

FINAL ENVIRONMENTAL IMPACT REPORT

**CONDITIONAL USE PERMIT 86-312-(5)
SUB-PLAN AMENDMENT
CONDITIONAL USE PERMIT 2556**

STATE CLEARINGHOUSE NUMBER 84082908

THE NORTH SAN FERNANDO VALLEY AREA

**COUNTY OF LOS ANGELES
DEPARTMENT OF REGIONAL PLANNING
320 WEST TEMPLE STREET
LOS ANGELES, CA 90012**

OCTOBER 1990

**ADDENDUM TO DRAFT
ENVIRONMENTAL IMPACT REPORT
SUNSHINE CANYON LANDFILL EXTENSION
PROJECT NO. 86-312-(5)
SUB-PLAN AMENDMENT
CONDITIONAL USE PERMIT 2556
STATE CLEARINGHOUSE NO. 84082908**

The Final Environmental Impact Report (EIR) for the above project consists of the following documents:

Volume I - Draft EIR - April 1989
Volume II A & II B - Appendices to Draft EIR - April 1989
Volume III - Response to County Agency Comments - July 1989
Volume A & B - Responses to Public Review Comments - July 1990
And this Addendum dated October 1990

At its meeting on September 27, 1990 the Regional Planning Commission concluded deliberation on the proposed project as well as the related environmental documents and indicated their intent to approve a less intense alternative. The Regional Planning Commission directed staff to prepare findings and conditions and a Final Environmental Impact Report for consideration.

The project selected for approval by the Commission consists of a 16.9 million ton capacity landfill which will cover approximately 215 acres. The project generally corresponds to sequence No. 1 of the Unincorporated County Only Alternative described in the Draft Environmental Impact Report and illustrated on Figure 50. Sequence No. 1 of the larger proposed project as illustrated in Figure 3A of the Draft EIR is identical as well to the project selected for approval. In addition, the Regional Planning Commission selected a daily fill limitation of 6,000 tons per day subject to some overage discretion by the County Board of Supervisors. The specifics of the approval are detailed in the Conditional Use Permit which is incorporated into this Final EIR by reference including the Monitoring Program which is part of the Conditional Use Permit.

The environmental analysis contained in the documentation to date was considered by the Regional Planning Commission in the formulation of their decision. As such the documentation was found to be adequate in allowing an informed decision relative to the potential significant effects of the selected project.

The design of the approved project and adopted mitigation measures as set forth in the Conditional Use Permit and Monitoring Program are sufficient to reduce potential significant effects in all but one of the environmental systems identified to insignificance. The environmental system identified as having potential unavoidable significant effects is Biota for the reasons and circumstances described in the Draft EIR and now as a part of this Final EIR.

Consistent with Section 15093, of the California Environmental Quality Act (CEQA) Guidelines the decision-makers have balanced the benefits of the project against its unavoidable environmental risks in determining whether to approve the project which has been selected. In so doing, the adverse environmental effects have been found to be acceptable since these are outweighed by the benefits attributable to the project selected for approval.

It is important to note that the intent of an EIR is to serve as an informational document and to show a good faith effort by providing a full public disclosure of the physical impacts a proposed project may have. An EIR is not a technical document (though technical documents have been appended to or referenced in the subject EIR), nor does the evaluation of impacts need to be exhaustive. In this case many comments were received opining the insufficiency of the EIR. Those comments have been embodied in the EIR (Volumes A & B) and were considered in deciding to approve the project. Disagreement among experts does not invalidate the EIR. the environmental documentation process emphasizes the need to discuss significant environmental impacts, mitigation measures, and alternatives.

As part of the environmental review process, the Draft EIR materials were made available for public comment and input well beyond the minimum set forth by State law. Specifically, the public review period commenced on July 10, 1989 when a notice of completion was sent to the State Clearinghouse. The official review period for State agencies was set from July 12, 1989 to August 25, 1989. However, comments both written and oral were accepted till January 17, 1990 when the public hearings before the Regional Planning Commission were closed. Public hearings were held on October 4, 1989, November 2, 1989 and January 17, 1990. In addition, the project was discussed and deliberated on in public by the Regional Planning Commission on July 10, 1990, July 25, 1990, and September 27, 1990.

Project No. 86-312-(5)
Sub-Plan Amendment
Conditional Use Permit
Oak Tree Permit
State Clearing House No. 840829908

Attachment "A"
**SUNSHINE CANYON LANDFILL EXPANSION
ENVIRONMENTAL FINDINGS
AND STATEMENT OF OVERRIDING CONSIDERATION**

The Final Environmental Impact Report consisting of the following documents:

Volume I - Draft EIR April 1989
Volume IIA and IIB - Appendices to Draft EIR April 1989
Volume III - Responses to County Agency
Comments July 1989
Volume A and B - Responses to Public Review Comments
July 13, 1990
Final Environmental Impact Report October 1990

(Collectively, the "EIR") for the Sunshine Canyon Landfill Expansion (the project) has been prepared in compliance with all applicable provisions of the California Environmental Quality Act (CEQA). The project analyzed in the Draft EIR involves the expansion and further development of an existing 230 acre Class III sanitary landfill generally located on the westerly side of the Golden State Freeway (I-5) and San Fernando Road, northerly of O'Melveny Park in the City of Los Angeles.

A. Objective, Description and Background

1. The objective of the Sunshine Canyon Landfill Expansion is to provide needed landfill capacity for the County and City of Los Angeles into the Twenty-First Century. As analyzed in the Draft EIR, the proposed project was estimated to have an ultimate capacity of 215 million tons. The landfill expansion footprint would disturb and occupy approximately 542 acres within County unincorporated area on the northwesterly portion of the site and 164 acres within the City of Los Angeles on the southeasterly portion of the site. An existing 230 acre landfill site within the City of Los Angeles, also on the southeasterly portion of the site, would experience additional landfilling operations over the existing deposits. During the period in which public hearings were held before the Regional Planning Commission, the proposed landfill expansion within the unincorporated County portion of the site was reduced by 42 acres by the project proponents.

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2. An Initial Study was prepared in July 1986 and identified potential environmental impacts attributable to the project. These potential environmental impacts were:

- (a) Geotechnical
- (b) Flood
- (c) Fire
- (d) Noise
- (e) Water Quality
- (f) Air Quality
- (g) Biota
- (h) Cultural Resources
- (i) Visual Resources
- (j) Traffic/Access
- (k) Utilities (Water Consumption)
- (l) General (Litter, Rodents, etc.)
- (m) Environmental Safety (Hazardous Materials)

As a result of the Initial Study, it was determined that the project would not have a significant impact on other environmental factors since the potential impacts did not exceed threshold criteria for significance as established by the County of Los Angeles.

3. The Draft EIR prepared for the project discussed and analyzed the potential impacts identified in the Initial Study within the following sections of the document:

- (a) Geology
 - 1. Lithology
 - 2. Landslides
 - 3. Folds and Faults
 - 4. Seismicity
 - 5. Slope Stability
- (b) Surface Water
- (c) Ground Water
- (d) Biota
- (e) Archaeological, Historical and Paleontological Resources
- (f) Air Quality
- (g) Odor/Landfill Gas
- (h) Traffic/Circulation
- (i) Noise
- (j) Visual
- (k) Public Utilities
 - 1. Electrical Power
 - 2. Water Supply
- (l) Fire Service
- (m) Hazardous Materials

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Additionally, the following alternatives were discussed:

- (a) No Project
- (b) Alternate Project Location
- (c) Resource Recovery Systems
 - 1. Material Recovery
 - 2. Recycling
- (d) Smaller Landfill Alternative
- (e) Unincorporated County only Alternative

Furthermore, consistent with CEQA requirements the following were discussed:

- (a) Growth-Inducing Impacts
- (b) Short Term vs. Long Term Productivity
- (c) Irreversible Environmental Changes

3. The Draft EIR consisting of Volumes I, IIA, IIB, and III was circulated for public review on July 10, 1989 and a Notice of Completion was sent to the State Clearinghouse. The official review period established for state agencies was set from July 12, 1989 to August 25, 1989. Comments from the general public both written and oral however, were accepted well beyond August 25, 1989 to January 17, 1990 when the public hearings before the Regional Planning were closed.
4. Public Hearings for the project were held before the Regional Planning Commission on the following dates:

October 4, 1989
November 2, 1989
January 17, 1990

In addition, the project was discussed and deliberated in public by the Regional Planning Commission on the following dates:

July 10, 1990
July 25, 1990
September 27, 1990

5. During the public review and hearing processes, extensive public interest was expressed as well as concern over the adequacy of the circulated Draft EIR. These concerns including disagreements with the Draft EIR, have been responded to by the County of Los Angeles in Volume A Responses to Comments text dated July 1990. Many of the issues raised relate to factors discussed within the scope of the Draft EIR. Others involve opinions as to the disposition of land use matters before the decision-makers and not within the scope of the EIR.

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6. As a result of the public review, hearing and deliberation processes of the Regional Planning Commission, the permitting of the proposed landfill expansion has been restricted to approximately 17 million tons within the County unincorporated area. This is an alternative that corresponds generally to that described in the Draft EIR as sequence No. 1 of the proposed project and also to the alternative titled "Unincorporated County Area Only Alternative". Potential future expansion is uncertain at this time and could proceed in either way subject to appropriate additional environmental review. The related conditional use permit does not imply that additional expansion is guaranteed or approved. If additional expansion is considered in the future, the manner in which it follows would be dependent on satisfactory compliance of performance criteria as set forth in the approval of the conditional use permit including condition 10D which relates to a Memorandum of Cooperation by and between the City of Los Angeles and the County of Los Angeles with respect to subsequent landfill permitting by the City of Los Angeles. Any additional expansion within the County unincorporated area will require the approval of another Conditional Use Permit.

B. Environmental Impacts and Mitigation

1. **Geotechnical:** During the Initial Study, the project site was identified as lying within the Alquist-Priolo study area and that slope failure could potentially occur due to seismic activity. This concern was underscored since the project involves a major alteration of landform. The EIR provided the results of detailed studies of the geologic characteristics of the site as well as the potential impacts associated with implementation of the project. It recognized that under worst case conditions, a number of potentially adverse impacts could unavoidably occur however the facility can be designed and operated to limit the potential adverse effects. Feasible mitigation measures, to be made conditions of approval, as well as the design of the project will reduce potentially significant geotechnical impacts to less than significant and acceptable levels through compliance with all applicable County grading requirements and recommendations. Potential landslide areas will be delineated by a qualified geotechnical engineer and removed as operations proceed. Removal or other excavation will not take place under adverse weather conditions. More detailed stability analyses will be undertaken and incorporate all resulting recommendations. Rigorous erosion control including compliance with the proposed revegetation Program set forth in the EIR and design features, such as sediment settling ponds and filters in interceptor ditches to restrict transport of eroded soil, will be adhered to.

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Compliance with the appropriate mitigation will be ensured through Condition No. 28 of the Conditional Use Permit. Monitoring will be accomplished through routine oversight of the Local Enforcement Agency in consultation with the Department of Public Works Drainage and Grading Division as well as through biennial reporting as required by the Monitoring Program adopted along with the approval of the project.

FLOOD: During the Initial Study of the project several major drainage courses, as identified on U.S.G.S. quad sheets, were identified on the project site. Concern was documented over the proposed alteration of drainage courses including potential erosion and debris deposition from run-off to off-site areas. The EIR provided more detailed surface water characteristics including rainfall data, run-off rates, and existing drainage improvements servicing the project site. It concluded that no water run-off from Sunshine Canyon enters the public water supply in the area (Van Norman Reservoir). The impacts of the project are such that the existing natural features will be completely altered by project design.

Feasible mitigation measures, to be made conditions of grant, and project design will ensure that no significant impacts such as flooding, erosion and leachate migration occurs by complying with all applicable County requirements and recommendations. A drainage plan has been provided which will accommodate surface runoff from slopes of the landfill, minimize infiltration of surface water and prevent ponding. Features of the drainage plan are such that surface water will be intercepted and diverted around the active operation through perimeter ditches. Retention ponds will be used to control off-site run-off and reduce sediment load. Underdrains, where seeps and springs occur, will collect and direct run-off. Ongoing application of fill covers will limit percolation of surface water. Installation of surface drains on working slopes will isolate run-off from refuse. On-site drainage facilities will meet 100 year storm conditions and 24-hour rainfall. Compliance with the appropriate mitigation will be ensured through Condition No. 28 of the Conditional Use Permit. Monitoring will be accomplished through routine oversight of the Local Enforcement Agency in consultation with the Department of Public Works Drainage and Grading Division as well as through biennial reporting as required by the Monitoring Program adopted along with the approval of the project.

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3. **Fire:** During the Initial Study, the project site was identified as being a Fire Zone 4 (High Fire Hazard) area. The use of heavy equipment and possible presence of combustible material in the area presented a concern over potential fire hazard. The EIR provided a description of the environmental setting of the area and fire protection facilities currently available to respond to a potential fire. It also described the existing fire program for the existing 230 acre landfill site within the City of Los Angeles. Implementation of the project could potentially increase fire danger through increased vehicles on-site, landfill gas emissions, and use of fuel tanks on site. Feasible mitigation measures, to be made conditions of grant, and design of the project will mitigate potential significant impacts relative to fire hazard upon implementation. The project will conform to all applicable County requirements and recommendations of the Forester and Fire Warden including expanding the existing fire suppression system. Service lines for existing fire hydrants will be extended. A 100-foot fire break will be provided around working areas. Brush will be cleared within 100-feet of all structures and/or 10-feet from road surfaces. Roof surfaces will be kept free of combustible materials. Readily available fire-extinguishing equipment will be kept and maintained. Fuel storage tanks will be installed in accordance with applicable Fire Department regulations. Vapor emissions will be controlled by carbon filters. The gas recovery system component of the landfill will control the potential for landfill gas emissions. Gas flaring will be done in accordance with applicable Fire Dept requirements. Compliance with the appropriate mitigation will be ensured through Conditions 18, 31 and 32 of the Conditional Use Permit. monitoring will be accomplished through routine oversight of the Local Enforcement Agency in consultation with the Fire Department as well as through biennial reporting as required by the Monitoring Program adopted along with the approval of the project.
4. **Noise:** The Initial Study identified the project site as being near a high noise source (I-5 Freeway). The anticipated noise increase attributable to the landfill operation was documented as an area of concern for the surrounding area. The EIR provided a more detailed description of the noise element in the area including sources and receptors and their spatial relationship to each other. Noise measurement methodology used was described. Existing noise levels were measured using six off-site locations. The EIR after analysis concluded that noise increases due to landfill operation would not cause a significant effect on surrounding land uses considering distance, topography, existing noise levels and operating equipment.

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Secondary noise impacts attributable to landfill related traffic on Balboa Blvd south of the site was found to be already mitigated by the City of Los Angeles Ordinance No. 161201 which prohibits trucks (other than local serving and not exceeding 6,000 lbs gross weight) from using that road. Therefore, no landfill related traffic would be anticipated to influence ambient noise levels. Although noise impacts were found to be insignificant set hours of operation, as mitigation for other environmental areas, and use of low-noise mufflers on operating equipment can be feasibly implemented to ensure the insignificance of project related noise impacts. Compliance with the appropriate mitigation will be ensured through Conditions 8, 21, and 33 of the Conditional Use Permit. Monitoring will be accomplished through routine oversight of the Local Enforcement Agency in consultation with the Department of Health Services as well as through biennial reporting as required by the Monitoring Program adopted with the approval of the project.

5. **Water Quality:** In the Initial Study, impacts on ground water supply as a result of percolation and run-off of liquid disposed material was identified as a concern. The EIR provided data from several study sources pertaining to groundwater characteristics on-site and pertinent areas adjacent to the site. Exploratory boring and packer tests were conducted within and outside of the proposed refuse boundary in areas warranting subsurface documentation. Groundwater was encountered within gully bottoms. The studies indicated no high permeability groundwater bearing formations and thus limited groundwater resources on-site. The EIR, based on studies of the area, concluded that the project site is hydraulically separated from the San Fernando Valley alluvium by low permeability bedrock and thus groundwater does not enter usable aquifers below the Canyon. Groundwater within Sunshine Canyon surfaces at the base of the Canyon. In addition, groundwater from Sunshine Canyon was found to be of poor quality and unfit for use as drinking water due to natural conditions of chemical content. Feasible mitigation measures, as conditions of approval, and project design will prevent infiltration of leachate into the existing groundwater system beneath the site through the leachate collection and removal system (L.C.R.S.) described in the EIR. To supplement natural containment features of the site a compacted man made liner will be placed within the Canyon bottom and side slopes. The landfill will be operated as a Class III landfill and will not accept liquid waste or hazardous material.

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Watering of vegetation will be regulated and balanced to present water percolation into refuse fill. The drainage plan in the DEIR will be substantially adhered to in order to divert surface drainage from the refuse fill preventing water infiltration in the refuse fill. Onsite grades and regular compacting will prevent infiltration of precipitation and direct surface water away from the fill. Inundation of the refuse fill will be prevented by the artificial drainage system, including ditches, berms, dissipators and other drainage devices. Groundwater seepage will be accommodated by a filter rock blanket and drains to connect to the under drain system. Application of daily intermediate and final covers will limit infiltration of liquid to the landfill mass in order to restrict leachate formation. The incorporation of the mitigation measures set forth in the EIR will prevent potential further degradation of the existing groundwater in Sunshine Canyon. In consideration of this, the natural containment features of the site, and the existing quality of water of the site, no significant impacts on groundwater supplies will occur. Compliance with the appropriate mitigation will be ensured through Conditions 8, 10, 21, 26, 28, 29, 30, 31 of the Conditional Use Permit as well as through biennial reporting as required by the Monitoring Program adopted along with the approval of the project.

6. **Air Quality:** The Initial Study identified potential impacts on air quality due to gas emissions of the landfill, odors, and increases in dust. The EIR provides an analysis of air quality impacts identified in the Initial Study as well as impacts attributable to landfill-related traffic in the area both from a site-specific and cumulative perspective. The EIR provides a description of the environmental setting, climate, wind patterns, existing monitored air quality in the area, estimated emissions of the existing landfill, and a discussion of standards and applicable plans relative to reducing air quality degradation. Direct impacts attributable to the project discussed in the DEIR included increased fugitive dust emissions, heavy-duty equipment emissions, and emissions from flaring activities. Mobile emissions associated with landfill related traffic would occur as well. As a result of the Regional Planning Commission's approval action, the potential emissions due to mobile emissions has been substantially reduced due to an approximately two thirds reduction in the requested daily intake of solid waste (17,500 tons per day to 6,000 tons per day).

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Feasible mitigation measures, as conditions of approval, and project design/location to reduce significant impacts include regular and controlled watering to suppress dust, daily cover of refuse landscaping, use of soil sealant on inactive faces, cuts, and on active working faces at end of the week intervals, paving of roads and interim vegetation as described in the Revegetation Program.

The methane gas collection system described in the DEIR will accommodate landfill gas generated by the project. When gas recovery becomes economically viable for sale, gas flaring will be significantly reduced creating a commensurate reduction in emissions. It is recognized that landfill-related traffic is not necessarily a cause of the project but would occur whether or not the project were developed. In that regard, it is conceivable that trash hauling traffic would potentially have to travel further causing additional emissions if the project was not approved. The landfill will be operated in conformance with all applicable requirements of the South Coast Air Quality Management District as well as applicable County requirements and recommendations set forth by the Dept. of Public Works. As such, many changes or alterations will be within the responsibility of another agency and not by the Lead Agency and should be adopted by such agency. Compliance with appropriate mitigation is set forth in Conditions 11, 13, 18, 21, 22, 35, and 36. Monitoring will be accomplished by routine oversight of the SCAQMD (through their Permit to Construct procedure) and through biennial reporting as required by the Monitoring Program adopted with project approval.

7. **Biota:** The Initial Study identified the site as lying within Significant Ecological Area #20 Santa Susana Mountains. The impact of total removal of a potential habitat for flora and Fauna in a mapped ecologically sensitive area including large numbers of oak trees (including Dunn's Oak, known only from SEA #20 in Los Angeles County) was documented as a significant impact. The EIR provided more detailed data and analysis on the existing setting of the site and surrounding areas as well as the impacts attributable to the project. An inventory of plants, and animals occurring or potentially occurring on the site was listed. The EIR stated that no rare or endangered plants that could occur on the site were found. It recognized the importance of the Oak Woodlands though no Dunn's Oaks were found. The EIR also found that there were no legally defined rare animal species but that there were potentially two endangered species (the Peregrine Falcon and the Least Bells Vireo) albeit with a low probability on the site. During the public review and hearing processes extensive public controversy and opposition to the project was generated relative to the destruction of this resource.

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The Big Cone Douglas Fir Trees, abundant on the site, also become an area of great concern to the public. The project was reviewed by the County's Significant Ecological Areas Technical Advisory Committee (SEATAC) who agreed to support the project only on the condition that the adjacent East Canyon to the West of the project site be dedicated or deed restricted to remain as open space.

During the public hearings, a change was announced by the project proponent reducing the landfill footprint in the northerly portion by 42 acres thereby leaving undisturbed 1,363 Oak Trees and approximately 75 Big Cone Douglas Fir Trees previously proposed for removal. The total number of Oak Trees proposed to be removed with the proposed change totaled approximately 7,350. The EIR recognizes that the loss of vegetation in the project site will represent a significant unavoidable adverse impact. As such, this finding is also that a significant impact will occur. Feasible mitigation measures, as conditions of approval, will reduce the significant biotic impacts attributable to the project but not to insignificance. The impacts to the site itself will remain unmitigable. As a means of compensating, to a degree, the significant impact of the project the project applicant has agreed to dedicate approximately 524 acres of land in East Canyon to the County of Los Angeles in order to remain perpetually in open space. The applicant shall replace each oak tree removed at a rate of 2:1 in full cooperation with the Los Angeles County Forester and Fire Warden. Plantings will be done both on-site and off-site including East Canyon, O'Melveny Park, and Bee Canyon as set forth in the Oak Tree Mitigation Plan dated June 11, 1990. The applicant will also cooperate with the Forester to upgrade their existing nursery facility and provide Oak seedlings for planting throughout the County. The applicant will provide adequate protection for trees not disturbed by the project. The applicant will replace each Douglas Fir Tree removed at a rate of 5:1 on-site. The applicant will engage in a study, in cooperation with an institution of relevant capability, of Los Angeles County's forest resources and reforestation needs.

Revegetation of slopes will occur in conformance with the Revegetation Program in the Draft EIR. Full abatement plans in cooperation with the Dept of Health Services will be implemented to control rodents, flies and gulls. Periodic monitoring of vector activity will be performed by the operator.

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Replacement of riparian habitat on a 2:1 ratio will be provided as part of the overall vegetation mitigation program to the satisfaction of the California Dept of Fish and Game and the Army Corp of Engineers. Compliance with the appropriate mitigation will be ensured through Conditions 8, 14, 15, 21, 24, 38, 39, 40, 41, 42, 43, 44, 45, 46, and 47 of the Conditional Use Permit. Routine monitoring will be conducted by the various permitting agencies by virtue of their respective responsibility and jurisdiction as well as through biennial reporting as required by the Monitoring Program adopted with the approval of the project.

8. **Cultural Resources:** The Initial Study identified features on site indicating possible archaeological sensitivity and/or paleontological resources. An archaeological site was cited as potentially existing on site. The EIR presented the results of an Archaeological, Paleontological and Historical Resources Report which stated that no archaeological or historical sites had been found. A paleontological survey was also conducted which found no significant fossils. Implementation of the project would impact any as yet undetected sites or resources existing on site. Feasible mitigation measures, as conditions of approval, will mitigate any potential significant impacts and include the requirement that an archaeologist and paleontologist be on site during major excavation work as well as periodic monitoring particularly when grading takes place in the Miocene-early Pliocene Towsley Formation. Landfill operators will be required and instructed to report any potential finds and cease work until a qualified archaeologist/paleontologist has made a determination of significance. Any resources encountered will be recovered and disposed of per expert recommendations prior to initiation of initial excavation. Specific sections of the site will be resurveyed to minimize potential loss of sites or resources. Compliance with the appropriate mitigation will be ensured through Condition 25 of the Conditional Use Permit. Monitoring will be accomplished by the required archaeologist/paleontologist and the Local Enforcement Agency as well as through biennial reporting as required by the monitoring program adopted with the approval of this project.
9. **Visual Resources:** The Initial Study identified visual quality as a potentially significant impact of the project due to the I-5 Freeway being designated as a scenic highway, the visibility of the project site from a regional trail, the S.E.A. designation of the site and concerns over the finish profile of the site after closure. The EIR provided a more detailed analysis of visual features of the full project and surrounding area.

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The site is largely not visible from surrounding properties due to the perimeter ridges. Nearby views of the site are limited to locations above the ridges or locations at the mouth of the Canyon. Few people would view the site from higher elevations due to limited access. Views at the mouth of the canyon are limited due to the interior location and distance of the Canyon.

The largest area from which the site can be viewed is over one mile southeast from the canyon in the San Fernando Valley. Implementation of the full project would cause potentially adverse views of the site from a number of surrounding locations however, the landfill would not be visible from most of the surrounding area due to the topography of the site. Areas from which the site could be visible could potentially be interrupted by existing structures, trees landscaping or haze. Feasible mitigation measures, as conditions of approval, as well as the design of the project and the nature of a reduced design of 16.9 million tons over an approximately 215 acre area will reduce the potential impacts to acceptable levels. Cover material will be revegetated as specified in the Revegetation Plan after completion of final or interim contours (one year or longer of inactivity). No landfilling of exterior ridges shall occur. Filling of the Canyon will extend no higher than 50 feet below the ridgelines. Cover material will taken from areas which will be filled within 3-4 months to reduce the amount of cut areas. Final cover material will be landscaped with irrigation systems, groundcover, and plant species and maintained until the site is converted to its final use. Compliance with the appropriate measures are set forth and/or referred to the appropriate responsible entity in conditions 6,8,14,16,17,23 and 24 of the Conditional Use Permit. Monitoring will be accomplished primarily through oversight of the Local Enforcement Agency and various other regulatory agencies through required biennial reporting as required by the Monitoring Program adopted along with project approval.

10. **Traffic/Access:** The Initial Study identified traffic as a potential significant impact on area circulation. The EIR describes and analyzes traffic within the context of a worst-case scenario. Five intersections were analyzed for existing conditions and future cumulative conditions. The majority of traffic to be generated by the project is expected to be from trucks. The overall traffic associated with the project analyzed in the Draft EIR is not expected to significantly impact operation of the key intersections analyzed with feasible mitigation measures cited.

Since the approval of a 16.9 million ton project with its associated 6,000 ton per day waste stream is substantially reduced from the 17,500 ton per day waste stream analyzed in the Draft EIR, associated potential traffic are commensurately reduced. Feasible mitigation to reduce any potential impacts is available through traffic improvements as set forth in Condition 15 of the Conditional Use Permit. Implementation of this condition rests with the City of Los Angeles as a responsible agency and not with the Lead Agency.

Such traffic improvements should be adopted by the City of Los Angeles when found to be warranted. Monitoring of this condition will be accomplished through biennial reporting as required by the monitoring program adopted with approval of this project.

11. Utilities (Water Consumption): The Initial Study identified water consumption as a potential significant impact due to the anticipated high volume of water usage anticipated as a result of the project. The Draft EIR quantified the amount of water anticipated to be used by a larger project, (17,500 tons per day intake). During the environmental review process, no significant problems were identified by the respective future water purveyors of the project. Feasible mitigation measures as conditions of grant, are available to reduce water consumption to an acceptable level such as use of drought-tolerant plants as set forth in the Revegetation Program and the use of a dust suppression additive to reduce the amount of water used for dust control. Compliance with the appropriate mitigation will be ensured through Conditions 10, 17, 18, and 37. Monitoring will be accomplished primarily through routine oversight of the Local Enforcement Agency as well as through biennial reporting as required by the Monitoring Program adopted along with project approval.
12. General: The Initial Study identified potential impacts relative to litter, rodents, and other such nuisances associated with the proposed land use. The EIR provided an analysis of the litter concern and the potential for litter blowing into adjacent properties. Testimony relative to this issue was also expressed at the public hearings. Feasible mitigation measures are available, as conditions of approval as well as the design of the project, to reduce the potential impacts to a less than significant level. The approved landfill expansion is located in an area that is much further than the existing 230 acre landfill from residential areas to the south. The landfill expansion as well as the daily intake has been reduced substantially from the project described in the EIR which will have a commensurate reduction in the creation of litter.

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Airborne litter will be controlled by selectively located litter fences and operating areas (at wind-shielded areas) during windy periods. A litter control program will be followed as set forth in the EIR (Appendix Y Vol. IIB) including radio dispatch to respond quickly to complaints. Compliance with the appropriate mitigation will be ensured through Conditions 8, 10, 18, 19, 20, 21 and 22. Monitoring will be accomplished through routine oversight of the Local Enforcement Agency as well as through biennial reporting as required by the Monitoring Program adopted along with the project approval. Feasible mitigation, as conditions of approval for vector control will be ensured through compliance with Conditions 26 and 42 of the Conditional Use Permit.

13. **Environmental Safety:** The Initial Study identified a potential impact relative to hazardous materials being introduced into the landfill. The EIR provides an analysis with respect to landfill operation and hazardous waste. The proposed expansion is to be a Class III facility which does not accept hazardous waste. It is recognized that some household hazardous wastes may unavoidably enter the fill however, the relatively small quantities anticipated will not create a hazardous condition and is considered insignificant. Feasible mitigation is available as conditions of approval to reduce the potential for hazardous materials entering the landfill such as compliance with the Landfill Waste Load Checking Program set forth in the EIR. Direct visual inspection as well as remote monitors will be utilized to prevent illegal entry of hazardous materials. Employee training programs on hazardous waste detection will be incorporated. A full time inspector will be on hand to inspect materials as they are deposited. Diligent reporting of violations to such agencies as the County Health Department and the Los Angeles Police Department will be required. Posting and distribution of Waste Handling procedures will be made available to users of the landfill to minimize introduction of hazardous wastes. A 24-hour emergency line will be available for the public to notify personnel of any emergency. Compliance with appropriate mitigation will be ensured through various regulatory agencies as set forth in Condition 8 of the Conditional Use Permit. In addition, Conditions 10, 14, 26, and 27 further ensure that potential impacts relative to hazardous waste are reduced to insignificance. Monitoring will be accomplished primarily through routine oversight of the Local Enforcement Agency as well as through biennial reporting as required by the Monitoring Program adopted with approval of the project.

C. Project Alternatives

1. Alternatives to the proposed project described in the Draft EIR were considered. The alternatives discussed in the EIR constitute a reasonable range of potential options necessary to permit a reasoned choice. In this case, the Regional Planning Commission has selected a less-intense development which generally corresponds to the first sequence of the Unincorporated County Only Alternative as described in the Draft EIR. This alternative consists of a 16.9 million ton capacity landfill on an approximately 215 acre footprint as illustrated on Figure 50 of the Draft EIR. The rate of fill selected is 6,000 tons per day with additional provisions as set forth in the Conditional Use Permit. Selection of this alternative and the associated changes and/or alterations from the applicant's proposed project as described in the EIR will mitigate, avoid or lessen significant environmental effects.
2. The alternative of No Project was considered. The selection of this alternative has been rejected in order to avoid a countywide solid waste capacity shortfall by September 1991. Furthermore, selection of this alternative would be in conflict with solid waste disposal plans as set forth in the "Solid Waste Management Status and Disposal Options in Los Angeles County" report dated February 1988 as well as the County Solid Waste Action Plan adopted by the Board of Supervisors on April 8, 1988. That report and adopted plan establish that landfill capacity is needed at this time and can be met in the short term by the approval of additional capacity at Sunshine Canyon. Additionally, these documents provide for a long-term solution to the "garbage crisis" which this project can contribute to. For that reason, the No Project alternative is rejected.
3. An alternate project location alternative was considered for the Elsmere Canyon site located approximately one mile northeast of the project. This alternative has been rejected in order to avoid a Countywide shortfall of solid waste capacity by September 1991.

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It is expected that if this alternative were to be pursued, due to the longer processing and permitting time required, the anticipated solid waste shortfall would not be avoided and could thus constitute a potential threat to the Health Safety and Welfare of the residents of Los Angeles County. Moreover, even if Elsmere Canyon or any of the other potential sites discussed was available for development at this time, this option could not be considered an alternative since both sites are listed in the County Solid Waste Action Plan and no single component of the plan can responsibly abate the crisis in the near or distant future.

4. Resource Recovery Systems (Material Recovery and Recycling) have been considered. While this is not an alternative to the landfill expansion, several aspects of this discussion in the EIR have been incorporated into the approved 16.9 million ton project. Condition 10 of the Conditional Use Permit specifically requires that waste which can be recycled be prohibited from knowingly being deposited in the landfill and that on-site waste diversion and recycling facilities consistent with the amount to be diverted be in place. Compliance and monitoring of this condition is ensured through the agreement entered between the County and the permittee pursuant to PART II of the Monitoring Plan adopted along with the approval of this project.
5. A Smaller Landfill Alternative was considered. The selection of this alternative has been rejected since there is no substantial reduction in environmental impacts associated with this choice. The smaller landfill alternative would follow the same footprint as the larger project analyzed in the Draft EIR but with a smaller capacity for landfilling.
6. The Unincorporated County Only Alternative has been considered. An identical alternative corresponding to Sequence 1 of this alternative has been selected for approval by the Regional Planning Commission. This alternative is the best choice since it provides for a more environmentally sensitive approach to meeting the solid waste capacity shortfall anticipated. In addition, this alternative provides a built-in monitoring plan in which the Regional Planning Commission retains oversight of the operation. Reservation of future options with respect to other components of the Solid Waste Action Plan including implementation of rigorous recycling, expansion of their landfills, opening of new landfills and the possibility of rail haul to provide an equitable distribution of waste disposal.

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7. A City Only Alternative has been considered as suggested during the public review and hearing processes for this project. The City only proposal is that the existing 230 acre landfill operation in the City of Los Angeles be utilized for an additional 5 years in order to enable time to seek an alternative site or method of disposal to the Sunshine Canyon site. This alternative is discussed in more detail in Volume A, Topical Response 27 of the EIR. This alternative fails to address the Country's Overall Waste Management policy as set forth in the Solid Waste Management plan or related documents.

Moreover, there is evidence that this alternative would be infeasible from an economic and engineering standpoint though there is indication that there is disagreement with this analysis. As a consequence, the Regional Planning Commission rejected this option as a feasible alternative to the selected alternative project.

D. Statement of Overriding Considerations

1. The Environmental Impact Report for the Sunshine Canyon Landfill Expansion identifies significant effects which could occur as a result of implementing a 215 million capacity facility with a daily wastestream of 17,500 tons per day. With implementation of mitigation measures discussed in the EIR, most individual effects can be mitigated to levels of insignificance except for unavoidable significant impacts relating to biotic resources.
2. As a result of the Regional Planning Commission's action to approve a less intensive 16.9 million ton capacity project alternative with a 6,000 ton per day wastestream limitation, commensurate reductions in potential impacts will occur as compared to the proposed project described in the EIR. However, the significant impacts on biota will remain significant when viewed with a conservative perspective.

Biota: Implementation of the project will still result in the removal of approximately 215 acres of ecologically significant habitat including approximately 43% of the oaks which would have been lost if the full expansion was approved. The same riparian resources will be lost as well.

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3. The environmental impacts have been take into account in the decision of the project. However, any unavoidable impacts resulting from development of the project are considered acceptable since the project has the following associated benefits which outweigh its environmental costs, thus justifying the project.
 - A. The Project will provide needed landfill capacity, available to both public and private entities within the County, to help avert an impending County-wide waste disposal capacity shortfall "crisis" projected to begin in 1991. The Project will serve as a major Class III landfill site and as a component of the County's regional integrated waste management system and is expected to accommodate a portion of the County's waste disposal needs into the twenty-first century.
 - B. The landfill extension is located in an area which is in close proximity to the majority of wastestream sources in the County of Los Angeles, As such, there are economic and environmental benefits to this location when compared to the potential of having to transport waste to a further location. Such benefits include the potential for lower waste handling costs, fuel conservation, and a relative reduction in air quality impacts.
 - C. The County, or other designated public agency, will acquire approximately 524 acres in East Canyon adjacent to the Project site, through dedication by the project applicant, for public open space, and park and recreational use.
 - D. The Project would provide opportunities to implement various waste diversion, recovery and recycling measures, through an agreement(s) entered into between the County and the Applicant, to contribute to the County's efforts to comply with the requirements of Assembly Bill 939, codified as Sections 40000 through 49620 of the Public

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Resources Code. The Applicant has prepared a program for the recovery and recycling of various incoming waste materials, including yard wastes, wood wastes, inorganic material and corrugated paper, as part of the proposed landfill operation. In addition to off-site export for reuse by various market sources, these processed materials will be utilized at the landfill in daily operations. Recycling of residential waste materials at the proposed landfill could also be possible in the future in combination with implementation of curbside recycling programs and/or transfer station processing center.

- E.** The project site itself will ultimately provide permanent open space for the County when the landfilling has reached final capacity and the facility's closure plan is completed. The completed landfill surface will be revegetated with substantial trees and vegetation, as described in the EIR. The site will be maintained by the project applicant until the time that its final use is determined by the State and County, however, it is expected that ultimately it will be made available to the public at no additional acquisition cost to the agency designated to receive the land.
- F.** The landfill owner will enter into a contract with Cal Poly University Pomona, or an institution of similar capabilities acceptable to the Forester and Fire Warden, to engage in a study of Los Angeles County's hardwood. Forest resources and reforestation needs.
- G.** The project as initially proposed has been down scaled substantially as a result of careful review and extensive input from nearby residents and interested parties.