cumulative adverse impacts on agricultural resources. Cumulative impacts on agricultural resources due to dust may result from the combined incremental impact of increases in dust on agricultural parcels.	This statement speaks for itself and is reason for not approving the project.
ES-25/25-26	Therefore, the proposed project would result in a cumulatively considerable contribution to significant cumulative impacts associated with increases of dust on agricultural resources.	Is "cumulatively considerable" equivalent or more severe than "significant" under CEQA?
ES-25/36-39	Construction and operation of the proposed project would obstruct scenic views of the Santa Susana Mountain Range from the SR-118 scenic view shed resulting in cumulatively considerable contribution to significant cumulative impacts associated with obstruction of important public views from the SR-118 scenic viewshed.	Is "cumulatively considerable" equivalent or more severe than "significant" under CEQA?
ES-25/44-45	Therefore, cumulative impacts on scenic areas/features from the Alamos Canyon Trail would be cumulatively considerable.	Is "cumulatively considerable" equivalent or more severe than "significant" under CEQA?
ES-30/2-3	... there is a regional shortage of water pressure, which potentially affects fire fighting capabilities.	The relationship between this statement and the statement on page ES-17 that enough water pressure exists for fire fighting purposes needs to be resolved. In addition, for fire suppression purposes, there is a difference between volume of water capable of being supplied in a pipe versus the pressure needed to deliver the volume of water. The regional shortage is critical as this statement speaks for itself and is reason for not approving the project.
ES-31/13-14	Thus, the proposed development would impede future development of recreation parks/facilities and regional trails and impacts to these future facilities would be significant.	
EXECUTIVE SUMMARY TABLE ES32-64		
ES-32	LU-1: The applicant shall pay a one-time fee (as determined by decision making body) to a County approved low income housing entity or an established housing trust fund to assist in providing for construction of affordable housing within the vicinity of Simi Valley.	The fee has not been determined, therefore the mitigation of the impact is speculative. There are too many undetermined factors and lack of specifics associated with this mitigation measure. "Vicinity" is not described nor mapped.

Page/Lines	DEIR	SVLETF Comments
ES-33	<p>AQ-1: Contractor to minimize idling time, maintain equipment engines, lengthen the construction period during smog season. Encourage the use of alternatively fueled construction equipment such as compressed natural gas or electricity if feasible.</p>	<p>How does lengthening the construction period during smoke period decrease the daily AQ impacts? How are the impacts measured, where are the measuring devices to be located, and what is the measuring frequency to determine the efficacy of this mitigation measure? Minimizing idling time is not specific as to maximum idling time and there is no enforcement or compliance provision for this weak and ineffectual mitigation measure. Furthermore, the air quality impact and greenhouse gas calculations use five minutes for idling. This should be increased to 10 minutes if idling limitations of five minutes are not enforceable. "Encourage" is not a statement for which compliance or mitigation can be assured. "if" "Which is assumed" is not a definitive statement assuring the dust mitigation rule is adequate or enforceable.</p>
ES-33	<p>AQ-2: The calculation of unmitigated fugitive dust emissions from proposed construction activities is based upon compliance with VCAQMD Rule 55, Fugitive Dust, which is assumed to produce a 50 percent reduction in PM10 emissions from uncontrolled levels.</p>	
ES-35	<p>AQ-3: Beginning in 2009, convert equipment to engines with EPA Tier 3 standards, where feasible.</p>	<p>Instead of stating "where feasible" provide an equipment inventory and identify engines where conversion is not-feasible then assess the environmental impact.</p>
ES-35	<p>AQ-4: This would occur with the use of rigorous watering of the site and other control measures such as a limitation of vehicle speeds to 15 mph on-site.</p>	<p>Define and specify "rigorous watering" for determining adequacy in mitigating impact and what is the water quantity to be used on a daily basis to mitigate this impact. The quantity of water for dust abatement in Simi Valley, an area prone and known for the frequency of high winds must be quantified and included in the water resources</p>
ES-35	<p>AQ-5: ... recommends implementing an Emissions Reduction Program to ensure additional mitigation of air quality impacts by requiring the project proponent to contribute funds for programs that reduce air pollutant emissions from non-project sources. However, while several municipal jurisdictions in the county have enacted air emissions mitigation programs in the form of Transportation Demand Management (TDM) programs, Ventura County has not established a Government Code section 660000 fee rule or made a Board of Supervisors commitment to adopt such a fee rule to a access, collect and spend such fees on mitigation programs</p>	<p>It is incumbent upon the County to explain the lack of initiative in establishing a TDM program countywide. There is no specificity to what constitutes an Emissions Reduction Plan to ensure it is adequate in mitigating this significant impact. There is no value in asking for funds to "buy your mitigation measure" in the absence of specific measurable and enforceable requirements that mitigate the significant impact.</p>

Page/Lines	DEIR	SVLEIF Comments
	<p>... some other legally enforceable, feasible mechanism to achieve the same result is required. In this instance, a legally enforceable agreement between the County of Ventura, VCAPCD and the applicant (WMI) could be executed pay the assessed fees over a time period...fees would be used by VCAPCD.</p>	<p>"Some other legally enforceable" is still a "buy your mitigation measure" proposal and is weak in substantive value. Any funds or fees collected should be used exclusively in Simi Valley to offset the air quality impacts to residents and community members breathing the fouled air.</p>
	<p>It is uncertain the extent to which the SVLRC Emissions Reduction Program would offset overall project-related vehicular emissions and it is not possible to calculate what those reductions might be because the specific emission mitigation projects are unknown at this time. However, implementing an Emissions Reduction Program Agreement for the proposed Simi Valley Landfill expansion project is considered an effective emission reduction measure.</p>	<p>The statements are woefully inadequate in providing the public with assurance the significant impact will be mitigated to a level of less than significant. The public needs certainty not uncertainty. Why aren't the specific mitigation projects known at this time? When would they be known? How was the leap-of-faith assumption that reduction programs are effective made, on what basis, and by whom? Is it reasonable to assume the average person would come to the same conclusion?</p>
ES-37	<p>AQ-6; Odor Control Plan: ...implement Condition Number 41, Odor Control Plan in CUP 314207 during proposed operations at the SVLRC. This plan shall be updated as deemed necessary to comply with current regulations by the VCEHD and Planning Division.</p>	<p>Why isn't an update of the plan being performed now and part of this DEIR. Certainly, the substantial expansion proposed qualifies as the "deemed necessary" justification.</p>
ES-37	<p>Impact AQ-7c: Potential incremental contributions from the project to global climate change. See AQ-3</p>	<p>The response references AQ-3 which does not address climate change gases other than Nox and only in relationship to on-site off-road mobile equipment. The Task Force requests that the State Attorney General's Office, the Environmental Protection Agency, the California Air Resources Board and the California Integrated Waste Management Board provide review and</p>
ES-39	<p>WR-3: Detention/Sedimentation Basin Armoring: shall be armored sufficiently to withstand erosive flow associated with a 100-year storm event along Alamos Canyon Creek.</p>	<p>The mitigation measure does not provide sufficient information to determine adequacy of "armored sufficiently."</p>
ES-39	<p>BIO-1: In the event of positive surveys results, the project applicant would consult with the USFWS to determine whether formal Section 7 consultation should be initiated.</p>	<p>"Would", "whether" and "should" are not definitive statements ensuring mitigation will result in a less than significant environmental impact.</p>
ES-41	<p>Bio-4: 2 - project site or other property...</p>	<p>Define "other property" and parameters to determine adequacy of mitigation measure.</p>
	<p>Bio-4: 11protection of the mitigation sites in perpetuity..</p>	<p>How will "in perpetuity" be assured? What site protection measures will be stipulated?</p>

Page/Lines	DEIR	SVLETF Comments
ES-42	<p>Bio-5: The permitted shall implement vector control methods to deter refuse scavenging species such as gulls and crows from the water disposal area. In the vicinity of Alamos Canyon, vector control methods (such as noisemakers and propane cannons, distress call, and use of falcons and dogs) that could result in the avoidance of the use of Alamos canyon as a wildlife corridor shall be avoided.</p>	<p>Define and map "vicinity." The expansion is directly adjacent to Alamos Canyon. What is meant by "shall be avoided" as it is not a clear statement nor an enforceable statement assuring the mitigation measure is adequate. Is the county aware of the project applicant's current use of falconers? How can falcons be controlled in the air space?</p>
ES-43	<p>Bio-6: ...in and adjacent to the Alamos Canyon wildlife corridor...</p> <p>Bio-8: Because it is not known which of these measures would be technically feasible, the standard for success of this measure will be implementation and maintenance of three or more of the actions identified below, which have been previously identified by experts as actions that would facilitate wildlife crossing under SR-118 plus the two measures identified below that are applicable to all three crossings.</p>	<p>Provide map and three dimensional space defining protection area "in and adjacent to" Alamos Canyon.</p> <p>Why is this mitigation open ended by stating "three or more?" Why isn't more project information provided to better ascertain technical feasibility?</p>
ES-45	<p>Bio-8: Additionally, collaboration should be done with local groups to secure conservation easements on properties between...</p> <p>Bio-9: These measures shall be updated as necessary and applied to the proposed project."</p> <p>Bio-9:....portable wind fences..</p>	<p>"Collaboration should be done" tells the public what? What local groups is the measure referring to? Could the applicant set up their own "local group?"</p> <p>What agency determines update and when? What is the criteria for determining "as necessary"?</p> <p>Define and adequately describe portable wind fences.</p> <p>What is the aesthetic impact of these fences?</p>
ES-47	<p>AG-1: Soils impact - mitigation - none feasible</p>	<p>This is a significant impact for which no mitigation is proposed. The loss of agricultural soils in the densely populated southern California locale, impacts future food security. By decreasing available agricultural lands near population centers, more food must be transported from</p>
ES-48	<p>AG-2 Dust - mitigation impact</p> <p>Impact VIS-1: Scenic Highways - mitigation - none feasible</p> <p>Impact VIS-2: Scenic Areas/features - All landscaping plans shall follow the Ventura County Guide to Landscape Plans guidelines.</p> <p>VIS-2: Glare. Develop a lighting plan</p>	<p>This statement speaks for itself. The impact on Simi Valley's beloved viewshed will forever be marred by the proposed mountain of trash into perpetuity.</p> <p>This significant impact is mitigated by the mere suggestion of following a guideline. How the scenic impact is mitigated is not described nor is the landscape plan goals expressly stated. How do the guidelines relate to or A photometric study should be required to determine lighting impacts on nocturnal wildlife.</p>

Page/Lines	DEIR	SVLETF Comments
ES-50	Geo-1: Paleontological Mitigation Program: An updated/expanded PMP shall be submitted by Waste Management to the County for review and approval.	When will this be submitted? What are the mitigation measure requirement for this significant impact? How will the impacts be lessened? Is the current plan inadequate
ES-52	Cul-1: ...avoid Wharton Ranch... WS-2: Water supply quantity.	Provide a map of the area to be avoided. Explain in specific terms why the impact on water supply is less than significant and why mitigation measures are necessary when page ES-11 states a water availability letter would be submitted by CMWD with the proposed project application, verifying that adequate water supplies
ES-54	REC-1: Local parks/Facilities: The applicant shall pay in lieu fees for local parks/facilities.	How does paying a fee mitigate the impact? Although this may be common practice, the benefit of this practice to this specific project and impact on local parks/facilities is
1. INTRODUCTION		
1-1, 33	1.2 Project Purpose and Need	No supportable "need" for the project is substantiated in
1-1, 29	SVLRC engages in recycling	WM is a business and recycling is not an engagement for WM but a business component. "Engages" oversimplifies the impact of the combined business expansion proposal. The 2007 estimated annual revenue of the U.S. recycling industry was \$236 billion. Recycling rates in the United States have doubled since 1992. Reducing the recycling component of the landfill operations from 6,250 tpd to 3,250 tpd does not address the significant benefits of recycling. It limits the capacity of the landfill to meet the next generation of waste diversion and that is the growing recyclables market spurred by increased diversion requirements. The CIWMB states "the environmental impacts of recycling are astounding. Each year recycling saves enough energy to power 1.4 million California homes and reduces water pollution by 27,047 tons. The same beneficial impacts of recycling stated by CIWMB should be stated in this DEIR.
1-1,34-35	The purpose of the proposed project is to provide long term waste management capability within the Ventura County.	It shall be noted that the DEIR did not define "long-term" in years for this statement. As has been previously stated, the waste management capability of the county is not in jeopardy with the county having 21 years of capacity

Page/Lines	DEIR	SVLETF Comments
1-1, 35-37	Communities within the counties of Ventura and Los Angeles that comprise the major customers of the SVLRC are expected to experience population increases during the planning period of the proposed project (to 2054).	The DEIR acknowledges that Los Angeles County is a "major customer" of the SVLRC. Projected population increases in and of themselves do not constitute a direct or implied need for landfill expansion. On the contrary, waste reduction laws, regulations, and public education control waste to landfill. Residential disposal in California
1-2, 7-9	WMC seeks, via this proposed project, to extend the site life and to continue providing a solid waste disposal facility that would adequately serve the areas beyond 2050.	"Adequately serve the areas beyond 2050" is a nebulous phrase as there is no reference to what constitutes "adequately" and secondly, "beyond 2050," is an indefinite horizon. Suggestedly inserted to support the need for the proposed expansion, these statements fail to meet this objective. Furthermore, no calculations are provided to demonstrate that the county, the region or the state is not
1-2, 10-27	Project Objectives	As has been stated, the project objectives do not provide a basis for supporting that the particular solution (proposed landfill expansion) is necessary at this time, in the next five years, in the next decade, or in the next 15
1-4, 2	In order to receive a revised SWFP (Solid Waste Facility Permit) the landfill operator must submit an application to the EHD (Ventura County Environmental Health Division).	The requirements of the SWFP need to be provided and described in the DEIR to ascertain the bearing of the permit and the local agency's enforcement power on environmental protection. The timing and sequencing of the permit in relationship to the EIR and CUP needs to be provided as well to ensure mitigation is meaningful and that the enforcement mechanisms are in existence prior to
1-4, 11-12	In addition to these major permits, various other permits would be required from Ventura County Building and Safety, Environmental Health, and Fire Department	What are these permits? What are the requirements for these permits? Do these permits have a bearing on the project's environmental impact? Are these separate permits or sequential? Do these permits have a bearing on the "major" permits? For purposes of the DEIR what

Page/Lines	DEIR	SVLETF Comments
1-5 to 1-20	Table 1-2. Comments Received During the Public Scoping Process	It is not full disclosure nor in the public's best interest to solicit comments on a project of this magnitude and regional significance and to answer pointed questions raised by the public by referring to sections of the DEIR - not pages, not lines but entire sections. This requires the public to seek and interpret the question independent of an answer being provided by the paid DEIR professionals. As an example, Simi Valley Mayor Paul Miller asked a direct question (page 1-10), "What population will be served by the expansion?" The response given is "Chapter 2.0 Project Description." CHAPTER 2 IS 64 PAGES IN LENGTH. Other questions are answered with the ambiguous phrase "Comment Noted." What good is
		Until responses to the public comments have been addressed the Task Force does not have the information necessary to comment in detail on whether the comments/questions raised by the public have been
2. PROJECT DESCRIPTION		
2-1.	Table 2.1-1 Existing and Proposed CUP Expansion Parcels	There are 11 parcels associated with the project. In the unlikely event that the County should approve this unnecessary expansion request, a condition of approval should be required to consolidate all of these parcels into one parcel in compliance with the Subdivision Map Act and to ensure no parcels are segmented or sold off at a future date to the detriment of the environment; to ensure buffer areas remain intact; and to ensure mitigation measures such as habitat protection are not compromised nor diminished. The lot consolidations are also necessary This material lies at unknown locations, but under more recently deposited trash, and without a leachate impervious liner. DEIR does not address geologic
2-6, 20-21	From 1971 until 1982, the landfill received approximately 29,000 tons of solid, liquid, and contained hazardous waste.	This is expressly why a hasty rush to approve the unnecessary expansion at this time may prove to be of a significant detriment to the environment and the health of residents in the community in years to come. Lessens of the past should be lessens for the future. It is not known what the past practices of unprotected hazardous waste landfill may have when combined with future waste
2-6, 29-	At the onset of this disposal activity in 1971, it was generally not required by permit nor was it within the state of the art to place a liner or leachate collector below the waste. Such was the case at the Simi Valley Landfill, where it has been reported that neither a liner nor a leachate collector were installed beneath the Class I area.	
2-7, 2-24	2.3 Existing Landfill Design and Operation	

Page/Lines	DEIR	SVLEIF Comments
	<p>2.3.2 Daily and Intermediate Cover: 2.3.4 Waste Delivery and Processing: Appendix B, Air Quality Table B-1 PP-2; Table 2.3-1</p>	<p>Critical information on daily cover and Alternate Daily Cover (ADC) is missing and is not referenced. Analysis is not provided on the daily cover and ADC to determine the environmental impact of daily cover and ADC increases associated with the substantial landfill expansion. The ratio of landfill disposal waste, the daily tonnage, the volume of daily cover, and the ADC composition is not provided as part of the project description yet it is a critical operating practice required by the state and should be evaluated for environmental impacts. The reader must dig deep to understand the operational aspects of ADC employed and proposed at the landfill. In Section 2.3.5 Waste Delivery and Processing, waste is divided into two categories 1) Municipal Solid Waste and 2) Recyclables. What is not expressly provided is the amount of</p>
		<p>The public must extrapolate from multiple DEIR sections and appendices to try to figure out how much of the allowable ADC can be derived from "recyclables" thus permanently landfilled. Using the maximum ADC of 1,466 tons/day (to increase to 2,931 for the proposed expansion) and subtracting the recyclables that can be used for ADC from Table 2.3-1 (1,070) it is inferred that 100% of the recyclables collected can be used for ADC. In essence no recyclables need to be recycled off-site because WM needs the material to meet the state requirement for ADC. The DEIR is seriously negligent in not fully explaining and evaluating the environmental impacts of the total materials (solid waste and recyclables) permanently landfilled and leaves the false impression that recyclables are reused off-site. The proposed project ADC requirement is listed as</p>
		<p>Coincidentally, the proposed tonnage of recyclables (3,000) nearly matches the maximum ADC (2,931) for the expansion. In Table 2.4-4 Summary of Current and Proposed Permit Limits for Materials Received at SVLRC, no data on daily cover or ADC is provided. In the project description the DEIR hides behind daily cover, alternate daily cover and recyclables in an effort to avoid disclosure of the true environmental impacts of the project ADC. It appears that the construction and demolition operations along with the green waste collection amount to practices</p>

Page/Lines	DEIR	SVLETF Comments
		For purposes of determining the base amount of solid waste from which the diversion requirements of this article shall be calculated, "solid waste" does not include the diversion of agricultural wastes; inert solids, including inert solids used for structural fill; discarded, white-coated, major appliances; and scrap metals. In other words, the CWMB strategic directives call for halving the amount of organics sent to the landfill by 2020. This goal may have an impact on the source for the Simi Valley Landfill ADC
2-9, 21-25	Non-native, non-invasive species (such as barley) can be used for short-term erosion control on temporarily exposed slopes.	What is the definition of "short term"? Has the short term non-native species used for cover been evaluated for its environmental impacts in relationship to local native species and for water impacts? For example, barley may require 6-8 inches of water or more to germinate and
2-10- 2-15	Leachate, Liners, etc.	According to published studies, HDPE landfill liners have been shown to contain numerous leaks over unit area resulting primarily from construction defects. Pressure, vacuum and spark testing are available testing methods, however DEIR has failed to adequately evaluate risk
2-15,	Table 2.3-1 Average Tons per Day of MSW and Recyclables Received at SVLRC	What is the time period for which the "average" was calculated? (See also comments under 2-9, Daily Cover)
2-15, 24-25	The majority of the MSW is received in packer trucks. Packer trucks hold eight to 10 tons of waste.	How much is a "majority" in this reference (51%, 99%)? The percentage closer to actual should be included in the description as the information should be known. In other sections page 2-26) of the DEIR transfer trucks are listed as the primary trucks and they are stated as having a capacity of averaging 20 tons apiece. The DEIR needs to resolve the difference and use of terms "packer trucks"
2-41, 2-6	Surplus excavated soils would be stockpiled on or near the active landfill face for later use as cover. In addition, a varying amount of cover material would be surplus dirt delivered to the landfill by contractors from local construction projects. With these available sources of soil, no need is anticipated for additional soil to be imported from outside the site.	What is missing from this description is that 1) ADC can be used for daily cover in lieu of soil, 2) that the soil brought in from contractors used for daily cover is not considered "waste" and is not factored into the waste received daily but as "recyclables", 3) there is no mandatory requirements that the stockpiled soil must be used for daily cover before any outside materials are used, and 4) there is no reference to or analysis of the time limit,
2-16,	Recyclable Material	In each description of the recyclable material categories, the average amount used for ADC average in tons per day should be provided

Page/Lines	DEIR	SVLETF Comments
2-17, 8-13	<p>In current operations, approximately 16.3 million gallons of potable water and 11 million gallons of reclaimed water are supplied to the SVLRC by CMWD annually. Approximately 4 million gallons of potable water is supplied to the off-site GI Rubbish hauling facility annually by CMWD. ... this water use would be discontinued at the current GI Rubbish location.</p>	<p>What quantity of water will be required at the SVLRC to continue the GI Rubbish location operations which currently use 4 million gallons of water annually? Just because it is stated that the water will no longer be needed at the GI's current site by GI does not mean a new use will not have a 4 million gallon water need nor that the relocated use will not need 4 million gallons or more. In the water impact section, it is unclear if the 4 million gallons of water at the current GI Rubbish site was subtracted from the water purveyors supply needs or left in for a future probable and similar use. Both sites are</p>
2-17, 29-30	<p>This excess landfill gas is incinerated in an on-site flare.</p>	<p>Irrespective of the landfill expansion request, the County should require that the current excess landfill gas be put to a beneficial use not for atmospheric exhaust.</p>
2-17, 33	<p>LFG typically contain 30 to 60 percent methane (by volume), up to 45 percent carbon dioxide,...</p>	<p>Carbon dioxide emission are known to effect global climate change and will be subjected to more rigorous emission controls in the near future. The DEIR has failed to adequately address the leakage of carbon dioxide, or in</p>
2-18, 14	<p>and a 10,000 gallon wastewater storage tank...</p>	<p>What is the collected wastewater used for? How is it disposed of if there is no connection to the municipal sewer system? Is this water used as part of the landfill operations? How long does it take to fill the 10,000 gallon tank? Does tank storage need to be expanded to meet the needs of the landfill expansion? If yes, how much? If the</p>
2-19, 8	<p>...as well as to produce excess electricity that can be sold to electricity suppliers for off-site use.</p>	<p>Is this excess electricity sold to electricity suppliers? "Can be" does not describe the current LNG produced and its actual use. How much electricity is produced and how much will be produced with the expansion? Is this an</p>

Page/Lines	DEIR	SVLETF Comments
2-19, 24-30	<p>The SVLRC is required to comply with a variety of plans and programs to reduce the impacts of operation on the both the work area and surrounding area as conditions of CUP-3142-7. Programs include, but are not limited to a: groundwater and leachate monitoring program; gas emissions control and monitoring program; wind monitoring program; noise abatement program; visual impact mitigation program; fire protection program; seismic design; clay and cover availability study; site sign program; noise abatement plan; hazardous waste exclusion program; radioactive waste exclusion program; emergency procedures program; on-site drainage control plan; and stockpile plans. Several to these programs are outlined below..... Odors.. Litter... Dust... Vectors.... Visual....</p>	<p>No narrative is provided as to the effectiveness of these programs in mitigated the associated impacts or achieving program goals. The programs outlined (odors, litter, dust, vector, visual) are not specified in the previous listing. The relationship between these two sets of lists needs to be provided. Why aren't all programs listed instead of using the "but are not limited to" phrase? The full description of environmental control measures needs to be provided.</p>
2-18, 38	<p>The Odor Control Plan also identifies steps to be taken to mitigate odors in the event of a compliant.</p>	<p>What are the steps for mitigating complaints? How effective are these steps? How are complaints filed and received? Has the complaint process been reviewed by a third party to ensure effectiveness? With the tripling of the landfill, increased opportunities for odor complaints may arise in which case the public should have the necessary information in the DEIR to evaluate the effectiveness of past and future measures for submitting, receiving, and</p>
2-18-19, 42-2	<p>An odor control product mixed with water is emitted from nozzles when warranted by landfill operations and wind conditions. The Material Safety Data Sheet (MSDS) for this product is provided in Appendix A.</p>	<p>The MSDS provided is dated 1998. Is there a more recent MSDS than one 11 years old for this product? Aren't MSDS required to be updated and available on the site? If so, is this project in compliance with this requirement? Has this been the sole product used for odor control in the past nine years? Does the DEIR include an analysis of the environmental impacts of this odor control substance? What are the associated health risks of this substance? Are there any stated requirements or conditions of approval for monitoring and approving the product selection? Is there a generic odor control substance description as opposed to a product? What safer products</p>

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		<p>The MSDS (material data safety sheets) for this product, Odor Armor, found in Appendix A, states that there are "not established" criteria for OSHA and other categories; that the respiratory tract sensitization is listed as "no data available"; that teratogenicity reproduction effects are listed as "no data available"; and that mutagenicity is listed as "no data available". What is the definition of "when warranted"? Is this described in the Odor Control Plan? If so, it should be provided in the DEIR. Are there other</p>
2-19, 7	<p>Litter ... periodic inspection and cleanup of site and surrounding area to ensure the ongoing cleanup program is effective in collecting any litter that may have escaped;</p>	<p>Has this litter control program been evaluated by an independent third party for compliance and effectiveness "to ensure the ongoing cleanup program is effective in collecting any litter that may have escaped" for</p>
2-19, 11-12	<p>A Dust Suppression Plan (DSP) was approved by the Planning Division in 2003. The Plan contains descriptions of procedures used to minimize dust generation including</p>	<p>Has this six-year-old DSP been evaluated by an independent third party for compliance and effectiveness for environmental impact dust mitigation?</p>
2-19, 25	<p>SVLRC also uses treated leachate for dust suppression ...</p>	<p>Is this described and analyzed as a health risk?</p>
2-19, 33-34	<p>Vector Control Program... periodic inspections are conducted to determine levels of various vectors.</p>	<p>Has this VCP been evaluated by an independent third party for compliance and effectiveness to ensure that it controls vectors as an environmental impact mitigation? Define "periodic inspections" and is this a reasonable time period for control? How are levels of various vectors determined and what constitutes an unacceptable level?</p>
2-19, 36-37	<p>In addition, nuisance birds are controlled by a variety of noise-making devices and other harassment methods including falcons and owls whose presence discourages other birds.</p>	<p>Has an assessment been done to determine if these harassment methods have a negative impact on native birds?</p>
2-10, 1-6	<p>Visual. A Visual Impact Mitigation Program was approved ... in May 2003. The Plan provides a description of how the landfill operations will be effectively screened from the view as seen from SR-118 and surrounding properties.</p>	<p>If in 2003 it was deemed by the County to effectively screen the landfill from the view as seen from the SR-118 and surrounding properties, the same should hold for the proposed expansion. The rationale and environmental consequences for imposing this conditions and VIMP requirement must stand today as they did in 2003. Where is the analysis of the effectiveness of the 2003 VIMP? Waste Management staff, at public meetings, has stated that a purpose of the landfill expansion is to preserve the</p>

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2-21, 30-31	Environmental Monitoring. The SVLRC is subject to various state and local regulations pertaining to environmental monitoring at the site. Specific monitoring requirements include water quality, landfill gas migration and air quality.	The impact and effectiveness of these "various" regulations cannot be ascertained if the list is incomplete. This should be known information disclosed in the DEIR.																	
2-21, 33-35	Site Closure	What is the anticipated use of the project site after closure? Plans for the current, and proposed 887 site after operations cease in 2050 should be disclosed? What has been the post-closure use for other landfills with similar conditions? The community needs to know what the probable uses of this site is after closure. If it is too																	
2-21,	Final Grade... 15 foot wide benches every 50 vertical feet... final cover elevation is proposed to be 1,118 feet above msl.	There is no discussion of contour grading replicating natural land forms at final grade and project closure for the current nor for the proposed project expansion. This should be mandated by the county. The significant visual impact of this project cannot go unaddressed by relying on business-as-usual manufacture red and engineered slopes of artificial proportions, grades and contours. 15-foot benches every 50 vertical feet are visual blights upon																	
2-21, 13	Final Cover. Two feet of appropriate materials compacted to the maximum density obtainable at optimum moisture content in accordance with accepted civil engineering practice.	What constitutes "appropriate materials"? Shredded tires, construction waste? If yes, how will vegetation grow on these mediums? Some vegetation absorbs lead and other metals from the soil. Wildlife then eats the vegetation and can suffer health impacts. Has this been addressed in the																	
2-21, 27	...average Ventura County waste represented 1,276 tons per day out of average total receipts of 3,681 tons per day.	This phrase does not define the "waste" per previous descriptions and tables. Is this municipal solid waste, recyclable waste, or the total solid waste? Using these figures, out-of-county waste constitutes 65% of the "waste" received by the landfill in 2008. This percentage will dramatically rise with the Ventura County quantities																	
2-23, 30	The closed landfill site will provide 235 acres of open space.	What is the final disposition of the 235 acres of open space? Who will own it? Will this require a zone change? Can this be future waste areas per the Ventura County Integrated Waste Management Plan Countywide Siting Element, 1995? What prevents this acreage from																	
2-24, 2-63	2.4 Proposed Project - SLVRC Expansion Project	Most of the comments under Section 2.3 Existing Landfill Design and Operation apply to Section 2.4																	
2-24,	Table 2.4-1 Comparison of Existing and Proposed Landfill Expansion Project	The elevation limit for the proposed expansion is given as 1,270 +/- 5 feet. This is not a "limit" but a range and the CUP must establish an actual limit, not give or take 5 vertical feet (multiplied by the page 26 feet) is a sizable																	

Page/Lines.	DEIR	SVLETF Comments
2-26, 12-21	Under the proposed project the permitted fill elevation would increase from 1,118 feet above msl to approximately 1,270 feet above msl, for a net increase of 152 feet. The proposed project would leave the existing natural ridgelines intact from most viewpoints and blend the proposed elevation of the landfill with the adjacent hilltops and ridges, which vary from approximately 1,000 to 1,350 feet above msl.	As stated above, "approximately" is not a limit but a range. The DEIR needs to be definitive on the vertical limit in elevation of the proposed expansion. The "blending" concept needs to be fully explained to understand the impact and it is not clearly explained as to what "adjacent hilltops and ridges" are referenced here. An aerial photo with contours and ridgelines shown should be required to illustrate this concept.
2-26, 27-29	SVLRC from its currently permitted 43.5 million cubic yards (cy) of air space and 34.8 million tons of waste, to 130.2 million cy of airspace (an increase of 86.7 million cy) and 104.2 million tons of waste (an increase of 69.4 million tons).	These calculations to the decimal point support the need for stated height limits, not approximations. As previously noted, the sizable expansion request has not been proven to be necessary at this time.
2-26, 34-37	Assuming the additional disposal tonnage is delivered exclusively by transfer trucks averaging 20 tons apiece, there would be an increase of 150 deliveries per day if the full 6,000 tpd of disposal tonnage is received.	What is the impact on local roads and highways for these additional heavy weight (20 tons each) deliveries. This concentrated weight and frequency will certainly shorten the life of these roads at a cost to the tax payer.
2-28,	The SVLRC has not generally received as much MSW and recyclable material as it is permitted to receive. Table 2.4-4 Summary of Current and Proposed Permit Limits for Materials Received at SVLRC. Baseline condition 2,521 tons per day disposals. Currently permitted 9,250 tons per day, baseline condition 3,444 tons per day.	Yet again, the facts speak for themselves in why an expansion is not necessary at this time. The existing permitted landfill is not receiving its permitted capacity, but only 37% (3,444/9250 tons). The table does not provide tonnage of recyclables diverted off-site. Theoretically, the recyclables exported would reduce the baseline daily tonnage, so the daily variance in permitted tonnage and
2-29, 7-8	Based upon actual or baseline receipts (2,521 tpd) it is anticipated that the landfill would reach its currently permitted capacity in 2028 (based on disposal 6 days per week, 312 days per year).	Another reason why the proposed expansion is not necessary at this time. (See also comments on Appendix K - Waste Capacity Study)
2-29, 32	The facilities area would include a MRF/RTF to enhance recycling capabilities for the community.	The proposal seeks to decrease recyclables permitted from 6,250 tons per day to 3,250 tons per day, a difference of 3,000 tons per day so it is contradictory to state that the proposals seeks to enhance recycling capabilities. Additionally, "the community" is not defined so
2-29,	front end processing of up to 500 tpd of source separated recyclables and/or the transfer of recyclables... could be immediately reloaded into transfer vehicles without on-site processing	it is unclear as to the quantity of the 500 tpd is projected to be transferred for off-site reuse. This needs to be stated for all recyclables categories.

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2-32, 2-3	The existing entrance road would be expanded to accommodate three in-bound queue lanes and one bypass land within the gates of the SVLRC.	Explain expanded from what?
2-32, 7-22	C&D Debris Recycling. This area would migrate within the waste disposal footprint. Residual material meeting the definition of C&D ADC would be ground for use on the active face. Green Waste. Most of the processed materials would be removed off-site after chipping. The material that remains on-site would be used for mulch and/or ADC. No composting is proposed as part of this operation.	The very nature of the C&D operations to be sited at the active landfill cells underscores the lack of sincerity in recycling and reusing C&D materials off-site for a better and higher use than a component of landfill operations. "Most of the processed materials" in regards to greenwaste needs to be defined. If this is indeed the business case, the county should ensure this by conditioning the project to remove off-site (and not to another landfill or temporary holding area, or for LNG usage) a stated majority in tonnage for greenwaste to be removed. Composting of greenwaste for a better use is preferred yet the project proposal includes no composting facilities in a geographic area rich in premium farmland. This should be a mitigation measure for the project.
2-32, 23-34	Expanded Landfill Gas to Energy (LFGTE) Operations. Electricity generated from these additional systems would be used internally to power new and expanded buildings and facilities with the excess sold to the local utility grid and/or support a LFGTLNG facility at the SVLRC.	How much energy is projected to be used at the expanded facilities? How much energy is projected to be excess? It is assumed but not stated in the DEIR that there is a market for the excess electricity. This needs to be made clear.
2-39, 2-28	Landfill Gas to Liquefied Natural Gas Facility. The facility would produce up to 13,000 gallons of LNG per day. Landfill gas typically contains 30-60 percent methane up to 45 percent carbon dioxide as well as nitrogen, oxygen, water vapor,....commercially marketable product (dry ice), which would be exported off-site. Not more than approximately six truckloads per day would export there by-products off-site. The remainder of the LNG would be exported by tanker truck (typically 10,000 gallon capacity trucks) for use off-site.	In order for a LNG plant to function, it requires the long-term burying of a large stream of organic and other carbonaceous wastes at the site. More garbage, more gas. The plant, like gas flares or their existing on-site generators, is in reality a mitigation measure to prevent methane and toxic gases produced by decaying waste from entering the atmosphere. Methane is 20 times worse than Co2 as a GHG precursor. This is why the CA Air Resources Board, through AB 32, is trying to implement measures to divert organics from landfills. This needs to be disclosed for the environmental impact and mitigation measure that it is. The dry ice production is a separate for-profit business as is the excess LNG trucked for sale off-site. How is this factored in the permitting
2-39,	Cover Slopes	See previous comment under natural contour and grading
2-41,	Stockpiling of Soil for Cover Material	See previous comments under section 2.3
2-43,	Water Supply	See previous comments on water supplies and sources.

Page/Lines	DEIR	SVLETF Comments
2-43,	Construction. The C&D debris recycling activities and green waste processing operations would occur on the landfill footprint in an area not receiving waste and would migrate from place to place within the landfill....	See previous comments on sincerity of C&D waste for reuse off-site.
2-49, 6-43	Waste Quantities and Truck Traffic. Average traffic counts during first quarter 2008. Based on the above projection methodology, future daily trips related solely to landfill operations (that is, not to commuter trips) were calculated to be 1,173 trips per day. This is larger than the 892 trucks per day projected in Waste Management's application for the proposed project and, therefore, considerable more conservative.	Is it industry practice to only use traffic counts for one quarter in forecasting future trips for a project of this regional significance and scope?
2-50,	Table 2.4-13 SVLRC Permitted, baseline and Proposed Vehicle Trips. 1,010 maximum daily round trips net vehicle trip increase from baseline vehicle round trips.	Where in the table are LNG and dry ice transport listed? These products are not recyclables, not waste material, and not employee trips.
2-52, 2-63 1	Measures to Minimize Environmental Impacts Table 2.5-1	See previous comments under section 2.3 and 2.4 on effectiveness, etc., of plans, programs. Where in the DEIR are the plans and programs provided in their entirety for review? Vector Program and Hazardous Waste Inspection Program appear to be missing from the table. Permitted
3 ENVIRONMENTAL SETTING AND IMPACT ANALYSIS		
3.1-1-3,	Regulatory Setting. Ventura County General Plan	The SVLETF has not had an opportunity to review this section in its entirety.
		No mention is made as to the project's compatibility with the Ventura County Integrated Waste Management Plan Countywide Siting Element, 1995 and associated maps

Page/Lines	DEIR	SVLETF Comments
3.2-13	Greenhouse gas emissions. Table 3.2-4 Annual GHG Emissions for Operation of the Existing SVLRC - CEQA Baseline Period of 2009-2034	<p>The table should provide the CO₂e in million metric tons not units of million metric tons. There is no shortage of space to include the actual figures in the table and it is misleading to the public to include a figure of 0.54 for total 2009 CO₂e when the actual projection is 540,000 million metric tons. There is no summary comparing the Total Annual GHG Emissions for the existing project, to the proposed project, to alternate 2 project in the appendix nor in section 3. There is no Table in section 3 or the Appendix with totals for the entire project ghg emissions (construction and operations) and comparing these totals with the existing project and alternative 2. The total greenhouse gas emissions from all sources is not summarized in section 3. There are 164 tables in the</p> <p>Until this data is provided in in Section 3 and in tabular format in the appendices the SVLTF cannot provide thorough comments on the significant environmental impacts and health hazards associated with greenhouse</p>
3.2-29, 8-9	Proposed building construction would meet at a minimum Silver Level certification under the LEED Green Building Rating System, developed by the U.S. Green Building Council.	<p>The LEED green building rating system is a flexible, points based system for evaluating project design, plans, specifications, construction, commissioning, and post-occupancy performance in five areas: 1) Sustainable Sites, 2) Energy, 3) Water, 4) Indoor Air Quality, and 5) Materials and Resources. There are NO credits expressly for greenhouse gas emission reductions although the USGBC is currently developing the means to address this gap by developing a 'common carbon metric' for those who are dedicated to promoting the understanding and development of a green, low-carbon and sustainable built environment. The metric is recognised by the UNEP Sustainable Building and Climate Initiative, and will be highlighted before decision-makers in December 2009. LEED review and verification can take up to nine months post occupancy to complete.</p>
4. CUMULATIVE ANALYSIS		
This section to be reviewed		The SVLETF has not had an opportunity to review this
5. ALTERNATIVES		

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5-12, 26-29	<p>implementing a watershed boundary is therefore not without numerous potential political and economic difficulties. Based on the court cases and other issues discussed above, as well as the potential for political conflict and economic constraints, a watershed boundary imposed on the SVLRC by Ventura County is considered infeasible and is not analyzed further in the EIR.</p>	<p>The SVLETF has not had an opportunity to review this section in its entirety.</p> <p>Explain why CEQA allows dismissal of alternatives based on "potential political and economic difficulties?" Isn't the purpose of CEQA to protect the environment and fully evaluate environmentally superior alternatives?</p>
AP K (page 6)	<p>Appendix K Waste Capacity Study - Under its conditional use permit limits, the Toland Landfill may accept waste only from the residents of the Santa Clara Valley and commercial loads having been processed through a Ventura County transfer station or materials</p>	<p>In direct contradiction to the above statement as to why limitations on waste from defined areas is politically and economically difficult (although not impossible) as well as citing Commerce Clauses, the Toland Landfill does have limitations as stipulated in its CUP.</p>
		<p>The Toland landfill CUP.3141 Mod#3 dated May 22, 1996 states: "Exclusive In-County Waste Acceptance. This condition implements the voluntary limitation in the permittee/applicant's project description, dated 12/4/95 (Condition Attachment 2) as modified by the applicant during the (Board of Supervisors) public hearing regarding this permit, that Toland shall accept only waste (including green waste and other Class III refuse) generated in the County of Ventura except for existing (out-</p>
		<p>This condition of approval for a Ventura County landfill is a precedent that negates the SVLRC DEIR's meritless assertion that watershed limitations are infeasible and proves that "potential political and economic difficulties" have been overcome in the past by the Ventura County Board of Supervisors. For this reason, and the fact that voluntary limitations are an accepted county practice, the</p>
5-4,	<p>5.3.3 Alternate Landfill Technologies</p>	<p>The DEIR does not evaluate off site, non-disposal alternatives such as biorefineries and the DEIR fails to evaluate or to note studies and projects supporting the environmental benefits of these alternative waste to</p>

Page/Lines	DEIR	SVLETF Comments							
5-7,	5.3.3.2.2. Thermochemical Conversion	<p>The DEIR inaccurately characterized and assessed thermochemical conversion by limiting the discussion to plasma arc, gasification, and pyrolysis although many other waste conversion technologies are commercially available. The primary reason given for the lack of evaluation being economics yet no pro-formas are provided and no substantiated evidence is given as to the environmental benefits of these technologies over the lifetime of the project. If economics are to be used as a driving criteria for evaluating or not evaluating project alternatives then the entire spectrum of the true cost to the consumer, the community, the tax payer and the environment need to be included as part of these evaluations.</p> <p><i>Local governments and state courts are already obligated</i></p>							
5-10,	5.3.4.2 Change California Policies to Increase Diversion and Require More Recycling	<p>The DEIR should acknowledge that currently before the California legislature are bills to raise the state landfill diversion mandate from 50% to 75% to improve manufacturer's responsibility, and to reduce certain products (e.g., single-use plastic bags) from the waste stream. The DEIR should acknowledge that both Ventura County and the ten cities have the independent authority</p> <p>The DEIR should acknowledge the waste reduction strategies described in the Southern California Association of Governments (SCAG) 2008 Regional Comprehensive Plan (RCP) Solid Waste Chapter which provides guidance to area communities in addressing the unsustainable practice of "mismanaging our natural resources by operating as unsustainable as to these and the associated health</p> <p>The DEIR should evaluate the environmental benefits of every jurisdiction in the county adopting Zero Waste Strategic Plans as planning tools with implementation measures to aggressively reduce their associated waste-to-landfill streams. Zero Waste represents a fundamentally different approach that tackles the root causes of waste generation and broadens responsibility for the solutions. This is also associated with reducing</p>							

Page/Lines	DEIR	SVLETF Comments
		<p>Suggested strategies to reduce waste generation in the County must include: 1) each jurisdiction submitting a Zero Waste Strategic Plan for approval by the year 2012, 2) re-evaluating the tipping fees and associated charges to encourage diversion, 3) supporting state legislation to increase diversion from 50% to 75% while placing restrictions on how Alternative Daily Cover is calculated and permitted, 4) make manufacturers more responsible for the cradle-to-grave product waste generation, 5) implement aggressive and innovative waste reduction</p>
		<p>7) promote and support energy recovery facilities at existing county landfills for both power and liquid fuel production as beneficial landfill gas mitigation alternatives, 8) create partnerships with local renewable energy producers for government procurement of green power, and for the fueling of green municipal fleets, 9) support a</p>
		<p>The county should also promote, support and incentivize new or expanded material recovery, construction and demolition debris recovery and composting facilities both at landfills and at existing off-site locations with the caveat that the collected materials are re-introduced into the environment for beneficial reuse - not buried in a landfill for profitable operating practices. The county should commence active procurement processes for the siting and development of advanced waste conversion facilities as industrial parks or as eco-park land use</p>
		<p>The County should evaluate the green job creation through reuse and recycling in comparison to the standard landfill operations. According to figures released by the Institute for Local Self-Reliance (ILSR), on a per-ton basis, pallet repair operations sustain 14 times more jobs than disposal facilities, electronics reuse enterprises sustain 68 times more jobs, multi-material reuse facilities sustain 38 times more jobs, and textile reuse businesses create 37 times the number of jobs as disposal facilities. Thus, the potential to create new jobs through reuse is enormous. ILSR estimates, for instance, that 110,000 new jobs could</p>

Page/Lines	DEIR	SVLETF Comments
5-56,	5.5.5.1 Impacts of Alternative 5: No Project Alternative	This is the only preferred alternative considering the significant environmental consequences resulting from this premature and unnecessary expansion. As had been previously mentioned, the Ventura County decision makers need to flex their authority in assuring aggressive landfill waste diversion practices be proactively adopted by
	9. REFERENCES	Ventura Waterworks #8 Urban Water Management Plan of 2005 is not referenced. Ventura County Integrated Waste Management Plan Countywide Siting Element, 1995 is not referenced.
	APPENDICES	The SVLETF has not had an opportunity to review the appendices in their entirety.
	APPENDIX B-1 EMISSION CALCULATIONS	The SVLETF has not had an opportunity to review this section in its entirety.
Page 147-148	Table B-1-B-6c Proposed Project Total Greenhouse Gases Generated from Landfill Gas: CO2e Emissions (Metric Tons). 2009 - 169,043.84 metric tons. 2020 - 192,288.75 metric tons.	These projected emissions are significant but only include totals for landfill gas. The appendix does not appear to contain a table totaling all greenhouse gas emissions for the project (stationary, mobile, fugitive, operations and construction). Is the expansion request at this time seeking to avoid proposed EPA health hazard findings requiring federal permits for both new facilities and existing facilities undergoing major expansions which emit more than 25,000 tons of GHG annually? The EPA is
	APPENDIX K WASTE CAPACITY STUDY	The SVLETF has not had an opportunity to review this section in its entirety.
Page 1	The proposed project would expand the waste capacity of the SVLRC to 98.5 million tons, an increase of 63.7 million tons above current permitted levels. Approximately 31 percent of waste accepted (SVLRC) in the first quarter of 2008 originated outside the County.	By doubling the solid waste daily capacity from 3,000 tons to 6,000 tons, the SVLRC will increase its for-profit capacity for receiving trash outside of Ventura County from 31% to 65% using the 2008 quarterly results. Profit alone cannot be a reason for permitting an expansion at this time.

Page/Lines	DEIR	SVLEITF Comments
	<p>The model extrapolates future waste disposal rates based on a factor related to projected population growth using the current distribution of sources that deliver waste to the facility (first quarter 2008 baseline data). It is important to recognize that projections far into future years are subject to a great deal of uncertainty.</p>	<p>In forecasting future disposal rates the waste capacity study relies exclusively on one quarter of SVLRC landfill results. A waste capacity study of this magnitude should not rely on one quarter's data but should include an entire year and include normalized conditions using past trends. Within the DEIR the recent (past 12 months) economic downturn has been cited as a reason for less waste</p>
Page 3	<p>In areas, such as eastern Ventura county, with a large waste generating population nearby, there is reason to believe that imposing a wasteshed boundary would prolong the life of a landfill while at the same time curtailing the economic rewards of operating the facility.</p>	<p>The assumption that imposing a wasteshed boundary is directly related to curtailing economic rewards of operating a landfill facility is not proven. This rationale is unfounded speculation and based on economic rewards as opposed to environmental protection.</p>
	<p>Restricting waste received to only Ventura County ...that scenario was deemed too speculative to provide useful information and therefore is not reported here.</p>	<p>As has been previously stated and cited, the justification for not including a wasteshed analysis is meritless. While the DEIR, in compliance with CEQA, can cite "too speculative" as a reason for not pursuing an alternative it</p>
Page 7	<p>Waste generation is a function of population, employment, business activity and consumer spending. More people plus an increase in better paying jobs leads to growth in the purchase of goods and ultimately waste generation.</p>	<p>This statement is a misrepresentation of waste generation factors and should be stricken from the DEIR. It assumes that all growth increases waste. Regulatory environments, public awareness, manufacturers' responsibility among other factors, contribute to waste reduction, reuse, and recycling. Case in point, California's residential per capita</p>
Page 7	<p>In Ventura County, total waste requiring disposal peaked in 2005.</p>	<p>This contradicts the previous statement unless the growth in the County has been nonexistent or reduced since 2005. Moreover, this statement supports the fact that waste generation is not directly attributed to growth and perhaps, it can be proven, that diversion programs have</p>
Page 7	<p>Table 1. Disposal and Alternative Daily Cover in Ventura County</p>	<p>The respective disposal to ADC percentages for the years 2004, 2005, 2006 and 2007 are 1.4%, 13%, 3% and 8%.</p>
Page 8	<p>Table 2. Simi Valley and Toland Road Landfill Disposal and Alternative Daily Cover in Ventura County</p>	<p>The Simi Valley Landfill, respective disposal to ADC percentages for the years 2004, 2005, 2006 and 2007 are 17%, 7.3%, 24% and 27%. This is a phenomenal ratio of disposal to ADC at the SVLRC and supports the false notion that greenwaste, shredded tires, construction materials and other materials are being diverted from the Simi Valley Landfill. There are also discrepancies in the annual mass of trash (tons/year) found on this table compared to Table B-1-B-2 Baseline Estimated Trash Volumes & Daily Cover Needs by Year. In particular Table 1 lists 2005 disposal as 2,098, 103 tons and table B-1 lists 2005 disposal as 2,098, 103 tons.</p>

Page/Lines	DEIR	SVLRTF Comments		
Page 8	About 7 percent of the disposal waste originating in Ventura County is disposed in Los Angeles County.	What is the impact on this to the SVLRC? There is no description of the waste leaving the county so the impact is not known. It is also unknown if this is a trend for future projections of county generated waste. Does the term		
Page 9	Figure 1. Simi Valley Landfill and Recycle Center Total Disposal and ADC and Toland Road Landfill Total Disposal and ADC, 1995 to 2007 by Quarters.	This graph illustrates the phenomenal misconception that ADC materials are recycled, reused or diverted off-site and it illustrates the significant amount of ADC that is permanently landfilled along with solid waste - with the percentage of ADC increasing annually. What is missing from this graph that needs to be shown is the separation of ADC and total disposal for Toland. Additionally, the report does not include a graph depicting waste and ADC for the proposed project in comparison to the existing conditions. Furthermore, there is no description as to the capacity of landfill in fulfilling its increased ADC requirements for the proposed project (2691 tons daily) where the ADC materials will come from and the composition of the ADC. If greenwaste is a primary		
Page 9	Some 64 percent of the materials accepted in the first quarter of 2008 were from Ventura County with slightly over 31 percent originating in Los Angeles County, the next largest source.	One quarter is not enough to statistically draw conclusions from. This table needs to show all quarters of 2008 compatible with the baseline established for air quality and greenhouse gas emissions.		
Page 14	The March 25, 2008 air space report estimated the remaining capacity of SVLRC at 57,654,299 tons. The proposed expansion is estimated to increase the capacity by 63.7 million tons.	Table B-1 B-1 under Air Quality list the air space available in cubic yards. Why are two different units (tons and cubic yards) used for airspace? It is difficult to ascertain the environmental impacts when different units are used to		
Page 14	Table 9. Assume Transfer of Disposal Wastes to SVLRC from Landfill Closures	The table accounts for closures but it does not, nor does the report, include data on the Mesquite Regional Landfill in the Imperial County. The 2,290 acre landfill is under construction and expected to be operational in 2012 with a permitted capacity of 20,000 tons per day of municipal solid waste. This waste-to-rail system is being developed		

SIMI VALLEY LANDFILL EXPANSION TASK FORCE

Comments to the Simi Valley Landfill Expansion D.E.I.R.

December 9, 2009

The Simi Valley Landfill Expansion Task Force concludes that there is no evidence in the public record supporting a Statement of Overriding Consideration for the Simi Valley Landfill and Recycling Center expansion request. The project Draft Environmental Impact Report (DEIR) identifies significant environmental impacts resulting from the proposed project which cannot be mitigated. Moreover, the DEIR is unable to make a compelling reason or matter of urgency supporting an expansion at this time. It is the Task Force's opinion that, to satisfy the applicant's expansion request, the Ventura County Board of Supervisors must adopt a Statement of Overriding Consideration with unsubstantiated findings as no fair argument can be made that the merits of approving the project outweigh the environmental damage resulting from the project expansion.

As proposed, the project will be the second highest man-made structure in Ventura County, attaining a height of 1,270 feet above sea level; the colossal slopes and artificial ridgeline formed by the mammoth collection of 123 million cubic yards of waste will permanently scar Simi Valley's beloved view shed into perpetuity; the landfill will destroy the Alamos Canyon tributary creek and eliminate the storage capacity of the EPA-designated 100-year flood plain (see Appendix F (HEC-RAS) containing a total of 270 Errors warning Notes); construction will result in the reduction in population and direct long-term loss and degradation of habitat of two locally important bird species; the economic gain of an insignificant number of jobs created by the project will be significantly outweighed by the loss of potential job creation, business development and retention in adjacent properties; the project's expanded coverage from 185 to 371 acres will destroy locally important farmland; and the project will increase the region's cumulative carbon footprint in a time where California leads national efforts to reduce greenhouse gas emissions.

An approval of a project with regional significance will send a signal that the county is willing to sidestep aggressive efforts to control waste generation within its boundaries and will take the "easy out" solution for the continued and unsustainable practice of dumping waste in and on our precious lands. However, by firmly and resoundingly rejecting the unsubstantiated claim that the expansion is needed now, future generations will hold the County Board of Supervisors and the Simi Valley City Council in high regard for protecting their ability to enjoy a safe and prosperous life.

In the best interest of the residents of Ventura County, the Task Force encourages the Board of Supervisors and the Simi Valley City Council to take this opportunity to proactively partner with jurisdictions and members within its boundary to strengthen waste diversion rates, improve recycling programs, expand waste educational programs and to lobby for aggressive waste reduction legislation and support 21st century engineering technologies to convert waste to energy and inert useable materials.

1. Supporting Reasons

In addition to the above statements, the Task Force finds the following deficiencies of the DEIR:

Reason #1: The public record for the project does not provide information detailing how the county's waste disposal options have been exhausted and that the landfill expansion is of vital need for public safety and to address a dire waste storage situation. In fact, the DEIR is erroneously silent to the Countywide Siting Element's findings, adopted by the ten Cities, with regard to projections of future waste generation, remaining disposal capacity, and disposal alternatives. Conservative landfill capacity estimates, prepared as recently as 2009, conclude that twenty-one years of capacity, at a minimum, are currently available in Ventura County without the subject landfill expansion.

Reason #2: Odorous emissions from the proposed expanded landfill have not been adequately evaluated. No receptors have been established nor has an acceptable dispersion model been prepared. In concluding that odors will be minimal, or sufficiently masked by perimeter perfumed chemical dispersants, the DEIR refers to the lack of historic public complaints of odors. In fact, hundreds of odor complaints have been made according to residents of surrounding residential communities and commercial businesses, although the specific County of Ventura department or official may not have been contacted. Most residents of Simi Valley maintain the belief that the subject landfill is, in fact, a part of the City of Simi Valley.

Reason #3: The DEIR fails to adequately evaluate negative environmental impacts of the landfill expansion over an oil and gas field. Although public comments were previously provided to the authors, the document has failed to incorporate a methane or hydrogen sulfide site evaluation. Additionally, the DEIR has failed to address well known industrial accidents associated with the mixing and horizontal/vertical migration of landfill gas, gas storage reservoir gases and biogenic gases generated from landfill operations as may be magnified and not readily mitigated due to landfill gas impermeable liners. State requirements for 1,000 ft. boundaries extending beyond the landfill may be substantially unable to provide an adequate environmentally safe buffer that may, in fact, be on the order of one mile or larger.

Reason #4: The "no project" alternative cannot be refuted and proves that no expansion is justified at this time or in the near future.

Reason #5: There is strong supporting evidence that the State of California is committed to its Zero Waste Policy and towards that end actions, programs and legislation will continue to be introduced to achieve this goal.

Reason #6: The DEIR fails to adequately address either off-site alternatives of local governments to promote and procure next-generation nondisposal facilities that effectively divert post-recycled residual wastes to beneficial use, or on-site waste

conversion technology facilities at the landfill. The document addresses only limited technologies that are relatively obsolete in the United States or not cost effective. Other state-of-the-art technologies are either misconstrued in terms of effectiveness or in terms of costs.

Reason #7: The DEIR fails to evaluate a watershed boundary for the landfill. While the document notes Federal restrictions on government mandated regulations, it fails to address the alternative of negotiated boundaries.

Reason #8: The DEIR is rife with statements concluding that the actual project impacts cannot be fully disclosed at this time and will require further studies, reports, plans and actions to be prepared.

Reason #9: The DEIR identified secondary for-profit business that will result from the proposed expansion including, but not limited to, production and off-site transport of LNG and CO₂ as dry ice. Both of these businesses are known to result in significant environmental risk, including explosivity and ammonium or other toxic compounds, yet neither process has received environmental risk review in the D.E.I.R.

Reason #10: The DEIR has failed to adequately address Community concerns to the expansion application. Off-the-cuff responses in the DEIR, as example "comment noted", "see Section 2" and "responsibility of another Agency" are incomplete and do not provide required response.

Reason #11: The proposed landfill expansion may be out of compliance with the Ventura County Siting Plan which identifies areas in the County suitable for landfill operations based on criteria established by the plan and ratified by all Cities within the County. The DEIR fails to address requirements imposed by, and maps incorporated therein, the Plan, including, but not limited to, residential and certain health sensitive business receptors.

Additional specific comments to the DEIR are summarized following on the attached Exhibit made a part of this submittal.

Submitted this 9th day of December 2009 by the Simi Valley Landfill Expansion Task Force.

Barbra Williamson, Chair
Simi Valley Landfill Expansion Task Force

Members: Charles Blaugrund; L. Maitland; Jason Oliver; Louis J. Pandolfi;
Alice Sterling; Robert Swoish;

Simi Valley Landfill Expansion Task Force

436 Sunbonnet Street, Simi Valley, CA 93065

9 September 2010

County of Ventura
Resource Management Agency, Planning Division
Attn: Becky Linder
800 South Victoria Avenue, L#1740
Ventura, CA 93009-1740

RE: Simi Valley Landfill and Recycling Center Expansion Project
Recirculated Draft Environmental Impact Report, July 2010

Dear Ms. Linder:

The Simi Valley Landfill Task Force respectfully submits comments on the Simi Valley Landfill and Recycling Center Expansion Project Recirculated Draft Environmental Impact Report (RDEIR) which is tentatively scheduled to be presented to the Ventura County Board of Supervisors in early 2011.

The Task Force's comments contained herein are in addition to the extensive comments previously submitted on the project's Draft Environmental Impact Report (DEIR). Upon review of the materials contained in the RDEIR, the Task Force ascertained that many of our previous comments had not been addressed in the RDEIR and that it is unknown as to how the County determined what comments were of significance as no direct response on the public comments received was provided as part of the RDEIR. The Task Force is deeply concerned that the County will not provide enough time for public review once these items have been addressed and made available to the public as part of the final EIR.

Task Force Summary:

As the host community for the landfill, the Task Force implores the County to safeguard the interest of Simi Valley from the numerous individual and cumulative adverse environmental, economic and social impacts the expansion will cause on our community. If the County approves the project as proposed, the Task Force finds the magnitude of the environmental damage that will be inflicted on the community to be significant as is substantiated by the breadth of issues raised in the RDEIR.

Identified in the RDEIR are no fewer than 24 areas contributing to a significant environmental impact prior to mitigation, 13 areas remain significant after mitigation, and seven areas cannot be mitigated and are therefore determined to be "unavoidable." The Task Force finds that these undesirable and irreversible impacts can be lessened and/or avoided altogether by altering the project scope and objectives; employing 21st century waste management technologies and alternatives to permanent landfill

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disposal; accelerating and augmenting Countywide waste collection and recycling programs; banning organics from landfills; adopting stringent waste diversion goals that exceed California State requirements; and adopting rules to increase manufacturer responsibility for product disposal. The County must show leadership by enforcing a progressive and forward thinking strategic waste reduction plan for the jurisdictions and agencies within its border before it can contemplate an expanded Simi Valley Landfill with its adherent multi-generational impacts. The County can take steps to aggressively explore recommendations contained in the County adopted comprehensive bioenergy platform of 2001 and to leave a legacy that protects present and future generations.

The following findings reflect the Task Force's position on this matter. In submitting our comments, the Task Force emphasizes that insufficient time was afforded for a thorough review of the substantial changes contained in the RDEIR, such as in the Air Quality Report (Appendix B – Volume II) which is 730 pages in length and is replete with technical graphs, charts, tables and calculations related to air pollutants, toxic emissions and global climate change impacts. Challenges in reviewing this report were exacerbated by the inclusion of tables without labels, lack of summary information, the DEIR and Appendices removal from the County website, and general reader-unfriendliness of the report. The RDEIR contains nearly 1,000 pages in addition to the substantial body of materials contained in the previously circulated DEIR.

Significant Environmental Impacts per CEQA

In reviewing the project documents, the Task Force finds no less than 24 areas of significant impact including air quality, demand for housing, water quality, flooding, migration corridors, scenic areas, local parks and cultural resources (see summary table Attachment A). After mitigation, there are 13 areas of significant impact and seven impacts that are declared "unavoidable." Particularly distressing are the detrimental "unavoidable" impacts to Simi Valley on housing demand, local parks and scenic highways. Once the landfill operations cease, sometime in the middle of this century, Simi Valley will be left with a forever-altered scenery caused by the mammoth pile of waste permanently landfilled in our community. These environmental impacts will also have an economic impact discussed below.

CEQA Statement of Overriding Consideration:

As cited above, the Simi Valley Landfill and Recycling Center Expansion Project will cause significant and sustained environmental damage. When a project will cause one or more significant environmental effects, CEQA requires the lead agency, the County in this case, to prepare a statement of overriding considerations **IF** it considers approval of the project. The County must express its views in writing as to how the merits of approving the project, despite the environmental damage, is balanced by competing community objectives (including environmental, legal, technical, social, and economic

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factors). The statement must be substantiated by specific reasons based on the final EIR or other substantial evidence in the record.

In March 2010, CEQA Section 15093, titled "Statement of Overriding Considerations" was amended to provide that region-wide or statewide environmental benefits should be considered when a decision-making agency balances "the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project." Section 15093 also now provides, "If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal project outweigh the unavoidable adverse environmental benefits, the adverse environmental effects may be considered "acceptable."

The Task Force stands by its previously submitted comments in which we expressed our lack of discovery in the public record supporting a landfill expansion at this time or for a compelling reason or matter of urgency for the requested expansion. Moreover new information in the RDEIR further supports our position in that there are additional areas of significant impact not previously identified and not therein properly addressed. Indeed, the RDEIR contains a revised Air Quality section which calculates the enormous quantities in metric tons of greenhouse gas emissions attributed to the SVLRC expansion. Contrary to the above cited CEQA statement, the GHG emissions are a region-wide and statewide adverse environmental impact that cannot be sustained. The County must demand a 21st century approach to the waste generation, diversion and disposal needs of the community to avoid these regional impacts.

Economic and Social Impact Deficiencies:

Discussion of project-related social or economic damage is not required under CEQA, unless social and economic issues will potentially cause specific damage. While not required by CEQA, public costs and revenues of a project may be analyzed concurrently with environmental review.

Speaking specifically to the landfill expansion, the project may have a negative economic impact on Simi Valley, particularly the West End Specific Plan and the thousands of jobs and related revenue forecasted for this area. The landfill expansion will usurp the land previously marketed as a future site for local clean jobs - without the hazard and complications of the landfill. In the 2007 Technical Background Report for the City of Simi Valley General Plan Update it states:

"The expansion of the landfill footprint has potential land use implications for future development within Simi Valley. Expansion of the landfill would **limit the potential** (emphasis added) for new industrial/business park uses that could otherwise be developed as part of the West End Specific Plan."

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Simi Valley's protection of its bedroom community character is pronounced in the measures adopted in its General Plan to prevent urban decay by providing local jobs for its residents and increased tax revenue by new businesses that will employ them. The RDEIR does not address the project's economic impact and potential damage to our community nor does it provide plans for offsetting this impact. The County must provide the public with an economic review and analysis of project impacts and it must consider the views held by members of the public in all areas affected by the project. The County must not limit its economic analysis to tipping fees received.

Two recent cases stand out, as testament to the need for economic review under CEQA and go so far as to require that when there is evidence that the social and economic effects caused by a project could result in a reasonably foreseeable environmental impact, such as urban decay, this indirect effect must be analyzed by CEQA.

In the case of Bakersfield Citizens of Local Control v. City of Bakersfield, the 5th District Court of Appeals rejected the EIR because it failed to evaluate potential urban decay impacts that may have resulted from a single commercial project. In Anderson First Coalition v. City of Anderson, the 3rd District took a different approach in determining what a lead agency must do to evaluate urban decay impacts in order to satisfy CEQA; substantiation that review of economic impact is paramount. Simi Valley cannot sustain more job losses therefore the Task Force urges the County to prepare an economic study evaluating the potential negative impacts on the community including the causation of future economic blight particularly from the loss of forecasted local jobs.

Mitigation Measures:

The RDEIR contains a menu of mitigation measures which supposedly will lessen the severity of the 24 environmental impact areas. These measures include complex plans, multiple agency reviews, collection of fees, cooperative agreements with the applicant, numerous permits, good-faith-efforts on the applicant's part, periodic reviews, submission of samples, construction activities, completion of surveys, and implementation of control measures to name a few. The RDEIR also cites areas where the impact is significant but unavoidable because there is no 'feasible' mitigation measure.

Under Air Quality, the RDEIR provides an extensive list of features to include in an emissions reduction program, but states as a conclusion that it is **uncertain** the extent to which the program would offset overall projected related vehicular emissions and it is not possible to calculate what those reductions might be because the specific emissions mitigation projects are unknown at this time. It shall be noted that this program includes a provision that funds be collected for a countywide lawn mower replacement program as a mitigation measure for the fouling of Simi Valley's air quality by the landfill project.

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The Task Force is deeply troubled by the faith the County appears to place in the applicant in adhering to each and every mitigation measure. The Task Force implores the County to direct mitigation fees and efforts specifically to Simi Valley where the brunt of the environmental damage will be sustained, long into the future, should the project be approved as presented. It is also unclear how the County can determine that mitigation will be successful in lessening the impacts of this substantial regional project in the absence of a thorough and detailed Mitigation Reporting or Monitoring Program. It appears that the County is hopeful but "uncertain" that each and every mitigation measure will be successful. It also appears the County assumes each and every agency has agreed that they have the authority and means to accomplish the designated enforcement responsibilities necessary for achieving the recommended mitigation measures.

Project Purpose and Project Objectives:

The RDEIR includes yet another version of the project purposes and project objectives including "to provide waste disposal capacity within Ventura County" which supposedly addresses long-term availability of Ventura County's landfill needs. The Task Force questions why a project of this size and scope has three versions of the project description and objectives (1 - application for expansion, 2 - DEIR and 3 - RDEIR) yet continues to leave out the most obvious purpose - namely to increase its profits by accommodating Los Angeles County's ever expanding waste disposal needs.

The RDEIR (Volume II Appendix B – Air Quality, Table B-1-B-17) contains a table with data for trucks entering the Simi Valley Landfill in 2008. The table paints a picture of where the trucks are coming from and how even at the current permitted waste disposal allowances, an inordinate number of trucks come from outside the County limits – a few examples follow:

LA County 1,337
Sun Valley 168
Anaheim 768

Van Nuys 390
Pacoima 171
Granada Hills 144

Play del Rey 157
Huntington Beach 89

Truck loads come from as far as Hemet and San Bernardino and this will only increase if the project is approved yet this does not improve waste disposal capacity for Ventura County as is inferred in the project purpose. The County should pointedly demand an explanation as to why increasing the landfill waste disposal to accommodate agencies outside of Ventura County is not expressly included in the project purpose.

Air Quality Report Deficiencies

As previously mentioned, the RDEIR includes a newly revised Air Quality Report. This substantial re-write was necessary to address the significant greenhouse gas (GHG) emissions caused by the project construction and operations, and expansions to the

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liquefied natural gas processing facility (LFGTLNG). The RDEIR concludes that the GHG emissions will exceed annual thresholds suggested by California State and Ventura County (10,000 CO₂e metric tons a year) therefore they are a significant impact and “cumulatively considerable.” Furthermore, no mention is made of AB 32’s goal of reducing GHG emission to 80 percent below the 1990 level by 2050 and how the project will comply with this goal.

Operation of the proposed landfill expansion will significantly contribute to GHG in the order of 520,270 metric tons annually by 2041 or nearly three times the current landfill GHG emissions (estimated at nearly 178,000 metric tons or 17 times the stated threshold). Not surprising, the mitigated project emissions (519,559 metric tons) are only slightly less than the unmitigated project emissions (520,270). Furthermore, the Air Quality section of the RDEIR does not present a summary table of the calculations for the project alternatives (similar to Table 3.2-15 Annual GHG Emissions) so no comparison can be made to ascertain whether alternatives would pose less than a significant impact on air quality. Table B-1-Alt2-2 Alternative 2 Total Greenhouse Gases appears to be incomplete or cut-off.

Model parameters for calculating the GHG emissions state a methane generation rate (k) of 0.050 (AQ Report -1 and Report 2) and 0.700 (AQ Report 2). The Task Force could not find a k input value of 0.700 listed in the EPA LandGem values and the Task Force would like to know how the 0.700 value was determined.

The Task Force found a k value of 0.020 for semi-arid areas that receive less than 25 inches of rainfall per year. The Task Force would like to know why the default k value of 0.050 was used instead of the 0.020 value when Simi Valley receives less than 25 inches of rainfall per year.

The Air Quality section does not fully explain the assumptions and rationale for excluding biogenic GHG emissions from the project GHG emissions estimates or why biogenic emissions account for a nearly 53% reduction in the estimated GHG emissions. This critical information and explanations need to be provided.

The estimated GHG emissions currently caused by the gas flares represent 50,926 metric tons of carbon (CO₂e) and account for 29% of the total landfill existing GHG emissions. Putting this into perspective, it is about the amount of GHG generated by the annual electricity used by 6,200 homes – or 5,729,856 gallons of gasoline. This is a phenomenal disclosure. So significant is the GHG emissions attributed to the landfill flares that the project was revised to increase the LFGTLNG facility to accommodate landfill gas diverted from the flares. The Task Force finds this existing condition caused by the gas flares of particular concern and the County should demand that this existing environmental impact be addressed - immediately. The County must disclose how the current project complies with Title 17, CCR Article 4, Subarticle 6, sections 95460 to 95477 in which landfills that generate methane over a specific threshold must install landfill gas control equipment and/or perform specified monitoring and reporting.

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In light of the regional and national significance of global warming and the discrepancies raised by the Task Force on the GHG emissions calculations included in the RDEIR, the Task Force requests an **independent peer review and summary** of the Air Quality Report be submitted prior to the County Board of Supervisors consideration of the project. This action is needed to assure the public that this information is correct. It would be advantageous for the County to request a review be performed by the EPA.

Hazards Assessment

In the RDEIR, Appendix N, Hazards Study for Bio-LNG Facility Simi Valley Landfill, the Task Force has serious reservations on an assumption for projecting worse-case LNG explosion potential. The report states that calculations for flammable vapors associated with the LNG tanks “assumes a release rate of 330 gallons per minute which is an assumed truck loading flow rate.” What is not calculated is an assumption that takes into account a catastrophic failure of the 15,000 gallon tank (of a magnitude well in excess of 330 gpm) coupled with immediate ignition. The Task Force poses the question, “Wouldn’t the County benefit from understanding the hazards associated with a worse-case explosion to better prepare the community unlike the recent events emanating from the BP offshore platform explosion in the Gulf of Mexico?”

Landfill Liners

In the past, the Task Force has raised concerns over the efficacy of liners used in landfills. The RDEIR states the following:

The Los Angeles Regional Water Quality Control Board (LARWQCB) recently concluded that geosynthetic clay liners (GCL) “would not afford the same protections to groundwater as the prescriptive liner system” (two feet of clay overlaid by HDPE) due to “recently observed deficiencies on GCL at several landfills ... and the concerns that certain mechanical and chemical properties of GCL may not be as reliable as a compacted clay liner” (LARWQCB 2009). Therefore, unless the LARWQCB approves an alternative, a prescriptive liner would be necessary in future expansions of the existing landfill.

An additional two feet of soil will need to be excavated to mitigate this mechanical deficiency. The Task Force cites this as a further example of the risk associated with making a premature decision to approve the project expansion and the severe consequences that may result in future years. Additionally, the excavation of another two feet of soil over the expansion area has not been fully calculated nor addressed. How much clay is this in cubic yards for the entire expansion area? Has the current

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mitigation monitoring plan been amended to address the deficiencies in current practices?

Alternatives Not Addressed

The Task Force eagerly anticipated that previously raised concerns on the inadequacies of evaluating viable project alternatives, a major component in CEQA, would be included in the RDEIR. Unfortunately, this is not the case and the Task Force remains skeptical as to the County's diligence in providing full disclosure on this critical EIR component. Approval of the proposed business-as-usual landfill project is not warranted in the absence of an analysis on project alternatives such as advanced waste conversion technologies, aggressive waste diversion goals and programs, and voluntary establishment of a watershed boundary. As part of the project alternatives, the County needs to fully disclose its efforts in investigating next-generation nondisposal facilities that effectively divert post-recycled residual wastes to beneficial uses thereby significantly reducing the volume of materials for permanent landfilling

Further information needs to be provided on organic waste streams entering the landfill for anaerobic disposal as opposed to off-site aerobic decomposition and/or waste-to-energy conversion. The associated benefits to the greater community of diverting organics from permanent landfill disposition and the GHG impacts needs to be disclosed as part of the alternatives discussion in the DEIR.

The project applicant, Waste Management, has invested in waste-to-energy conversion technologies. Accordingly, there must be a profit-motive for this corporation to invest in these advanced technologies and to employ them in other landfills across the nation. The final EIR for the SVLRC project must describe why the project alternatives analyzed in the EIR, including the no-project alternative, are infeasible. An alternative is not infeasible simply because the project applicant does not want to do it, nor is it infeasible because it would be more expensive or generate less profit.

Prior to approving the project as mitigated, the County must first determine, with respect to such impacts, whether there remain any project alternatives that are both environmentally superior and feasible within the meaning of CEQA. In addition, unless the County has chosen to approve one of the project alternatives, it must describe why the alternatives examined in the final EIR are infeasible.

The final DEIR must provide evidence and disclose that the additional costs or lost profitability of an alternative are sufficiently severe as to render it impractical to proceed with the project. The fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible (see Citizens of Goleta Valley v. Board of Supervisors (1988) 197 Cal.App.3d 1167). The Task Force looks forward to reviewing documentation produced for the County in respect to the above concerns related to project alternatives.

Simi Valley Landfill Expansion Task Force

436 Sunbonnet Street, Simi Valley, CA 93065

Sustainable Simi Valley

On August 30, 2010 the Simi Valley City Council adopted a progressive and visionary Green Communities Action Plan to solidify and document Simi Valley's commitment to a sustainable future - a commitment that balances environmental, economic, and social considerations. The Plan includes the following vision under Waste Reduction and Recycling:

Simi Valley is a city where all sectors of the community employ practices that minimize waste generation and reduce the amount of landfilled waste.

In respect to Simi Valley reducing its waste stream the Plan includes a goal for businesses and residents to achieve a *3.6 lbs./day per capita disposal rate by 2020, which is equivalent to a 75% diversion rate*. Listed among the activities to achieve this goal is Action WR 5-5 *Support waste conversion technologies as alternatives to landfilling material*.

The City of Simi Valley is taking immediate action to reduce its dependency on permanent landfills and to reduce waste generation. As depicted in the RDEIR, the Simi Valley Landfill and Recycling Center Expansion Project does not present a visionary business practice that compliments Simi Valley's Green Communities Action Plan.

A modified and technologically superior landfill expansion project may be a project the Task Force can one day support but for now we will remain vigilant in protecting this community, in which we live, work and play, for ourselves, our families, and for generations to come.

On behalf of the Task Force, thank you for the opportunity to present our views to you.

Sincerely,

Barbra Williamson
Chair

cc: Ventura County Supervisors Foy, Parks, Bennett, Long and Zaragoza;
Simi Valley Mayor Paul Miller;
Simi Valley Council members, Foster, Sojka, and Becerra

Simi Valley Landfill Expansion Task Force

436 Sunbonnet Street, Simi Valley, CA 93065

**Simi Valley Landfill and Recycling Center Expansion
DEIR (September 2009) and Recirculated DEIR (July 2010)**

The DEIR and RDEIR contain 24 impacts of significance before mitigation including 13* impacts of significance after mitigation. Seven significant impact issues having no feasible mitigation measures and are deemed "unavoidable."

Table 1: Summary of Environmental Issues with Significant Impacts Before Mitigation¹

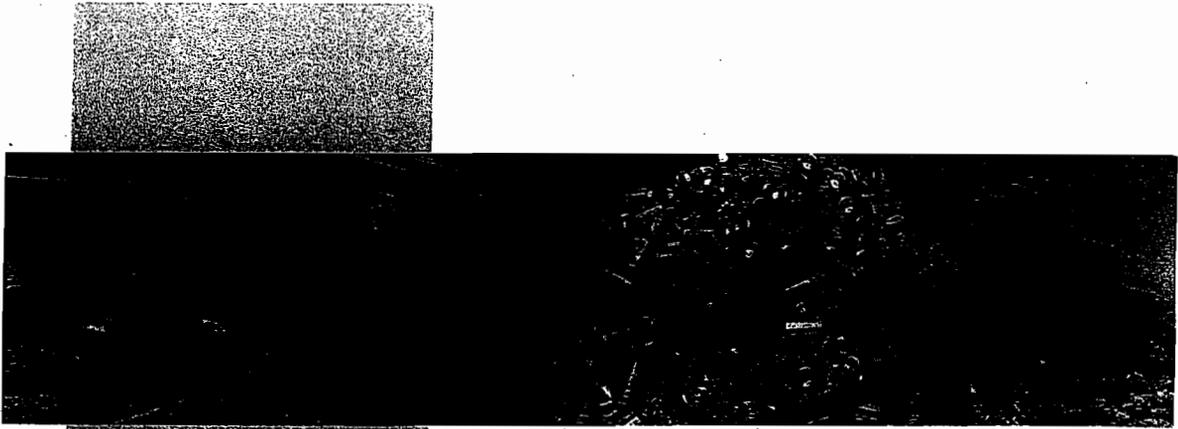
#	Environmental Impact Issue
1*	Impact LU-3: Demand for Housing. Increase the demand for housing due to construction or operation.
2*	Impact AQ-1o: Air Quality. Project operations would produce emissions that exceed VCAPCD daily ROC and NOx emission significance thresholds.
3	Impact AQ-1c: VCAPCD Daily Emission Significance Criteria. Project construction would produce emissions that exceed VCAPCD daily ROC and NOx emission significance thresholds.
4	Impact AQ-2c: Air Quality. Project construction would result in offsite ambient air pollutant concentrations that would contribute to an exceedance of an ambient air quality standard.
5*	Impact AQ-2o: Air Quality. Project construction and operation would result in offsite ambient air pollutant concentrations that would contribute to an exceedance of an ambient air quality standard.
6*	Impact AQ-7o: Air Quality. Proposed operational emissions of GHGs would cause a significant impact on the environment.
7	Impact WR-4: Surface Water Quality. Degrades the quality of surface water and causes it to fail to meet surface water quality objectives for a hydrologic unit defined in the most recent Water Quality Control Plan.
8	Impact WR-5: Flooding. Flooding hazards are ubiquitous throughout Ventura County and are accommodated by the Ventura County Building Code and the Ventura County Watershed Protection District Standards and Specifications Design Manual. The effects of flooding hazards are required to be considered within the existing framework of grading and building code ordinances which apply to all projects.
9	Impact BIO-1: Endangered, Threatened or Rare Species and Nesting Birds. Directly or indirectly: reduce species population; reduce species habitat; or restrict reproductive capacity.
10	Impact BIO-2: Wetland Habitat. Direct reduction of, or a substantial indirect impact to, a significant Wetland Habitat. All wetlands are potentially significant.
11	Impact BIO-3: Migration Corridors. Substantially interfere with the use of said area by fish or wildlife. This could occur through elimination of native vegetation, erection of physical barriers, or intimidation of fish, or wildlife via introduction of noise, light, development, or increased human presence.
12	Impact BIO-4: Locally Important Plant and Wildlife Species/Communities. Directly or indirectly cause a substantial reduction in population numbers, habitat area, or reproductive capacity. For locally important communities or habitats a significant impact would result if the Project caused a substantial reduction in area or impairment in quality or function.
13*	Impact AG-1: Soils. Direct and/or indirect loss of soils designated Prime, Statewide Importance, Unique or Local Importance or agricultural soils meeting or exceeding the acres

¹ Information from Simi Valley Landfill and Recycling Center DEIR Table ES.7-1. and ESR.2

Simi Valley Landfill Expansion Task Force

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	lost criteria.
14*	Impact AG-2: Dust. Result in a ten percent or greater increase in dust on agricultural parcels within one-half mile of the proposed project.
15*	Impact VIS-1: Scenic Highways. Change or obstruct important visual resources as experienced from a scenic highway during construction or operation.
16*	Impact VIS-2: Scenic Areas/Features. Degrade scenic areas or features or significantly alter them during construction or operation.
17	Impact VIS-3: Glare. Create substantial sources of light or glare.
18*	Impact Geo-8: Paleontological Resources. Direct impacts to fossil sites including grading and excavation of fossiliferous rock, which can result in the loss of scientifically important fossil specimens and associated geological data. Indirect impact including increased access opportunities and unauthorized collection of fossil materials.
19	Impact CUL-1: Cultural Resources. Cause a substantial adverse change in the significance of an archaeological or historical resource.
20	Impact HAZ-4: Petroleum Wastes. Exposure of soils (or associated soil gas) containing toxic substances and petroleum hydrocarbons, associated with prior oil field operations, would be deleterious to humans, based on regulatory standards established by the lead agency for the site.
21*	Impact REC-1: Local Parks/Facilities. Cause an increase in the demand for recreation when measured against the following standard: five acres of developable land (less than 15 percent slope) per 1,000 population.
22*	Impact REC-2: Regional Parks/Facilities. Cause an increase in the demand for recreation when measured against the following standard: five acres of developable land per 1,000 population.
23*	Impact REC-3: Regional Trails/Corridors. Cause an increase in the demand for recreation when measured against the following standard: two-and-a-half miles per 1,000 population.
24*	Impact REC-4: Future Development. Cause an increase in the demand for recreation when measured against the following standard: impede future development of Recreation Parks/Facilities and/or Regional Trails/Corridors.



Simi Valley Landfill and Recycling Center Expansion Project

**PUBLIC DRAFT
ENVIRONMENTAL IMPACT REPORT**

September 2009

Submitted to:
County of Ventura Planning Division



Executive Summary

1 ES.1 Intended Uses and Authorizing Agencies

2 This Environmental Impact Report (EIR) fulfills the requirements of the California Environmental Quality
3 Act (CEQA) (Public Resources Code, Section 21000 et seq.), *Ventura County Initial Study Assessment*
4 *Guidelines* (February 2009), *County of Ventura Administrative Supplement to the State CEQA Guidelines*
5 (August 3, 1999). According to State CEQA Guidelines [California Code of Regulations (CCR), Title 14,
6 Division 6, Chapter 3, §15121(a)], the purpose of an EIR is to serve as an informational document that
7 "...will inform public agency decision-makers and the public generally of the significant environmental effect
8 of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to
9 the project".

10 ES.2 Project Purpose and Need and Project Objectives

11 CEQA requires that an EIR state the objectives of a proposed project to explain the reasons for project
12 development, and why this particular solution is currently being recommended. Additionally, the project
13 objectives are instrumental in determining which alternatives should be considered in the document.

14 The purpose of the proposed project is to provide waste disposal capacity within Ventura County to meet the
15 County's current and projected waste diversion and disposal needs consistent with the goals and policies of
16 the Ventura County General Plan, Ventura County Integrated Waste Management Plan, the requirements of
17 Assembly Bill (AB) 939, and other California waste management laws and regulations. The specific
18 objectives of the proposed project include the following:

- 19 • Provide a minimum of 15 years of waste diversion and disposal capacity to meet state-mandated
20 waste diversion goals;
- 21 • Provide an environmentally waste disposal and diversion operation that complies with local, state,
22 and federal regulations and plans;
- 23 • Minimize adverse impacts to environmental resources; and
- 24 • Provide harmony between the project and adjacent land uses.

25 ES.3 Description of the Project and Alternatives

26 Project Location

27 The Simi Valley Landfill and Recycling Center (SVLRC) is located in an unincorporated area of southeast
28 Ventura County within the United States Geological Survey (USGS) 7.5 minute Simi Valley West
29 topographic quadrangle (Figure 2.1-1). The site is north of State Route (SR)-118 and west of the Madera
30 Road overcrossing. The site entrance is approximately 2,800 feet west of Madera Road. The facility address is
31 2801 Madera Road, Simi Valley, California 93065.

32 Project Overview

33 The SVLRC is an existing Class III (non-hazardous) municipal solid waste (MSW) landfill permitted to
34 receive 3,000 tons per day (tpd) of MSW. In addition to waste disposal, SVLRC engages in recycling,
35 including materials such as green waste, wood waste, asphalt/concrete, white goods, and scrap metal.

Executive Summary

1 SVLRC, which is located in southeast Ventura County, California near the City of Simi Valley, is owned and
2 operated by Waste Management of California, Inc. (WMC) under Conditional Use Permit (CUP)-3142-7.

3 The proposed project (Permit Case No. LU07-0048; Major Modification No. 8 to CUP-3142) is an expansion
4 of the existing SVLRC. The proposed expansion is comprised of five main components: (1) expanding the
5 physical limits of the landfill (CUP boundary, landfill footprint, and elevation); (2) extending the operating
6 limits and life of the site (increasing the waste disposal capacity); (3) constructing support/ancillary facility
7 area; (4) expanding existing and constructing new recycling and resources recovery facilities; and (5)
8 expanding existing and constructing new energy conversion facilities.

9 The SVLRC's CUP boundary is proposed to be expanded to encompass 887 acres within which the waste
10 disposal area would be expanded north and west from its current permitted location to encompass 186 acres of
11 additional waste disposal area and to increase the total capacity of the landfill from 43.5 to 130.2 million
12 cubic yards. The amount of MSW that could be received per day is proposed to increase from 3,000 tons to
13 6,000 tons and the amount of recycling to be reduced from 6,250 tpd to 3,250 tpd. The total daily tonnage
14 (i.e., combined MSW and recyclables) permitted for the facility would not change. Additionally, several
15 existing ancillary facilities (defined facilities ancillary to the active landfill such as the waste receiving and
16 recycling facilities for the purpose of this project) and support facilities (defined as facilities that support the
17 landfill operation such as administrative offices and maintenance facilities for the purpose of this project)
18 would be expanded and new facilities constructed within the landfill CUP boundary including: office
19 building; heavy equipment and vehicle maintenance facility; waste hauling yard; material recovery
20 facility/recyclable transfer facility (MRF/RTF); public household hazardous waste collection facility; new
21 entrance road, scales, and scale house; expanded construction and demolition (C&D) debris recycling
22 processing area; expanded green waste processing facility; expanded landfill gas-to-energy (LFGTE) facility;
23 and landfill gas-to-liquefied natural gas (LFGTLNG) facility. The proposed project would require a major
24 modification to the existing SVLRC CUP (CUP 3142-7) issued by the County of Ventura.

25 **Construction**

26 Construction of the SVLRC Expansion Project would involve two types of construction and occur in four
27 phases. The initial construction activities would include the construction of facilities in the 30-acre
28 support/ancillary facilities area (including the MRF/RTF, Simi Valley Environmental Collection Center
29 (SVECC), waste hauling yard, office facilities, heavy equipment and vehicle maintenance Facility, and new
30 scales and scalehouse). This initial construction would also include expansion of the existing LFGTE facility
31 and construction of a LFGTLNG facility. The C&D debris recycling activities and green waste processing
32 operations would occur on the landfill footprint in an area not receiving waste and would migrate from place
33 to place within the landfill as portions are filled to capacity. Construction of additional waste depository space
34 within the waste disposal area would also occur during Phase I. Subsequent construction activities would
35 involve the sequential excavation of Phases II through IV of the waste footprint and would include clearing,
36 compacting, and preparing the phase(s) for landfilling.

37 The approximately 30-acre support/ancillary facilities area would be completed within approximately 18
38 months of project approval. Phase I of the waste footprint would include additional filling of the existing
39 landfill area. Construction of Phase II would begin as Phase I approaches its design capacity, which has been
40 estimated to take approximately seven to eight years. The construction of each subsequent phase would begin
41 as the previous phase reaches capacity (estimated to take between 12 to 14 years).

42 During peak construction, the construction workforce would include approximately 45 personnel for the 30-
43 acre support/ancillary facilities area. The waste disposal areas would be constructed in four consecutive
44 phases with each phase divided into cells. Phase I would be comprised of one cell and would require 29
45 personnel including 18 equipment operators, 9 construction personnel, and 2 managers. Phase II would be
46 comprised of four cells and would require 116 construction personnel. Phases III and IV would each contain

1 three cells and require 87 personnel. Wastes generated from construction would either be hauled within the
2 landfill for disposal or recycling or off-site to local recycling centers.

3 **Operations**

4 Landfill operations include waste receipt and or disposal, waste hauling within the landfill footprint,
5 application of daily and intermediate cover, and site grading and maintenance. As the landfill expands,
6 additional excavation would begin in new phases, and other heavy equipment operations would occur on the
7 surface of areas surrounding the refuse columns.

8 Currently, SVLRC is permitted for a maximum limit of 822 round trips per day (except for the “free days” as
9 directed by the Agreement for the Operation and Closure of the Simi Valley Landfill pursuant to County
10 Ordinance 4760). Based on an analysis of the current average waste delivery, the SVLRC currently receives
11 approximately 470 truck round trips (i.e., vehicles entering and leaving) per day of waste. This includes
12 approximately 178 vehicle round trips hauling MSW and 292 vehicles round trips delivering recyclable
13 materials. Additionally, the facility receives approximately 22 employee vehicle round trips per day.¹ This is
14 considered the baseline condition.

15 As part of the proposed project, SVLRC is projected to generate up to a total of 892 vehicle trips (roundtrips)
16 per day. This number involves up to 6,000 tpd of solid waste (547 round trips) and up to 3,250 tpd of
17 recyclable materials (345 round trips). This would result in the permitted total of up to 9,250 tpd of materials
18 hauled to the site (Table 2.4-14). The additional truck trips associated with MSW are expected to be large
19 capacity transfer trucks, resulting in fewer trips for a given tonnage of waste than is the case when smaller
20 local trucks dominate the truck trips. In addition to the trips associated with the transport of waste (including
21 the relocation of the GI Rubbish waste hauling yard to the SVLRC) and recyclable materials to the site,
22 employees of SVLRC and GI Rubbish are expected to generate an average of approximately 405 daily
23 roundtrips, bringing the total maximum projected vehicle trips (roundtrips) to 1,297 per day. Thus, the
24 proposed SVLRC Expansion Project would result in a net increase of 475 vehicle round trips per day above
25 SVLRC’s permitted limit and 786 vehicle round trips above the baseline condition.

26 The actual volume of any specific material varies on a daily basis. Therefore, it is the projected daily total
27 (1,297 round trips) that defines maximum traffic for the proposed project, not the number of trips by type of
28 vehicle or by type of waste.

29 Municipal solid waste and recyclables from the local community would be delivered to SVLRC in packer
30 trucks for disposal in the landfill for processing in the MRF/RTF. Each truck would be weighed and specific
31 information about its origin documented at the weigh station. The GI Rubbish fleet of packer trucks would be
32 sent out multiple times per day, but would remain at the SVLRC in the proposed waste hauling yard at the end
33 of each day. GI Rubbish packer trucks would also be maintained at the proposed Heavy Equipment and
34 Vehicle Maintenance Facility within the SVLRC.

35 SVLRC would continue to receive transfer trucks, trucks carrying recyclables, and trucks carrying roll-off
36 bins. Each truck would be weighed and specific information about its origin documented at the weigh station.
37 The trucks would dispose of their contents at the tipping areas based on the type of commodity they are
38 carrying. To the maximum extent possible, trucks bringing material in would be reloaded and sent outbound
39 with material from the MRF/RTF and resource recovery facility areas. The trucks would be weighed upon
40 leaving the facility.

41 The proposed project would result in an overall increase of 150 employees. Currently, SVLRC and GI
42 Rubbish employ 250 personnel of which 25 are located at SVLRC and 225 (135 drivers and 90 customer

¹ Based on data provided by WMC from January through March 2008.

Executive Summary

1 service, shop, support, and management personnel) are located off-site at the existing GI Rubbish hauling
2 facility. Under the proposed project the existing hauling facility would be relocated to the SVLRC and the
3 hauling facility personnel would increase to 350 (225 drivers and 125 customer service/billing staff, shop,
4 support, and management personnel) over the life of the project. Additionally, the landfill personnel would
5 increase to 50 personnel.

6 The expanded SVLRC would continue to comply with the currently permitted hours of operation: 6:00 AM to
7 8:00 PM, 7 days per week, 365 days per year. However, SVLRC is typically closed on New Year's Day,
8 Easter Sunday, Memorial Day, July 4, Labor Day, Thanksgiving, and Christmas. The hauling vehicle fleet
9 would operate between the hours of 4:00 AM and 8:00 PM, 7 days per week, 365 days per year with the
10 exception of the holidays listed above. However, it should be noted that current operations occur six days a
11 week plus one Sunday per month. Other activities such as LFG and leachate collection/disposal, equipment
12 and vehicle maintenance, MRF/RTF operations, and compliance tasks would not be limited by this condition.

13 An updated closure plan would be prepared to take into account the revised fill plan, the increased waste
14 disposal capacity, and the extended site life. The closure plan would be submitted to the Ventura County
15 Environmental Health Division, which is the local enforcement agency (LEA) for solid waste disposal
16 facilities, along with the application for revision of the Solid Waste Facilities Permit (SWFP).

17 The SVLRC would be filled sequentially within the four phases. Once the landfill reaches capacity it would
18 be brought to final grade and the final alternative evapotranspirative cover currently approved under
19 SVLRC's Closure/Post-Closure Maintenance Plan would be installed (Geosyntec 2002).

20 WMC has an existing Post-Closure Maintenance and Monitoring Agreement to ensure protection of the
21 surrounding environment during the closure period (a minimum of 30 years after the last wastes have been
22 deposited). This agreement would be extended to include the proposed project area.

23 As required by 27 CCR §21190(c), all proposed post-closure land uses, other than non-irrigated open
24 space, shall be submitted to the LEA, Los Angeles Regional Water Quality Control Board
25 (LARWQCB), Ventura County Air Pollution Control District (VCAPCD), and local land use agency for
26 review. The LEA must review and approve proposed post-closure land uses if the proposed use involves
27 structures within 1,000 feet of the disposal area, structures on top of waste, modification of the low
28 permeability layer, or irrigation over waste.

29 Environmental Design

30 Currently, the SVLRC is required to comply with a variety of plans and programs to reduce the impacts of
31 operation on both the work area and surrounding area as conditions of the landfill's CUP permit. Programs
32 include, but are not limited to, groundwater and leachate monitoring program; gas emissions control and
33 monitoring program; wind monitoring program; noise abatement plan; visual impact mitigation program; fire
34 protection program; seismic design; clay and cover availability study; site sign program; noise abatement
35 plan; hazardous waste exclusion program; radioactive waste exclusion program; emergency procedures
36 program; on-site drainage control plan; and stockpile plans. Several of these programs are outlined below.

37 As a part of the routine daily activities, the site supervisor periodically inspects the facility to ensure the
38 operation is in compliance with applicable regulations, especially 27 CCR §20005-20890, and standard
39 operating policies.

40 These plans and programs would be reviewed prior to approval of a modification to the existing CUP to
41 determine if changes would be required to address the specific features of the modified permit and current
42 regulations.

1 **Alternatives**

2 The following alternatives were considered, but eliminated from further analysis:

3 **Offsite Alternatives** – Other waste-disposal options for Ventura County, including:

- 4 • Expand the Toland Road Landfill: (eliminated based on the inability of the applicant and/or County
5 to implement and the low potential to reduce project environmental impact);
- 6 • Develop a new landfill in western Ventura County (eliminated based on the inability of the applicant
7 and/or County to implement, the low potential to reduce project environmental impacts, and the
8 substantial associated costs);
- 9 • Transport waste to out-of-County or out-of-state landfill sites via Countywide transfer facility
10 (eliminated based on: the inability of the applicant and/or County to implement; potential for
11 equivalent or greater environmental impacts as compared to the proposed project; and the substantial
12 associated costs); and
- 13 • Install multiple waste-to-energy facilities (thermal incinerators) at locations near sources of waste
14 within Ventura County ((eliminated because of: the inability of the applicant and/or County to
15 implement; potential for equivalent or greater environmental impacts as compared to the proposed
16 project; and the substantial associated costs).

17 **Alternative On-Site Technologies** – Other waste disposal technologies (i.e., conversion, diversion, and
18 minimization technologies) that can be implemented once waste reaches the SVLRC to reduce the amount of
19 material deposited in SVLRC, including:

- 20 • Aerobic bioreactor technology (eliminated based: on the incompatibility of the technology with
21 current landfill operations at SVLRC; its increased need for water as compared to the proposed
22 project; and substantial cost as compared to the proposed project);
- 23 • Thermal incinerator technology (eliminated based on: the potential of this technology to result in
24 additional environmental impacts including air quality issues and the production of residual ash; and
25 the substantial costs as compared to the proposed project); and
- 26 • Thermochemical technologies (eliminated based on the potential of this technology to result in
27 additional environmental impacts including increased air pollutant emissions and the production of
28 residual non-degradable material that would need to be disposed of conventionally; and the
29 substantial costs as compared to the proposed project).

30 **Alternative Policy & Permit Options** – Permit requirements, changes to public policy, or the
31 implementation of programs to reduce the amount of waste received by landfills in Ventura County,
32 including:

- 33 • Education/outreach program to decrease the need for landfill facilities (eliminated based on the
34 uncertainty regarding the effectiveness of educational outreach and how the applicant or the County
35 could feasibly implement this alternative, and based on potentially high associated costs);
- 36 • Change California policies to increase diversion and recycling (eliminated based on: the uncertainty
37 of how the applicant or the County would change state policies to increase the incentive for recycling
38 without widespread collaboration and support; and the costs of pursuing this policy change are
39 unknown, but possibly considerable); and
- 40 • Impose a washed boundary on the SVLRC to limit the geographic area from which waste could be
41 received (eliminated based on the legal infeasibility of the County to implement a washed
42 boundary without violating the commerce clause of the U.S.).

- 1 Table ES.3-1 provides an overview of the key features of the proposed project as compared to the five project
 2 alternatives.

Table ES.3-1. Comparison of Key Parameters Among Alternatives

<i>Parameter</i>	<i>Proposed Project</i>	<i>Alternative 1 Reduced Capacity</i>	<i>Alternative 2 Bioreactor</i>	<i>Alternative 3 Graduated Permit Limit</i>	<i>Alternative 4 Differential Surcharge</i>	<i>Alternative 5 No Project</i>
Landfill Height (above MSL)	1,270	1,193 – 1,270	1,270	1,270	1,270	1,118
Landfill Area (acres)	371	307	371	371	371	185
Daily Permitted Disposal (Tons)	6,000	6,000	6,000	6,000	6,000	3,000
Daily Permitted with Recycling (Tons)	3,250	3,250	3,250	3,250	3,250	6,250
Total Capacity (million yd ³)	123	112 - 86	123+	123	123	43.5
Building Area (sq ft)	127,000	127,000	127,000	127,000	127,000	20,000
Net Increase of Employees on-site	150	150	150	150	150	0
Closure year	2054	2049 - 2044	2054+	2054	2054	2024
LFGTE Units (total)	5	5	6	5	5	2
LNG Units (total)	1	1	1	1	1	0
Water Use (afy)	174	174	290	174	174	97 ¹
<i>Note:</i>						
1. Based on the actual water usage at SVLRC during 2008						

3 **Alternative 1: Reduced Landfill Capacity Alternative**

4 The Reduced Landfill Capacity Alternative would involve either reducing the overall height of the landfill,
 5 reducing the overall footprint of the area used to deposit waste, or some combination of the two. Reducing the
 6 landfill capacity would have the effect of limiting the overall volume of waste the landfill could receive over
 7 its lifetime.

8 Depending on the approach to reducing the overall capacity of the landfill, the reduction in capacity could
 9 range from 11 million cubic yards (approximately 8.7 million tons) to 37 million cubic yards (28.1 million
 10 tons). At an estimated annual receipt rate of 2.6 million tons per year at fully permitted capacity based on
 11 current operational levels, these capacity reductions would reduce the landfill life by approximately 3 to 10
 12 years. The reductions would modestly reduce visual impacts and potential biological impacts if the landfill
 13 footprint were reduced.

14 In all other respects, the Reduced Landfill Capacity Alternative would be identical to the proposed project.
 15 All other proposed project components would be constructed, including the: office building; heavy
 16 equipment and vehicle maintenance facility; waste hauling yard; MRF/RTF; public household hazardous
 17 waste collection facility; new entrance road, scales, and scale house; expanded C&D debris recycling
 18 processing; expanded green waste processing; additional LFGTE generator units; and LFGTLNG facility.

19 **Alternative 2: Anaerobic Bioreactor Technology Alternative**

20 Under this alternative, the existing waste disposal area (Phase I) would continue operating as it has in the past
 21 until it reaches capacity. All future phases would be developed as in-situ anaerobic bioreactor cells. Although
 22 prepared similarly to a standard landfill cell, bioreactor cells require different liner systems as well as
 23 substantially modified and expanded leachate and landfill gas recovery systems and could not be implemented

1 in the Phase I where portions are unlined and the lined areas were not designed for bioreactor systems.
2 Therefore, it is not feasible to implement bioreactor technology on Phase I.

3 Within the permitted footprint area, approximately five bioreactor cells would be constructed instead of
4 traditional landfill cells. The exact number and size of cells would depend on design considerations and the
5 optimal allocation of available landfill volume to ensure acceptable cell function. Each cell would have a
6 capacity of approximately 12 to 15 million cubic yards and would take from 7 to 8 years to fill at the
7 permitted level of 6,000 tons per day. If less than 6,000 tons per day is received, on average, in any future
8 year, the effective life would be correspondingly extended by an unknown amount. Anaerobic processing
9 would require approximately 170,000 gallons per day of additional water over and above what is currently
10 consumed at the site. There is no confirmed readily available local source for water (e.g. industrial process
11 waste water) in the immediate vicinity of the landfill, so the source of water for anaerobic operations is
12 uncertain. This alternative is analyzed based on the assumption that a reasonably available and reasonably
13 priced water source can be found.

14 In most other respects, the Anaerobic Bioreactor Technology Alternative would be the same as the proposed
15 project. All other proposed project components would be constructed, including the office building; heavy
16 equipment and vehicle maintenance facility; waste hauling yard; MRF/RTF; public household hazardous
17 waste collection facility; new entrance road, scales, and scale house; expanded C&D debris recycling
18 processing; and expanded green waste processing would be constructed as for the proposed project.
19 Bioreactors are expected to maximize landfill gas production, potentially requiring expanding the number of
20 LFGTE generator units plus the LFGTLNG facility. For the purpose of the environmental impact analysis, it
21 is assumed here that one additional LFGTE generator. The LFGTLNG facility would be built as proposed.

22 Anaerobic bioreactor cell technology would accelerate waste decomposition compared to the standard
23 restricted moisture disposal methods currently employed and required by regulations. For the purposes of
24 analysis, it is assumed that decomposition in a cell would take approximately 10 years, rather than more than
25 30 for a typical dry cell technology. At maximum decomposition, the volume would be reduced to
26 approximately 60 percent of the original airspace of the cell (allowing for decomposition, settlement, and the
27 application of daily cover) in 10 years or less making 40 percent of the originally available airspace available
28 for additional disposal.

29 Therefore, each cell would be reactivated after the contents complete decomposition approximately 10 years
30 following its first closure. The newly available 40 percent of the original capacity would then be prepared to
31 accept more waste and the cell would again be operated as an anaerobic reactor until filled and the contents
32 have decomposed. The effect of the anaerobic bioreactor implementation would be to provide for the reuse of
33 waste capacity made available through the accelerated decomposition process during continuing operations.
34 This would increase the overall capacity of a given volume of landfill to accept waste over the life of the
35 project.

36 **Alternative 3: Phased Permitted Daily Tonnage Limit Alternative**

37 Under this alternative, the SVLRC Expansion Project would proceed as described under the proposed project.
38 However, the permitted daily tonnage limit would be incrementally increased from its current 3,000 ton per
39 day level, to an intermediate limit of 4,500 tons per day immediately following permit approval, and,
40 ultimately, to the full 6,000 tons per day in 2014. Upon approval of the CUP modification (anticipated to be in
41 2009), the SVLRC would comply with a daily tonnage limit of 4,500 tpd through 2013. Between 2014 and
42 2052 (expected closure date) the permitted daily tonnage limit would be increased to 6,000 tpd. This
43 alternative may result in a reduction in truck traffic in the near term, and a potential reduction in the
44 associated traffic/circulation impacts as compared to the proposed project until the full 6,000 tons per day is
45 being received. However, it is unclear, since the facility currently fails to receive its full 3,000 ton per day

1 limit except very occasionally, whether waste receipts under phased permit limits would actually differ from
2 those without such limits.

3 Receipts are very unlikely to suddenly jump from an average of about 2,500 tons per day currently to 6,000
4 tons per day if the permit is issued for the new facility. Realistically, there would be a period of time after the
5 permit is issued when receipts would gradually ramp up to the full 6,000 tons per day. The most likely driver
6 of significant increased receipts would be the closure of a major nearby landfill. Since the Puente Hills
7 landfill is scheduled to close in 2013, it would be reasonable to expect an incremental increase at that time.
8 Whether an additional 3,000 tons per day would begin being delivered to the SVLRC when Puente Hills
9 closes is difficult to predict. Puente Hills is currently permitted to receive 13,200 tons per day and regularly
10 closes early when this limit is reached. It is unlikely that 3,000 tons per day (about 22 percent) of that waste
11 stream would be delivered to SVLRC following the Puente Hills closure given several other closer available
12 landfills. However, when other landfills in the vicinity close, it is reasonable to expect the SVLRC to be a
13 logical choice for alternate disposal. Since the Puente Hills landfill closure is the earliest major landfill
14 closure scheduled, it is unlikely that an increment of more than 1,500 tons per day (i.e. to the 4,500 tons per
15 day intermediate phased limit) would be received prior to 2014.

16 ***Alternative 4: Differential Surcharge Alternative***

17 Under this alternative, the SVLRC Expansion Project would be constructed as considered under the proposed
18 project. However, the waste received by SVLRC would be limited indirectly by a fee schedule established by
19 the County that would require higher payments for disposal of waste from outside a specified geographic area.
20 This alternative would need to be accompanied by a system whereby waste haulers would be required to
21 provide documentation or other certification of waste origin to the landfill operator, who would, in turn, be
22 required to provide documentation to the County, along with payment of the surcharges, demonstrating that
23 fees were properly collected on out-of-area wastes. The additional surcharge on out-of-area waste is expected
24 to discourage haulers from outside the area from using the SVLRC by making it more costly than alternative
25 facilities with lower total charges (tipping fees plus surcharge). Existing waste collection and disposal
26 contracts should be considered to ensure that long term patterns of waste collection and disposal are not
27 disrupted unnecessarily. Issues related to the documentation of waste sources required to enforce the
28 boundary would need to be resolved, as would reporting and enforcement mechanisms.

29 Implementing a graduated surcharge system would prolong the working life of the SVLRC by limiting
30 receipts from sources outside the area of lowest surcharge. This alternative has the potential to reduce impacts
31 from truck traffic compared to the proposed project since the distance between the origin and destination of
32 waste may be reduced and the amount of waste delivered for disposal may not result in the full permitted
33 6,000 tons per day being received.

34 In all other respects, the Graduated Surcharge Alternative would be identical to the proposed project. All
35 other proposed project components would be constructed, including: the office building; heavy equipment and
36 vehicle maintenance facility; waste hauling yard; MRF/RTF; public household hazardous waste collection
37 facility; new entrance road, scales, and scale house; expanded C&D debris recycling processing; expanded
38 green waste processing; additional LFGTE generator units; and LFGTLNG facility would be constructed as
39 for the proposed project.

40 ***Alternative 5: No Project Alternative***

41 As specified in the State CEQA Guidelines, Section 15126.6(e), an EIR must evaluate the specific alternative
42 of "no project" along with its potential impacts. The purpose of describing and analyzing a no project
43 alternative is to allow decision-makers to compare the impacts of approving the proposed project with the
44 impacts of not approving the proposed project.

1 For this EIR, the No Project Alternative is defined as no approval of an expansion of the existing SVLRC.
2 Under the No Project Alternative, the SVLRC would continue operating under the existing Conditional Use
3 Permit (CUP 3142). On or before 2034, the site would reach the end of its permitted life, would no longer
4 accept waste, and would undergo formal closure. The County of Ventura and the cities that use the landfill (or
5 their haulers) would have to identify another location or locations for disposal of waste and delivery of
6 recyclable materials. After closure, the remaining permitted disposal capacity of the site, if any, would go
7 unused.

8 **ES.4 Environmental Issues**

9 **Land Use/General Plan Goals, Policies, and Programs**

10 The land use analysis evaluates consistency or compliance of the proposed project with adopted plans and
11 policies governing land use and development in the County of Ventura including the Ventura County General
12 Plan, the Ventura County Zoning Ordinance, and other applicable plans. The land use analysis also evaluates
13 the potential for the proposed project to introduce incompatible land uses relative to existing surrounding land
14 uses or activities.

15 The proposed project area is zoned as open space with a 160 acre minimum lot size. The proposed project
16 would result in the expansion of the existing SVLRC by 186 acres over open space land. The facilities
17 proposed within the expansion area are consistent with surrounding zoning and land uses. In addition, the
18 proposed project is consistent with all land use policies of the General Plan. As such the proposed project
19 would result in less than significant impacts to community character.

20 The proposed project would not remove any existing housing units. Therefore, no impacts to existing housing
21 would occur. In addition, the proposed project construction activities would generate employment
22 opportunities that could create a demand for additional housing. However, it is reasonable to assume that due
23 to the temporary nature of construction activities and the sufficient number of construction workers available
24 within Ventura County and the Los Angeles Metropolitan region, impacts on housing demands during project
25 construction would be less than significant. During proposed project operations, the workforce would increase
26 by a total of 150 permanent employees. Although the County of Ventura does not maintain statistics on the
27 amount of affordable housing available to lower-income families, recent inventory studies have shown that
28 there is not adequate lower-income inventory available throughout the County (personal communication,
29 Shelley Sussman 2009). As such and because the project would employ more than 30 new full-time
30 employees, the proposed project's impact on housing demand would be significant. Implementation of
31 Mitigation Measure LU-1, an in-lieu fee to support funding housing developments in the vicinity of Simi
32 Valley, would reduce impacts on housing demand to less than significant.

33 The project does not include and would not necessitate the expansion of critical public facilities, including
34 roads, water supply, sewers, or flood control facilities. No new roads or Watershed Protection District
35 facilities would be constructed as part of the project. Additionally, the proposed project does not include an
36 amendment to an adopted policy of the County that could establish a precedent or an accommodation for
37 further growth. As the project would not result in the expansion of public facilities or an amendment to a
38 County policy, impacts to growth inducement would be less than significant.

39 Construction and operation of the proposed project would not result in inconsistencies with plans and policies
40 contained in the Ventura County General Plan. Without mitigation, some inconsistencies would exist with
41 regards to land use, air quality, water resources, biological resources, cultural resources, and recreation;
42 however, implementation of the resources specific mitigation measures included in the various resource
43 sections contained in this EIR would ensure compliance with these plans and policies. As resource specific
44 measures would ensure consistency with the plans and policies contained in the Ventura County General Plan,
45 impacts on land use would be less than significant.

1 **Air Quality**

2 Emissions from proposed project construction and operation would exceed the VCAPCD daily nitrogen oxide
3 (NO_x) and reactive organic compounds (ROC) emission thresholds. Implementation of Mitigation Measure
4 AQ-1 would reduce emissions of ROC and NO_x from construction to less than significant levels during a
5 peak day of activity. Implementation of Mitigation Measure AQ-3 would reduce combustive emissions from
6 project operations; however, impacts would remain significant.

7 Project construction and operation would result in offsite ambient air pollutant concentrations that would
8 contribute to exceedances of the following standards: (1) 1-hour California Ambient Air Quality Standard
9 (CAAQS) for nitrogen dioxide (NO₂); (2) 24-hour CAAQS and National Ambient Air Quality Standard
10 (NAAQS) for particulate matter less than 10 microns in diameter (PM₁₀); (3) annual CAAQS for PM₁₀; (4) the
11 24-hour NAAQS for particulate matter less than 2.5 microns in diameter (PM_{2.5}); and (5) annual CAAQS and
12 NAAQS for PM_{2.5}. All other pollutant impacts would remain below significance levels. Implementation of
13 Mitigation Measures AQ-1 through AQ-4 would reduce combustive and fugitive dust emissions from
14 construction and operations. These mitigation measures would reduce proposed impacts to below the
15 NAAQS for 24-hour PM₁₀ and annual PM_{2.5}. However, all other construction and operational impacts
16 identified above would remain significant. Mitigation Measure AQ-5 would further reduce operations related
17 impacts, but since it is uncertain the extent to which this measure would offset overall project-related
18 vehicular emissions it is not possible to calculate what those reductions might be. these exceedances would
19 remain significant.

20 A Health Risk Assessment (HRA) estimated cancer and non-cancer effects to several population subgroups
21 (receptors), including residential, offsite occupational, and sensitive receptors. Project construction and
22 operations would not expose the public to significant levels of toxic air contaminants (TACs). Thus,
23 associated health risks to the public would be less than significant.

24 Project consistency with the AQMP requires an evaluation of the impact of a project on population growth
25 and air quality. Project construction would nominally affect population in Ventura County, as proposed
26 construction would occur for less than two years and many of the construction workers would originate from
27 the existing residents in the County. Project construction would produce nonattainment pollutants in the form
28 of combustive and fugitive dust (PM₁₀/PM_{2.5}) emissions. The 2007 AQMP proposes emission reduction
29 measures that are designed to bring the County into attainment of the ambient air quality standards. The
30 attainment strategies in this plan include mobile source control measures and clean fuel programs that are
31 enforced at the state and federal level on engine manufacturers and petroleum refiners and retailers and as a
32 result, project construction would have to comply with these control measures. The 2007 AQMP includes
33 projections of future emissions from construction activities. Project construction emissions would fit into
34 these future emission growth projections. The 2007 AQMP also assumes source compliance with adopted
35 VCAPCD rules. Project construction would comply with all applicable VCAPCD rules and regulations, such
36 as Rule 55 (Fugitive Dust). Lastly, this EIR analysis requires mitigations to minimize emission from project
37 construction (Mitigation Measure AQ-1 and AQ-2). Therefore, compliance with these requirements would
38 ensure that project construction would not conflict with or obstruct implementation of the applicable air
39 quality plans.

40 The combined ambient impact of both construction and operational emissions would not generate significant
41 levels of fugitive dust. Project construction and operation would comply with VCAPCD Rule 55, Fugitive
42 Dust. The air quality analysis estimates that the proposed project, prior to mitigation, would reduce PM₁₀
43 emissions from uncontrolled levels by 50 percent, depending on the source type. Mitigation Measures AQ-2
44 and AQ-4, Additional Fugitive Dust Controls for Construction and Operations, respectively, would further
45 reduce fugitive dust emissions from these sources to 90 percent from uncontrolled levels. As a result,
46 implementation of Mitigation Measures AQ-2 and AQ-4 would further lower the ambient fugitive dust,
47 ensuring a less than significant impact.

1 Project construction would increase air pollutants due to the combustion of diesel fuel. The mobile and
2 intermittent nature of most emission sources would help to adequately disperse combustive emissions from
3 project construction. Additionally, since there are no sensitive receptors in close proximity to the project site,
4 project construction and operations would not expose the public to significant levels of odors. Project
5 operations would generate odorous emissions due to: (1) the combustion of diesel fuel in mobile equipment;
6 (2) the presence of municipal refuse and green waste; and (3) the decomposition of refuse and green waste.
7 Historically, the green waste operations have been the main source of odor emissions from the SVLRC. With
8 the implementation of Mitigation Measure AQ-6, effective use of the odor control system and implementation
9 of the Odor Control Plan in the future, project operations would not expose the public to significant levels of
10 odors.

11 The greenhouse gas (GHG) emissions generated by project construction and operations would incrementally
12 contribute to global climate change. Measures that reduce fossil fuel consumption of proposed construction
13 equipment would reduce GHG emissions. Implementation of Mitigation Measure AQ-1 would have this effect.
14 This is the case, as use of equipment that comply with the newest emission standards would have more fuel-
15 efficient engines compared to older equipment. Additionally, minimizing equipment idling time and using
16 alternatively-fueled equipment would reduce fossil fuel consumption and resulting GHG emissions compared to
17 unmitigated construction activities.

18 Water Resources

19 Expansion of the SVLRC would not result in significant impacts to groundwater quantity. Although the
20 Calleguas Municipal Water District (CMWD), the water purveyor for the SVLRC, would use limited
21 groundwater from the Las Posas Basin, the main source of water would be imported State San Joaquin Delta
22 water. Because a water availability letter would be submitted by CMWD with the proposed project
23 application, verifying that adequate water supplies are available; an updated water supply plan would be
24 included as part of a Master Development Plan; and the CMWD is considered a permanent source of water
25 (See Section 3.12, Water Supply); groundwater quantity impacts would be less than significant.

26 The proposed project has the potential to adversely affect groundwater quality in the Simi Valley
27 Groundwater Basin due to landfill leachate. However, the expanded waste disposal area would be fully lined
28 with regulation-compliant liner systems to prevent direct contact between the waste and soil or bedrock
29 Therefore, the potential for leachate contamination from expanded areas of the land fill would be less than
30 significant. In addition, groundwater quality impacts due to landfill gas, pesticides, oil field impact, and
31 laboratory contaminants would not become incrementally greater than the baseline condition as more waste is
32 placed into the landfill. Therefore, impacts of the proposed project to groundwater quality would be less than
33 significant.

34 The proposed project would not increase the net utilization of surface water in a hydraulic unit that is
35 overdrafted or adversely impact an overdrafted hydraulic unit. Surface runoff within the proposed CUP
36 boundary would continue to be collected at the perimeter of the fill area. This runoff, along with sheet flow
37 generated on the fill area itself, would continue to be diverted through a combination of lined and unlined
38 ditches, sediment traps, and slope benches, with the runoff culminating in six detention basins around the
39 perimeter of the landfill. Surface water would subsequently be discharged from these basins to downstream
40 drainage features. Drainage to these discharge points would accumulate within the proposed CUP project
41 boundary, but outside the proposed waste disposal area. Surface runoff would not be utilized for any project-
42 related purpose. Thus, proposed project impacts to surface water quantity would be less than significant.

43 During the proposed expansion period, contamination of surface waters could occur by various means
44 including: use of inadequately treated toe barrier liquids for dust control; ponding of water on the surface of a
45 landfill; washout of cover materials and waste due to inadequate drainage; and exposure of areas of bare earth
46 (from excavations) and loose soil (from stockpiling and covering activities) to erosion. These, in turn, could

1 result in incremental increases in debris loading and siltation of downstream drainage conveyances. However,
2 due to the implementation of the planned landfill drainage and cover provisions, and the limited precipitation
3 in the area, incremental project impacts from the proposed expansion would be less than significant.
4 Likewise, in addition to existing drainage and erosion control measures and water quality monitoring, a
5 system of six detention/sedimentation basins is proposed for removal of silt from stormwater runoff before
6 being discharged from the site. Except during peak flow conditions, sand particles 0.1 millimeters and greater
7 are expected to settle and not be transported downstream, thus preventing downstream siltation of drainages
8 and creeks. Use of existing and proposed drainage and erosion control measures would reduce incremental
9 increases in infiltration of surface water into the landfill waste mass, which increases leachate generation, and
10 erosion-related impacts. As such, incremental increases in water quality impacts due to erosion would be less
11 than significant.

12 However, recent on-site sampling data indicated that surface water quality objectives were exceeded for
13 nitrates, nitrites, sulfate, total dissolved solids, total suspended solids, specific conductance, and several metals,
14 including iron, lead, and mercury. Because 1) existing surface water quality at the SVLRC exceeds Basin Plan
15 and Federal EPA benchmark water quality objectives, thus contributing to impairment of the Calleguas Creek
16 watershed; 2) there is no indication that future landfill operations would be different from existing landfill
17 operations (i.e., contaminated runoff would continue to occur); 3) currently contaminated runoff from the
18 existing landfill would be co-mingled with runoff from the proposed expansion; and 4) toe barrier liquids
19 from the landfill, possibly containing groundwater-based pollutants, would continue to be used for dust
20 control, surface water quality impacts are considered significant. Mitigation Measures WR-1, Toe Barrier
21 Liquid Analysis by VCWPD, and WR-2, Stormwater Runoff Analysis by VCWPD, would be implemented to
22 reduce potentially significant impacts associated with the contaminated runoff to a less than significant level.

23 Project construction and operation would have the potential to result in increased flooding. The west end of
24 the northern expansion area is located within a 100-year flood plain, as designated by the Federal Emergency
25 Management Agency (FEMA) (FEMA 2008). This flood plain merges westward with the flood plain of upper
26 Alamos Canyon Creek. The proposed landfill expansion would fill the Alamos Canyon tributary creek and
27 substantially change the drainage performance of the drainage area, effectively eliminating the existing 100-
28 year flood storage capacity of the tributary creek. However, because surface runoff within this tributary
29 canyon (to Alamos Canyon Creek) would be controlled by project-related drainage features, including a
30 detention basin, flooding would not occur within the landfill expansion area during landfill operations,
31 resulting in less than significant impacts. In addition, because 100-year storm flow rates would be reduced to
32 less than or equal to existing flood flows, as a result of the detention basin, less than significant impacts would
33 occur with respect to contributing flood flow to Alamos Canyon Creek. The structural integrity of the
34 detention basin could be undermined by erosive floodwaters along Alamos Canyon Creek, resulting in
35 potentially significant flooding impacts. Mitigation Measure WR-3, Detention/Sedimentation Basin
36 Armoring, would be implemented to reduce potentially significant impacts associated with the potential
37 erosive undercutting of the detention basin bank, due to 100-year flood along Alamos Canyon Creek to a less
38 than significant level. In addition, construction of the detention/sedimentation basin partially within the
39 floodplain could result in downstream erosion within Alamos Canyon Creek. Mitigation Measure WR-4,
40 Downstream Erosion Control Measures and/or Redesign of Detention/Sedimentation Basin, would be
41 implemented to reduce potential downstream erosion impacts.

42 **Biological Resources**

43 Impacts on biological resources were evaluated by determining the potential for the proposed project to
44 adversely affect: endangered, threatened, or rare plant or wildlife species; wetland habitat; migration
45 corridors; or locally important species or communities. No federally or state listed plants are known or
46 believed to occur on-site; however, limited potentially suitable habitat may be present within the project site
47 for several listed species including Braunton's milk vetch (*Astragalus brauntonii*), San Fernando Valley
48 spineflower (*Choizanthe parryi* var. *ferandina*), or Lyon's pentachaeta (*Pentachaeta lyoni*). Impacts to these

1 species, if present, would be significant. Implementation of Mitigation Measure BIO-1 would reduce these
2 potentially significant impacts to less than significant. The proposed project would result in the removal of
3 249.4 acres of sage scrub habitat, and could affect the coastal California gnatcatcher, a federally listed bird
4 species, if present. Impacts to the coastal California gnatcatcher would be significant, but feasibly mitigated
5 by Mitigation Measure BIO-2, requiring protocol surveys for coastal California gnatcatcher to be conducted
6 prior to project-related removal of coastal scrub habitat. Construction of the proposed project could also
7 result in adverse impacts to nesting birds, which are protected under federal and state regulations. Impacts to
8 nesting birds would be significant, but feasibly mitigated by Mitigation Measure BIO-3, requiring either that
9 vegetation removal activities be conducted outside of bird breeding season (February 1 through August 15) or
10 that pre-grading surveys be conducted prior to ground disturbing activities in the vicinity of suitable nesting
11 habitat for resident or migratory bird species. Implementation of these mitigation measures would reduce
12 impacts on biological resources to less than significant.

13 Proposed project construction would also result in the permanent removal of approximately 0.05 acre of
14 marsh vegetation associated with two seeps in the southern part of the expansion area. Mitigation Measure
15 BIO-4 would ensure that the removed wetland habitat would be mitigated to less than significant.
16 Construction and operation of the proposed project would result in indirect impacts to Alamos and Brea
17 Canyons resulting from sediment washing into these areas from exposed surfaces adjacent to active landfill
18 areas. Since, the proposed project would require permits to control stormwater during both construction
19 (General Construction National Pollutant Discharge Elimination System [NPDES] permit) and operations
20 (Industrial Activities Storm Water General NPDES Permit) and measures would be built into the project to
21 control stormwater and sediment movement during operations, indirect impacts on offsite wetlands would be
22 less than significant.

23 Construction and operational activities could adversely affect wildlife migration in Brea and Alamos canyons
24 in a variety of ways including: impeding access from Brea to Alamos Canyons causing wildlife to move
25 across busy highways; increasing noise and nighttime lighting; and impacting adjacent vegetation and wildlife
26 habitat. Implementation of Mitigation Measures BIO-5, vector control methods, BIO-6, habitat enhancements
27 in and adjacent to the Alamos Canyon wildlife corridor, BIO-7, habitat enhancements along the channel in
28 Alamos Canyon, BIO-8, improvements or enhancements to the Alamos Canyon crossings and BIO-9, CUP
29 conditions, would ensure that significant impacts to wildlife migration would be less than significant.

30 Construction and operational activities would result in a substantial direct reduction in population and direct
31 long-term loss and degradation of habitat of two locally important plant species, Plummer's mariposa lily and
32 Catalina mariposa lily. Mitigation Measures BIO-6 and BIO-7 would reduce significant impacts to these two
33 locally important plant species. In addition, locally important wildlife species known to be residents or regular
34 visitors to the SVLRC site and vicinity and locally important raptor species known to forage within the
35 project would experience a substantial loss of foraging and breeding habitat (252.2 acres of native and
36 naturalized vegetation and habitat would be lost as a result of landfill development, 198.9 of these acres
37 would be permanently lost). Populations of species having smaller home ranges would also be reduced as a
38 result of the habitat loss. Mitigation Measure BIO-3 and Mitigation Measures BIO-12 and BIO-14 would
39 reduce significant impacts to locally important wildlife to less than significant.

40 Direct losses of over 252.1 acres of these habitats, including sage scrub (91.1 acres), chamise chaparral (8.1
41 acres), grassland (152.7 acres), and coast live oak woodland (0.2 acres) as a result of landfill expansion
42 represent a substantial reduction in these locally important communities, a long-term direct impact. In
43 addition to the direct loss of these locally important communities, expansion of the landfill would contribute
44 to the degradation of habitat quality in adjacent areas due to off-site effects as well as introduction and spread
45 of invasive non-native species in the project vicinity of the landfill. Examples include tree tobacco (*Nicotiana*
46 *glauca*), Russian-thistle (*Salsola tragus*), fountain grass (*Pennisetum setaceum*), and bull thistle (*Cirsium*
47 *vulgare*). Mitigation Measures BIO-13 and BIO-14 would reduce significant impacts on locally important
48 plant and wildlife communities to less than significant.

1 **Agricultural Resources**

2 The proposed project would convert approximately 165 acres of open space/rural designated farmland of local
3 importance to industrial/commercial uses. Although proposed project soils are considered locally important,
4 the site does not currently support agricultural operations and the agricultural viability of on-site soils is
5 dependent upon irrigation. However, the conversion and loss of locally important agricultural soils to
6 industrial/commercial uses would be a significant impact on agricultural resources. No feasible mitigation
7 measures would reduce or avoid the conversion of locally important farmland onsite while meeting the project
8 objectives. Thus, project impacts to agricultural resources would be significant.

9 Farmlands of local importance extend directly west of the project site in Alamos Canyon. The air quality
10 analysis in this EIR performed dispersion modeling analyses to estimate the ambient impact of project
11 construction and operational emissions. Review of the project dispersion modeling shows that unmitigated
12 project construction and operational emissions would produce a maximum ambient 24-hour PM₁₀ impact of
13 54 µg/m³, which would exceed the 24-hour PM₁₀ CAAQS of 50 µg/m³. The overwhelming majority of this
14 impact would occur from fugitive dust generated from proposed earth-moving activities and the operation of
15 mobile sources on paved and unpaved surfaces. The maximum ambient impact estimated for project PM₁₀
16 and therefore fugitive dust emissions would occur within the farmlands of local importance directly west of
17 the project site in Alamos Canyon. While the 24-hour ambient background concentration of fugitive dust
18 within these areas is not known, it is expected to be somewhat less than 49 µg/m³. Therefore, unmitigated
19 proposed construction and operation would increase ambient fugitive dust levels by more than 10 percent
20 from background levels to farmlands within one-half mile of the project site. Implementation of Mitigation
21 Measure AG-1 would reduce impact from fugitive dust to agricultural resources. However, mitigated
22 proposed construction and operation would increase ambient fugitive dust levels by more than 10 percent to
23 farmlands within one-half mile of the proposed project site, resulting in a significant impact.

24 **Visual Resources/Glare**

25 This analysis of potential visual effects of the proposed project was conducted using quantitative Federal
26 Highway Administration (FHWA) Visual Impact Assessment and Bureau of Land Management (BLM)
27 Visual Resource Management techniques.

28 The project site is located within one-half mile of SR-118, which is designated as an Eligible Scenic
29 Highway. The proposed landfill footprint and elevations would be visible to individuals traveling eastbound
30 on SR-118 and thus obstruct important visual resources experienced from SR-118, resulting in a significant
31 impact to a scenic highway.

32 The visual impacts that would result from the project construction and operations would depend on the
33 specific location and elevation of the observer. Impacts on sensitive visual resources as viewed from Tierra
34 Rejada Park, South Crest Place (south of Tierra Rejada), and Big Sky Ranch Development would be less than
35 significant while impacts from Madera Road, Alamos Canyon Easterly Loop Trail, Alamos Canyon Trail, and
36 North Park Village Residential Development would be significant. Implementation of Mitigation Measure
37 VIS-1, requiring a landscape plan, would ensure impacts on scenic areas/features from the Madera Road,
38 Alamos Canyon Easterly Loop Trail, and North Park Village Residential Development vantage points would
39 be reduced to a less than significant level. However, as the final landfill contour would extend above the
40 existing horizon defined by the Santa Susana Mountain ridgelines and due to the close proximity of the
41 viewer, impacts on visual resources from the Alamos Canyon Trail vantage point would be significant.

42 The proposed project would increase the number of lighting fixtures as a result of the need for illumination of
43 proposed structures and exterior areas, and for nighttime maintenance or operations. As such, the project
44 would introduce a substantial amount of new night light and glare, representing a significant change in the
45 level of night light illumination when compared to what is presently generated over the project site.

1 Furthermore, the proposed project does not include any specifications identifying the number, type, location,
2 and/or intensity of lighting infrastructure. Although existing topography would screen the proposed facilities
3 area from adjacent public view corridors, impacts on visual resources would be potentially significant.
4 Implementation of the project Lighting Plan (Mitigation Measures VIS-2 and VIS-3) would ensure that the
5 illumination and glare of exterior fixtures would be directed so as to reduce the potential for spillover light
6 onto surrounding areas. With implementation of these mitigation measures, impacts on visual resources would
7 be less than significant.

8 **Geologic Hazards/Mineral Resources/Paleontological Resources**

9 **Geology and Seismic Hazards**

10 The geological analysis evaluated impacts of geohazards on project components that may result in substantial
11 damage to structures or infrastructure or expose people to substantial risk of injury. The project area and
12 immediate vicinity consist of generally rugged terrain. Canyon sides are steep and slopes of 1:1 (horizontal:
13 vertical) are common. Local relief ranges up to 250 feet. Earthquakes could result in impacts to proposed
14 project operations. The principal damaging effects of earthquakes consist of surface rupture, ground shaking,
15 and liquefaction. The closest large active fault is the Simi-Santa Rosa Fault, which trends east-west about
16 3,000 feet south of the landfill. Also, two potentially active faults, the Canada de la Brea and Strathearn faults,
17 traverse the landfill property. The Canada de la Brea fault is likely too short to generate an independent
18 earthquake of sufficient size to produce fault rupture, but may experience sympathetic (i.e., triggered) slip
19 during large earthquakes on nearby faults. This sympathetic slip, if it occurs, likely will be minor (i.e., on the
20 order of several centimeters). Therefore, impacts due to fault rupture hazard are considered less than
21 significant.

22 A large earthquake on a nearby or regional fault could cause severe ground shaking, resulting in damage to
23 project structures such as buildings, containment structures, leachate and gas collection facilities, and surface
24 drainage facilities. Ground shaking can also cause landfill settlement and trigger landslides. Cracking of the
25 containment structure could result in the exposure of buried waste. In extreme cases, human life may be
26 endangered. The potential for the occurrence of these impacts would be incrementally greater under the
27 proposed project than under existing conditions. In addition, the alluvial areas in canyon bottoms of the
28 project area would be subject to liquefaction in the event of severe seismically induced ground movement,
29 potentially resulting in damage to site structures such as buildings, containment structures, leachate and gas
30 collection facilities, and surface drainage facilities during project operations. However, design and
31 construction in accordance with this updated seismic design study, as well as all relevant federal, state, and
32 local regulations, would result in less than significant seismic impacts.

33 Subsidence is not expected to occur at the landfill site in association with extraction of oil, gas, or
34 groundwater. The project site is underlain by the Simi Oil Field. Previous oil and gas extraction has occurred
35 in the vicinity of the landfill; however, the oil production activities have been terminated and the proposed
36 project would preclude oil and gas drilling from within project boundaries. In addition, groundwater
37 extraction is not occurring in large quantities in the landfill vicinity. Subsidence within the waste footprint
38 would occur during landfill operations due to compaction and settlement of refuse over time. However, this
39 phenomenon is typical of all landfills and is anticipated during long-term landfill management. Also, no
40 permanent structures that might be adversely affected by subsidence-induced settlement would be constructed
41 on an area of engineered fill in the southern portion of the project site, where no refuse would be placed.
42 Therefore, subsidence impacts would be less than significant.

43 Superficial soils at the project site generally consist of clay loams, and the underlying Sespe Formation
44 contains beds of claystone. These clays could be expansive. Construction on expansive soils could result in
45 damage to foundations, roads, utilities, and other infrastructure as a result of the contracting and expanding
46 clays. However, development of the project site will be subject to the requirements of the Ventura County

1 Building Code, which is adopted from the California Building Code, Chapter 18, §1804.4 (ICC 2007) and
2 which requires mitigation of potential adverse effects of expansive soils for the proposed structures.
3 Compliance with these requirements would ensure that impacts relating to expansive soils would be less than
4 significant.

5 Slope instability could occur from excavation of soil from slopes within the project area during construction
6 activities. Likewise, slope instability could occur within the waste disposal area during project operations. The
7 stability and containment of the waste fill depends on the integrity of the final landfill slopes. Potential fill
8 slope stability impacts would be minimized or prevented through development of the proposed project in
9 compliance with regulatory requirements, implementation of proper landfill design and operating procedures,
10 and standard engineering geology and geotechnical engineering principles. Therefore, the proposed project
11 would result in less than significant slope stability impacts.

12 ***Mineral Resources***

13 The proposed landfill expansion area is located within a portion of the Canada de la Brea sections of the
14 former Simi Oil Field. There are no active oil wells, pipelines, or other facilities within the proposed
15 expansion or buffer areas. All wells have been abandoned. Proposed landfill expansion would preclude oil
16 and gas drilling from within proposed project boundaries; however, petroleum reserves beneath the site could
17 be accessed from remote locations, using directional (or slant) drilling techniques. Therefore, the proposed
18 project would not result in the permanent loss of availability of a known petroleum resource that would be of
19 future value to the region and the residents of the state. Mineral resource impacts would be less than
20 significant.

21 ***Paleontological Resources***

22 The occurrence of a number of previously recorded fossil sites in the middle member of the Sespe Formation
23 and of numerous additional sites in the project area, suggests a high potential for previously unrecorded fossil
24 sites and remains being encountered by earth-moving activities during excavation of the expansion area,
25 excavation of daily cover, and general grading of the site. As such, the proposed project would cause the loss
26 of scientifically important fossils and associated geologic data, resulting in a significant impact on
27 paleontological resources. Additional adverse impacts could potentially result due to unauthorized fossil
28 collecting by rock hounds, commercial collectors, and project personnel who would be afforded easier access
29 to fossiliferous exposures as a result of the proposed project. This impact could contribute to the loss of
30 highly important fossil specimens and associated scientific data, particularly from the middle member of the
31 Tertiary continental formation. Implementation of Mitigation Measure GEO-1, requiring a Paleontological
32 Mitigation Program, would mitigate many of the paleontological impacts of the proposed project. However,
33 since any such program would only recover a small sample of the total number of fossils disturbed by landfill
34 operations, the overall impact of the proposed project on paleontological resources would still be considered
35 significant.

36 ***Cultural Resources***

37 Impacts on cultural resources were evaluated by determining the potential for the proposed project to
38 adversely affect a resource listed in or eligible for listing in the National Register of Historic Places (NRHP),
39 the California Register of Historic Resources (CRHR), or otherwise considered a unique or important
40 archaeological resource under CEQA. Due to a lack of potential for data recovery, none of the five prehistoric
41 sites described in Section 3.8.1.2.4 are considered a unique archaeological resource; nor are they considered
42 eligible for listing on the CRHR. Therefore, these sites are not historical resources for the purpose of CEQA.
43 Although no significant prehistoric sites have been recorded within the expansion area, the presence of
44 previously recorded prehistoric sites in close proximity show that regional site utilization during prehistoric
45 times did occur and unidentified, subsurface deposits may exist in some areas.

1 The Unrecorded Areas of Interest have no clear historic association and lack the potential for data recovery.
2 Therefore, these locations do not appear eligible for listing on the CRHR and are not considered to be
3 historical resources for the purposes of CEQA.

4 The Wharton Ranch contains the only standing structures within the project site, but does not retain sufficient
5 integrity to qualify for the CRHR and is not considered a historical resource for the purposes of CEQA.
6 However, the Wharton Ranch is considered to possess the potential for subsurface historical archaeological
7 deposits that would qualify the site for eligibility for the CRHR. Construction and operation of the proposed
8 project is not expected to occur in this area. However, any project-related clearing, grubbing, and grading in
9 this area would have the potential to result in a significant adverse effect on any significant archaeological
10 deposits.

11 Implementation of Mitigation Measures CUL-1 through CUL-3, would ensure that any impacts to subsurface
12 archaeological deposits during grading or construction activities would be less than significant.

13 Hazards

14 Hazards impacts were evaluated assessing the potential for fires, the release of hazardous materials/wastes,
15 and/or exposure to petroleum contaminated soil and associated soil gas from abandoned oil wells during
16 project construction and operation.

17 A potential exists for both surface and subsurface fires at the project site. The SVLRC is located in a high
18 wildfire hazard area, as it is surrounded by uncultivated, flammable vegetation in the form of coastal sage
19 scrub and grassland, shrubs with scattered chaparral, and oaks. However, similar to the existing County-
20 approved CUP 3142-7, Sections 14(l) and 56, the SVLRC would respond to fires through implementation of
21 the site specific Simi Valley Landfill Emergency Procedures Manual, which includes procedures to contain
22 potential fire hazards, such as use of on-site fire suppression capabilities. In addition, the SVLRC maintains a
23 fire response training program for site personnel. The SVLRC is surrounded by a fire break to reduce the
24 potential for off-site migration of landfill fires. With respect to subsurface fires, open flames typically do not
25 occur, thus, the potential for wildfires to be ignited on adjacent, off-site areas is low and the potential for
26 subsurface fire as a result of a surface fire is remote. Additionally, sufficient water pressure is available for
27 fire-fighting purposes at the SVLRC. Therefore, the proposed project would result in less than significant fire
28 hazard impacts.

29 As a Class III landfill, the SVLRC does not accept hazardous waste as part of the municipal solid waste
30 disposed of in the landfill. This would not change due to the proposed project. As such, the proposed project
31 would not increase the potential health risk due to disposal of household hazardous wastes or other hazardous
32 materials in the landfill.

33 The SVLRC Expansion Project includes the construction and operation of a landfill gas to liquefied natural
34 gas (LNG) facility, located just north of the existing landfill gas flare station. The project also includes
35 storage, use, handling, and disposal of various hazardous materials including petroleum products used to fuel,
36 repair, and maintain the vehicles and household hazardous materials that would be collected and stored at the
37 SVECC for off-site disposal. Improper storage, handling, use, and disposal of these materials could result in
38 contamination of on-site soils, as wells as adverse impacts to health and safety of on-site personnel. However,
39 hazardous materials would be stored, handled, and disposed in accordance with the Ventura County Uniform
40 Fire Code, as well as all other relevant Federal, State, and local regulations and standard best management
41 practices (BMPs) would be implemented. As such, the project would result in less than significant hazardous
42 materials and waste impacts.

43 Residual concentrations of petroleum products and hazardous substances may be present in on-site soil as a
44 result of oil and gas drilling operations. Abandoned oil wells are typically cut off 5 feet below grade and may

1 not be visible during excavation activities for landfill construction. Excavations could cause damage to the
2 abandoned oil well casings, potentially resulting in an oil and/or gas leak. The possibility of damage to the
3 abandoned oil wells during grading is a potentially significant impact. In addition, health and safety impacts
4 associated with a potential release of hazardous substances or petroleum products as a result of landfill
5 construction, in the vicinity of on-site abandoned oil wells, is a potentially significant impact. Implementation
6 of Mitigation Measures HAZ-1 through HAZ-3 would reduce potential health and safety impacts to on-site
7 personnel to less than significant levels.

8 Exposure to Valley Fever (*Coccidioidomycosis*) from soil disturbed at the landfill would pose a less than
9 significant impact. Landfill-related activities have the potential for release of *coccidioides immitis* spores at the
10 landfill. However, it is assumed that of the majority of the population of Ventura County have already been
11 exposed to Valley Fever and would continue to be exposed from the various earthmoving activities that occur
12 throughout the region. Given the endemic nature of the disease and the number of earthmoving activities in
13 the County, it is not possible to attribute a specific case of Valley Fever to a specific earthmoving activity.
14 Furthermore, the SVLRC has an ongoing, aggressive dust control program to minimize dust at the landfill due
15 to vehicular movement, earthmoving, and other onsite activities. This dust program would continue with
16 implementation of the proposed project. The impact due to the potential for exposure to Valley Fever would
17 therefore be less than significant.

18 **Noise**

19 Noise impacts were evaluated to determine the levels of noise generated during construction and operation,
20 and the vibration that would be generated during project operation. Proposed project construction would not
21 result in an Equivalent Noise Level (Leq1H) of 55 A-weighted sound levels [dB(A)] or ambient noise level
22 plus 3dB(A), whichever is greater, during any hour from 6:00 AM to 7:00 PM. Because of the topography of the
23 landfill site and the location of the proposed new support facilities within a bowl surrounded by hills on nearly
24 all sides, potential noise impacts from construction of those facilities within the bowl would be reduced
25 substantially by the barrier effect of the surrounding hills. The only direct line-of-sight between public areas and
26 the new facility construction location is through the canyon draining the landfill site to the south. The SR-118 is
27 the closest public location to the landfill. Because of the significant traffic-generated noise along the freeway
28 and the minimal time window within which they could be exposed, travelers on the freeway are not expected to
29 be impacted by construction related noise. Therefore, the construction noise increase impact of the project
30 would be less than significant. Similarly, the proposed project operation would not result in an Leq1H of 55
31 dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 6:00 AM to 7:00 PM
32 nor would it result in an Leq1H of 50 dB(A) or ambient noise level plus 3dB(A), whichever is greater, during
33 any hour from 7:00 AM to 10:00 PM. Therefore, the operational noise increase impact of the project would be
34 less than significant.

35 The project would not result in detectable vibration at sensitive land uses. The vibration associated with the
36 increased truck traffic is not likely to be detectable at the sensitive receptor locations. As indicated, the actual
37 increases in noise levels, estimated as L_{Aeq} , are relatively small and not likely to be perceived by receptors.
38 Similarly, air-borne vibrations from the incident increase in pressure would not be noticeable. Moreover,
39 vibrations transmitted through structural connection generally do not travel far and are considered
40 insignificant when contrasted to the existing vibration associated with present traffic on SR-118 and
41 associated traffic on surface streets. The project's incremental contribution to transportation-related ground-
42 transmitted vibration would be undetectable at locations adjacent to a roadway on which project vehicles
43 travel. Therefore, the impacts of operation vibration would be less than significant.

44 **Transportation/Circulation**

45 Traffic operations in the vicinity of the project were analyzed using an intersection capacity-based
46 methodology known as the Intersection Capacity Utilization (ICU) method for the signalized locations, per

1 County of Ventura standards. At stop-controlled intersections, the Highway Capacity Model (HCM)
2 methodology for unsignalized locations is used to calculate the average delay and corresponding LOS.
3 Freeway roadway segments were analyzed using the guidelines from the *Caltrans Guide for Preparation of*
4 *Traffic Impact Studies, State of California, December 2002.*

5 The Existing with project peak hour volumes were derived from the number of new trips generated by the
6 project added to existing intersection volumes identified in the previous section. The trip generation for the
7 proposed project was calculated using the existing SVLRC trip rates and accounting for the projected growth
8 in waste tonnage and associated truck trips from the SVLRC expansion.

9 The total project trip generation consists of the existing auto and trucks trips at the SVLRC, the projected
10 additional truck trips generated by the proposed project, and the relocation of the existing auto and truck trips
11 at the recycling/waste hauling yard from 195 W. Los Angeles Avenue to the SVLRC. The relocation of the
12 hauling yard requires that all auto and truck trips be shifted to the SVLRC and be counted as part of the
13 landfill trip generation during buildout.

14 The existing AM and PM peak hour counts show that the SVLRC is currently generating 54 AM and 18 PM
15 peak hour auto trips, and 162 AM and 30 PM peak hour passenger car equivalent (PCE) (one truck equals two
16 passenger vehicles) truck trips for a total of 216 AM peak hour PCE trips and 48 PM peak hour PCE trips. The
17 proposed project is forecast to generate an additional 217 AM and 40 PM peak hour PCE truck trips at the
18 project site at buildout. The relocation of the recyclable/waste hauling yard to the SVLRC will add 11 AM and
19 30 PM peak hour auto trips, and 118 AM and 30 PM peak hour PCE truck trips to the project site. The total new
20 trips from the proposed expansion is 562 AM peak hour PCE trips (246 inbound and 316 outbound) and 148
21 PM peak hour PCE trips (49 inbound and 99 outbound).

22 Using the Caltrans TIA guidelines, all of the study freeway segments are projected to continue to operate at
23 unacceptable LOS D and E during the AM peak hour, and two of the three study segments are projected to
24 continue to operate at unacceptable LOS D and E during the PM peak hour. However, the additional traffic
25 from the proposed project will not trigger a change in the LOS. Therefore the proposed project roadway
26 segment impact is considered less than significant.

27 According to the City of Simi Valley TIA guidelines, the results of the intersection analyses indicate that
28 impacts from the addition of the traffic from the proposed project will not reach a level considered significant
29 at any of the study area intersections. The LOS remains an acceptable C or better on all segments even with
30 project traffic.

31 The County of Ventura has noted that the addition of one PHT to the intersection of Somis Road and SR-118
32 is considered a significant impact. However, Caltrans is currently in the process of environmental review for a
33 project to improve safety conditions along State Route (SR) 118 at the intersections with SR 34 and Donlon
34 Road. Independently, the County of Ventura Public Works Agency, Transportation Department has developed
35 a separate project for realignment of Donlon Road. The effect of the State project is anticipated to improve the
36 LOS of this intersection to LOS 'D'. If the State project is delayed, the effect of the County project alone
37 should improve the LOS of this intersection to a satisfactory level. With the commitment to road
38 improvements that ensure that the impact will be reduced to an acceptable LOS in a reasonable period of time,
39 projected impacts of the proposed project would not adversely affect the LOS and would therefore be
40 considered less than significant.

41 Water Supply

42 Water supply impacts were evaluated to determine compliance of the domestic water available to the
43 development with applicable State Drinking Water Standards and the availability of a permanent source of
44 water supply. The project site is served by Ventura County Waterworks District No. 8, which is a retail

1 customer of the CMWD. The main source of water for District No. 8 is imported State San Joaquin Delta
2 water, supplied by CMWD, which originates from the Metropolitan Water District of Southern California
3 (MWD), as part of their State Water Project annual contract rights. At least a portion of the water supply
4 includes groundwater from the Las Posas Basin and recycled water from the City of Simi Valley Wastewater
5 Treatment Plant, which is supplied via an existing pipeline installed by the City of Simi Valley and the
6 CMWD.

7 The annual water demand for the project would be 174 acre-feet per year (Psomas 2007b). The project would
8 be served by the CMWD, which is considered by Ventura County to be a permanent source of water. A water
9 availability letter from Ventura County Waterworks District No. 8 would be submitted by CMWD with the
10 proposed project application, verifying that adequate water supplies are available. In addition, similar to
11 Condition #14 (Master Development Plan) of CUP-3142-7, imposed by Ventura County for the current phase
12 of landfill expansion, an updated water supply plan would be included as part of a Master Development Plan,
13 which is designed to ensure that the landfill is operated in an environmentally safe manner and to mitigate any
14 significant avoidable environmental impacts identified in the EIR. The water supply plan would describe
15 improvements to be made to assure adequate potable and non-potable water for landfill operations, dust
16 control, fire protection, landscaping, human consumption, and hygiene. Therefore, impacts to water supply
17 would be less than significant.

18 **Waste Treatment/Disposal**

19 Individual sewage disposal system impacts were evaluated to determine conformance of the system with the
20 requirements of the LARWQCB Basin Plan concerning development utilizing septic systems and with the
21 applicable sections of the Ventura County Building Code, enforced by the Ventura County Environmental
22 Health Division.

23 The proposed project would result in an increase in generation of domestic wastewater due to the increased
24 number of employees. Additional industrial wastewater would be generated from proposed truck and
25 equipment washing facilities. In total, the proposed project is expected to generate an average of 7,000
26 gallons of wastewater and a peak (2,500 gallons of domestic and 4,500 gallons of industrial) per day and a
27 peak of 24,500 gallons of wastewater (8,750 gallons of domestic and 15,750 gallons of industrial) per day.

28 The Ventura County Environmental Health Division determined that because the public sewer system with
29 capacity for additional wastewater load is not available within one-half mile of the SVLRC the proposed
30 project would meet exception condition #3 of the Ventura County Sewer Policy (Personal communication,
31 Melinda Talent 2008). The proposed project is expected to meet the remaining two Sewer Policy exception
32 conditions. Due to the size of the facility, the proposed project is expected to meet exception condition #1.
33 The proposed project would be required to comply with Exception condition #2 prior to project approval. As
34 such, the proposed project would be expected to meet the three Ventura County Sewer Policy exception
35 conditions and would not be required to connect to a public sewer system.

36 The California Water Code, Chapter 4, Article 5, sets forth criteria for regulating individual disposal systems.
37 While the LARWQCB has delegated local health or public works departments jurisdiction to permit septic
38 systems, such as those for single family dwellings, the Board would likely take jurisdiction over permitting
39 the proposed on-site wastewater treatment plant under an individual Waste Discharge Requirements (WDR)
40 permit. The level of treatment required and permitted reuse would be specified in the WDR issued by the
41 LARWQCB. As such, the proposed project would conform with the requirements of the LARWQCB's Basin
42 Plan concerning development utilizing individual sewer systems (LARWQCB 1994). The individual sewer
43 system proposed is a package treatment plant, not a septic system and would not involve discharges to the
44 ground. In addition, the proposed on-site wastewater treatment facility must meet operation and maintenance
45 guidelines required by the Ventura County Environmental Health Division; and meet requirements outlined in
46 the Ventura County Building Code. The proposed project would require a revised permit issued by the

LARWQCB to allow commingled treated leachate and treated wastewater to be beneficially reused as discussed above. Issuance of these permits and compliance with applicable State and County regulations with respect to design and operation of the treatment plant would reduce potential impacts from on-site sewage disposal to a level considered less than significant.

A capacity study was completed to assess the future landfill capacity in Ventura County as it would be affected by the proposed project. The proposed project would provide substantial additional waste disposal capacity. The results of the capacity study indicated that the SVLRC would result in the County reaching its 15 year capacity in approximately 2060 based on the assumptions used in the model. As such, the proposed project would not substantially impact the demand for solid waste disposal capacity in Ventura County such that there would be less than 15 years of disposal capacity available for county disposal. Thus, impacts to waste treatment and disposal would be less than significant.

Recreational Facilities

The analysis of potential impacts to recreational facilities identified and evaluated the type and quantity of recreational facilities within the project's area of influence to determine if the needs of the proposed project could be adequately served by existing resources, or if the proposed project would result in an increase in demand for recreational facilities. Additionally, proposed trail/corridor systems and park sites within the area of influence were evaluated to determine whether the proposed project would preclude future development of these recreational facilities. The nearest local or regional park/facility is located approximately 0.8 miles from the proposed project site and two regional trails/corridors are located within a two-mile radius of the proposed project site, including the Arroyo Simi Bike Path and the Mt. McCoy Trail. No local or regional parks/facilities or regional trails/corridors are located within the proposed project area thus, no existing facilities would be directly impacted by the proposed project. However, because project-related employees and worker households would increase the demand for local and regional parks/facilities and trails/corridors, and no ordinance is in place to require payment of fees or dedication of land, the proposed project would create a significant impact on local and regional parks/facilities and trails/corridors. Implementation of Mitigation Measure REC-1 (payment of in lieu fees for local parks/facilities), REC-2 (payment of in lieu fees for regional parks/facilities), and REC-3 (dedication of public easements for future trails) would ensure that impacts on local and regional parks/facilities and trails/corridors would be less than significant.

Two planned multi-purpose trails are located in the project vicinity, including the Alamos Canyon Trail and the Alamos Canyon Easterly Loop Trail. As the Alamos Canyon Easterly Loop Trail is not located within the proposed project area, the project would not directly impede the future development of this regional trail/corridor. However, the Alamos Canyon Trail would be located within the western portion of the proposed project area. In addition, a planned 20-acre community park site is located within the project site. Although the exact location of the facility has not been determined, it is reasonable to assume the community park would be located within the proposed 516-acre buffer area around the disposal footprint. As the proposed project does not include provisions for on-site recreational facilities, the proposed development would impede future development of recreation parks/facilities and regional trails resulting in a significant impact on recreational resources. Implementation of Mitigation Measures REC-1 through REC-3, would ensure that impacts on planned recreational facilities and multi-use trails would be less than significant.

ES.5 Cumulative Impacts

Land Use/General Plan Goals, Policies, and Programs

Over the years, the County has developed consistency with the General Plan and site zoning regulations, ensuring consistency with land use/density designations to minimize impacts on surrounding areas. Similarly, existing facilities within the project vicinity have been modified as necessary to ensure proposed land

1 use/density designations are consistent with their respective land use plan and site zoning designations. As the
2 proposed project would be consistent with zoning and General Plan land use policies, and would be
3 compatible with surrounding land uses, impacts on community character would be less than significant.
4 Therefore, the proposed project would have a less than significant cumulative contribution to cumulative
5 impacts on land use.

6 The past, present, and reasonably foreseeable cumulative projects would not cause growth (i.e., new housing
7 generators) that exceeds project levels for the year of proposed project buildout (2050) that would result in
8 adverse impacts on housing demands. It is expected that local workers will fill most of the construction and
9 operations jobs associated with these projects and would not require relocation within the region that would
10 require new development of housing. Since the proposed project would have no impacts on existing housing,
11 it is not necessary to analyze the proposed project's contribution to past, present, and reasonably foreseeable
12 impacts on existing housing.

13 **Air Quality**

14 The region of analysis for cumulative effects on air quality is the South Central Coast Air Basin (SCCAB).
15 However, the most severe impacts under the proposed project in the context of past, present, and reasonably
16 foreseeable projects would occur within the areas adjacent to the proposed project, including unincorporated
17 portions of Ventura County, the City of Simi Valley, and the City of Moorpark.

18 The Ventura County region does not attain the national and state ambient air quality standards for ozone (O₃),
19 respirable particulate matter (PM₁₀), and fine particulate matter (PM_{2.5}). These pollutant nonattainment
20 conditions within the project region are considered to be cumulatively significant. Foreseeable future projects
21 in the vicinity of SVLRC with overlapping construction schedules with the proposed project may add to the
22 emission levels and ambient concentrations around the landfill. Impacts of multiple construction projects,
23 along with the proposed project, could be cumulatively considerable. In addition, project construction and
24 operations would produce emissions that would exceed the VCAPCD daily ROC and NO_x emission
25 thresholds for each modeled year. Additionally, emissions from project construction and operation would
26 contribute to exceedances of the following standards: (1) 1-hour CAAQS for NO₂; (2) 24-hour CAAQS and
27 NAAQS for PM₁₀; (3) annual CAAQS for PM₁₀; (4) 24-hour NAAQS for PM_{2.5}, and (5) annual CAAQS and
28 NAAQS for PM_{2.5}. Implementation of Mitigation Measures AQ-1 through AQ-4 would reduce proposed
29 impacts to below the NAAQS for 24-hour PM₁₀ and annual PM_{2.5}. However, all other criteria pollutant
30 impacts identified above would remain significant and unavoidable. Existing and future project construction
31 and operational activities would add additional air emission burdens to these significant levels of project
32 emissions. Thus, the proposed project with mitigation would produce cumulatively considerable and
33 unavoidable contributions to O₃, NO₂, PM₁₀, and PM_{2.5} levels.

34 With regard to ambient levels of TACs due to the relatively rural setting of the area of influence, impacts
35 from cumulative projects adjacent to the project site are cumulatively less than significant. Emissions of
36 TACs from project construction and operation would marginally increase cancer risks and non-cancer effects
37 in proximity to the project site. Existing and future project construction and operational activities would
38 nominally combine with these project impacts at low levels, due to their relatively long distance from the
39 project site. As a result, the project construction and operational activities would produce less than
40 cumulatively considerable impacts to levels of TACs and public health effects.

41 Fugitive dust from project construction and operations would exceed the 24-hour PM₁₀ CAAQS. However,
42 this maximum impact is predicted to occur on the SVLRC property line and proposed ambient PM₁₀ impacts
43 would quickly decrease in magnitude with distance from the SVLRC facility. Therefore, project construction
44 and operation would not generate a cumulatively considerable impact to levels of fugitive dust.

1 Odorous emissions from project construction would occur due to the combustion of diesel fuel. The mobile
2 and intermittent nature of most emission sources would adequately disperse such emissions during
3 construction. In addition, there are no sensitive receptors in close proximity to the project site. Odorous
4 emissions during project operation would result from diesel fuel emissions from mobile equipment, municipal
5 refuse and green waste, and the decomposition of refuse and green waste. Implementation of Mitigation
6 Measure AQ-6 would ensure that the project would not result in a cumulatively considerable impact from
7 odorous emissions.

8 Scientific evidence indicates a correlation between increasing global temperatures/climate change over the
9 past century and human induced GHG emissions. These and other environmental changes have potentially
10 negative environmental, economic, and social consequences around the globe. Climate change, as it relates to
11 man-made GHG emissions, is by nature a global impact. Thus, the issue of global climate change is a
12 cumulative impact and an appreciable impact on global climate change would occur when GHG emissions
13 from a project combine with GHG emissions from other man-made activities on a global scale. The approved
14 and proposed projects would contribute to the existing cumulative air quality conditions. The proposed project
15 would produce GHG emissions that would exceed levels of GHG emissions produced from the existing
16 SVLRC. These project increases of GHG emissions would incrementally contribute to global climate change.
17 Implementation of Mitigation Measures AQ-1, AQ-3, and AQ-6 would reduce the project's contribution to
18 global climate change. The significance of the impacts in the absence of established criteria is not determined.

19 **Water Resources**

20 Past projects have not contributed to groundwater withdrawal from the Las Posas Groundwater Basin, as the
21 Calleguas Municipal Water District (CMWD), the water purveyor for these past projects, has not historically
22 used the Las Posas Groundwater Basin for its water supplies. However, the CMWD intends to initiate
23 groundwater pumping from this basin, to supplement its supplies from the State Water Project. Therefore,
24 some present and most reasonably foreseeable projects, including the proposed project, would receive water
25 from the CMWD, thus contributing to groundwater withdrawals from the Las Posas Groundwater Basin.
26 Because a water availability letter would be submitted by CMWD with the proposed project application,
27 verifying that adequate water supplies are available; an updated water supply plan would be included as part
28 of a Master Development Plan; and the CMWD is considered a permanent source of water (See Section 3.12,
29 Water Supply); groundwater quantity impacts associated with proposed expansion of the SVLRC would be
30 less than significant. However, because of the uncertainty associated with future groundwater withdrawals by
31 other users within the already overdrafted Las Posas basin, the project's contribution to cumulative effects
32 would potentially result in a significant cumulative impact on groundwater quantity..

33 Numerous past, present, and reasonably foreseeable projects within the Simi Valley Groundwater Basin that
34 use and/or dispose of hazardous materials/waste and/or bulk petroleum products, including the existing
35 SVLRC, could further contribute to groundwater quality degradation. However, because of the poor water
36 quality in the basin, groundwater from the Simi Valley Groundwater Basin is generally not extracted for
37 beneficial uses. Impacts to water quality impacts would not become incrementally greater if the existing
38 landfill were expanded. Therefore, the cumulative impact to groundwater quality is less than significant and
39 the contribution of the proposed project is less than cumulatively considerable.

40 Past projects that diverted surface waters for project related beneficial uses may have increased the net
41 utilization of surface water in a hydraulic unit that is overdrafted or adversely impacted an overdrafted
42 hydrologic unit. Similarly, present and reasonably foreseeable future projects may increase the net utilization
43 of surface water in an overdrafted hydraulic unit. The proposed landfill expansion would not increase the net
44 utilization of surface water in a hydraulic unit that is overdrafted or adversely impact an overdrafted
45 hydrologic unit. Therefore, no cumulative impacts would occur in association with surface water quantity.

1 Construction and operation of the proposed project would use existing and proposed drainage and erosion
2 control measures, reducing incremental increases in infiltration of surface water, which increases leachate
3 generation, and erosion-related impacts. However, similar to the proposed project, numerous past, present,
4 and reasonably foreseeable projects within local drainages and creeks would contribute runoff and pollutants,
5 potentially resulting in adverse surface water quality impacts. Although existing surface water flows and
6 water quality on and proximal to the site have been monitored on a regular or periodic basis, in accordance
7 with Water Quality Order No. 97-03-DWQ, sampling data indicate that stormwater runoff is not in
8 compliance with water quality objectives established in the Basin Plan, including associated TMDLs, nor in
9 compliance with Federal EPA benchmarks. Such contaminated runoff is incrementally contributing to water
10 quality impacts within the Calleguas Creek watershed. A representative with the LARWQCB indicated that it
11 is common for stormwater runoff at commercial and industrial facilities located throughout RWQCB Region
12 4, the Los Angeles Region (as established by the State Water Resources Control Board), to exceed Federal
13 EPA water quality benchmarks (Lee, personal communication 2009). Therefore, past, present, and
14 reasonably foreseeable projects located within the watershed would similarly contribute to adverse water
15 quality impacts within the Calleguas Creek watershed, which is considered an impaired water body due to
16 water column and sediment toxicity, organophosphate pesticides in water, and chlorpyrifos in fish tissue. The
17 cumulative impact is significant and the contribution of the proposed project is cumulatively considerable.
18 Past projects may have resulted in increased flooding in Arroyo Simi, primarily as a result of increased
19 paving, less permeable surfaces, and associated increased surface runoff. Projects that did not include
20 detention basins to retard project related increased surface flows would be especially prone to downstream
21 flooding contributions. The proposed project would result in an increase in surface water runoff. However,
22 prior to construction of the proposed project, proposed drainage facilities and improvements to existing
23 facilities would provide stormwater management capabilities equivalent to those of existing conditions and
24 those at final development of the expanded landfill as well as control surface runoff to Alamos Canyon Creek
25 As a result, flooding would not occur within the landfill expansion area during landfill operations. A flooding
26 analysis completed by Hall & Foremen, Inc. (2009) indicated that future grading improvements affecting a
27 tributary canyon to Alamos Canyon Creek that would be filled by the expansion project should not negatively
28 impact the upstream or downstream 100-year floodwater surface of Alamos Canyon Creek. However,
29 potentially increased surface flow velocities, as a result of partial infringement of the detention/sedimentation
30 basin on the floodplain, could result in downstream erosion within Alamos Canyon Creek. Implementation of
31 downstream erosion control features, in coordination with the VCWPD, Floodplain Management Division,
32 and/or redesign of the basin such that it does not infringe on the floodplain, would reduce potential
33 downstream erosion during 100-year flood events, such that impacts would be less than significant. There are
34 no other past, present, or reasonably foreseeable projects that include construction within the Alamos Canyon
35 Creek floodplain that might contribute to increase flood-induced erosion. Therefore, the cumulative impact is
36 less than significant and the contribution of the proposed project is less than cumulatively considerable.

37 **Biological Resources**

38 The area of influence for cumulative projects with respect to biological resources is limited within one mile of
39 the project site. All listed projects occurring within one mile of the project area and north of SR-118 are located
40 within an urban landscape and, therefore, are unlikely to add cumulative adverse impacts to native habitat
41 communities and wildlife. Urban projects that include vegetation removal during nesting season in the
42 vicinity may adversely impact nesting birds. In addition, cumulative projects with regards to wildlife
43 corridors are those located within the Santa Monica Mountains-Tierra Rejada-Santa Susana Mountain Range
44 wildlife corridors. Cumulative impacts on biological resources within wildlife corridors may result from the
45 combined incremental impact of increases in removal of high quality native habitat.

46 The proposed project would result in significant impacts to: the California coastal gnatcatcher and nesting
47 birds; about 2,125 square feet (0.05 acre) of marsh vegetation associated with two seeps in the southern part
48 of the expansion area; movement corridors and important habitat in Alamos and Brea canyons adjacent to the
49 project site; and locally important plants, wildlife, and communities. Impacts to these biological resources

1 would be less than significant with implementation of Mitigation Measures BIO-1 through BIO-14. Because
2 adjacent projects occur in urban settings that are already partially or fully developed, the cumulative impact to
3 Impacts BIO-1, BIO-2, and BIO-4 are less than significant and the contribution of the proposed project is less
4 than cumulatively considerable. With implementation of these measures, the cumulative impact on wildlife
5 corridors (Impact BIO-3 is potentially significant and the contribution of the proposed project is less than
6 cumulatively considerable.

7 **Agricultural Resources**

8 Cumulative impacts on agricultural resources may result from the combined incremental conversion of
9 agricultural lands to urban uses within Ventura County. Past development has converted and/or displaced
10 agricultural land within the cumulative region of influence. Present and reasonably foreseeable projects
11 located on the periphery of the urban/rural boundary, would convert agricultural lands to urban uses.
12 Together with past development, they would incrementally contribute to cumulative adverse impacts on
13 agricultural resources. Cumulative impacts on agricultural resources due to dust may result from the
14 combined incremental impact of increases in dust on agricultural parcels. Present and reasonably foreseeable
15 projects located on or within a half-mile of the property that currently are in or suitable for agricultural
16 production could experience a 10 percent or greater increase in dust on agricultural parcels.

17 The proposed project would convert approximately 165 acres of open space/rural designated farmland of local
18 importance to industrial/commercial uses. The resulting the direct loss of locally important farmland to non-
19 agricultural uses would be a significant impact, and the proposed project would result in a cumulatively
20 considerable contribution to significant cumulative impacts associated with the loss of agricultural soils.
21 Regarding impacts related to dust, unmitigated proposed construction and operations would increase ambient
22 fugitive dust levels by more than 10 percent from background levels to farmlands within one-half mile of the
23 proposed project site, thereby resulting in a significant impact. Mitigation Measure AG-1 would reduce these
24 impacts, but not to a less than significant level. Therefore, the proposed project would result in a cumulatively
25 considerable contribution to significant cumulative impacts associated with increases of dust on agricultural
26 resources.

27 **Visual Resources and Glare**

28 Past development in the project vicinity and surrounding areas has transformed the natural setting to create an
29 urbanized landscape. In this area, construction of residential communities, industrial facilities, and
30 commercial centers has eliminated public views of natural features, including undulating ridgelines, canyons,
31 expansive grasslands, and oak/riparian woodlands. Probable future projects would contribute to cumulative
32 impacts on visual resources are projects due to the conversion of undeveloped, natural areas to
33 industrial/commercial development, obstruction of public views along the SR-118 scenic view corridor, and
34 light/glare. These sites also include important visual qualities experienced from public viewpoints that would
35 be compromised when developed.

36 Construction and operation of the proposed project would obstruct scenic views of the Santa Susana Mountain
37 Range from the SR-118 scenic viewshed resulting in a cumulatively considerable contribution to significant
38 cumulative impacts associated with obstruction of important public views from the SR-118 scenic viewshed.
39 In addition, the proposed project would result in significant impacts to visual resources as viewed from
40 Madera Road, Alamos Canyon Easterly Loop Trail, elevated North Park Village residential lots, and Alamos
41 Canyon Trail. Implementation of Mitigation Measure VIS-1 would reduce impacts to these scenic features to
42 a less than significant level. However, as the final landfill contour would extend above the existing horizon
43 defined by the Santa Susana Mountain ridgelines and due to the close proximity of the viewer, impacts on
44 visual resources from the Alamos Canyon Trail vantage point would be significant. Therefore, cumulative
45 impacts on scenic areas/features from the Alamos Canyon Trail would be cumulatively considerable.

1 Past development in the project vicinity and surrounding areas have created sources of light and glare and
2 resulted in changes in ambient illumination levels in adjacent areas. Because of the lighting policies and
3 standards that are currently implemented by local jurisdictions to minimize exterior light illumination, the
4 contributions of present and reasonably foreseeable projects to cumulative light/glare impacts in the area will
5 be limited. The proposed project would introduce a substantial amount of new night light and glare,
6 representing a significant change in the level of night light illumination when compared to what is presently
7 generated over the project site. Impacts would be potentially significant; however implementation of the
8 project Lighting Plan (Mitigation Measures VIS-2 and VIS-3) would result in a less than significant
9 cumulative contribution to cumulative light/glare impacts.

10 ***Geologic Hazards/Mineral Resources/Paleontological Resources Geology and Seismic***
11 ***Hazards***

12 Past projects, including projects may have been impacted by geologic hazards, including fault rupture, severe
13 seismically induced ground shaking, liquefaction, subsidence, expansive soils, and landslides/mudslides. Past
14 development has increased the amount of infrastructure, structural improvements, and number of people
15 working in the Simi Valley area (i.e., the cumulative geographic scope) and has placed commercial,
16 industrial, and residential structures and their occupants in areas that are susceptible to geologic hazards.
17 Thus, these developments have had the effect of increasing the potential for geologic hazards to result in
18 damage to property and injury to people. Similarly, present and reasonably foreseeable future projects,
19 including the existing SVLRC, may be impacted by geologic hazards. However, past, present, and reasonably
20 foreseeable future projects (including the proposed project) would not change the risk of these geologic
21 hazards. The proposed landfill expansion area is not located within a: 1) State of California designated
22 Alquist-Priolo Special Fault Study Zone; 2) County of Ventura designated Fault Hazard area; or 3) County of
23 Ventura designated Potential Fault Hazard Area. The nearest large active fault is the Simi-Santa Rosa Fault,
24 which trends east-west about 3,000 feet south of the landfill. The on-site, potentially active Canada de la Brea
25 Fault may experience sympathetic (i.e., triggered) slip during large earthquakes on nearby active faults. This
26 sympathetic slip, if it occurs, likely will be minor (i.e., on the order of several centimeters). In addition,
27 alluvial areas in canyon bottoms would be subject to liquefaction in the event of severe seismically induced
28 ground movement, potentially resulting in damage to site structures such as buildings, containment structures,
29 leachate and gas collection facilities, and surface drainage facilities. However, impacts are site-specific and
30 relate primarily to construction techniques. In addition, the expanded landfill, as well as all cumulative
31 projects would be designed and constructed in accordance with seismic design studies, as well as all relevant
32 State and County regulations. Therefore, the cumulative impact is less than significant and the contribution of
33 the proposed project is less than cumulatively considerable.

34 Past projects may have been constructed over known or unknown petroleum resources, thus precluding oil
35 drilling from within project boundaries. Past projects may have also resulted in displacement of oil wells that
36 have produced oil from the Simi Valley area. However, modern directional (or slant) drilling techniques have
37 allowed access to oil reserves from remote locations; therefore, past industrial and commercial development
38 have not substantially reduced access to oil reserves in the Simi Valley area. Similarly, present and
39 reasonably foreseeable future projects will not preclude continued development of the Simi Valley area, as
40 these project sites could be accessed from remote locations, using directional drilling techniques. Although
41 previous oil and gas extraction has occurred in the vicinity of the landfill, most of the production activities
42 have been terminated at the project site, as well as within the encompassing Simi Valley. In addition,
43 groundwater extraction is not occurring in large quantities in the landfill vicinity or the encompassing Simi
44 Valley Groundwater Basin. Therefore, cumulative subsidence is not expected to occur in association with
45 extraction of oil, gas, or groundwater. The cumulative impact is less than significant and the contribution of
46 the proposed project is less than cumulatively considerable.

1 **Mineral Resources**

2 Past projects, including projects have been constructed over known or unknown petroleum resources, thus
3 precluding oil drilling from within project boundaries. Past projects may have also resulted in displacement of
4 oil wells that have produced oil from the Simi Valley area. However, modern directional (or slant) drilling
5 techniques have allowed access to oil reserves from remote locations; therefore, past industrial and
6 commercial development have not substantially reduced access to oil reserves in the Simi Valley area.
7 Similarly, present and reasonably foreseeable future projects will not preclude continued development of the
8 Simi Valley area, as these project sites could be accessed from remote locations, using directional drilling
9 techniques.

10 Proposed landfill expansion would preclude oil and gas drilling from within proposed project boundaries.
11 However, petroleum reserves beneath the site, as well as beneath other cumulative projects listed in Table 4.1-
12 1, could be accessed from remote locations, using directional (or slant) drilling techniques. Therefore, the
13 proposed project, as well as cumulative projects in the Simi Valley area, would not result in the permanent
14 loss of availability of a known petroleum resource that would be of future value to the region and the residents
15 of the state. Because of modern oil and gas drilling techniques, the cumulative impact is less than significant
16 and the contribution of the proposed project is less than cumulatively considerable.

17 **Paleontological Resources**

18 Past projects, including may have destroyed paleontological resources. Construction activities associated with
19 present and reasonably foreseeable future projects would potentially require excavation into portions of the
20 Sespe Formation with potentially significant vertebrate paleontological resources. Therefore, such projects
21 may result in the destruction of paleontological resources. The proposed project would result in ground
22 disturbances within areas of high paleontological sensitivity. Based on the relative uniqueness of land
23 mammal fossils found in this area, the potential disturbance to these paleontological resources by the
24 proposed project would be significant, prior to mitigation. Therefore, the incremental effect of the proposed
25 project on paleontological resources prior to mitigation would be cumulatively considerable when considered
26 in conjunction with past projects and related present and future projects.

27 **Cultural Resources**

28 Past, present, and reasonably foreseeable development that would contribute to cumulative impacts on
29 cultural resources includes projects that would have the potential for ground disturbance in the region of
30 analysis. Those projects that have the potential to modify and/or demolish structures over 50 years old have
31 the potential to contribute to cumulative impacts on historical architectural resources. Projects that involve
32 grading of intact, natural landforms have the potential to contribute to cumulative impacts on archaeological
33 resources. Reasonably foreseeable future cumulative projects would potentially disturb unknown, intact
34 subsurface prehistoric and historic archaeological resources. Although much of the area has been previously
35 disturbed, there is potential for related infill projects to potentially contribute to this impact. Discretionary
36 review of incremental projects would minimize impacts on cultural resources, as local policies encourage the
37 avoidance and protection of archaeological resources. However, impacts on cultural resources associated with
38 past, present, and reasonably foreseeable buildout would be cumulatively considerable. If significant
39 archaeological deposits are discovered during grading or construction, the project would have a significant
40 impact on archaeological resources. Implementation of Mitigation Measures CUL-1 through CUL-3, would
41 ensure that impacts to subsurface archaeological deposits would be less than significant. With implementation
42 of these mitigation measures, the proposed project would result in a less than significant cumulative
43 contribution to cumulative impacts on archaeological resources. Since the proposed project would have no
44 impacts on historical resources, it is not necessary to analyze the proposed project's contribution to past,
45 present, and reasonably foreseeable impacts on historical resources.

1 **Hazards**

2 Past projects may have been impacted by hazards, including fire, hazardous materials/waste spills, and soil
3 contamination/soil gas associated with former oil wells. Past development has had the effect of increasing the
4 potential for hazards to result in damage to property and injury to people. Similarly, present and reasonably
5 foreseeable future projects, including the existing SVLRC, may be impacted by fire, hazardous
6 materials/waste, and oil field hazards.

7 The potential for wildfires to be ignited on adjacent, off-site areas is low and impacts are considered less than
8 significant. The expanded landfill, as well as all cumulative projects would be required to comply with fire
9 prevention regulations established by the Ventura County Fire Protection District. Therefore, the cumulative
10 impact is less than significant and the contribution of the proposed project is less than cumulatively
11 considerable.

12 The proposed SVLRC expansion includes the storage, handling, and disposal of hazardous materials and
13 hazardous waste. Improper storage, handling, and disposal of these substances could result in contamination
14 of on-site soils, as well as adverse impacts to health and safety of on-site personnel. Expanded landfill
15 operations, as well as all cumulative projects would be required to comply with fire prevention regulations
16 established by the Ventura County Uniform Fire Code, as well as all other relevant County, State, and Federal
17 regulations. Therefore, the cumulative impact is less than significant and the contribution of the proposed
18 project is less than cumulatively considerable.

19 Residual concentrations of petroleum products and hazardous substances may be present in on-site soil as a
20 result of historic oil and gas drilling operations. Grading and landfill operations in the immediate vicinity of
21 the existing oil wells could create significant adverse health and safety impacts, such as organic vapor
22 emissions and exposure of contaminated soils. In addition, elevated concentrations of petroleum hydrocarbons
23 are present beneath oil field service roads, to a depth of approximately two feet. Grading in the vicinity of
24 these roads could similarly result in adverse health and safety impacts. Excavations could cause damage to the
25 abandoned oil well casings, potentially resulting in an oil and/or gas leak. The possibility of damage to the
26 abandoned oil wells during grading is considered a potentially significant, but mitigable impact. In addition,
27 health and safety impacts associated with a potential release of hazardous substances or petroleum products as
28 a result of landfill construction, in the vicinity of on-site abandoned oil wells, is considered a potentially
29 significant, but mitigable impact. Expanded landfill operations, as well as cumulative projects that are located
30 in the vicinity of active or abandoned oil wells, would similarly result in potentially significant health and
31 safety impacts in the event that grading and construction is completed in proximity to active or former oil
32 field infrastructure. However, such health and safety impacts are localized in nature and specific to each
33 cumulative project site. Therefore, the cumulative impact is less than significant and the contribution of the
34 proposed project is less than cumulatively considerable.

35 Exposure to Valley Fever from soil disturbed at the landfill would pose a less than significant impact because
36 ground-disturbing activities are considered baseline and represent a continual source of spores that contribute
37 to the low number of Valley Fever cases reported each year; and a major ground-disturbing event (i.e., large
38 earthquake) is required to release a large number of spores over a wide area wide enough for a significant
39 outbreak of Valley Fever to occur. Expanded landfill operations, as well as cumulative projects, would result
40 in less than significant impacts. Therefore, the cumulative impact is less than significant and the contribution
41 of the proposed project is less than cumulatively considerable.

42 **Noise**

43 The geographic scope for cumulative noise impacts is the vicinity of the SVLRC and local roadways that
44 would be used by waste vehicles. Projects that could contribute to cumulative construction noise and vibration
45 impacts include demolition, grading and construction projects in the vicinity of the proposed project. Those

1 that could contribute to operational noise and vibration impacts include projects in the vicinity of SVLRC that
2 could exceed the standards of Ventura County Noise Policy 2.16.2-1(4).

3 Virtually all past, present, and reasonably foreseeable future projects will make some incremental contribution
4 to noise, at least during construction and most likely during operations, as well. Residential development
5 results in noise from vehicles, household occupants (people and pets), and associated lawn and garden
6 equipment, recreational vehicles, mechanized toys, etc. Commercial development involves vehicle traffic
7 noise as well as noise associated with the presence of people and the loading and unloading of goods.
8 Industrial development involves noise associated with vehicles, loading and unloading of goods, industrial
9 processes including release of pressure, clanging of metal on metal, whistles, and equipment and vehicle
10 noise. The cumulative effect of development projects over time has been to overall increase the noise levels in
11 developed areas to levels considerably above pre-development ambient levels. Therefore, the cumulative
12 noise impact of past, present, and reasonably foreseeable future projects has been considerable.

13 The proposed project would cause increases in noise of less than one dB (A) over current ambient levels at all
14 analyzed locations. Since three dB (A) is considered the threshold of audibility for a person with normal
15 hearing in a typical setting, the incremental noise from the proposed project would be considerably below the
16 threshold of audibility and would therefore not, on its own, be distinguishable from background levels.
17 Nevertheless, the project would contribute a measureable increment to existing noise levels and may be
18 considered to contribute to cumulatively considerable noise impacts.

19 **Transportation/Circulation**

20 The transportation environmental setting for the cumulative transportation and circulation analysis includes
21 those streets and intersections that would be used by both automobile and truck traffic to gain access to and
22 from the proposed project and past, present, and reasonably foreseeable future projects in the SVLRC
23 vicinity, as well as those streets that would be used by construction traffic (i.e., equipment and commuting
24 workers).

25 Future peak hour and annual average daily freeway volumes along SR-118 from the City of Simi Valley
26 Travel Demand Forecasting Model were used for the Future freeway segment analysis. All the study freeway
27 segments are projected to continue to operate at the same LOS during the Future With Project scenario.
28 Therefore, the contribution of the project to cumulative freeway segment impacts is less than cumulatively
29 considerable.

30 Future peak hour volumes from the City of Simi Valley Travel Demand Forecasting Model were used for the
31 Future local roadway segment analysis. All the study roadway segments are projected to continue to operate
32 at the same unacceptable LOS during the Future With Project scenario. However, the project would not
33 contribute to a lowering of the level of service nor would it be responsible for more than 50 percent of the
34 increase in traffic volumes. Therefore, the cumulative impact of the project with regard to local roadway
35 segments is less than cumulatively considerable.

36 With regard to the intersection of Somis Road and SR-118, the proposed project is not expected to add
37 substantial traffic to the intersection. Given the proposed improvements in the reasonably foreseeable future,
38 the contribution of the project to the cumulative impacts is less than cumulatively considerable.

39 **Water Supply**

40 Past development has increased the amount of infrastructure, structural improvements, and number of people
41 working in the Simi Valley area (i.e., the cumulative geographic scope). Most of the water associated with
42 this past development has been supplied by the CMWD. Thus, these developments have had the effect of
43 increasing the water demand from this water purveyor. Similarly, present and reasonably foreseeable future

1 projects, including the existing SVLRC, would require water supply from the CMWD. In addition, in the
2 eastern portion of Simi Valley, there is a regional shortage of water pressure, which potentially affects fire-
3 fighting capabilities. Specifically, the lack of sufficient water pressure occurs in the Knolls area, a result of
4 insufficient water storage in the Alta Vista Zone storage tank.

5 The project would be served by the CMWD, which provides water that is in compliance with the applicable
6 State Drinking Water Standards. Therefore, impacts to water quality would be less than significant. CMWD
7 is considered by Ventura County to be a permanent source of water. A water availability letter from Ventura
8 County Waterworks District No. 8 would be submitted by CMWD with the proposed project application,
9 verifying that adequate water supplies are available. In addition, an updated water supply plan would be
10 included as part of a Master Development Plan, which is designed to ensure that the landfill is operated in an
11 environmentally safe manner and to mitigate any significant avoidable environmental impacts identified in the
12 EIR. The water supply plan would describe improvements to be made to assure adequate potable and non-
13 potable water for landfill operations, dust control, fire protection, landscaping, human consumption, and
14 hygiene. In addition, water supply at SVLRC is not derived from the Alta Vista water storage tank. Thus,
15 sufficient water pressure is available for fire-fighting purposes at SVLRC. Therefore, impacts would be less
16 than significant. All cumulative projects would be required to comply with the same protocol described
17 above for the proposed project, in order to determine availability of water supply from CMWD as well as
18 meet applicable water quality regulations. Therefore, the cumulative impact is less than significant and the
19 contribution of the proposed project is less than cumulatively considerable.

20 **Waste Treatment/Disposal**

21 Past, present, and reasonably foreseeable future development that have an individual sewage disposal system,
22 or involve new or expanded solid waste facilities may have contributed cumulative impacts. There are no
23 past, present, or reasonably foreseeable solid waste facility projects that would contribute to cumulative
24 impacts. With respect to cumulative projects with an individual sewage disposal system, discretionary review
25 of these incremental projects minimizes cumulative impacts due to individual sewage disposal systems, as
26 projects are required to comply with state and local policies regarding individual sewage disposal systems.
27 Thus, impacts on sewage and treatment disposal associated with past, present, and reasonably foreseeable
28 buildout of the cumulative projects would not be cumulatively considerable. The project would be required to
29 obtain an individual WDR permit for the proposed on-site wastewater treatment plant from the LARWQCB.
30 The level of treatment required and permitted reuse would be specified in the WDR. As such, the proposed
31 project would conform with the requirements of the LARWQCB's Basin Plan concerning development
32 utilizing septic systems (LARWQCB 1994). In addition, the proposed on-site wastewater treatment facility
33 must meet operation and maintenance guidelines required by the Ventura County Environmental Health
34 Division; and meet requirements outlined in the Ventura County Building Code. Issuance of these permits
35 and compliance with applicable State and County regulations with respect to design and operation of the
36 treatment plant would reduce potential impacts from on-site sewage disposal to a level considered less than
37 cumulatively considerable. Cumulative projects that include individual sewage disposal systems would be
38 required to comply with the same regulations. Therefore, the cumulative impact is less than significant and
39 the contribution of the proposed project is less than cumulatively considerable.

40 **Recreational Facilities**

41 Cumulative impacts on recreational resources may result from the combined incremental demands on existing
42 local and regional parks/facilities and trails resulting from past, present, and reasonably foreseeable
43 development within the cumulative region of influence. Past development in the project vicinity and
44 surrounding areas has resulted in a deficit of developed parkland within the region. The majority of present
45 and reasonably foreseeable projects are residential developments that would result in a substantial demand for
46 recreational facilities in the region. Additionally, the Colton Lee Manufactured Housing Community (#8) has
47 the potential to impede future development of the RSRPD Trail #15 (Las Lajas to Black Canyon). Because

1 Quimby fees (provisions for the dedication of fees and/or parkland) are currently required for proposed
2 subdivision developments, the contributions of present and reasonably foreseeable projects to cumulative
3 recreation impacts in the area would not be cumulatively considerable.

4 No local or regional parks/facilities, regional trails/corridors are located within the proposed CUP boundary
5 such that no existing facilities would be directly impacted by the proposed project. The proposed project
6 would, however, result in a net increase of 150 employees, thereby creating the potential for an increase in
7 population and a corresponding increase in the demand for local and regional parks/facilities and
8 trails/corridors. Mitigation Measures REC-1 through REC-3 would offset costs of developing and/or
9 improving local and regional park/facilities and trails/corridors associated with increased demands on existing
10 recreational facilities. Therefore, the proposed project would result in a less than significant cumulative
11 contribution to cumulative impacts on local and regional parks/facilities.

12 One planned multi-purpose trail (Alamos Canyon Trail) and a 20-acre community park site is located within
13 the proposed CUP boundary. Thus, the proposed development would impede future development of
14 recreation parks/facilities and regional trails and impacts to these future facilities would be significant.
15 However, implementation of Mitigation Measures REC-1 through REC-3 would ensure that impacts would be
16 less than significant. As such, the proposed project would result in a less than significant cumulative
17 contribution to cumulative impacts on the future development of recreational facilities.

18 **ES.6 Public Involvement**

19 The County issued a Notice of Preparation and Initial Study (NOP/IS) for SVLRC CUP-3142-8 on December
20 20, 2007. The NOP/IS described the project and the environmental review process and solicited public input
21 on environmental issues two to be addressed in the EIR. Copies of the NOP/IS were distributed to various
22 movement agencies, organizations and individuals during the 30-day review period. The NOP and IS was also
23 made available for review at various libraries and online at the County Planning Department website. During
24 the public review period, 21 comment letters were received.

25 The County conducted a public scoping meeting on June 2, 2008 at the City of Simi Valley Council Chamber.
26 During this meeting the County presented information on the project and solicited public input on topics to be
27 addressed in the EIR. During the Scoping meeting 11 individuals provided comments. Table 1.6-1
28 summarizes the environmental issues that were identified during the NOP/IS public review period and the
29 public scoping process and indicates the EIR sections in which these issues were addressed.

30 **ES.7 Impacts and Mitigation Measures**

31 Table ES.7-1 summarizes the environmental impacts and mitigation measures identified in this EIR.

Table ES.7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation Land Use/General Plan Goals, Policies, and Programs	Mitigation	Significance After Mitigation
Impact LU-1: Community Character. Compatibility of design/architectural style with the surrounding community. Including surrounding land uses, buildings, General Plan designations, zoning, and parcel sizes.	Less than significant	None necessary.	Less than significant
Impact LU-2: Existing Housing. Forced removal of housing that are currently or were formerly renter-occupied, that are affordable to families of either moderate-income located within the coastal zone and/or lower-income located within the County, resulting in adverse impact on existing housing.	Less than significant	None necessary.	Less than significant
Impact LU-3: Demand for Housing. Increase the demand for housing due to construction or operation.	Significant	LU-1: The applicant shall pay a one-time fee (as determined by the decision-making body) to a County-approved low-income-housing entity or an established housing trust fund to assist in providing for construction of affordable housing within the vicinity of Simi Valley.	Less than significant
Impact LU-4: Growth Inducement. Significance of growth inducing impacts of a project depends on how much added growth would be accommodated by removing the impediment and setting a precedent for similar actions in the future and whether that growth is consistent with the planned land use of an areas, and the physical impacts of said growth.	Less than significant	None necessary.	Less than significant
Impact AQ-1c: VCAPCD Daily Emission significance Criteria. Project construction would produce emissions that exceed VCAPCD daily ROC and NO _x emission significance thresholds.	Significant	Air Quality AQ-1: The construction contractor shall implement following measures to mitigate ozone precursor emissions from on-site off-road construction equipment: 1. All construction equipment shall meet the EPA Tier 3 nonroad equivalent standards. The construction contractor shall be exempt from this requirement if he provides proof that a given piece of equipment is unavailable within the California that meets Tier 3 standards. 2. Minimize equipment idling time. 3. Maintain equipment engines in good condition and in proper tune as per manufacturers' specifications. 4. Lengthen the construction period during smog season (May through October), to minimize the number of vehicles and equipment operating at the same time.	Less than significant

Table ES.7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
Impact AQ-1c (continued)	Significant	<p>Air Quality (continued) Encourage the use of alternatively fueled construction equipment, such as compressed natural gas (CNG), liquefied natural gas (LNG), or electricity, if feasible. See AQ-1.</p>	Less than significant
Impact AQ-2c: Project construction would result in onsite ambient air pollutant concentrations that would contribute to an exceedance of an ambient air quality standard.	Significant	<p>AQ-2: Additional Fugitive Dust Controls for Construction. The calculation of unmitigated fugitive dust emissions from proposed construction activities is based upon compliance with VCAPCD Rule 55, Fugitive Dust, which is assumed to produce a 50 percent reduction in PM₁₀ emissions from uncontrolled levels. This would occur with the use of rigorous watering of the site and other control measures, such as a limitation of vehicle speeds to 15 miles per hour (mph) on-site. The proposed construction contractor shall develop and implement dust control methods to achieve a 90 percent reduction of fugitive dust emissions from uncontrolled levels. Additional control measures to reduce fugitive dust shall include, but are not limited to, the following: 1. Designate personnel to monitor the dust control program and order increased watering, as necessary, to ensure a 90 percent control level. Their duties shall include holiday and weekend periods when work may not be in progress. 2. Apply approved non-toxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas or replace groundcover in disturbed areas. 3. Provide temporary wind fencing around sites being graded or worked. 4. Cover truck loads that haul dirt, sand, or gravel or maintain at least two feet of freeboard in accordance with Section 23114 of the California Vehicle Code. 5. Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off tires of vehicles and any equipment leaving the site. 6. Suspend all soil disturbance activities when winds exceed 25 mph as instantaneous gusts or when visible dust plumes emanate from the site and stabilize all disturbed areas. 7. Sweep all streets at least once a day if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water). 8. Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces. Pave road and road shoulders.</p>	Significant for (1) 1-hour CAAQS for NO ₂ , (2) 24-hour CAAQS for PM ₁₀ , (3) annual CAAQS for PM ₁₀ , and (4) 24-hour NAAQS for PM _{2.5} .

Table ES.7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
Air Quality (continued)			
AQ-3c: Project construction would expose the public to toxic air contaminants (TACs).	Less than significant	See AQ-1.	Less than significant
AQ-4c: Project construction would conflict with or obstruct implementation of the applicable air quality plan.	Less than significant	See AQ-1 and AQ-2.	Less than significant
AQ-5c: Project construction would generate fugitive dust emissions in such quantities as to endanger the public.	Less than significant	See AQ-2.	Less than significant
AQ-6c: Project construction would generate odorous emissions in such quantities as to endanger the public.	Less than significant	None necessary.	Less than significant
AQ-7c. Potential incremental contributions from the project to global climate change.	Incrementally contribute to global climate change.	See AQ-1.	Incrementally contribute to global climate change.
Impact AQ-1a: Project operations would produce emissions that exceed VCAPCD daily ROC and NOx emission significance thresholds.	Significant	AQ-3: To reduce peak daily emissions of ROC and NOx from Project operations, the landfill operator shall implement the following measures to mitigate ozone precursor emissions from on-site off-road mobile equipment: 1. Beginning in 2009, convert equipment to engines with EPA nonroad Tier 3 standards, where feasible. 2. Minimize equipment idling time. 3. Maintain equipment engines in good condition and in proper tune as per manufacturers' specifications. 4. Use alternatively fueled equipment, such as CNG, LNG, or electric, if feasible.	Significant
Impact AQ-2a: Project construction and operation would result in onsite ambient air pollutant concentrations that would contribute to an exceedance of an ambient air quality standard.	Significant	See AQ-1, AQ-2, and AQ-3. AQ-4: The calculation of unmitigated fugitive dust emissions from proposed construction and operational activities is based upon compliance with VCAPCD Rule 55, Fugitive Dust, which is assumed to produce a 50 to 75 percent reduction in PM ₁₀ emissions from uncontrolled levels, depending on the source type. This would occur with the use of rigorous watering of the site and other control measures, such as a limitation of vehicle speeds to 15 mph on-site. The project landfill operator shall develop and implement dust control methods to achieve a 90 percent reduction of fugitive dust emissions from uncontrolled levels. Additional control measures to reduce fugitive dust shall include, but are not limited to, the following: 1. Designate personnel to monitor the dust control program and	Significant for (1) 1-hour CAAQS for NO ₂ ; (2) 24-hour CAAQS for PM ₁₀ ; (3) annual CAAQS for PM ₁₀ ; (4) 24-hour NAAQS for PM _{2.5} ; and (5) annual CAAQS and NAAQS for PM _{2.5} .

Table ES.7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
Impact AQ-2o (continued)	Significant	<p>Air Quality (continued)</p> <p>order increased watering, as necessary, to ensure a 90 percent control level. Their duties shall include holiday and weekend periods when work may not be in progress.</p> <ol style="list-style-type: none"> Apply approved non-toxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction and operational areas or replace groundcover in disturbed areas. Provide temporary wind fencing around sites being graded or worked. Cover truck loads that haul dirt, sand, or gravel or maintain at least two feet of freeboard in accordance with Section 23114 of the California Vehicle Code. Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off tires of vehicles and any equipment leaving the site. Suspend all soil disturbance activities when winds exceed 25 mph as instantaneous gusts or when visible dust plumes emanate from the site and stabilize all disturbed areas. Sweep all streets at least once a day if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water). Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces. Pave road and road shoulders. <p>AQ-5: Simi Valley Landfill Emissions Reduction Program Agreement. In instances, when air quality impacts from mobile sources due to project operations cannot be mitigated to insignificant levels with the available air pollution control measures recommended for the project, the VCAPCD, in its Air Quality Assessment Guidelines, recommends implementing an Emissions Reduction Program to ensure additional mitigation of air quality impacts by requiring the project proponent to contribute funds for programs that reduce air pollutant emissions from non-project sources. However, while several municipal jurisdictions in the county have enacted air emissions mitigation programs in the form of Transportation Demand Management (TDM) programs, Ventura County has not established a Government Code section 66000 et seq. fee rule or made a Board of Supervisors commitment to adopt such a fee rule to assess, collect, and spend such fees on mitigation programs.</p>	Significant for (1) 1-hour CAAQS for NO ₂ ; (2) 24-hour CAAQS for PM ₁₀ ; (3) annual CAAQS for PM ₁₀ ; (4) 24-hour NAAQS for PM _{2.5} ; and (5) annual CAAQS and NAAQS for PM _{2.5} .

Table ES.7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
<p>Impact AQ-2o (continued)</p>	<p>Significant</p>	<p>Air Quality (continued) Therefore, to accomplish the purposes of an Emissions Reduction Program, some other legally enforceable, feasible mechanism to achieve the same result is required. In this instance, a legally enforceable agreement between the County of Ventura, VCAPCD, and the applicant (WMI) could be executed such that funding would be provided by the applicant via the agreement to the VCAPCD for the purpose of funding emission reduction programs in Ventura County, based on estimated mobile source emissions from operations in excess of standards. Such an agreement would, at a minimum, have the following features:</p> <ul style="list-style-type: none"> • A binding agreement would be executed by the County of Ventura, the VCAPCD, and the applicant wherein the applicant commits: <ul style="list-style-type: none"> ○ To the payment of fees, calculated based on the amount of project operational emissions from mobile sources in excess of standards, into a fund administered by the VCAPCD. Fees would be determined based on the project's mobile source emissions in excess of standards and the cost-effectiveness of projects funded by the VCAPCD's Carl Moyer Memorial Air Quality Standards Attainment Program. ○ Pay the assessed fees over a time period mutually agreeable to all parties. • The VCAPCD would be entitled to recover all cost of administering the expenditure of the funds so collected. • The fees would be used by the VCAPCD to fund emission reduction projects in Ventura County. Projects that could be funded include, but would not necessarily be limited to, project types eligible for funding under the VCAPCD's emission reduction incentive programs such as: <ul style="list-style-type: none"> ○ <i>The Carl Moyer Memorial Air Quality Standards Attainment Program,</i> 	<p>Significant for (1) 1-hour CAAQS for NO₂; (2) 24-hour CAAQS for PM₁₀; (3) annual CAAQS for PM₁₀; (4) 24-hour NAAQS for PM_{2.5}; and (5) annual CAAQS for and NAAQS for PM_{2.5}.</p>

Table ES.7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
Impact AQ-2o (continued)	Air Quality (continued)	<ul style="list-style-type: none"> o Clean Air Fund, o The Lower Emissions School Bus Program, and o The Lawn Mower Trade-In Program. 	Significant for (1) 1-hour CAAQS for NO ₂ ; (2) 24-hour CAAQS for PM ₁₀ ; (3) annual CAAQS for PM ₁₀ ; (4) 24-hour NAAQS for PM _{2.5} ; and (5) annual CAAQS and NAAQS for PM _{2.5} .
AQ-3o: Project construction and operation would expose the public to TACs.	Significant	Emission reduction programs such as the one described above facilitate reductions in emissions by reducing individual vehicle emissions (buses, trucks, etc.) and emissions from other devices and equipment powered by internal combustion engines through the use of more efficient engines, less polluting fuels, or electric or hybrid power sources. It is uncertain the extent to which the Simi Valley Landfill and Recycling Center Emissions Reduction Program would offset overall project-related vehicular emissions and it is not possible to calculate what those reductions might be because the specific emission mitigation projects are unknown at this time. However, implementing an Emissions Reduction Program Agreement for the proposed Simi Valley Landfill expansion project is considered an effective emission reduction measure.	Less than significant
AQ-4o: Project operation would conflict with or obstruct implementation of the applicable air quality plan.	Less than significant	See AQ-1 and AQ-3.	Less than significant
AQ-5o: Project operations would generate fugitive dust emissions in such quantities as to endanger the public.	Less than significant	See AQ-3 and AQ-4.	Less than significant
AQ-6o: Project operation would generate odorous emissions in such quantities as to endanger the public.	Less than Significant	See AQ-4.	Less than significant
Impact AQ-7o: Potential incremental contributions from the project to global climate change.	Incrementally contribute to global climate change.	AQ-6: Odor Control Plan. The landfill operator shall implement Condition Number 41, Odor Control Plan, in Conditional Use Permit CUP-3142-7 during proposed operations at the SVLRC. This plan shall be updated, as deemed necessary to comply with current regulations, by the Ventura County Environmental Health Division (EHD) and Planning Division. See AQ-3.	Less than Significant Incrementally contribute to global climate change.

Table ES.7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
<p>Impact WR-1: Groundwater Quantity. Directly or indirectly decrease the net quantity of groundwater in a basin that is overdrafted; cause non overdrafted basin(s) to become overdrafted; result in a net increase in groundwater extraction in areas where the basin condition is not known.</p>	Less than significant	<p>Water Resources None necessary.</p>	Less than significant
<p>Impact WR-2: Groundwater Quality. Degrade the quality of groundwater and cause groundwater to fail to meet groundwater quality objectives set by the LARWQCB.</p>	Less than significant	None necessary.	Less than significant
<p>Impact WR-3: Surface Water Quantity. Increase the net utilization of surface water in a hydraulic unit that is overdrafted; adversely impacts an overdrafted hydrologic unit; cause the hydraulic unit to become overdrafted; or result in a net increase in surface water for hydraulic units in which the condition is not known.</p>	Less than significant	None necessary.	Less than significant
<p>Impact WR-4: Surface Water Quality. Degrades the quality of surface water and causes it to fail to meet surface water quality objectives for a hydrologic unit defined in the most recent Water Quality Control Plan.</p>	Significant	<p>WR-1: Toe Barrier Liquid Analysis by VCWPD. Toe barrier liquids sampling results shall be reviewed by the Ventura County Watershed Protection District, Water & Environmental Resources Division, Water Quality Section, for conformance with Basin Plan surface water quality objectives, including associated TMDLs, prior to use in dust control. In the event that sampling results are in excess of these water quality objectives, use of toe barrier liquids for dust control shall cease pending enhanced remedial actions and additional sampling demonstrating that the toe barrier liquids are within acceptable limits.</p> <p>WR-2: Stormwater Runoff Analysis by VCWPD. Stormwater runoff sampling results shall be reviewed by the Ventura County Watershed Protection District, Water & Environmental Resources Division, Water Quality Section, for conformance with Basin Plan surface water quality objectives, including associated TMDLs. In the event that sampling results are in excess of these water quality objectives, on-site Best Management Practices shall be adjusted and enhanced until additional sampling demonstrates that stormwater runoff is within acceptable limits.</p>	Less than significant

Table ES.7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
<p>Impact WR-5: Flooding. Flooding hazards are ubiquitous throughout Ventura County and are accommodated by the Ventura County Building Code and the Ventura County Watershed Protection District Standards and Specifications Design Manual. The effects of flooding hazards are required to be considered within the existing framework of grading and building code ordinances which apply to all projects.</p>	<p>Significant</p>	<p>Water Resources (continued) WR-3: Detention/Sedimentation Basin Armoring. The proposed detention/sedimentation basin in the northwest portion of Phase III, at the confluence of Alamos Canyon Creek and the tributary creek to the northeast, shall be armored sufficiently to withstand erosive flow associated with a 100-year storm event along Alamos Canyon Creek. Basin armoring shall include rock rip-rap, precast concrete block, or roller compacted concrete. WR-4: Downstream Erosion Control Measures. The applicant shall coordinate with the VCWPD, Advanced Planning Section, Floodplain Management Division, in developing erosion control features within Alamos Canyon Creek, downstream of the proposed detention/sedimentation basin in the northwest portion of Phase III, at the confluence of Alamos Canyon Creek and the tributary creek to the northeast, to address increased stormwater runoff flow velocities adjacent to the proposed basin. Alternatively, the detention/sedimentation basin shall be redesigned such that it does not encroach on the designated floodplain.</p>	<p>Less than significant</p>
<p>Impact BIO-1: Endangered, Threatened, or Rare Species and Nesting Birds. Directly or indirectly: reduce species population; reduce species habitat; or restrict reproductive capacity.</p>	<p>Significant</p>	<p>Biological Resources BIO-1: Pre-construction botanical surveys shall be conducted by a County-approved biologist for the Braunton's milk vetch, San Fernando Valley spineflower, Lyon's pentachaeta, and other listed species during the appropriate flowering period prior to start of grading activities (including, but not limited to: initial construction activities, development of each landfill cell, and other project-related activities) within suitable habitat for these species. The applicant shall notify United States Fish and Wildlife Service (USFWS) within 24 hours of locating any individuals of these species. In the event of positive survey results, the project applicant would consult with the USFWS to determine whether formal Section 7 consultation should be initiated. BIO-2: Prior to removal of coastal scrub habitat from construction activities (including initial construction activities, development of each landfill cell, and any other project-related activities), a qualified biologist shall conduct protocol surveys for coastal California gnatcatcher and the results provided to the County of Ventura, USFWS, and California Department of Fish and Game (CDFG). Appropriate coordination with and approval of agencies would be required. The applicant shall notify USFWS at least 7 days prior to initiation of surveys and within 24 hours of locating any gnatcatchers.</p>	<p>Less than significant</p>

Table ES.7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
<p>Impact BIO-1 (continued)</p>	<p>Biological Resources (continued) Significant</p>	<p>In the event of positive survey results, the project applicant would consult with the USFWS to determine whether formal Section 7 consultation should be initiated. In addition, should this species be found on-site a qualified biologist shall do the following: a. Perform additional surveys once a week during project construction during the breeding season of the coastal California gnatcatcher. These additional surveys may be suspended as approved by the USFWS. The applicant shall notify the USFWS at least 7 days prior to the initiation of surveys, and within 24 hours of locating any coastal California gnatcatchers. Postpone work if a gnatcatcher nest is found within 500 feet of project construction activities. A qualified biologist shall coordinate with USFWS to devise an optimal strategy of postponing work only in areas where continued construction activities may pose an adverse impact to the coastal California gnatcatcher, thereby allowing work to continue beyond the 500 foot buffer beyond documented gnatcatcher nests. BIO-3: Removal of vegetation from construction activities (including initial construction activities, development of each landfill cell, and any other project-related activities) shall be conducted outside the breeding season (February 1 through August 15) in order to avoid destruction of bird nests or eggs. If vegetation removal cannot be completed outside the February 1 through August 15 breeding season, vegetation removal in areas where suitable nesting habitat for resident or migratory bird species may occur shall occur only after pre-grading surveys by a County-approved biologist show that active nests would not be impacted by the activities. The pre-grading surveys shall focus on breeding behavior and nesting locations in the proposed work area and immediately adjacent to that area. Based on the results of the surveys, recommended buffer areas between construction activities and observed nesting habitat shall be provided to the County and to the project engineer if the work needs to occur near those locations while nesting is occurring (February 1 through August 15). BIO-4: The project applicant shall prepare and implement a wetlands mitigation plan acceptable to the County of Ventura prior to initiation of grading activity in the vicinity of the known seeps. Appropriate mitigation would include enhancing, expanding, or restoring existing wetlands, creating/establishment of new wetlands, or permanently protecting wetlands in the proposed project vicinity. The wetlands</p>	<p>Less than significant</p>
<p>Impact BIO-2: Wetland Habitat. Direct reduction of, or a substantial indirect impact to, a significant Wetland Habitat. All wetlands are potentially significant.</p>	<p>Significant</p>	<p>The wetlands</p>	<p>Less than significant</p>

Table ES.7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
Impact BIO-2 (continued)	Biological Resources (continued)	<p>mitigation plan shall include the following components at a minimum:</p> <ol style="list-style-type: none"> 1. A minimum mitigation ratio of 3:1 for acres of wetlands lost versus acres mitigated as a result of the Plan. 2. Location(s) of mitigation on suitable portions of the project site or other property that can be protected in perpetuity from future development. 3. Timing which shall be initiated prior to acceptance of waste within proposed expansion area. 4. Detailed information on the vegetation, quality, soils, and hydrology of the mitigation site prior to implementation. 5. The mitigation shall have a goal of no net loss of wetlands. Additional goals may include specific functions and values of habitat types to be established, restored, enhanced, and/or preserved. 6. Methods for restoration, creation, or enhancement (as applicable). 7. Baseline information (i.e., a description of the ecological characteristics of the proposed mitigation project site), if applicable, shall be obtained as a basis for measuring mitigation performance. Baseline information may include: descriptions of historic and existing plant communities, historic and existing hydrology, soil conditions, a map showing the locations of the impact and mitigation site(s) or the geographic coordinates for those site(s), and other characteristics appropriate to the type of resource proposed as compensation. 8. Monitoring, maintenance, and reporting for a minimum monitoring period, which shall not be less than 5 years, if applicable. 9. Performance criteria, if applicable, must be approved by the County and any other appropriate regulatory agency. Performance criteria shall at a minimum include the following parameters: percent cover, plant diversity, percent non-native plant species, target functions and values, and target hydrological regime. 10. The plan shall include an adaptive management strategy to address unforeseen changes in site conditions or other components of the mitigation project, including the party or parties responsible for implementing adaptive management measures. 11. Procedures to ensure protection of the mitigation sites in perpetuity, either through the recordation of a conservation easement, a deed restriction, recordation of a development's covenants, codes, and restrictions, or other agreements approved by the County and other relevant regulatory agencies. 	Less than significant

Table ES.7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
<p>Impact BIO-3: Migration Corridors. Substantially interfere with the use of said area by fish or wildlife. This could occur through elimination of native vegetation, erection of physical barriers, or intimidation of fish or wildlife via introduction of noise, light, development, or increased human presence.</p>	<p>Biological Resources (continued) Significant</p>	<p>BIO-5: The permittee shall implement vector control methods to deter refuse scavenging species such as gulls and crows from the waste disposal area. In the vicinity of Alamos Canyon, vector control methods (such as noisemakers and propane cannons, distress call, and use of falcons and dogs) that could result in the avoidance of the use of Alamos Canyon as a wildlife corridor, shall be avoided.</p> <p>BIO-6: To ensure the continued availability of the Alamos Canyon Wildlife Corridor for the benefit of native plants and wildlife, the permittee shall obtain, dedicate, enhance, and manage habitat in and adjacent to the Alamos Canyon wildlife corridor (including the riparian zone and adjacent upland habitats) from the SR-118 freeway place extending northward at least to the latitude of the northernmost portion of buffer area associated with the proposed landfill expansion. Dedication shall be in perpetuity through a legal instrument such as a conservation easement. Enhancement shall be as described in Mitigation Measure BIO-7.</p> <p>BIO-7: The permittee shall design and implement a plan acceptable to the County of Ventura for habitat enhancements along the channel in Alamos Canyon in order to improve overstory cover for migrating animals and to increase potential habitat for species that rely on riparian corridors. The plan must provide for planting and maintenance of sycamore and coast live oak trees to be planted and maintained in and adjacent to Alamos Canyon in areas void of trees. By focusing especially on areas of the canyon near the landfill and areas having direct line of sight to the landfill, the plan will create a pattern of more-continuous tree cover. A minimum of 30 sycamores and 30 coast live oaks shall be established within the area identified above (see also Figure 3.4-3). Specifications for these habitat enhancements shall be included in the Habitat Restoration and Revegetation Plan identified in Mitigation Measure BIO-13. In addition, planting of vegetation or other work within or adjacent to Los Alamos Canyon channel falls under the regulatory and permitting authority of the Ventura County Watershed Protection District per Ordinance FC-18 as amended. As such, habitat enhancement plans for Alamos Canyon shall be reviewed and commented on by the Watershed Protection District.</p>	<p>Less than significant</p>

Table ES.7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
Impact BIO-3 (continued)	Biological Resources Significant	<p>Biological Resources (continued)</p> <p>BIO-8: The permittee shall construct improvements or enhancements to the Alamos Canyon crossings (i.e., Alamos Canyon East and West culverts and Alamos Canyon Road undercrossing) as shown on Figure 3.4-3 in order to enhance the ability of wildlife in the project vicinity, including Alamos and Brea canyons, to move under SR-118 thereby helping to maintain wildlife diversity in Ventura County. Mitigation proposed below was originally described by LSA Associates (2004) and adopted by the Ventura SR-118 Wildlife Corridor Multi-Agency Working Group (2006). These measures were supported and supplemented by Penrod et al. (2006). The permittee shall work with the County of Ventura, Caltrans, and technical advisors selected by the County to identify and implement the most effective and feasible measures to increase connectivity across SR-118 along Alamos Canyon, with final approval of measures from the County prior to commencing project construction. These may be a combination of measures from the following list of previously identified measures from studies referenced above. Because it is not known which of these measures would be technically feasible, the standard for success of this measure will be implementation and maintenance of three or more of the actions identified below, which have been previously identified by experts as actions that would facilitate wildlife crossing under SR-118, plus the two measures identified below that are applicable to all three crossings. Planting of vegetation or other work within or adjacent to Los Alamos Canyon channel falls under the regulatory and permitting authority of the Ventura County Watershed Protection District per Ordinance FC-18 as amended. As such, habitat enhancement plans for Alamos Canyon shall be reviewed and commented on by the Watershed Protection District</p> <p><i>Alamos Canyon West Corridor:</i></p> <p>The following enhancements would decrease the angle of approach, thereby improving access and line-of-sight for wildlife.</p> <ul style="list-style-type: none"> • Enhance and maintain riparian vegetation near culverts. • Enlarge the existing twin culverts into a single undercrossing under SR-118 by re-grading the existing steep approach and lowering the entrance on the north side of the culvert; or, by creating a raised 5-foot wide inside "catwalk" running the length of both culverts. 	Less than significant

Table ES.7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
Impact BIO-3 (continued)	<p>Biological Resources (continued)</p> <p>Significant</p>	<p><i>Alamos Canyon Road Undercrossing:</i></p> <ul style="list-style-type: none"> The following changes would enhance the utility of the undercrossing. <ul style="list-style-type: none"> Increase the vegetative cover along Alamos Canyon Road. Replace the paved road with a decomposed granite surface if it is still used for maintenance, otherwise remove the road surface and base entirely and replace it with native vegetation. Remove the barbed wire fencing along the road. Enlarge undercrossings at the railroad crossing south of SR-118 and at Los Angeles Avenue. <p><i>Alamos Canyon East Corridor:</i></p> <p>The following enhancements would increase the utility of the undercrossing.</p> <ul style="list-style-type: none"> Increase vegetation cover along the drainage. Enlarge the culvert by means of "tunnel jacking". <p><i>Measures Applicable to the three Alamos Canyon Corridors:</i></p> <p>The following measures apply to the three Alamos Canyon corridors/undercrossings identified above and in Figure 3.4-3:</p> <ul style="list-style-type: none"> Installation of fencing by the project applicant to funnel wildlife into the Alamos Canyon undercrossings, Reporting to the proper authorities (including police or Caltrans) any unauthorized human activities or trespassing (including homeless encampments) in the vicinity of Alamos Canyon observed during routine patrols would increase the utility of the undercrossings. <p>Additionally, collaboration should be done with local groups to secure conservation easements on properties between the SLVRC and the Simi Hills to provide a continuous habitat corridor between the Santa Susana Mountains, Oak Ridge, Big Mountain, and the Simi Hills.</p> <p>BIO-9: The conditions applicable to minimizing off-site noise and vibration, nighttime lighting, control of wind-blown refuse, and control of nuisance species of birds (crows, ravens, gulls) and mammals (non-native rodents) in CUP-3142-7 shall be applied to the expansion project including:</p> <ul style="list-style-type: none"> Night lighting for the proposed project shall in accordance with CUP-3142-7 Condition 34 limiting hours of operation to 6 AM to 8 PM and CUP-3142-7 Condition 105 requiring shielding to ensure 	<p>Less than significant</p>

Table ES.7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
<p>Impact BIO-3 (continued)</p>	<p>Significant</p>	<p>Biological Resources (continued) that when night lighting is used, natural areas are not lighted. These measures shall be updated as necessary and applied to the proposed project. A revised dust suppression plan shall be implemented as required under CUP-3142-7 Condition 44. Litter shall be controlled through the use of portable wind fences to confine waste to the area of the working face and to ensure that adjacent habitats are maintained free of litter. Existing litter control measures (CUP-3142-7 Condition 45) shall be applied to the proposed project. See BIO-3.</p>	<p>Less than significant</p>
<p>Impact BIO-4: Locally Important Plant and Wildlife Species/Communities. Directly or indirectly cause a substantial reduction in population numbers, habitat area, or reproductive capacity. For locally important communities or habitats a significant impact would result if the Project caused a substantial reduction in area or impairment in quality or function.</p>	<p>Significant</p>	<p>BIO-10: The project proponent shall develop and implement a Sensitive Plant Species Restoration Plan for Plummer's and Catalina mariposa lily acceptable to Ventura County Planning Division prior to onset of grading in the expansion area. The plan shall include:</p> <ul style="list-style-type: none"> • An up to date review of research on the reproductive success of each species and the success of previous attempts at salvage and transplanting; • Methodology and timing for salvaging seed and plants (corms) from areas to be impacted and procedures for transplanting and/or propagation; • Identification of suitable (approved) locations for transplants and the means to protect the locations from future development; • Maintenance, monitoring, and replacement program to document the success of the transplantation and restoration of Plummer's mariposa lily and Catalina mariposa lily; and, • The number of individuals lost as a result of the proposed project shall be restored in-kind on-site with a 1:1 ratio. <p>BIO-11: Pre-construction spring botanical surveys shall be conducted by a County-approved biologist for the Plummer's mariposa lily, Catalina mariposa lily, and other locally important plant species with the potential to occur within the project site prior to start of grading activities including, but not limited to: initial construction.</p>	<p>Less than significant Less than significant</p>

Table ES.7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
Impact BIO-4 (continued)	<p>Significant</p>	<p>Biological Resources (continued)</p> <p>BIO-12: A preconstruction survey shall be conducted by a County-approved biologist for locally important wildlife species no sooner than 14 days prior to the start of grading including, but not limited to: initial construction activities, development of each landfill cell, and any other project-related activities in vegetated areas. Prior to vegetation removal, the biologist shall ensure that potential natal badger dens are avoided and that less mobile species, such as coast horned lizard, will be relocated to suitable habitat outside of the construction area. A qualified biologist shall be on-site to monitor vegetation removal and topsoil salvaging and stockpiling to minimize injury or mortality to locally important wildlife species.</p> <p>BIO-13: The applicant shall develop a Habitat Restoration and Revegetation Plan to address losses of habitats of locally important species through revegetation efforts that emphasize native plant species and provision of quality habitat for locally important wildlife species and other native wildlife. This shall be applied to all lands temporarily disturbed by grading as well as intermediate, permanent slopes and closed portions of the landfill as indicated below. The plan shall be subject to review and approval by Ventura County prior to its implementation and be completed and implemented prior to the initiation of ground disturbance. The plan shall include the following:</p> <ul style="list-style-type: none"> • Provisions for salvaging and stockpiling topsoil and seed bank for use in revegetation. • Procedures to stabilize soil and revegetate areas disturbed by site preparation or other grading outside the overall waste boundary with native species from seed or cuttings collected in the immediate project area creating habitat conditions compatible with adjoining habitat not disturbed by the project. • Specifications that native plants and seed stock used in revegetation shall be locally collected or propagated from locally collected seed or cuttings (from the Simi Valley area) to maintain the genetic integrity of the local flora. An attempt shall be made to restore some of the existing native plant diversity by specifically including some of the less common native species currently found on the site. • Specifies for seed mix, seed application, seeding methods, timing of monitoring and reporting and performance criteria. • Provision that non-native, non-invasive species may be used for short-term erosion control (such as barley on temporarily denuded slopes) or for long-term visual mitigation. Where invasive species have persisted after having been used in the past, they shall be removed. 	<p>Less than significant Less than significant</p>

Table ES.7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
Impact BIO-4 (continued)	Significant	<p>Biological Resources (continued)</p> <p>Procedures for maintenance and reduction of non-native invasive plant species on the proposed SVLRC landfill site and adjacent property owned by the applicant. The invasive non-native plants/escaped non-natives listed in the following sources shall be targeted as undesirable plants:</p> <p>BIO-14: The loss of habitat for locally important wildlife species on-site, including sage scrub, chamise chaparral, grassland, and oak woodland, shall be mitigated by off-site restoration and preservation of an equal or greater acreage of these plant communities in the project vicinity. This measure would ideally be coordinated with the Mitigation Measure BIO-6. Restoration measures would depend on the specifics of the parcel to be preserved but could include control of invasive non-native species, increasing the prevalence of high-value wildlife species by planting or use of other management techniques, revegetation of barren surfaces resulting from previous human activities or control of erosion related to human activities (e.g., originating from concentrated runoff from unpaved roads). Preserved and restored habitat shall be of similar or higher quality and integrity in comparison to the habitat removed and shall be dedicated and managed as vegetation and wildlife habitat in perpetuity through a legal instrument such as a conservation easement. A site-specific habitat restoration and enhancement plan including details of restoration measures appropriate to the site and performance criteria shall be developed by the applicant and approved by the County of Ventura prior to initiation of ground disturbance.</p>	Less than significant Less than significant
Impact AG-1: Soils. Direct and/or indirect loss of soils designated Prime, Statewide Importance, Unique or Local Importance or agricultural soils meeting or exceeding the acres lost criteria.	Significant	<p>Agricultural Resources</p> <p>None feasible.</p>	Significant
Impact AG-2: Dust. Result in a ten percent or greater increase in dust on agricultural parcels within one-half mile of the proposed project.	Significant	<p>AG-1: Fugitive Dust. Project construction and operations would comply with VCAPCD Rule 55, Fugitive Dust, which would reduce project PM₁₀ emissions from uncontrolled levels by 50 to 75 percent, depending on the source type. Mitigation measures AQ-2, Additional Fugitive Dust Controls for Construction and AQ-4, Additional Fugitive Dust Controls for Operations (presented in Section 3.2.2.4 of this EIR), would further reduce fugitive dust emissions from these sources to 90 percent from uncontrolled levels.</p>	Significant

Table ES.7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Visual Resources/Glare	Mitigation	Significance After Mitigation
<p>Impact VIS-1: Scenic Highways. Change or obstruct important visual resources as experienced from a scenic highway during construction or operation.</p>	Significant	None feasible.		Significant
<p>Impact VIS-2: Scenic Areas/Features. Degrade scenic areas or features or significantly alter them during construction or operation.</p>	Significant		<p>VIS-1: All landscaping plans shall follow the <i>Ventura County Guide to Landscape Plans</i> guidelines. This shall occur prior to the issuance of the Conditional Use Permit modification. The Plans specify the minimum landscape and irrigation coverage, minimum plant survival rates, and suggested drought tolerant species.</p>	Significant
<p>Impact VIS-3: Glare. Create substantial sources of light or glare.</p>	Significant		<p>VIS-2: Prior to issuance of a Zoning Clearance for the construction of any facilities that include outdoor lighting, the permittee shall develop a Lighting Plan that meets the following requirements:</p> <ul style="list-style-type: none"> • There shall be no light source in excess of 150 watts that directly illuminates adjacent properties; • Outdoor lighting shall not result in the indirect illumination of adjacent properties in excess of 0.5 foot candles; • For pedestrian lighting systems, there shall be no point of overlap between light patterns greater than seven feet; and • There shall be no lighting within the Project site that is greater than seven foot-candles. <p>The locations of all exterior lighting fixtures, an arrow showing the direction of light being cast by each fixture, and the height of the fixtures shall be depicted on the Lighting Plan to be reviewed by the Resource Management Agency, Planning Division, prior to issuance of a Zoning Clearance. All lighting shall be shielded, shall be directed downwards, and shall avoid being directed towards facilities with reflective services that could produce glare off-site. The Lighting Plan shall be consistent with any mitigation measures that are developed to avoid or reduce impacts to wildlife movement, and shall not result in the illumination of sensitive habitat.</p>	Less than significant
			<p>VIS-3: Prior to the issuance of a Use Inauguration Zoning Clearance for grading activities within the proposed landfill expansion area, the permittee shall submit a lighting plan to the Resource Management Agency, Planning Division for temporary lighting that will be used to facilitate start-up/shutdown operations. The lighting plan shall comply with the following requirements:</p> <ul style="list-style-type: none"> • There shall be no light source in excess of 150 watts that directly illuminates adjacent properties; • Outdoor lighting shall not result in the indirect illumination of adjacent properties in excess of 0.5 foot candles; and • There shall be no lighting within the Project site that is greater than seven foot-candles. <p>All lighting shall be shielded, shall be directed downwards, and shall avoid being directed towards equipment with reflective</p>	

Table ES.7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
Impact VIS-3 (continued)	Significant	Visual Resources/Glare (continued) services that could produce glare off-site. The lighting plan shall specify the number, type, intensity, and duration of use of all lighting that will be used for start-up/shutdown operations.	Less than significant
Geology and Seismic Hazards, Mineral Resources, and Paleontological Resources			
Impact GEO-1: Fault Rupture Hazards. Project exists along pre-existing faults or within a State of California designated Alquist-Priolo Special Fault Study Zone; a County of Ventura designated Fault Hazard area; or a County of Ventura designated Potential Fault Hazard Area.	Less than significant	None necessary.	Less than significant
Impact GEO-2: Ground Shaking Hazards. Ground shaking hazards are ubiquitous throughout Ventura County and, ground failure phenomena aside, are accommodated by the Ventura County Building Code. The effects of ground shaking hazard are required to be considered within the existing framework of grading and building code ordinances which apply to all sites and projects. Special threshold criteria for ground shaking hazard are thus not established.	Less than significant	None necessary.	Less than significant
Impact GEO-3: Liquefaction Hazards. A liquefaction hazard is considered to exist based on project location with respect to mapped liquefaction-susceptible areas on the County General Plan maps, on maps contained in Division of Mines and Geology Open-File Report 76-5LA; and whether the project is located in a shallow bedrock area versus and area underlain by recent or older alluvium.	Less than significant	None necessary.	Less than significant
Impact GEO-4: Subsidence. A subsistence hazard is considered to exist on all new water and oil well projects in Ventura County and for all utility and drainage facility projects in the Oxnard Plain.	Less than significant	None necessary.	Less than significant
Impact GEO-5: Expansive Soils. An expansive soil hazard is considered to exist where soil with an expansion index of greater than 20 are present.	Less than significant	None necessary.	Less than significant

Table ES.7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
<p>Geology and Seismic Hazards, Mineral Resources, and Paleontological Resources (continued)</p> <p>Impact GEO-6: Landslides/Mudslides. Location of the site or project in areas with slopes greater than ten percent.</p> <p>Impact GEO-7: Petroleum Resources. Land use that is proposed to be located in or immediately adjacent to any known petroleum resource area, or adjacent to a principal access road to an existing petroleum Conditional Use Permit (CUP).</p> <p>Impact GEO-8: Paleontological Resources. Direct impacts to fossil sites including grading and excavation of fossiliferous rock, which can result in the loss of scientifically important fossil specimens and associated geological data. Indirect impact including increased access opportunities and unauthorized collection of fossil materials.</p>	<p>Less than significant</p> <p>Less than significant</p> <p>Significant</p>	<p>None necessary.</p> <p>None necessary.</p> <p>GEO-1: Paleontological Mitigation Program. An updated/expanded Paleontological Mitigation Program shall be submitted by Waste Management, Inc. to the County Planning Division for review and approval.</p>	<p>Less than significant</p> <p>Less than significant</p> <p>Significant</p>
<p>Impact CUL-1: Cultural Resources. Cause a substantial adverse change in the significance of an archaeological or historical resource.</p>	<p>Significant</p>	<p>Cultural Resources</p> <p>CUL-1: Construction and operation of the proposed project shall avoid Wharton Ranch. If avoidance is not possible, Phase II testing and evaluation of potential archaeological deposits within the Wharton Ranch areas shall be conducted prior to any surface disturbance in the vicinity of the ranch. Provisions must also be made for consultation with the County for approval of reporting of the findings of the Phase II testing, and, if need be, follow-on Phase III data recovery. Provision must also be made for curation of artifacts collected.</p> <p>CUL-2: Due to the poor visibility over much of the survey area and the lack of final construction plans such as depth of excavation and extent of maintenance activities, a full time archeological monitor shall be on-site during all brush clearance and disturbance of the first one foot of soil in areas that have not previously been disturbed. In the event that potentially significant archaeological materials are encountered during project-related ground disturbance, all work must be halted within the vicinity of the discovery until an assessment of the significance by a qualified archaeologist is completed. If significant resources are determined to be present, sufficient time must be allotted for implementation of avoidance measures or appropriate mitigations measures such as Phase II testing and/or Phase III Data Recovery of significant archaeological deposits. Treatment plans must be developed in consultation with the County and local Native Americans. Provisions must also be made for reporting of the findings of any testing/data recovery effort and curation of any significant artifact collections made.</p>	<p>Less than significant</p>

Table ES.7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
<p>Impact CUL-1 (continued)</p>	<p>Significant</p>	<p>Cultural Resources (continued) CUL-3: Health and Safety Code 7050.5, CEQA 15064.5(e) and Public Resources Code 5097.98 mandate the process to be followed in the unlikely event of an unanticipated discovery of any human remains in a location other than a dedicated cemetery. If human remains are found at the proposed project site, the following measures shall be implemented per the California Office of Historic Preservation Technical Assistance Bulletin 10 (46): ...ground-disturbing activities in the area of the discovery shall immediately be halted or redirected. A temporary construction exclusion zone will be established surrounding the site to allow for further examination and treatment of the find. A project representative shall immediately notify the Ventura County Coroner's office by telephone. By law, the Coroner will determine within two working days of being notified if the remains are subject to his or her authority. If the coroner recognizes the remains to be Native American, he or she shall contact the Native American Heritage Commission who will appoint the Most Likely Descendent (MLD). Additionally, if the bones are determined to be Native American, a plan will be developed regarding the treatment of human remains and associated burial objects and the plan will be implemented under the direction of the MLD [California 2001].</p>	<p>Less than significant</p>
<p>Impact HAZ-1: Fire Hazards. Projects located within a high fire hazard area.</p>	<p>Less than significant</p>	<p>Hazards None necessary.</p>	<p>Less than significant</p>
<p>Impact HAZ-2: Hazardous Materials. Result in significant hazard to the public or environment through the routine transport, use or disposal of hazardous materials.</p>	<p>Less than significant</p>	<p>None necessary.</p>	<p>Less than significant</p>
<p>Impact HAZ-3: Hazardous Wastes. Result in significant hazard to the public or environment associated with the storage, handling, or disposal of hazardous wastes.</p>	<p>Less than significant</p>	<p>None necessary.</p>	<p>Less than significant</p>
<p>Impact HAZ-4: Petroleum Wastes. Exposure of soils (or associated soil gas) containing toxic substances and petroleum hydrocarbons, associated with prior oil field operations, would be deleterious to humans, based on regulatory standards established by the lead agency for the site.</p>	<p>Significant</p>	<p>HAZ-1: Compliance with California Department of Conservation Division of Oil, Gas, and Geothermal Resources (DOGGR) Standards. Grading associated with landfill expansion shall include the following requirement: • All on-site oil wells shall be abandoned pursuant to current abandonment/re-abandonment requirements, and all grading shall be completed, in accordance with DOGGR Construction Project Site Review and Well Abandonment Procedures, as well as site-specific instructions from the DOGGR. HAZ-2: Locate and Mark Abandoned Wells. On-site abandoned wells shall be accurately located through surveying and marked with a post visible to equipment operators.</p>	<p>Less than significant</p>

Table ES.7-1. Summary of Environmental Impacts and Mitigation Measures

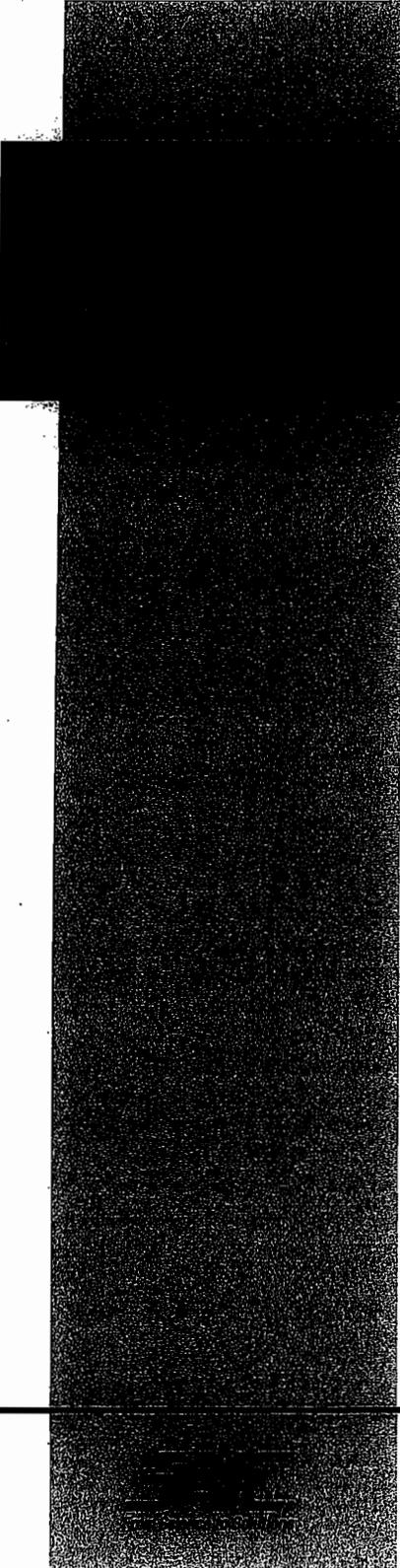
Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
Impact HAZ-4 (continued)	Significant	Hazards (continued) HAZ-3: Grading/Excavation Monitor. A qualified environmental engineer or environmental geologist shall be present during grading/excavations in the vicinity of on-site oil wells, to direct proper excavation and characterization of potentially contaminated materials. The qualified environmental engineer shall observe excavations for potential signs of contaminated soil, such as discoloration, unusual odors, and/or positive readings with a photo-ionization detector (PID) or organic vapor analyzer (OVA). The environmental engineer or environmental geologist shall be 40-hour Occupational Safety and Health Administration (OSHA) -trained with respect to handling of hazardous substances. Contaminated soil shall be excavated and disposed off-site at a facility permitted for disposal of such waste. Alternatively, the contaminated soil may be remediated in-situ (i.e., in-place) by bioremediation or other methods acceptable to the Ventura County Environmental Health Division. None necessary.	Less than significant
Impact HAZ 5: Valley Fever. Project construction or operation must not cause adverse impacts to public health.	Less than significant	None necessary.	Less than significant
Impact NOI-1: Construction Noise. Project construction related must not exceed established noise limits.	Less than significant	Noise and Vibration None necessary.	Less than significant
Impact NOI-2: Operational Noise. Project operation related noise must not exceed established noise limits.	Less than significant	None necessary.	Less than significant
Impact NOI-3: Operational Vibration. The Project would have a significant vibration impact if it would result in detectable vibration at sensitive land uses.	Less than significant	None necessary.	Less than significant
Impact TR-1: Freeway or Roadway Segments. Project related traffic must not cause the LOS of the study freeway or roadway segment to fall below LOS C, or, if already below C, to fall to a lower LOS.	Less than significant	Transportation and Circulation Transportation and Circulation None necessary.	Less than significant
Impact TR-2: Intersections. Project related traffic must not cause the LOS of a study intersection to fall below LOS C and the project trips to exceed 50 percent of the remaining capacity at the study intersection.	Less than significant	None necessary.	Less than significant

Table ES.7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
		Transportation and Circulation (continued)	
Impact TR-3: Somis Road and SR-118 Intersection. Project related traffic must not add one future PHT to the intersection of Somis Road and SR-118 unless there is a commitment to road improvements that ensure that the impact will be reduced to an acceptable LOS in a reasonable period of time.	Less than significant	None necessary.	Less than significant
		Water Supply	
Impact WS-1: Water Supply-Quality. The quality of domestic water available to development must be in compliance with the applicable State Drinking Water Standards, as described in Title 22 of the CCR, §65521 et seq.	Less than significant	None necessary.	Less than significant
Impact WS-2: Water Supply-Quantity. Does not provide a permanent supply of water. A permanent supply of water is defined as at least a 60 year supply. A spring does not meet the requirement for a permanent source of water supply.	Less than significant	None necessary.	Less than significant
		Waste Treatment and Disposal	
Impact WT-1: Individual Sewage Disposal System. A project is not in compliance with applicable sections of the following documents: Ventura County Building Code, Ventura County Sewer Policy, Ventura County Ordinance Code, Uniform Plumbing Code, Environmental Health Division Individual Sewage Disposal System Technical Information Manual, and Los Angeles Regional Water Quality Control Board Basin Plan.	Less than significant	None necessary.	Less than significant
Impact WT-2: Solid Waste Facility. Fails to comply with statutes, regulations, ordinances, and policies for solid waste facilities; or if it would impact the demand for solid waste disposal capacity in Ventura County such that there would be less than 15 years of disposal capacity available for county disposal.	Less than significant	None necessary.	Less than significant

Table ES.7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
<p>Impact REC-1: Local Parks/Facilities. Cause an increase in the demand for recreation when measured against the following standard: five acres of developable land (less than 15 percent slope) per 1,000 population.</p>	<p>Significant</p>	<p>Recreational Facilities REC-1: The applicant shall pay in lieu fees for local parks/facilities that would ensure that the applicant would offset costs of developing and/or making improvements to local recreation amenities associated with increased recreational demands from the proposed project. These fees shall be paid prior to the issuance of a Conditional Use Permit.</p>	<p>Less than significant</p>
<p>Impact REC-2: Regional Parks/Facilities. Cause an increase in the demand for recreation when measured against the following standard: five acres of developable land per 1,000 population.</p>	<p>Significant</p>	<p>REC-2: The applicant shall pay in lieu fees for regional parks/facilities that would offset costs of developing and/or making improvements to regional recreation amenities associated with increased recreational demands from the proposed project. These fees shall be paid prior to the issuance of a Conditional Use Permit.</p>	<p>Less than significant</p>
<p>Impact REC-3: Regional Trails/Corridors. Cause an increase in the demand for recreation when measured against the following standard: two-and-a-half miles per 1,000 population.</p>	<p>Significant</p>	<p>REC-3: The applicant shall dedicate public easements for the Alamos Canyon Trail that would link the trail with the proposed trail network for Simi Valley. New trail easements shall be aligned with existing dirt roads/trails to the greatest extent feasible. Development adjacent to the Alamos Canyon Trail shall include, where appropriate, the construction and assurance of the fitness of designated trails for two years, at which time the agency(ies) being dedicated the public easements would assume maintenance responsibility. Where immediate construction is not required, a construction bond shall be required. If dedication of the trail link easement comprises less than the project related-demand, the applicant shall pay in lieu fees to offset the remainder of the increased demand for trail miles. Any in lieu fees shall be paid prior to the issuance of a Conditional Use Permit.</p>	<p>Less than significant</p>
<p>Impact REC-4: Future Development. Cause an increase in the demand for recreation when measured against the following standard: impede future development of Recreation Parks/Facilities and/or Regional Trails/Corridors.</p>	<p>Significant</p>	<p>See REC-1 through REC-3.</p>	<p>Less than significant</p>



**Simi Valley Landfill
and Recycling Center
Expansion Project**

**VOLUME I
RECIRCULATED DEIR SECTIONS
AND APPENDIX N**

July 2010

Submitted to:
County of Ventura Planning Division

Executive Summary to Recirculated Portions of EIR

1 ESR.1 Recirculation of Draft EIR

2 In accordance with Section 15088.5 of the State California Environmental Quality Act (CEQA) Guidelines,
3 the County, as lead agency for the proposed project, is required to recirculate an Environmental Impact
4 Report (EIR) "...when significant new information is added to the EIR after public notice is given of the
5 availability of the draft EIR for public review under Section 15087 [Public Review of Draft EIR] but before
6 certification." There have been a number of changes to the Project Description for the Simi Valley Landfill
7 and Recycling Center Expansion Project as well as changes to CEQA Guidelines since the distribution of the
8 Public Draft EIR on September 28, 2009. This document contains the relevant revisions to the Draft EIR
9 related to those changes that represent significant new information. *Readers are advised that this document is*
10 *not intended to stand alone or to provide a complete overview of the full EIR. To obtain a full*
11 *understanding of the project and its environmental effects, it will be necessary to refer to the DEIR as well*
12 *as the recirculated portions presented herein.*

13 As defined by CEQA, "...the term 'information' can include changes in the project or environmental setting
14 as well as additional data or other information. New information added to an EIR is not 'significant' unless
15 the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a
16 substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an affect
17 (including a feasible project alternative) that the project's proponents have declined to implement." If the
18 revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters
19 or portions that have been modified (CEQA Guidelines Section 150088.5).

20 As directed by Senate Bill (SB) 97, the Natural Resources Agency adopted Amendments to the CEQA
21 Guidelines for greenhouse gas emissions effective on December 30, 2009. On February 16, 2010, the Office
22 of Administrative Law approved the amendments, and filed them with the Secretary of State for inclusion in
23 the California Code of Regulations. The amendments became effective on March 18, 2010. These
24 amendments, among other things, added a new category, greenhouse gases (GHGs), to the CEQA Guidelines
25 Appendix G, Initial Study Checklist. The new guidelines for GHGs require lead agencies to analyze and
26 determine the significance of impacts from GHG emissions in CEQA documents (CEQA Guidelines Section
27 15064.4). The Draft EIR for the Simi Valley Landfill and Recycling Center Expansion Project (SCH No.
28 2007121148) was prepared and circulated for a 90-day public review on September 28, 2009, prior to the
29 amendments to the CEQA Guidelines becoming final. While the Draft EIR addressed the project's individual
30 and cumulative GHG impacts, it did not determine the significance of GHG emissions or define significance
31 thresholds as would be necessary to be consistent with the March 2010 CEQA Guidelines amendment. While
32 Section 15007 of CEQA Guidelines provides that a document need not be revised "[i]f the document meets
33 the content requirements in effect when the document is sent out for public review," the County determined
34 that it would be prudent to revise the portion of the Draft EIR evaluating GHGs to meet the current content
35 requirements.

36 In addition to the revised requirements in CEQA Guidelines regarding GHG emissions discussed above, the
37 applicant modified the design of the proposed landfill gas to liquefied natural gas (LFGTLNG) processing
38 facility following circulation of the Public Draft EIR. The new design has a higher capacity and will process
39 more landfill gas to LNG, thereby reducing flare emissions and affecting the air quality impact analysis
40 prepared for the Public Draft EIR. Therefore, the Air Quality Impact analysis has been revised to reflect both
41 the revised emissions due to the change in LNG facility design as well as to address the significance of GHG
42 emissions. Table ESR-1 provides a summary of the key differences between proposed LNG facilities.

Table ESR-1. Comparison of Draft EIR and Current LFGTLNG Facility Parameters

<i>Parameter</i>	<i>Draft EIR Proposed Size/Capacity</i>	<i>Current proposed Size/Capacity</i>
Throughput (gallons per day)	13,000	18,000
Storage Tanks	2 each 25,000 gallon	4 each 15,000 gallon
Process	Multi-stage (activated carbon, multi-stage compression and cooling)	Integrated (pressure swing absorption, CO ₂ and N ₂ removal, liquefaction)

1 A hazards analysis was also prepared for the revised LFGTLNG facility design to assess the potential threat to
 2 the public from the operation of the facility and storage of LNG on site. This hazards analysis is integrated
 3 into the revised Hazards analysis in Section 3.9 of this document.

4 In addition, the Draft EIR contained mitigation measures for impacts in two issue areas (Housing and
 5 Recreation) that relied on the payment of fees to mitigate the impacts to housing of additional employees and
 6 impacts to recreation related to increases in demand for recreation facilities also brought about by the
 7 increased employment of the project. However, there are no formal programs established in Ventura County
 8 to collect or disburse such mitigation fees to ensure that the impacts would be fully mitigated. Therefore, upon
 9 further research into the legality and enforceability of the proposed mitigation measures, it has been
 10 determined that they would be neither legal nor enforceable. On that basis, these mitigation measures have
 11 been removed from the Draft EIR and the impacts, formerly considered less than significant after mitigation,
 12 are now considered significant and unavoidable based on there being no feasible mitigation available.

13 The revisions included in this Recirculated Draft EIR are limited to changes in the following
 14 chapters/sections: Executive Summary, Project Description (Chapter 2), the revised Land Use Section
 15 (Section 3.1), revised Air Quality Section (Section 3.2), revised Hazards Section (Section 3.9), revised
 16 Recreation Section (Section 3.14), and Cumulative Impacts Analysis for Land Use, Air Quality, Hazards, and
 17 Recreation. In accordance with Section 15088.5(g) of the CEQA Guidelines, the revisions made to the
 18 originally circulated Draft EIR are summarized in this Executive Summary. Consistent with Section 15150 of
 19 the CEQA Guidelines, documents, reports, maps, and other material cited in the DEIR are hereby
 20 incorporated by reference. *Readers are again advised that this document supplements the DEIR. It is not*
 21 *intended to stand alone or to provide a complete overview of the full EIR. To obtain a full understanding of*
 22 *the project and its environmental effects, it will be necessary to refer to the DEIR as well as the*
 23 *recirculated portions presented herein.*

24 Because only specific sections of the Draft EIR are revised in this recirculated document, the section numbers
 25 herein are not sequential. The section numbering from the Draft EIR is retained for consistency with the
 26 Public Draft EIR as well as to facilitate integrating the Draft EIR and the recirculated sections into a Final
 27 EIR. Therefore, gaps in section numbers represent those sections that did not require recirculation. The Final
 28 EIR will contain both the recirculated sections and any revisions to the Draft EIR resulting from public
 29 comments that did not lead to recirculation. This Executive Summary addresses only the issue areas and
 30 project data relevant to the recirculated portions of the Draft EIR.

31 **ESR.2 Project Purpose and Need and Project Objectives**

32 CEQA requires that an EIR state the objectives of a proposed project to explain the reasons for project
 33 development, and why this particular solution is currently being recommended. Additionally, the project
 34 objectives are instrumental in determining which alternatives should be considered in the document.

35 The purpose of the proposed project is to provide waste disposal capacity within Ventura County to meet the
 36 County's current and projected waste diversion and disposal needs consistent with the goals and policies of
 37 the Ventura County General Plan, Ventura County Integrated Waste Management Plan, the requirements of

1 Assembly Bill (AB) 939, and other California waste management laws and regulations. The specific
2 objectives of the proposed project include the following:

- 3 • Provide solid waste transformation and disposal facilities consistent with the Ventura County General
4 Plan and support programs facilitating compliance with diversion requirements of Assembly Bill
5 (AB) 939 [General Plan and AB 939].
- 6 • Ensure continuous solid waste disposal capacity for solid wastes generated within the County that
7 cannot be reduced, recycled, or composted to meet the County's current and projected waste disposal
8 needs [General Plan Goal 4.4.1-1, Countywide Siting Element of the CIWMP].
- 9 • Provide a waste disposal and diversion operation designed and conducted in a manner that complies
10 with local, state, and federal regulations and plans; protects the natural environment; ensures
11 protection of the public's health, safety and welfare; and is compatible with surrounding land uses
12 [General Plan Goal 4.4.1-2 and 4.4.2-5].
- 13 • Minimize incompatibilities between industrial and residential land uses.
- 14 • Minimize adverse impacts on environmental resources.

15 **ESR.3 Description of Project and Relevant Changes**

16 The following sections summarize key factors related to the proposed project with emphasis on those aspects
17 of the project that have changed since circulation of the DEIR.

18 **Project Location**

19 The Simi Valley Landfill and Recycling Center (SVLRC) is located in an unincorporated area of southeast
20 Ventura County within the United States Geological Survey (USGS) 7.5 minute Simi Valley West
21 topographic quadrangle (Figure 2.1-1). The site is north of State Route (SR)-118 and west of the Madera
22 Road overcrossing. The site entrance is approximately 2,800 feet west of Madera Road. The facility address is
23 2801 Madera Road, Simi Valley, California 93065.

24 **Project Overview**

25 The SVLRC is an existing Class III (non-hazardous) municipal solid waste (MSW) landfill permitted to
26 receive 3,000 tons per day (tpd) of MSW. In addition to waste disposal, SVLRC recycles materials such as
27 green waste, wood waste, asphalt/concrete, white goods, and scrap metal. The SVLRC is located near the City
28 of Simi Valley and is owned and operated by Waste Management of California, Inc. (WMC) under
29 Conditional Use Permit (CUP)-3142-7.

30 The proposed project (Permit Case No. LU07-0048; Major Modification No. 8 to CUP-3142) is an expansion
31 of the existing SVLRC. The proposed expansion is comprised of five main components: (1) expanding the
32 physical limits of the landfill (CUP boundary, landfill footprint, and elevation); (2) extending the operating
33 limits and life of the site (increasing the waste disposal capacity); (3) constructing support/ancillary facility
34 area; (4) expanding existing and constructing new recycling and resources recovery facilities; and (5)
35 expanding existing and constructing new energy conversion facilities.

36 The SVLRC's CUP boundary is proposed to be expanded to encompass 887 acres within which the waste
37 disposal area would be expanded north and west from its current permitted location to encompass 186 acres of
38 additional waste disposal area and to increase the total capacity of the landfill from 43.5 to 123.1 million
39 cubic yards. The amount of MSW received per day is proposed to increase from 3,000 tons to 6,000 tons and
40 the amount of recyclables to be reduced from 6,250 tpd to 3,250 tpd. The total daily tonnage (i.e., combined

1 MSW and recyclables) permitted for the facility would not change. Additionally, several existing ancillary
2 facilities (defined facilities ancillary to the active landfill such as the waste receiving and recycling facilities
3 for the purpose of this project) and support facilities (defined as facilities that support the landfill operation
4 such as administrative offices and maintenance facilities for the purpose of this project) would be expanded
5 and new facilities constructed within the landfill CUP boundary including: office building; heavy equipment
6 and vehicle maintenance facility; waste hauling yard; material recovery facility/recyclable transfer facility
7 (MRF/RTF); public household hazardous waste collection facility; new entrance road, scales, and scale house;
8 expanded construction and demolition (C&D) debris recycling processing area; expanded green waste
9 processing facility; expanded landfill gas-to-energy (LFGTE) facility; and landfill gas-to-liquefied natural gas
10 (LFGTLNG) facility. The proposed project would require a major modification to the existing SVLRC CUP
11 (CUP 3142-7) issued by the County of Ventura.

12 **Construction**

13 Construction of the SVLRC Expansion Project would involve two types of construction and occur in four
14 phases. The initial construction activities would include the construction of facilities in the 30-acre
15 support/ancillary facilities area (including the MRF/RTF, Simi Valley Environmental Collection Center
16 (SVECC), waste hauling yard, office facilities, heavy equipment and vehicle maintenance facility, and new
17 scales and scalehouse). This initial construction would also include expansion of the existing LFGTE facility
18 and construction of a LFGTLNG facility. The C&D debris recycling activities and green waste processing
19 operations would occur on the landfill footprint in an area not receiving waste and would migrate from place
20 to place within the landfill as portions are filled to capacity. Construction of additional waste depository space
21 within the waste disposal area would also occur during Phase I. Subsequent construction activities would
22 involve the sequential excavation of Phases II through IV of the waste footprint and would include clearing,
23 compacting, and preparing the phase(s) for landfilling.

24 Until December 2009, the LARWQCB had approved the use of both prescriptive and alternative liner designs
25 for use at SVLRC. The floor (bottom) and side slope liners allowed are described as follows:

- 26 • **Floor Liner (prescriptive).** The prescriptive floor liner system consists of (from the bottom up) a 24-
27 inch compacted clay liner, a 60-mil HDPE liner, a geotextile, a 12-inch leachate collection and
28 removal system (LCRS) drainage layer, a geotextile, and a 24-inch protective soil layer.
- 29 • **Floor Liner (alternate).** The alternative liner design consists of a geosynthetic clay liner (GCL) and
30 80-mil HDPE liner. The rest of the liner system (e.g. leachate collection layer) is the same as the
31 prescriptive design.
- 32 • **Side Slope Liner (prescriptive).** The proposed side slope liner system consists of (from the bottom
33 up) a GCL, a 60-mil HDPE liner, a geotextile, and a 24-inch protective soil layer.
- 34 • **Side Slope Liner (alternate).** The alternative side slope liner design consists of an 80-mil HDPE liner.

35 In many cases, GCLs have become an accepted alternative to the 24-inch compacted clay liner. GCLs
36 generally provide lower hydraulic conductivity than compacted clay liners and are less susceptible to
37 desiccation cracking than compacted clay. GCLs are comprised of a granular sodium bentonite (clay) layer
38 encapsulated between two woven or non-woven geotextiles depending on needed strength. However, the
39 LARWQCB recently concluded that GCL “would not afford the same protections to groundwater as the
40 prescriptive liner system” (two feet of clay overlaid by HDPE) due to “recently observed deficiencies on GCL at
41 several landfills ... and the concerns that certain mechanical and chemical properties of GCL may not be as reliable
42 as a compacted clay liner” (LARWQCB 2009). Therefore, unless the LARWQCB approves an alternative, a
43 prescriptive liner would be necessary in future expansions of the existing landfill. Note that the alternate side slope
44 liner continues to be approved. To comply with the requirements for a prescriptive liner, soils suitable for
45 compacting to a permeability of less than 1×10^{-7} cm/sec would need to be excavated and stockpiled

1 separately. Therefore, Waste Management will need to excavate an additional two feet of soils under the
2 landfill footprint to provide for the same landfill capacity. In addition, WM will need to ensure that soils of
3 the appropriate permeability for constructing a prescriptive liner are available.

4 A report by Geosyntec [Geosyntec 2010] to assess the clay resources on site concluded that “adequate soil
5 resources exist within the expansion area to use as low permeability (clay) liner material...” provided that it is
6 selectively graded, screened, and/or processed or admixed with bentonite or another suitable material. The
7 report concludes that about 2.5 percent of the planned excavation volume would need to be suitable material
8 to provide a sufficient quantity for a prescriptive liner. A minor number of truckloads may be required to
9 deliver bentonite or another material to augment native soils to meet the permeability standards. The exact
10 number of trips is not known, but expected to average less than one trip per day.

11 The approximately 30-acre support/ancillary facilities area would be completed within approximately 18
12 months of project approval. Phase I of the waste footprint would include additional filling of the existing
13 landfill area. Construction of Phase II would begin as Phase I approaches its design capacity. The construction
14 of each subsequent phase would begin as the previous phase reaches capacity (estimated to take between 12 to
15 14 years).

16 During peak construction, the construction workforce would include approximately 45 personnel for the 30-
17 acre support/ancillary facilities area. The waste disposal areas would be constructed in four consecutive
18 phases with each phase divided into cells. Phase I would be comprised of one cell and would require 29
19 personnel including 18 equipment operators, 9 construction personnel, and 2 managers. Phase II would be
20 comprised of four cells and would require 116 construction personnel. Phases III and IV would each contain
21 three cells and require 87 personnel. Wastes generated from construction would either be hauled within the
22 landfill for disposal or recycling or off-site to local recycling centers.

23 **Operations**

24 Landfill operations include waste receipt and or disposal, waste hauling within the landfill footprint,
25 application of daily and intermediate cover, and site grading and maintenance. As the landfill expands,
26 additional excavation would begin in new phases, and other heavy equipment operations would occur on the
27 surface of areas surrounding the refuse columns.

28 Municipal solid waste and recyclables from the local community would be delivered to SVLRC in packer
29 trucks for disposal in the landfill for processing in the MRF/RTF. Each truck would be weighed and specific
30 information about its origin documented at the weigh station. The GI Rubbish fleet of packer trucks would be
31 sent out multiple times per day, but would remain at the SVLRC in the proposed waste hauling yard at the end
32 of each day. GI Rubbish packer trucks would also be maintained at the proposed Heavy Equipment and
33 Vehicle Maintenance Facility within the SVLRC.

34 SVLRC would continue to receive transfer trucks, trucks carrying recyclables, and trucks carrying roll-off
35 bins. Each truck would be weighed and specific information about its origin documented at the weigh station.
36 The trucks would dispose of their contents at the tipping areas based on the type of commodity they are
37 carrying. To the maximum extent possible, trucks bringing material in would be reloaded and sent outbound
38 with material from the MRF/RTF and resource recovery facility areas. The trucks would be weighed upon
39 leaving the facility.

40 The expanded SVLRC would continue to comply with the currently permitted hours of operation: 6:00 AM to
41 8:00 PM, 7 days per week, 365 days per year. However, SVLRC is typically closed on New Year's Day,
42 Easter Sunday, Memorial Day, July 4, Labor Day, Thanksgiving, and Christmas. The hauling vehicle fleet
43 would operate between the hours of 4:00 AM and 8:00 PM, 7 days per week, 365 days per year with the
44 exception of the holidays listed above. However, current operations occur six days a week plus one Sunday

1 per month. Other activities such as LFG and leachate collection/disposal, equipment and vehicle maintenance,
2 MRF/RTF operations, and compliance tasks would not be limited by this condition.

3 **Revised Landfill Gas to Liquefied Natural Gas (LFGTLNG) Plant**

4 The SVLRC Expansion Project includes the construction and operation of a LFGTLNG facility located just
5 north of the existing LFG flare station (Figure 2.4-3). This facility would treat landfill gas to remove
6 impurities, condense the gas to liquid phase by chilling, separate out the natural gas component, and store the
7 gas in cryogenic tanks for use as a transportation fuel to power heavy-duty landfill vehicles including
8 sanitation trucks. The LFGTLNG facility would produce up to 18,000 gallons of LNG per day, as compared
9 to 13,000 gallons per day for the facility proposed in the Draft EIR. Note that the increase in throughput will
10 directly reduce the amount of landfill gas that is diverted to the flare, thereby reducing flare emissions.

11 The proposed system would use a multiple bed pressure swing adsorption (PSA) system to remove hydrogen
12 sulfide and other impurities from the methane after the compression step. Following contaminant removal, the
13 process would consist of CO₂ polishing and removal of nitrogen (N₂) and then liquefaction. Liquid carbon
14 dioxide separated from the LFG may be further purified to provide a high grade, commercially marketable
15 product (dry ice), which would be exported off-site. The final LNG product would be stored in four 15,000
16 gallon cryogenic tanks (as opposed to two 25,000 gallon tanks proposed in the Draft EIR).

17 An LNG fueling station would be installed at SVLRC to fuel the existing fleet of disposal trucks using LNG.
18 The remainder of the LNG produced would be exported by tanker truck (typically 10,000-gallon capacity
19 trucks) for use off-site. The LNG production plant is designed to operate 24 hours per day, 7 days per week,
20 52 weeks per year. The LFGTLNG facility would be equipped with advanced data monitoring, tracking, and
21 recording hardware and software.

22 **ESR.4 Recirculated Draft EIR Environmental Issues**

23 **Land Use/General Plan Goals, Policies, and Programs**

24 The land use analysis evaluates consistency or compliance of the proposed project with adopted plans and
25 policies governing land use and development in the County of Ventura including the Ventura County General
26 Plan, the Ventura County Zoning Ordinance, and other applicable plans. Those aspects affected by the change
27 in mitigation measures are discussed below.

28 During proposed project operations, the workforce would increase by 150 permanent employees. The
29 increased demand for housing would exceed 30 workers, thereby triggering a significant impact associated
30 with the need for additional affordable housing. However, the County does not have a policy or ordinance in
31 place requiring an applicant to pay a housing impact fee nor does it have a Housing Demand Impact Fee
32 Program to collect and allocate such fees. Therefore, lacking the legal authority to impose a fee and a
33 mechanism to ensure that fees collected would mitigate impacts to housing, there is no feasible mitigation for
34 project impacts to housing demand created by additional project employees. Thus, this impact is considered
35 significant and unavoidable.

36 In all other Land Use respects, impacts would be the same as those evaluated in the Draft EIR and less than
37 significant.

38 **Air Quality**

39 Based on revisions to the project description (in particular, the revised LFGTLNG facility design) the entire
40 air quality impact analysis was revised. In addition, an expanded and updated analysis of the potential
41 greenhouse gas impacts was included. The main conclusions of the analysis are discussed below.

1 Emissions from proposed project construction and operation would exceed the VCAPCD daily operational
2 nitrogen oxide (NO_x) and reactive organic compounds (ROC) emission thresholds. Implementation of
3 Mitigation Measure AQ-1 would reduce emissions of ROC and NO_x from construction. Implementation of
4 Mitigation Measure AQ-3 would reduce combustive emissions from project operations; however, impacts
5 would remain significant.

6 Project construction and operation would result in offsite ambient air pollutant concentrations that would
7 contribute to or exacerbate exceedances of the following standards: (1) 1-hour California Ambient Air Quality
8 Standard (CAAQS) and National Ambient Air Quality Standard (NAAQS) for nitrogen dioxide (NO₂); (2) 24-
9 hour CAAQS and NAAQS for particulate matter less than 10 microns in diameter (PM₁₀); (3) annual CAAQS
10 for PM₁₀; (4) the 24-hour NAAQS for particulate matter less than 2.5 microns in diameter (PM_{2.5}); and (5)
11 annual CAAQS for PM_{2.5}. All other pollutant impacts would remain below significance levels.
12 Implementation of Mitigation Measures AQ-1 through AQ-3 and AQ-4 would reduce combustive and fugitive
13 dust emissions from construction and operations. These mitigation measures would reduce proposed impacts
14 to below the NAAQS for 24-hour PM₁₀. However, all other construction and operational impacts identified
15 above would remain significant. Mitigation Measure AQ-4 would further reduce operations related impacts.
16 However, it is uncertain the extent to which the Simi Valley Landfill and Recycling Center Emissions
17 Reduction Program would offset overall project-related vehicular emissions and thus it is not possible to
18 calculate their associated emission reductions.

19 A Health Risk Assessment (HRA) estimated cancer and non-cancer effects to several population subgroups
20 (receptors), including residential, offsite occupational, and sensitive receptors. Project construction and
21 operations would not expose the public to significant levels of toxic air contaminants (TACs). Thus,
22 associated health risks to the public would be less than significant.

23 Project consistency with the AQMP requires an evaluation of the impact of a project on population growth
24 and air quality. Project construction would nominally affect population in Ventura County, as proposed
25 construction would occur for less than two years and many of the construction workers would originate from
26 the existing residents in the County. Project construction would produce nonattainment pollutants in the form
27 of combustive and fugitive dust (PM₁₀/PM_{2.5}) emissions. The 2007 AQMP proposes emission reduction
28 measures that are designed to bring the County into attainment of the ambient air quality standards. The
29 attainment strategies in this plan include mobile source control measures and clean fuel programs that are
30 enforced at the state and federal level on engine manufacturers and petroleum refiners and retailers and as a
31 result, project construction would have to comply with these control measures. The 2007 AQMP includes
32 projections of future emissions from construction activities. Project construction emissions would fit into
33 these future emission growth projections. The 2007 AQMP also assumes source compliance with adopted
34 VCAPCD rules. Project construction would comply with all applicable VCAPCD rules and regulations, such
35 as Rule 55 (Fugitive Dust). Lastly, this EIR analysis requires mitigations to minimize emission from project
36 construction (Mitigation Measure AQ-1 and AQ-2). Therefore, compliance with these requirements would
37 ensure that project construction would not conflict with or obstruct implementation of the applicable air
38 quality plans.

39 The combined ambient impact of both construction and operational emissions would not generate significant
40 levels of fugitive dust. Project construction and operation would comply with VCAPCD Rule 55, Fugitive
41 Dust. The air quality analysis estimates that the proposed project, prior to mitigation, would reduce PM₁₀
42 emissions from uncontrolled levels by 50 percent, depending on the source type. Mitigation Measures AQ-2
43 and AQ-4, Additional Fugitive Dust Controls for Construction and Operations, respectively, would further
44 reduce fugitive dust emissions from these sources to 90 percent from uncontrolled levels. As a result,
45 implementation of Mitigation Measures AQ-2 and AQ-4 would further lower the ambient fugitive dust,
46 ensuring a less than significant impact.

1 Project construction would increase air pollutants due to the combustion of diesel fuel. The mobile and
2 intermittent nature of most emission sources would help to adequately disperse combustive emissions from
3 project construction. Additionally, since there are no sensitive receptors in close proximity to the project site,
4 project construction and operations would not expose the public to significant levels of odors. Project
5 operations would generate odorous emissions due to: (1) the combustion of diesel fuel in mobile equipment;
6 (2) the presence of municipal refuse and green waste; and (3) the decomposition of refuse and green waste.
7 Historically, the green waste operations have been the main source of odor emissions from the SVLRC. With
8 the implementation of Mitigation Measure AQ-6, effective use of the odor control system and implementation
9 of the Odor Control Plan in the future, project operations would not expose the public to significant levels of
10 odors.

11 Greenhouse gas (GHG) emissions generated by project construction and operations would incrementally
12 contribute to global climate change. Measures that reduce fossil fuel consumption of proposed equipment
13 would also reduce GHG emissions. Implementation of Mitigation Measure AQ-1 and AQ-3 would have this
14 effect as use of equipment that complies with the newest emission standards would have more fuel-efficient
15 engines compared to older equipment. Minimizing equipment idling time and using alternatively-fueled
16 equipment also would reduce fossil fuel consumption and resulting GHG emissions compared to unmitigated
17 construction activities. In addition, implementation of Mitigation Measures AQ-4, AQ-7, and AQ-8 would
18 reduce GHGs from proposed operations. However, the increase in GHGs emissions from proposed operations
19 for each development year would still exceed 10,000 metric tons per year of CO_{2e} after implementation of
20 these measures. Therefore, GHG emissions from proposed operations would result in a significant impact on
21 the environment.

22 **Hazards**

23 Hazards impacts were evaluated assessing the potential for fires, the release of hazardous materials/wastes,
24 and/or exposure to petroleum contaminated soil and associated soil gas from abandoned oil wells during
25 project construction and operation. In addition, a hazards analysis was completed for the newly proposed
26 18,000 gallon per day LFGTLNG facility. Only the new analysis related to the LFGTLNG facility is
27 summarized below.

28 LNG is natural gas that has been condensed into a liquid by cooling to approximately -260°F. With a methane
29 content of approximately 95%, LNG and LNG vapors have essentially the same properties as methane. LNG
30 vapors are colorless, odorless, non-toxic, and non-corrosive. In order to burn, the LNG vapors must be
31 mixed with air within the flammable mixture limits which are a 5% lower flammability limit (LFL) and
32 a 15% upper flammability limit (UFL). Outside of this range the vapors will not burn. The primary hazards
33 associated with LNG are the dispersion of potentially flammable vapors resulting from an LNG release and
34 radiant heat intensity from a fire resulting from an LNG release.

35 **Flammable Vapor Release:** LNG evaporates very rapidly on warm surfaces and will evaporate completely
36 such that the flammable vapor generation is essentially the same as the release rate, and an accumulation of
37 liquid does not occur. However, if the release is large or quick enough it could have a release rate and
38 duration adequate to cool the ground surface such that immediate evaporation does not occur and liquid can
39 accumulate. If a liquid release does occur, drainage to a sump would provide for safe containment. An
40 unignited vapor cloud is not injurious and can only be ignited when the concentration of LNG is between 5%
41 (LFL) and 15% (UFL). As the vapors are dispersed in the air, the mixing with air decreases the concentration
42 with increasing distance from the source until the concentration is below the LFL of 5% and it will no longer
43 be capable of igniting. Modeling of vapor dispersion was based on a release rate of 330 gallons per minute
44 and both a large and small concrete lined sumps. The LFL and ½ LFL isopleths are shown in Figures 3.9-2
45 and 3.9-3 respectively. The ½ LFL isopleth is considered the limit of the hazard footprint. At this
46 concentration, the vapors will not burn. Based on the modeled sump dimensions, the distance to the ½ LFL
47 isopleth from the source is calculated at 175 feet for the small sump and 210 feet for the large sump. These

1 distances are well within the project boundary. Therefore, impacts from flammable vapors are considered less
2 than significant.

3 **Radian Heat:** If an LNG release is immediately ignited, a stable fire will develop at the point of release. If
4 the ignition is delayed, the LNG will drain to the spill collection sump. If it is then ignited, a stable fire will
5 develop over the sump which creates radiant heat near the sump. This fire will be fed by vapors off the
6 surface of the liquid in the sump. Radiant heat calculations based on the proposed sump design result in the
7 radiant distances of 37 feet for public exposure, 25 feet for public buildings, and 20 feet for the property line.
8 These distances are well within the project boundary. The radiant heat analysis indicates that the radiant heat
9 hazard distance of the LNG facility is entirely within the project boundary and less than half the distance of
10 the flammable vapor footprints. The public would not be exposed. Therefore, radiant heat impacts are
11 considered less than significant.

12 **Secondary Hazards:** The low temperature of LNG can pose a hazard for contact with the skin and to the
13 respiratory system. The rate of cooling of tissue would be slow and obvious and direct contact with skin can
14 cause discomfort but rarely causes frostbite. In theory, injury could occur from direct skin contact with a very
15 cold surface, but a cold surface in an LNG facility would be covered with frost and probably ice in which case
16 the surface would be a non-hazardous 32°F. Explosion hazards were analyzed in the Hazards Study for four
17 categories of explosions: sudden mechanical failure, internal chemical reaction, Boiling Liquid Expanding
18 Vapor Explosion (BLEVE), and vapor cloud explosion. The results indicate that an explosion related to LNG
19 is unlikely. Sudden mechanical failure is unlikely because LNG vessels are protected by redundant pressure
20 relief valves and the pressure vessel materials are stronger at low temperatures. An internal chemical reaction
21 is extremely unlikely because the LNG vessels are always kept above atmospheric pressure which precludes
22 any entry of air or consequent chemical reaction. The BLEVE is prevented by the steel vacuum insulating
23 jacket of the vessels. A vapor cloud explosion will not occur with LNG because it has a low energy release
24 density and high ignition temperature which will only produce a slow flame that does not accelerate. None of
25 these events poses a hazard to the public. The secondary hazards impacts are considered less than significant.

26 **Transport:** LNG is typically transported using a standard 10,000- to 12,000-gallon LNG highway trailer,
27 which is a subclass of cryogenic trailers used to transport low temperature liquefied industrial gases including
28 liquid nitrogen, argon, and oxygen which are colder than LNG. Cryogenic transporters have a 60-year history
29 of use and the fleet of cryogenic trailers in the US is now more than 3,200 units of which approximately 250 –
30 300 are LNG trailers. The trailers are double walled, which provides low heat transfer and a strong structure
31 resistant to mechanical damage like penetration or rollover and direct flame impingement from an external
32 fire. There has not been an LNG trailer containment failure in over 40 years of LNG trailer transport in the
33 US. LNG trailers are designed according to strict safety standards and LNG transport by highway trailer has
34 an excellent safety record established over 45 years. There have been no incidents involving the public.
35 Impacts related to LNG transport are considered less than significant.

36 In all other respects related to Hazards, impacts would be the same as those evaluated in the Draft EIR and
37 less than significant. The discussion of Valley Fever has been moved to the Air Quality Section.

38 **Recreation**

39 The analysis of potential impacts to recreational facilities identified and evaluated the type and quantity of
40 recreational facilities within the project's area of influence to determine if the needs of the proposed project
41 could be adequately served by existing resources, or if the proposed project would result in an increase in
42 demand for recreational facilities. No local or regional parks/facilities or regional trails/corridors are located
43 within the proposed project area thus, no existing facilities would be directly impacted by the proposed
44 project. However, because project-related employees and worker households would increase the demand for
45 local and regional parks/facilities and trails/corridors, and no ordinance is in place to require payment of fees

1 or dedication of land, the proposed project would create a significant impact on local and regional
2 parks/facilities and trails/corridors. The discussion of impacts in the DEIR remains valid.

3 However, the DEIR proposed Mitigation Measures REC-1 (payment of in lieu fees for local parks/facilities),
4 REC-2 (payment of in lieu fees for regional parks/facilities), and REC-3 (dedication of public easements for
5 future trails) to reduce impacts on local and regional parks/facilities and trail corridors. These measures would
6 need to be legally implementable and enforceable. Because the County does not have a policy or ordinance in
7 place requiring an applicant to pay a recreation impact fee or dedicate public easements or a program for
8 collecting and allocating such fees, it therefore lacks the legal authority to impose a fee and a mechanism to
9 ensure that fees collected would mitigate impacts to recreation. There is therefore no feasible mitigation for
10 the recreation demand created by additional project employees. Mitigation Measures REC-1 and REC-2 are
11 infeasible and Measure REC-3 cannot legally be imposed. Nevertheless, REC-3 could be implemented
12 voluntarily by the applicant, although it could not otherwise be required as a condition of approval. Because
13 there is no assurance that additional recreational facilities would be provided, the impact is considered
14 significant and unavoidable.

15 In all other respects, impacts on Recreational Facilities would be the same as those evaluated in the Draft EIR
16 and less than significant.

17 **ESR.5 Cumulative Impacts**

18 **Land Use/General Plan Goals, Policies, and Programs**

19 Over the years, the County has developed consistency with the General Plan and site zoning regulations,
20 ensuring consistency with land use/density designations to minimize impacts on surrounding areas. Similarly,
21 existing facilities within the project vicinity have been modified as necessary to ensure proposed land
22 use/density designations are consistent with their respective land use plan and site zoning designations. As the
23 proposed project would be consistent with zoning and General Plan land use policies, and would be
24 compatible with surrounding land uses, impacts on community character would be less than significant.
25 Therefore, the proposed project would have a less than significant cumulative contribution to cumulative
26 impacts on land use.

27 Proposed project construction activities would generate employment opportunities that could create a demand
28 for additional housing (Section 3.1.2.3.3, Impact LU-3). However, due to the temporary nature of construction
29 activities and the sufficient number of construction workers available within Ventura County and the Los
30 Angeles Metropolitan region, impacts on housing related to an influx of construction workers during project
31 construction would be less than cumulatively significant.

32 As there is not an adequate vacancy rate or available housing for lower-income families in the County, and
33 because the project would employ more than 30 new full-time employees, impacts on housing during project
34 operations would be significant. Ventura County does not have a housing impact mitigation fee policy.
35 Therefore, lacking the legal authority to impose a fee and a mechanism to ensure that fees collected would
36 mitigate impacts to housing, there is no feasible mitigation for the housing demand created by additional
37 project employees. Therefore, the proposed project would result in a significant cumulative contribution to
38 cumulative impacts on housing.

39 **Air Quality**

40 The region of analysis for cumulative effects on air quality is the South Central Coast Air Basin (SCCAB).
41 However, the most severe impacts under the proposed project in the context of past, present, and reasonably
42 foreseeable projects would occur within the areas adjacent to the proposed project, including unincorporated
43 portions of Ventura County, the City of Simi Valley, and the City of Moorpark.

1 The Ventura County region does not attain the national and state ambient air quality standards for ozone (O₃),
2 respirable particulate matter (PM₁₀), and fine particulate matter (PM_{2.5}). These pollutant nonattainment
3 conditions within the project region are considered to be cumulatively significant. Foreseeable future projects
4 in the vicinity of SVLRC with overlapping construction schedules with the proposed project may add to the
5 emission levels and ambient concentrations around the landfill. Impacts of multiple construction projects,
6 along with the proposed project, could be cumulatively considerable. In addition, project construction and
7 operations would produce emissions that would exceed the VCAPCD daily ROC and NO_x emission
8 thresholds for each modeled year. Additionally, emissions from project construction and operation would
9 contribute to exceedances of the following standards: (1) 1-hour CAAQS and NAAQS for NO₂; (2) 24-hour
10 CAAQS and NAAQS for PM₁₀; (3) annual CAAQS for PM₁₀; (4) 24-hour NAAQS for PM_{2.5}, and (5) annual
11 CAAQS for PM_{2.5}. Implementation of Mitigation Measures AQ-1 through AQ-4 would reduce proposed
12 impacts to below the NAAQS for 24-hour PM₁₀. However, all other criteria pollutant impacts identified above
13 would remain significant and unavoidable. Existing and future project construction and operational activities
14 would add additional air emission burdens to these significant levels of project emissions. Thus, the proposed
15 project with mitigation would produce cumulatively considerable and unavoidable contributions to O₃, NO₂,
16 PM₁₀, and PM_{2.5} levels.

17 With regard to ambient levels of TACs due to the relatively rural setting of the area of influence, impacts
18 from cumulative projects adjacent to the project site are cumulatively less than significant. Emissions of
19 TACs from project construction and operation would marginally increase cancer risks and non-cancer effects
20 in proximity to the project site. Existing and future project construction and operational activities would
21 nominally combine with these project impacts at low levels, due to their relatively long distance from the
22 project site. As a result, the project construction and operational activities would produce less than
23 cumulatively considerable impacts to levels of TACs and public health effects.

24 Fugitive dust from project construction and operations would exceed the 24-hour PM₁₀ CAAQS. However,
25 this maximum impact is predicted to occur on the SVLRC property line and proposed ambient PM₁₀ impacts
26 would quickly decrease in magnitude with distance from the SVLRC facility. Therefore, project construction
27 and operation would not generate a cumulatively considerable impact to levels of fugitive dust.

28 Odorous emissions from project construction would occur due to the combustion of diesel fuel. The mobile
29 and intermittent nature of most emission sources would adequately disperse such emissions during
30 construction. In addition, there are no sensitive receptors in close proximity to the project site. Odorous
31 emissions during project operation would result from diesel fuel emissions from mobile equipment, municipal
32 refuse and green waste, and the decomposition of refuse and green waste. Implementation of Mitigation
33 Measure AQ-6 would ensure that the project would not result in a cumulatively considerable impact from
34 odorous emissions.

35 Scientific evidence indicates a correlation between increasing global temperatures/climate change over the
36 past century and human induced GHG emissions. These and other environmental changes have potentially
37 negative environmental, economic, and social consequences around the globe. Climate change, as it relates to
38 man-made GHG emissions, is by nature a global impact. Thus, the issue of global climate change is a
39 cumulative impact and an appreciable impact on global climate change would occur when GHG emissions
40 from a project combine with GHG emissions from other man-made activities on a global scale. The proposed
41 project would produce GHG emissions that would exceed levels of GHG emissions produced from the
42 existing SVLRC by more than 10,000 tons per year of CO₂ equivalents. These project increases of GHG
43 emissions would incrementally contribute to global climate change. Implementation of Mitigation Measures
44 AQ-1, AQ-3, AQ-4, AQ-7 and AQ-8 would reduce the project's contribution to global climate change. While
45 these measures would reduce GHG emissions below levels that would otherwise occur, the contribution of the
46 proposed project to global climate change would remain cumulatively considerable.

1 **Hazards**

2 Past projects may have been impacted by hazards, including fire, hazardous materials/waste spills, and soil
3 contamination/soil gas associated with former oil wells. Past development has also had the effect of
4 increasing the potential for hazards to result in damage to property and injury to people. Similarly, present and
5 reasonably foreseeable future projects, including the existing SVLRC, may be impacted by fire, hazardous
6 materials/waste, and oil field hazards. With regard to LNG facility hazards, the potential impact of the
7 proposed project in this regard was less than significant for all contributing factors. Therefore, the cumulative
8 impact associated with the proposed project would also be less than cumulatively considerable.

9 **Recreational Facilities**

10 Cumulative impacts on recreational resources may result from the combined incremental demands on existing
11 local and regional parks/facilities and trails resulting from past, present, and reasonably foreseeable
12 development within the cumulative region of influence. Past development in the project vicinity and
13 surrounding areas has resulted in a deficit of developed parkland within the region. The majority of present
14 and reasonably foreseeable projects are residential developments that would result in a substantial demand for
15 recreational facilities in the region. Additionally, the Colton Lee Manufactured Housing Community (#8) has
16 the potential to impede future development of the RSRPD Trail #15 (Las Lajas to Black Canyon).

17 The contributions of present and reasonably foreseeable subdivision projects to cumulative recreation impacts
18 in the area would not be cumulatively considerable. This is because Quimby fees (provisions for the
19 dedication of fees and/or parkland) are currently required for proposed subdivision developments to mitigate
20 project impacts to recreational resources. However, Quimby fees do not apply to commercial or industrial
21 projects and no legally established mechanism exists to collect comparable fees from commercial or industrial
22 developers or to ensure that funds collected would mitigate the recreational facility impacts associated with
23 population affected by industrial projects. As such, cumulative impacts associated with commercial and
24 industrial cumulative projects within the region of influence have the potential to be cumulatively
25 considerable.

26 The proposed project would result in a net increase of 150 employees, thereby creating the potential for an
27 increase in population and a corresponding increase in the demand for local and regional parks/facilities. The
28 County does not have a policy or ordinance in place requiring an applicant to pay a recreation impact fee or
29 dedicate public easements for commercial or industrial project. As such, there is no legal authority to impose
30 a fee or a mechanism to ensure that fees collected would mitigate impacts to recreation. There is therefore no
31 feasible mitigation for project impacts to the recreation demand created by additional project employees.
32 Therefore, the proposed project would result in a significant cumulative contribution to cumulative impacts on
33 local and regional parks/facilities.

34 One planned multi-purpose trail (Alamos Canyon Trail) and a 20-acre community park site is located within
35 the proposed CUP boundary. Thus, the proposed project would impede future development of recreation
36 parks/facilities and regional trails and impacts to these future facilities would be significant. Mitigation
37 Measure REC-3 (which would not be compulsory) could offset increased demands on existing recreational
38 facilities and the loss of a planned facility by providing additional public open space. However, there being no
39 legal authority to implement such a measure, there can be no assurance that a dedication of open space of
40 adequate size would occur. Therefore, the proposed project would result in a significant cumulative
41 contribution to cumulative impacts on local and regional parks/facilities.

42 **ESR.6 Public Involvement**

43 The County issued a Notice of Preparation and Initial Study (NOP/IS) for SVLRC CUP-3142-8 on December
44 20, 2007. The NOP/IS described the project and the environmental review process and solicited public input

1 on environmental issues two be addressed in the EIR. Copies of the NOP/IS were distributed to various
2 movement agencies, organizations and individuals during the 30-day review period. The NOP and IS was also
3 made available for review at various libraries and online at the County Planning Department website. During
4 the public review period, 21 comment letters were received.

5 The County conducted a public scoping meeting on June 2, 2008 at the City of Simi Valley Council Chamber.
6 The County issued a Notice of Completion of the Draft EIR for the SVLRC CUP-3142-8 on September 28,
7 2009. Copies of the Draft EIR were distributed to various state and local agencies, organizations and
8 individuals during the 90-day review period. The NOC and Draft EIR were also made available for review at
9 various libraries and online at the County Planning Department website.

10 The Recirculated Draft EIR will be distributed to various state and local agencies, organizations and
11 individuals for a 45-day review period starting July 27, 2010 and ending September 9, 2010. Comments on
12 the recirculated sections of the document must be received no later than September 9th. In accordance with
13 State CEQA Guidelines Section 15088.5(f)(2), comments are limited to the revised chapters and portions of
14 the EIR provided in this Recirculated Draft EIR. Comments on portions of the Draft EIR not contained in this
15 document will not be accepted during this public review period.

16 The contents of the Recirculated Draft EIR, along with the previous Draft EIR and ensuing Final EIR
17 documents, will comprise the whole of the Final EIR to be considered by the County for certification of
18 adequacy under CEQA.

19 **ESR.7 Revised Impact Summary Table**

20 Table ESR-2 contains a summary of those mitigation measures involved in the above issue areas that have
21 been changed or added during the reevaluation of impacts associated with this recirculation of portions of the
22 DEIR on the SVLRC Expansion Project. Only those measures that were changed or are new are included in
23 Table ESR-2.

Table ESR-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
<p>Impact LU-3: Demand for Housing. Increase the demand for housing due to construction or operation.</p>	<p>Land Use/General Plan Goals, Policies, and Programs Significant</p>	<p>LU-1: The applicant shall pay a one-time fee (as determined by the decision-making body) to a County-approved low-income housing entity or an established housing trust fund to assist in providing for construction of affordable housing within the vicinity of Simi Valley. No feasible mitigation as the County lacks the legal authority or an enforceable mechanism to impose fees and allocate them to projects that would mitigate housing demand impacts.</p>	<p>Less than significant Significant and unavoidable</p>
<p>Impact AQ-1c: VCAPCD Daily Emission significance Criteria. Project construction would produce emissions that exceed VCAPCD daily ROC and NO_x emission significance thresholds.</p>	<p>Significant</p>	<p>Air Quality AQ-1: The construction contractor shall implement following measures to mitigate ozone precursor emissions from on-site off-road construction equipment: 1. All construction equipment shall meet the EPA Tier 3 nonroad equivalent standards. The construction contractor shall be exempt from this requirement if he provides proof that a given piece of equipment is unavailable within the California that meets Tier 3 standards. 2. Minimize equipment idling time. 3. Maintain equipment engines in good condition and in proper tune as per manufacturers' specifications. 4. Lengthen the construction period during smog season (May through October), to minimize the number of vehicles and equipment operating at the same time. 5. Encourage the use of alternatively fueled construction equipment, such as compressed natural gas (CNG), liquefied natural gas (LNG), or electricity, if feasible. Sec AQ-1.</p>	<p>Less than significant</p>
<p>AQ-7c. Potential incremental contributions from the project to global climate change.</p>	<p>Less than significant</p>		<p>Less than significant</p>

Table ESR-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
<p>Impact AQ-1a: Project operations would produce emissions that exceed VCAPCD daily ROC and NOx emission significance thresholds.</p>	<p>Significant</p>	<p>AQ-3: To reduce peak daily emissions of ROC and NOx from Project operations, the landfill operator shall implement the following measures to mitigate ozone precursor emissions from on-site off-road mobile equipment:</p> <ol style="list-style-type: none"> 1. Beginning in 2009, convert equipment to engines with EPA nonroad Tier 3 standards, where feasible. 2. Minimize equipment idling time. 3. Maintain equipment engines in good condition and in proper tune as per manufacturers' specifications. 4. Encourage the use of alternatively fueled equipment, such as CNG, LNG, or electricity--if feasible. <p>AQ-4: <u>Simi Valley Landfill Emissions Reduction Program Agreement.</u></p> <p><u>In instances when air quality impacts from mobile sources due to project operations cannot be mitigated to insignificant levels with the available air pollution control measures recommended for the project, the VCAPCD, in its Air Quality Assessment Guidelines, recommends implementing an Emissions Reduction Program to ensure additional mitigation of air quality impacts by requiring the project proponent to contribute funds for programs that reduce air pollutant emissions from non-project sources. However, while several municipal jurisdictions in the county have enacted air emissions mitigation programs in the form of Transportation Demand Management (TDM) programs, Ventura County has not established a Government Code section 66000 et seq. fee rule or made a Board of Supervisors commitment to adopt such a fee rule to assess, collect, and spend such fees on mitigation programs.</u></p> <p><u>Therefore, to accomplish the purposes of an Emissions Reduction Program, some other legally enforceable, feasible mechanism to achieve the same result is required. In this instance, a legally enforceable agreement between the County of Ventura, VCAPCD, and the applicant (WMI) could be executed such that funding would be provided by the applicant via the agreement to the VCAPCD for the purpose of funding emission reduction programs in Ventura County, based on estimated mobile source emissions from operations in excess of standards.</u></p>	<p>Significant</p>

Table ESR-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
		<p>Such an agreement would, at a minimum, have the following features:</p> <ul style="list-style-type: none"> • A binding agreement would be executed by the County of Ventura, the VCAPCD, and the applicant wherein the applicant commits: <ul style="list-style-type: none"> ○ To the payment of fees, calculated based on the amount of project operational emissions from mobile sources in excess of standards, into a fund administered by the VCAPCD. Fees would be determined based on the project's mobile source emissions in excess of standards and the cost-effectiveness of projects funded by the VCAPCD's Carl Mover Memorial Air Quality Standards Attainment Program. ○ Pay the assessed fees over a time period mutually agreeable to all parties. • The VCAPCD would be entitled to recover all cost of administering the expenditure of the funds so collected. • The fees would be used by the VCAPCD to fund emission reduction projects in Ventura County. Projects that could be funded include, but would not necessarily be limited to, project types eligible for funding under the VCAPCD's emission reduction incentive programs such as: <ul style="list-style-type: none"> ○ The Carl Mover Memorial Air Quality Standards Attainment Program. ○ Clean Air Fund. ○ The Lower Emissions School Bus Program, and ○ The Lawn Mower Trade-In Program. <p>Emission reduction programs such as the one described above facilitate reductions in emissions by reducing individual vehicle emissions (buses, trucks, etc.) and emissions from other devices and equipment powered by internal combustion engines through the use of more efficient engines, less polluting fuels, or electric or hybrid power sources. It is uncertain the extent to which the Simi Valley Landfill and Recycling Center Emissions Reduction Program would offset overall project-related vehicular emissions and it is not possible to calculate what those reductions might be because the specific emission mitigation projects are unknown at this time. However, implementing an Emissions Reduction Program Agreement for the proposed Simi Valley Landfill expansion project is considered an effective emission reduction measure.</p>	

Table ESR-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
<p>Impact AQ-2a: Project construction and operation would result in offsite ambient air pollutant concentrations that would contribute to an exceedance of an ambient air quality standard.</p>	<p>Significant</p>	<p>See AQ-1, AQ-2, and AQ-3, and AQ-4: AQ-4: The calculation of unmitigated fugitive dust emissions from proposed construction and operational activities is based upon compliance with VCAPCD Rule 55, Fugitive Dust, which is assumed to produce a 50 to 75 percent reduction in PM₁₀ emissions from uncontrolled levels, depending on the source type. This would occur with the use of rigorous watering of the site and other control measures, such as a limitation of vehicle speeds to 15 mph on-site. The project landfill operator shall develop and implement dust control methods to achieve a 90 percent reduction of fugitive dust emissions from uncontrolled levels. Additional control measures to reduce fugitive dust shall include, but are not limited to, the following:</p> <ol style="list-style-type: none"> 1. Designate personnel to monitor the dust control program and order increased watering, as necessary, to ensure a 90 percent control level. Their duties shall include holiday and weekend periods when work may not be in progress. 2. Apply approved non-toxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction and operational areas or replace groundcover in disturbed areas. 3. Provide temporary wind fencing around sites being graded or worked. 4. Cover truck loads that haul dirt, sand, or gravel or maintain at least two feet of freeboard in accordance with Section 23114 of the California Vehicle Code. 5. Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off tires of vehicles and any equipment leaving the site. 6. Suspend all soil disturbance activities when winds exceed 25 mph as instantaneous gusts or when visible dust plumes emanate from the site and stabilize all disturbed areas. 7. Sweep all streets at least once a day if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water). 8. Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces. 9. Pave road and road shoulders. 	<p>Significant for (1) 1-hour CAAQS for NO₂; (2) 24-hour CAAQS for PM₁₀; (3) annual CAAQS for PM₁₀; (4) 24-hour NAAQS for PM_{2.5}; and (5) annual CAAQS and NAAQS for PM_{2.5}.</p>

Table ESR-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
<p>Impact AQ-7o: Proposed operational emissions of GHGs would cause a significant impact on the environment. Potential incremental contributions from the project to global-climate-change.</p>	<p>Significant incrementally contribute to global-climate change.</p>	<p>Previous AQ-5 Moved to AQ-41.</p> <p>AQ-5: Simi-Valley Landfill Emissions Reduction Program Agreement. In instances, when air quality impacts from mobile sources due to project operations cannot be mitigated to insignificant levels with the available air pollution control measures recommended for the project, the VCAPGD, in its Air Quality Assessment Guidelines, recommends implementing an Emissions Reduction Program to ensure additional mitigation of air quality impacts by requiring the project proponent to contribute funds for programs that reduce air pollutant emissions from non-project sources. However, while several municipal jurisdictions in the county have enacted air emissions mitigation programs in the form of Transportation Demand Management (TDM) programs, Ventura County has not established a Government Code section 66000 et seq. fee rule or made a Board of Supervisors commitment to adopt such a fee rule to assess, collect, and spend such fees on mitigation programs.</p> <p>See AQ-3.</p> <p>AQ-7. Additional Alternative Fuels Collection Trucks. The landfill operator shall operate a collection truck fleet that is powered by at least 50 percent alternative fuels. The definition of alternative fuels includes LNG, LPG, compressed natural gas (CNG), or electric power. The landfill operator shall achieve this level of operation by January 1, 2020.</p> <p>AQ-8. Use Biodiesel Blends in Diesel-Powered Off-Road Equipment and Collection Trucks. The applicant shall maximize the use of biodiesel in off-road equipment and diesel-powered collection trucks. The CO₂e emission factor for 100 percent biodiesel is about 7 percent lower than ultra-low sulfur diesel (ULSD). The most readily available form of biodiesel is a blend of 20/80 percent biodiesel/ULSD by weight (B20). The use of which would result in an approximately 2 percent reduction in GHG emissions relative to ULSD. Use of fuel with a higher biodiesel/ULSD ratio would result in higher GHG reductions. However, higher bio-diesel percentages than B20 may result in reduced power and/or require engine modifications.</p>	<p>Significant incrementally contribute to global-climate-change.</p>

Table ESR-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
<p>Impact REC-1: Local Parks/Facilities. Cause an increase in the demand for recreation when measured against the following standard: five acres of developable land (less than 15 percent slope) per 1,000 population.</p>	<p>Significant</p>	<p>Recreational Facilities REC-1: The applicant shall pay in-lieu fees for local parks/facilities that would ensure that the applicant would offset costs of developing and/or making improvements to local recreation amenities associated with increased recreational demands from the proposed project. These fees shall be paid prior to the issuance of a Conditional Use Permit. Because the County does not have a policy or ordinance in place requiring an applicant to pay a recreation impact fee or dedicate public easements, there is no legal authority to impose a fee or a mechanism to ensure that fees collected would mitigate impacts to recreation. There is therefore no feasible mitigation for the recreation demand created by additional project employees.</p>	<p>Less than significant</p>
<p>Impact REC-2: Regional Parks/Facilities. Cause an increase in the demand for recreation when measured against the following standard: five acres of developable land per 1,000 population.</p>	<p>Significant</p>	<p>REC-2: The applicant shall pay in-lieu fees for regional parks/facilities that would offset costs of developing and/or making improvements to regional recreation amenities associated with increased recreational demands from the proposed project. These fees shall be paid prior to the issuance of a Conditional Use Permit. Because the County does not have a policy or ordinance in place requiring an applicant to pay a recreation impact fee or dedicate public easements, there is no legal authority to impose a fee or a mechanism to ensure that fees collected would mitigate impacts to recreation. There is therefore no feasible mitigation for the recreation demand created by additional project employees.</p>	<p>Significant and unavoidable</p>
<p>Impact REC-3: Regional Trails/Corridors. Cause an increase in the demand for recreation when measured against the following standard: two-and-a-half miles per 1,000 population.</p>	<p>Significant</p>	<p>REC-3: The applicant shall dedicate public easements for the Alamos Canyon Trail that would link the trail with the proposed trail network for Simi Valley. New trail easements shall be aligned with existing dirt roads/trails to the greatest extent feasible. Development adjacent to the Alamos Canyon Trail shall include, where appropriate, the construction and assurance of the fitness-of-designated trails for two years, at which time the agency(ies) being dedicated the public easements would assume maintenance responsibility. Where immediate construction is not required, a construction bond shall be required. If dedication of the trail link easement comprises less than the project-related demand, the applicant shall pay in-lieu fees to offset the remainder of the increased demand for trail miles. Any in-lieu fees shall be paid prior to the issuance of a Conditional Use Permit.</p>	<p>Less than significant</p>

Table ESR-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
<p>Impact REC-4: Future Development. Cause an increase in the demand for recreation when measured against the following standard: impede future development of Recreation Parks/Facilities and/or Regional Trails/Corridors.</p>	<p>Significant</p>	<p>Because the County does not have a policy or ordinance in place requiring an applicant to pay a recreation impact fee or dedicate public easements, there is no legal authority to impose a fee or a mechanism to ensure that fees collected would mitigate impacts to recreation. There is therefore no feasible mitigation for the recreation demand created by additional project employees. See REC-1 through REC-3.</p> <p>Because the County does not have a policy or ordinance in place requiring an applicant to pay a recreation impact fee or dedicate public easements, there is no legal authority to impose a fee or a mechanism to ensure that fees collected would mitigate impacts to recreation. There is therefore no feasible mitigation for the recreation demand created by additional project employees.</p>	<p>unavoidable</p>
			<p>Less than significant</p> <p>Significant and unavoidable</p>