VOLUME I

FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT
SUNSHINE CANYON LANDFILL

Final SEIR 91-0377-ZC/GPA
State Clearinghouse Number 92041053

Lead Agency:

CITY OF LOS ANGELES
Department of City Planning
Environmental Review Section
221 North Figueroa Street, 15th Floor
Los Angeles, California 90012-2601

June 1998

FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT
SUNSHINE CANYON LANDFILL
COUNCIL DISTRICT 12

City of Los Angeles Final SEIR 91-0377-ZC/GPA
State Clearinghouse Number 92041053

This Document comprises the Second and Final Part of the Subsequent Environmental Impact Report (SEIR) for the project described below. The Draft SEIR which was previously circulated for public review and comment comprises the first part.*

PROJECT: The proposed project consists of the development, operation, maintenance, and monitoring of a Class III, nonhazardous solid waste landfill (City/County Landfill or proposed project). A portion of the proposed City/County Landfill footprint is located on ±194 acres within the City of Los Angeles (City). In order to facilitate the design of the proposed project, an area of approximately 42 acres in the County of Los Angeles (County) would be developed. This acreage would be engineered to ultimately connect, both vertically and horizontally, to the proposed landfill in the City and the operational County Landfill (landfill footprint of ±215 acres).

Initially, these landfill areas would be operated separately and provide an average daily capacity of 5,000 tons per day (tpd) in the City and 6,000 tpd in the County. Within 18 to 24 months, following the commencement of landfilling operations in the City, landfilling operations would be combined into a single landfill operation and at one working face area. This would allow for an average waste intake rate of 11,000 tpd. This landfill footprint configuration would ultimately encompass ±451 acres and result in a net disposal capacity of 90 million tons. This footprint includes the operational County Landfill with an approved permitted capacity of 17 million tons. The proposal also consists of developing and operating numerous ancillary areas and facilities to support landfilling operations at the City/County Landfill.

The proposed project within City jurisdiction would require an amendment to the Granada Hills-Knollwood Community Plan from "Open Space" to "Heavy Industrial" and a zone change from "A1-1-O" to "M3-1-O."

APPLICANT: Browning-Ferris Industries of California, Inc.
14747 San Fernando Road
Sylmar, California 91342
Contact: Mr. James T. Aidukas, Director of Environmental Affairs

PREPARED BY: Environmental Review Section, Los Angeles City Planning Department,
221 North Figueroa Street, 15th Floor
Los Angeles, California 90012-2601

DATE: June 1998

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* The Draft SEIR is available for review at the City Planning Department, 221 North Figueroa Street, Room 1500 and the libraries listed in Appendix B8 of this Final SEIR.

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1.0 INTRODUCTION

This *Final Subsequent Environmental Impact Report, Sunshine Canyon Landfill,* State Clearinghouse (SCH) Number 92041053 (Final SEIR) and the *Draft Subsequent Environmental Impact Report, Sunshine Canyon Landfill* (Draft SEIR) are part of the environmental review process undertaken by the City of Los Angeles (City) as Lead Agency for the proposed Class III nonhazardous solid waste landfill (City/County Landfill or proposed project). This Final SEIR responds to comments received on the Draft SEIR during its 132-day public review and comment period and provides additional technical information. Any additional information included in this Final SEIR augments the information and/or technical analysis contained in the Draft SEIR. The Draft SEIR examined the direct, indirect, and cumulative environmental impacts associated with the development, operation, maintenance, and monitoring of the City/County Landfill.

A portion of the proposed City/County Landfill footprint is located on ±194 acres within the jurisdiction of the City (within Sunshine Canyon) and provides an estimated net airspace disposal capacity of 55 million tons. In order to facilitate the design of the City/County Landfill, an area of approximately 42 acres within the jurisdiction of the County of Los Angeles (County) would be developed. This acreage would be engineered to ultimately connect, both vertically and horizontally, to the proposed landfill in the City and the existing operational County Landfill (landfill footprint of ±215 acres).

Initially, the City and County landfill areas would be operated separately and provide an average daily capacity of 5,000 tons per day (tpd) in the City and 6,000 tpd in the County. However, within 18 to 24 months following the commencement of landfilling operations in the City, both City and County landfilling operations would be combined into a single landfill located within one working face area. This combined operation would allow an average waste intake rate of 11,000 tpd.

The comments responded to in this document are limited to those written comments received by the City (as Lead Agency) pursuant to the California Environmental Quality Act (CEQA). All comments received by the City will be considered by the City decisionmakers during review of the Final SEIR for the proposed City/County Landfill. Additionally, the City received one comment letter after the close of the public review and comment period (see Section 3.9, Comments Received after December 5, 1997) and elected to respond to those comments.

1.1 Final Subsequent Environmental Impact Report

The *Guidelines for the Implementation of the California Environmental Quality Act* (State CEQA Guidelines) codified in the California Code of Regulations (CCR) require the City to consider all public and agency comments received on the Draft SEIR in its decisionmaking process. In accordance with §15088(a) of the State CEQA Guidelines:

> The Lead Agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The Lead Agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.

In accordance with §15132 of the State CEQA Guidelines, the Final SEIR will:

1. Incorporate the Draft SEIR.

2. Provide comments and recommendations received on the Draft SEIR.
3. Provide a list of persons, organizations, and public agencies that commented on the Draft SEIR.
4. Provide responses to significant environmental issues raised during the Draft SEIR review and consultation process.
5. Provide additional information by the Lead Agency.

1.2 Document Review Period and Noticing

On July 24,1997, the Governor's Office of Planning and Research (OPR), in its capacity as the SCH, acknowledged receipt of the City's Notice of Completion (NOC) for the Draft SEIR. This receipt subsequently commenced the 90-day public review period on the Draft SEIR. The review period was to conclude on October 31, 1997; however, due to a City Councilman's request, the review period was officially extended by City staff until December 5, 1997 (for a total review period of 132 days).

The Notice of Completion and Availability (NOCA) and Request for Comments were included with the Draft SEIR. These notices and the Draft SEIR were distributed to federal, State, regional, and local agencies; community homeowner associations; other interested parties; and libraries. In addition, other governmental agencies, property owners/occupants, and interested parties received a NOCA. The NOCA was published on July 24, 26, and 27, and on August 2 and 3, 1997, in *The Signal*, *Saugus Enterprise*, and *Daily News*. The NOCA was also published in the *Los Angeles Times* on July 24, 1997, as part of the City's notification process. The NOCA listed library locations where copies of the Draft SEIR could be reviewed, the comment period, and the address to submit comments on the Draft SEIR.

Copies of the NOC submitted to the OPR, the NOCA and Request for Comments, and proofs of publication are included as Appendix A in this document. Appendix B lists all parties who received a copy of either the Draft SEIR (with both notices) or the NOCA.

1.3 Incorporation of Comments

A number of the Responsible Agencies commented on the Draft SEIR. A Responsible Agency is defined under CEQA, §15381, as a public agency from whom discretionary entitlements will be required but which is not the Lead Agency. As stated in the State CEQA Guidelines, §15096(d), comments submitted by Responsible Agencies on the Draft SEIR "shall be limited to those project activities which are within the agency's area of expertise or which are required to be carried out or approved by the agency or which will be subject to the exercise of powers by the agency." Although some of the comments submitted by these agencies exceed their regulatory limitation, each comment is addressed herein.

1.4 Revised Summary Matrix of Environmental Impacts, Mitigation Measures, and Monitoring Phasing for the Proposed Project

Based on the comments received on the Draft SEIR, changes or additions to mitigation measures previously presented or changes to the monitoring or enforcement agency have been incorporated into the proposed City/County Landfill Mitigation Reporting and Monitoring Program. These revisions are presented in Section 2.5 (see Table 1.10-1 [Revised]). To assist the reviewer in identifying changes to this previously prepared table, additions are *redlined*, and deletions are indicated by ~~*strikeout*~~.

1.5 Revised Mitigation Reporting and Monitoring Program

To incorporate new changes, each new or revised mitigation measure and changes to the monitoring/ enforcement agency identified throughout this document are presented in Section 2.6. These revisions amend information previously presented in Section 7.0 in the Draft SEIR. Table 7.4-1 (Revised) includes changes based on comments received on the Draft SEIR. These changes are indicated by *redline* for additions and ~~*strikeout*~~ for deletions.

1.6 Written Comments Received

The following agencies, organizations, and individuals submitted written comments on the Draft SEIR. These comments were received by the City within the established review period. Copies of the original comment letters received are included in Appendix C of this document.

State Agencies

Jeannie H. Blakeslee — **Letter 3.3-1**
Permitting and Enforcement Division
California Integrated Waste Management Board
8800 Cal Center Drive
Sacramento, CA 95826
(Refer to Comments 1 through 6)

Antero A. Rivasplata, Chief — **Letter 3.3-2**
State of California
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814
(Refer to Comments 7 and 8)

Regional Agencies

J. David Stein, Manager — **Letter 3.4-1**
Performance Assessment and Implementation
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, CA 90071-3435
(Refer to Comments 9 through 47)

J. David Stein, Manager — **Letter 3.4-2**
Performance Assessment and Implementation
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017-3435
[Supplemental Comments]
(Refer to Comments 48 through 51)

Rodney H. Nelson, Chief **Letter 3.4-3**
Groundwater Regulatory Unit
Los Angeles Regional Water Quality Control Board
101 Centre Plaza Drive
Monterey Park, CA 91754-2156
(Refer to Comments 52 through 54)

Henry Hogo, Planning Manager **Letter 3.4-4**
Planning and Policy
South Coast Air Quality Management District
21865 East Copley Drive
Diamond Bar, CA 91765-4182
(Refer to Comments 55 through 76)

Laura J. Simonek **Letter 3.4-5**
Principal Environmental Specialist
Metropolitan Water District of Southern California
350 South Grand Avenue
Los Angeles, CA 90071
(Refer to Comments 77 through 85)

County Agencies

Don Stockenberg, REHS **Letter 3.5-1**
Solid Waste Management Program
County of Los Angeles
Department of Health Services
2525 Corporate Place
Monterey Park, CA 91754
(Refer to Comments 86 through 108)

David Yamahara **Letter 3.5-2**
Assistant Deputy Director
Planning Division
County of Los Angeles
Department of Public Works
900 South Fremont Avenue
Alhambra, CA 91803-1331
(Refer to Comments 109 through 111)

M. Michael Mohajer
Assistant Division Engineer — **Letter 3.5-3**
Environmental Programs Division
County of Los Angeles
Department of Public Works
900 South Fremont Avenue
Alhambra, CA 91803-1331
(Refer to Comments 112 through 127)

City Departments

Richard E. Olsen, Assistant Fire Marshall — **Letter 3.6-1**
Bureau of Fire Prevention and Public Safety
City of Los Angeles Fire Department
200 North Main Street, 9th Floor
Los Angeles, CA 90012
(Refer to Comment 128)

Homer M. Morimoto, Division Engineer — **Letter 3.6-2**
Development Services Division
City of Los Angeles
Bureau of Engineering
600 South Spring Street
Los Angeles, CA 90012
(Refer to Comments 129 through 131)

Charles C. Holloway — **Letter 3.6-3**
Supervisor of Environmental Assessment and EMF
City of Los Angeles
Department of Water and Power
111 North Hope Street
Los Angeles, CA 90051-0100
(Refer to Comments 132 through 136)

Robert T. Takasaki, Senior Transportation Engineer — **Letter 3.6-4**
City of Los Angeles
Department of Transportation
221 North Figueroa Street, Suite 600
Los Angeles, CA 90012
(Refer to Comments 137 through 148)

Hal Bernson, Councilman 12 District — **Letter 3.6-5**
City Council of the City of Los Angeles
200 North Spring Street, Room 237
Los Angeles, CA 90012-4878
(Refer to Comments 149 through 184)

Wayne Tsuda, Director — **Letter 3.6-6**
Materials and Waste Resources Division
City of Los Angeles
Environmental Affairs Department
201 North Figueroa Street, Suite 200
Mail Stop 177
Los Angeles, CA 90012
(Refer to Comments 185 through 235)

Local Agencies

David A. Bobardt, Planner — **Letter 3.7-1**
City of Glendale
633 East Broadway, Room 103
Glendale, CA 91206-4386
(Refer to Comment 236)

Donald M. Williams, Senior Planner — **Letter 3.7.-2**
City of Santa Clarita
Public Works
25663 West Avenue Stanford
Santa Clarita, CA 91355-1103
(Refer to Comments 237 through 247)

Other Interested Parties/Organizations

Patricia Dean, Real Estate and Asset Management Branch — **Letter 3.8-1**
Bill Piazza, Environmental Health and Safety Branch
Los Angeles Unified School District
355 South Grand Avenue, Suite 500
Los Angeles, CA 90071
(Refer to Comments 248 through 261)

Sharon McGowan — **Letter 3.8-2**
13327 Golden Valley
Granada Hills, CA 91344
(Refer to Comment 262)

Joycelyn and Davidson Turner — **Letter 3.8-3**
17512 Tuscan Drive
Granada Hills, CA 91344
(Refer to Comments 263 through 264)

Blair Norris, Environmental Engineer — **Letter 3.8-4**
Anheuser-Busch Companies, Inc.
Executive Offices
One Busch Place (202-4)
St. Lewis, MO 63118-1852
(Refer to Comment 265)

Commenter and address unknown — **Letter 3.8-5**
(Refer to Comments 266 through 275)

George R. Monte, Principal — **Letter 3.8-6**
Richmont Investment Property Services, Inc.
107 West Lemon Avenue
Monrovia, CA 91016
(Refer to Comment 276)

Sharon E. Yackey — **Letter 3.8-7**
12715 Goethe Place
Granada Hills, CA 91344
(Refer to Comments 277 through 282)

Louie Carnevale — **Letter 3.8-8**
Carnevale & Lohr, Inc.
6521 Clara Street
Bell Gardens, CA 90201
(Refer to Comment 283)

Lynne A. Plambeck, Chairperson — **Letter 3.8-9**
Landfill Alternatives Save Environmental Resources (LASER)
23942 Lyons Avenue, Suite 103-353
Newhall, CA 91321-2423
(Refer to Comment 284)

Donald T. Kasper — **Letter 3.8-10**
12356 Jolette Avenue
Granada Hills, CA 91344
(Refer to Comments 285 through 294)

Nancy and Phil Bogna — **Letter 3.8-11**
16924 Knollwood Drive
Granada Hills, CA 91344
(Refer to Comments 295 through 306)

Albert Knight, Vice President — **Letter 3.8-12**
Santa Susana Mountains Park Association
P.O. Box 4831
Chatsworth, CA 91313-4831
(Refer to Comments 307 through 315)

Ed You — **Letter 3.8-13**
9714 Sepulveda, #216
North Hills, CA 91343
(Refer to Comments 316 through 326)

Joanne Collins — **Letter 3.8-14**
17731 Candia Court
Granada Hills, CA 91344
(Refer to Comments 327 through 336)

Jeffrey H. Hill — **Letter 3.8-15**
Law Office of Jeffrey H. Hill
23929 West Valencia Boulevard, Suite 101
Valencia, CA 91355-2109
(Refer to Comments 337 through 338)

Mary Edwards — **Letter 3.8-16**
North Valley Coalition
17219 Orozco Street
Granada Hills, CA 91344
(Refer to Comments 339 through 341)

Wayde Hunter — **Letter 3.8-17**
[No address provided]
(Refer to Comments 342 through 521)

Elizabeth Folb — **Letter 3.8-18**
11850 Susan Drive
Granada Hills, CA 91344
(Refer to Comments 522 through 528)

Anne Ziliak — **Letter 3.8-19**
[No address provided]
(Refer to Comments 529 through 726)

Iris S. Shah, Ph.D., Secretary — **Letter 3.8-20**
Knollwood Property Owners Association
11862 Balboa Boulevard, #168
Granada Hills, CA 91344
(Refer to Comments 727 through 734)

Leonard M. Salle, P.E. **Letter 3.8-21**
150 Erica Way
Portola Valley, CA 94028-7440
(Refer to Comments 735 through 757)

William F. Salle **Letter 3.8-22**
Law Offices of William F. Salle
425 East Colorado Street, Suite 755
Glendale, CA 91205
(Refer to Comments 758 through 866)

George Kane **Letter 3.8-23**
11916 Mallot Place
Granada Hills, CA 91344
(Refer to Comments 867 through 870)

Lynn A. Plambeck, Chairperson **Letter 3.8-24**
Jeff Yann, 2nd Vice President
Landfill Alternatives Save Environmental Resources (LASER)
23942 Lyons Avenue, Suite 103-353
Newhall, CA 91321-2433
(Refer to Comments 871 through 919)

Thomas K. Murphy **Letter 3.8-25**
12820 Jolette Avenue
Granada Hills, CA 91344
(Refer to Comments 920 through 934)

Esther Simmons **Letter 3.8-26**
13222 Whistler Lane
Granada Hills, CA 91344
(Refer to Comments 935 through 963)

North Valley Coalition **Letter 3.8-27**
13222 Whistler Lane
Granada Hills, CA 91344
(Refer to Comments 964 through 1573)

Dr. Stanley P. Sander **Letter 3.8-28**
Senior Research Scientist in Atmospheric Chemistry
Jet Propulsion Laboratory
4800 Oak Grove Drive, M.S. 183/901
Pasadena, CA 91109-8099
(Refer to Comments 1574 through 1589)

Wendy Danner **Letter 3.8-29**
12622 Byron Avenue
Granada Hills, CA 91344
(Refer to Comments 1590 through 1606)

Barbara A. Fine **Letter 3.8-30**
Barbara A. Fine Consultants
1614 Benedict Canyon Drive
Beverly Hills, CA 90210-2003
(Refer to Comments 1607 through 1706)

Charlotte Rodrigues **Letter 3.8-31**
13301 Constable Avenue
Granada Hills, CA 91344
(Refer to Comments 1707 through 1724)

1.7 Written Comments Received after December 5, 1997

Although this letter was received after the comment period closed, the City has elected to respond to these comments. Refer to Appendix C7 in this document for a copy of the original comment letter.

Stephen J. Bushwell, Program Manager **Letter 3.9-1**
IGR/CEQA
California Department of Transportation
District 7
120 South Spring Street
Los Angeles, CA 90012-2601
(Refer to Comments 1725 and 1726)

Stephen J. Bushwell, Program Manager **Letter 3.9-2**
IGR/CEQA
California Department of Transportation
District 7
120 South Spring Street
Los Angeles, CA 90012-2601
(Refer to Comment 1727)

SEIR No. 91-0377-ZC/GPA SCH No. 92041053

Project Name: Sunshine Canyon Landfill

RECOMMENDATION FOR SEIR CERTIFICATION

Pursuant to California Code of Regulations, Title 14, Section 15090, this SEIR has been completed in compliance with the California Environmental Quality Act and current State and City Guidelines and based on the information available may be accepted and considered prior to making a final decision on the project. The decision-making body must certify that it has reviewed and considered the information contained in this Subsequent Environmental Impact Report prior to making such decision.

Submitted by:

Irene Y. Paul
Project Coordinator
Environmental Review Section

Hadar Plafkin
Supervising City Planner
Environmental Review Section

Darryl L. Fisher
Associate Zoning Administrator
City Planning Department

2.0 REVISIONS AND/OR ADDITIONS TO DRAFT SEIR

2.1 Introduction

Based on written comments received by the City in response to the dissemination of the NOA, NOCA, and the Draft SEIR, the following corrections and/or revisions to the Draft SEIR have been identified. To facilitate the incorporation of these corrections and/or revisions into the Final SEIR, the referenced text is presented, and recommended deletions or changes are represented by ~~*strikeout*~~, and additions are represented by *redlining*. The incorporated revisions are also cross-referenced to the letter and comments received and responded to in Section 3.0, Response to Comments when applicable.

The following revisions are identified by section number, page number, and paragraph number that correspond to the Draft SEIR. The paragraph symbol (¶) is used to further assist the reader in locating the corresponding text. For example, reference to ¶3 indicates the third paragraph on the page cited. Paragraph numbering commences at the top of the referenced page and includes both partial paragraphs (i.e., those commencing on the previous page) and "bulleted" items (i.e., those portions of the text that commence with either a graphic or numeric symbol) as separate paragraphs.

The errata, revisions, changes, and other modifications to the Draft SEIR as identified herein do not result in the introduction of (1) any new significant environmental impacts not previously disclosed in the Draft SEIR that result from either the proposed project or new or amended mitigation measures proposed for implementation, (2) a substantial increase in the severity of an environmental impact identified in the Draft SEIR, and/or (3) the introduction of a feasible alternative or mitigation measure that would clearly lessen the environmental impacts of the project below those levels previously indicated in the Draft SEIR. As a result, the additional information presented herein neither warrants the recirculation of the Draft SEIR nor a revision to the preliminary findings presented in the Draft SEIR nor necessitates substantive revisions to the information previously presented.

2.2 Errata

The errata noted below have been identified in the Draft SEIR by the project proponent and comments received on the Draft SEIR. Subsequent corrections and clarification to text and figures are incorporated into this Final SEIR.

Section 1.5.1, Prior Environmental Record Pertaining to the Proposed City/County Landfill Project and Existing Inactive Landfill, p. 1-4, ¶4, Footnote 2

. . . The Sunshine Canyon Landfill Extension Conditional Use Permit (CUP), Conditions of Project Approval, Condition (10)(b), directed the project proponent to file applications with the City to commence the environmental processing and permitting of a landfill within the City's jurisdiction as part of a combined County/City facility.[2]. . .

[2]/ Refer to Sunshine Canyon Landfill Extension CUP and Oak Tree Permit 86-312-(5), Conditions of Project Approval, initially approved on February 19, 1991, by the County of Los Angeles Board of Supervisors. Specifically, CUP Condition 10(b) stated in part, "therefore, as soon as possible, but not later than July 1, 1991, the permittee shall apply to the City of Los Angeles to expand the landfill within the City . . . " At the time of the Board of Supervisors' final approval of the project in November 1993, CUP Condition 10(b) was changed and stated in part, "therefore, the permittee shall diligently pursue its application to the City of Los Angeles to expand the landfill within the City . . . "

These conditions are incorporated in Appendix C6, Sunshine Canyon Landfill Extension, Findings of Fact and Statement of Overriding Considerations, and Conditions of Project Approval, of this document.

Section 4.2.10, Project Consistency with Applicable Plans, p. 4-83, ¶1

Goal 2. Promotes the reduction in single-occupant VTs. Because only 35 employees are associated with proposed landfill operations and 52 employees currently facilitate County landfill operations, the project would not be subject to SCAQMD's Rule 2202 (On-Road Vehicle Emissions Mitigation Options), which requires employers of more than 250 workers at one location to reduce motor vehicles through ridesharing or other programs. ~~However, since projected emissions exceed daily threshold criteria, project-related mitigation measures specify methods to encourage ridesharing and thereby ensure attainment of this goal.~~

Refer to Response 469 (Letter 3.8-17, Wayde Hunter) in Section 3.0, Response to Comments.

Section 4.4.3, Native and Nonnative Tree Resources, City Mitigation Measures p. 4-197, ¶6

- A total of 100 24-inch box and 25 36-inch box size Coast live oak trees shall be planted in areas identified by the City. These trees shall be natural in form. The total mitigation tree count obtained using the 5:1 replacement ratio shall be reduced by 125 trees to account for the inclusion of these larger trees.

Refer to Response 1406 (Letter 3.8-27, North Valley Coalition) in Section 3.0, Response to Comments.

Section 4.13.1, Traffic, Figure 4.13-14, p. 4-365

A revised Figure 4.13-14 (1998 A.M. Peak-Hour Background Traffic Volumes) is included in this section. In the Draft SEIR, Figure 4.13-14 was identical to Figure 4.13-15 (1998 P.M. Peak-Hour Background Traffic Volumes).

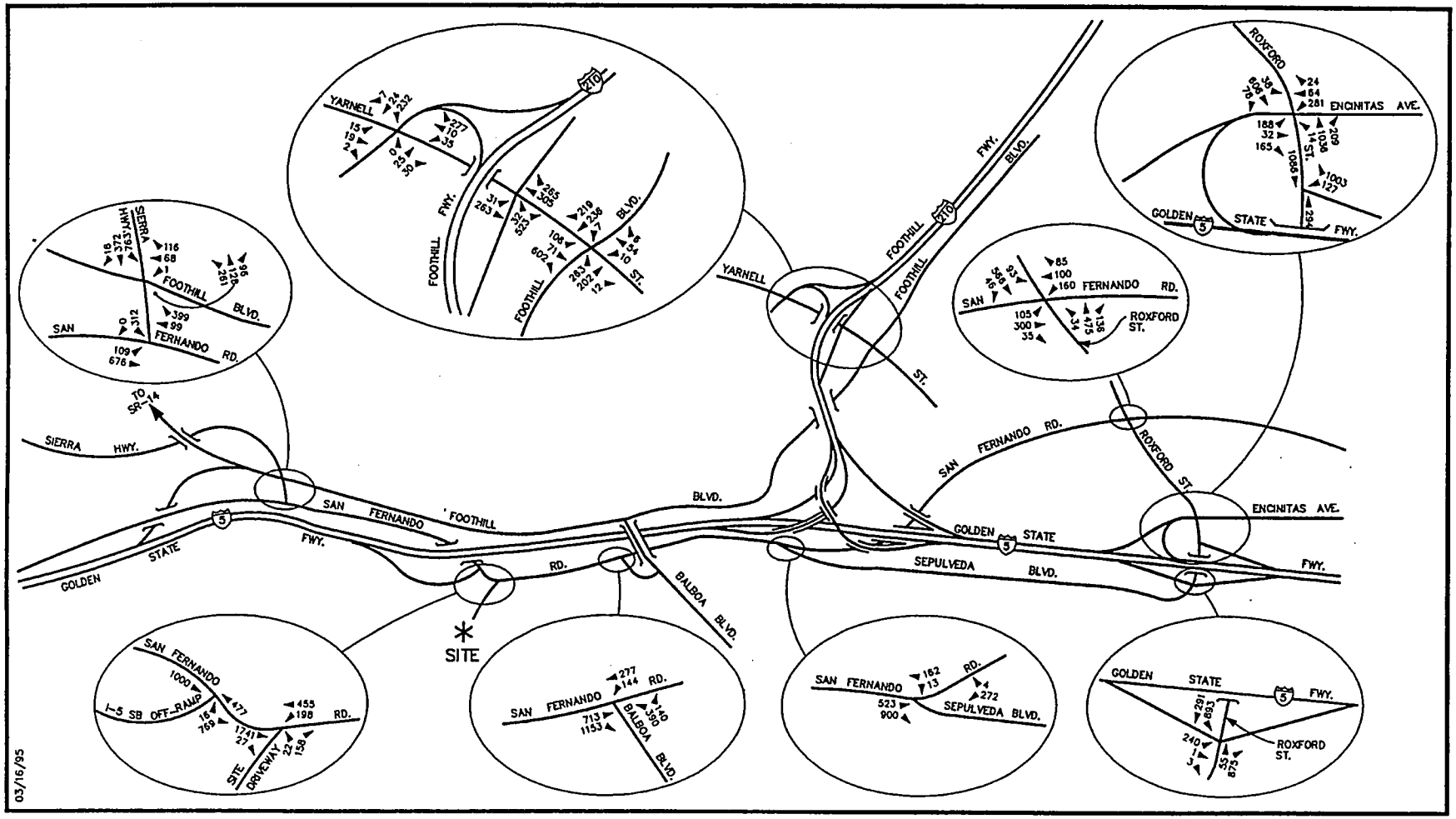
Refer to Response 110 (Letter 3.5-2, Department of Public Works, County of Los Angeles) in Section 3.0, Response to Comments.

Section 4.13.5, Access Roadway in Sunshine Canyon, pg. 4-381, ¶3

. . . The final realignment of the access roadway would parallel the I-5 Freeway as depicted on ~~**Figure 2.5-2**~~ **Figure 2.5-1**.

Section 4.19.2, Paleontological Resources, p. 4-490, ¶6

- The paleontologist shall be retained to perform inspection of the excavation and salvage exposed fossils. Collected fossils shall be curated at a public institution with an educational/research interest in the material. Any curatorial expenses ~~involved in curation~~ shall be ~~incurred~~ borne by the landfill operator.



Not to Scale
Source: Linscott, Law & Greenspan, Engineers

ULTRASYSTEMS ENVIRONMENTAL INCORPORATED

1998 A.M. Peak-Hour Background Traffic Volumes

FIGURE
4.13-14
(Revised)

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2.3 Changes/Revisions/Additional Information

The following changes and revisions are incorporated into this Final SEIR based on comments received on the Draft SEIR by the Lead Agency, Responsible Agencies, and Other Interested Parties.

Section 1.7.1, Unavoidable Significant Adverse Impacts, p. 1-10, ¶6

Air Quality. As defined by the South Coast Air Quality Management District (SCAQMD) CEQA Air Quality Handbook, residual air quality impacts are expected to remain significant for criteria pollutants ~~(i.e., nitrogen oxides [NO_x], reactive organic gases [ROG], and suspended particulate matter [PM_{10}]) due to project implementation. Regional emissions of all criteria pollutants (i.e., carbon monoxide [CO], NO_x, ROG, sulfur oxides [SO_x], and PM_{10}) will decrease by reduced mileage traveled within the South Coast Air Basin. Emission levels for CO and SO_x are projected to remain below their applicable threshold levels. Furthermore, CO emissions are not projected to exceed either State or federal ambient air quality standards or create "hot spots."~~ During construction, emissions for NO_x and PM_{10} would result in an exceedance of the SCAQMD significance thresholds after the incorporation of mitigation measures. Operations would result in exceedances of the CO, NO_x, SO_x, ROG, and PM_{10} criteria and would remain significant after the incorporation of mitigation measures.

Refer to Response 68 (Letter 3.4-4, South Coast Air Quality Management District) in Section 3.0, Response to Comments.

Section 1.9.1, Alternatives Not Evaluated, p. 1-12, ¶6

Mission/Rustic-Sullivan Landfill

Although the Mission/Rustic-Sullivan Landfill was originally mentioned as a proposed new solid waste landfill in the Solid Waste Management Status and Disposal Options in Los Angeles County, City Action Plan, City of Los Angeles Solid Waste Management Plan, Integrated Solid Waste Management System for Los Angeles County, City of Los Angeles Solid Waste Management Policy Plan, County of Los Angeles Source Reduction and Recycling Element, and Los Angeles County Countywide Siting Element, it was not included in the City of Los Angeles Source Reduction and Recycling Element. The City of Los Angeles, Department of Public Works, Bureau of Sanitation has recently stated that "development of these canyons is no longer considered a feasible alternative . . ."[1] In addition, because the Mission/Rustic-Sullivan Canyons are located within the area designated as the Santa Monica Mountains National Recreation Area, which is a unit of the National Park System (Public Law 95-625), the use of these canyons for a landfill site is in conflict with Public Law 98-506. Therefore, these canyons have been removed from further consideration.[2]

Refer to Response 122 (Letter 3.5-3, Department of Public Works, County of Los Angeles) in Section 3.0, Response to Comments.

1/ *Final Supplement to the 1991 Subsequent Environmental Impact Report Lopez Canyon Sanitary Landfill Operation Through 2001*, Volume 1, p. 6-5. April 1995.

2/ *Los Angeles County Countywide Siting Element, Volume I: The Element*, Los Angeles County, Department of Public Works, Environmental Programs Division, p. 7-5. June 1997.

Section 2.3.1, Statistical Information in Connection with Solid Waste Generation and Permitted Capacity within the City of Los Angeles, p. 2-4, ¶4

~~Based on the above data, approximately 5,665,909 tons of solid waste were generated within the City in 1995. The California Department of Finance estimates that approximately 3,593,729 people lived in the City in 1995. Based on the waste generation total of 5,665,909 tons for 1995, approximately 1.58 tons of solid waste/person/year was generated in the City in 1995. This equates to a waste generation per capita of 10.13 pounds/person/day of solid waste generated in the City.~~

The following identifies the quantities and distribution of the portion of the solid waste generated in the City of Los Angeles in 1995 and disposed of at permitted disposal facilities within and outside of Los Angeles County:

Permitted disposal facilities in Los Angeles County:	
Class III landfills	3,627,037 tons
Unclassified landfills	145,239 tons
Transformation facilities	56,525 tons
Permitted disposal facilities outside of Los Angeles County:	
Exports to Riverside County	4,623 tons
Exports to Ventura County	8,630 tons
Total disposed	3,842,054 tons

Based on the 1995 estimated diversion rate of 40.6 percent listed in the above-mentioned section and the disposal quantities cited above, the estimated solid waste generation rate for the City in 1995 was 6,468,104 tons. Based on the estimated City population of 3,593,729, this translates into a per-capita waste generation rate of 1.80 tons of solid waste per person per year in the City.

Refer to Responses 115 and 116 (Letter 3.5-3, Department of Public Works, County of Los Angeles) in Section 3.0, Response to Comments.

Section 2.3.2, Remaining Permitted Landfill Capacity in Los Angeles County, Table 2.3-1, pp. 2-5 and 2-6

A revised Table 2.3-1 (Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in the County of Los Angeles) is included in this section.

Refer to Responses 119 and 120 (Letter 3.5-3, Department of Public Works, County of Los Angeles) in Section 3.0, Response to Comments.

Section 2.3.3, County of Los Angeles Daily Disposal Capacity Projections, p. 2-9, ¶2

For example, and as noted in **Table 2.3-1**, ~~In January 1996~~ as of December 31, 1995, the remaining permitted capacity at all Class III landfills within Los Angeles County was estimated at ~~102.19~~ 102.31 million tons (or ~~187.74~~ 187.92 million cu. yd.). This capacity included the operational County Landfill. Based on the 1995 average disposal rate of 35,800 tpd (6-day week), excluding waste being imported into the County, this capacity is expected to be exhausted in less than 9 years. Additionally, the Los Angeles County Department

Table 2.3-1 (Revised)
REMAINING PERMITTED DISPOSAL CAPACITY OF EXISTING SOLID WASTE DISPOSAL FACILITIES IN THE COUNTY OF LOS ANGELES
~~JANUARY 1996~~ DECEMBER 31, 1995

Landfill Facility	Solid Waste Facility Permit (SWFP)	Facility Location	Operation Days/ Week	~~January 194~~ December 31, 1995 SWFP Daily Capacity (tons)	LUP Daily Capacity (tons)	1995 Average Daily Disposal 6 Days/Week (tons)			Quantity of MSW in 1995 (million tons)			Estimated Remaining Permitted Capacity (Effective ~~Jan. 1996~~ Dec. 1995)		Comments
						Source			Source					
						In-County	Out-of-County	Total	In-County	Out-of-County	Total	Million Tons	Million Cubic Yards [e]	
Class III Landfill Facilities														
Antelope Valley	19-AA-0009	Palmdale	7	1,400 (b)	—	~~548~~ 553	—	~~548~~ 553	0.17	—	0.17	2.13	3.55	Proposed expansion not fully permitted as of ~~1/1/96~~ 1/1/97.
~~Azusa Land Reclamation~~	~~19-AA-0013~~	~~Azusa~~	~~6~~	~~6,000 (b)~~	~~—~~	~~1,188~~ 1,430	~~149~~ 157	~~1,338~~ 1,587	~~0.37~~ 0.45	~~0.04~~ 0.05	~~0.41~~ 0.50	~~3.09~~ 3.00	~~4.41~~ 4.29	~~Class III portion of the landfill only.~~ Closed
~~BKK~~	~~19-AF-0001~~	~~West Covina~~	6	12,000	~~—~~	~~8,748~~ 8,587	~~953~~ 1,206	~~9,701~~ 9,786	~~2.73~~ 2.68	~~0.30~~ 0.38	~~3.03~~ 3.05	2.65	4.42	~~Closure on 9/15/96.~~ Closed
Bradley West	19-AF-0008	Los Angeles	6	7,000	—	~~4,475~~ 4,055	9	~~4,484~~ 4,604	~~1.40~~ 1.27	0.003	~~1.40~~ 1.27	~~7.51~~ 7.64	~~10.72~~ 10.91	LUP expires 4/13/2007.[c]
Brand Park	19-AA-0006	Glendale	5	102	—..	~~22~~ 28	—	~~22~~ 28	~~0.0068~~ 0.009	—	~~0.01~~ 0.009	0.59	0.99	Limited to City of Glendale Dept. of Public Works use only.
Burbank	19-AA-0040	Burbank	5	240	—	~~134~~ 132	—	~~134~~ 132	~~0.04~~ 0.041	—	~~0.04~~ 0.041	6.36	10.60	Limited to City's use only.
Calabasas	19-AA-0056	Unincorporated	6	3,500	—	~~2,017~~ 1,833	~~317~~ 326	~~2,334~~ 2,159	~~0.63~~ 0.57	~~0.099~~ 0.10	~~0.73~~ 0.67	~~15.00~~ 15.06	~~30.00~~ 30.12	Limited to the Calabasas wasteshed only.
Chiquita Canyon	19-AA-0052	Unincorporated	7	5,000	—	~~1,337~~ 1,236	~~151~~ 153	~~1,489~~ 1,389	~~0.42~~ 0.39	~~0.047~~ 0.048	~~0.46~~ 0.43	~~1.85~~ 1.88[d]	~~2.74~~ 2.78	~~LUP expires 11/24/97.[d]~~ LUP expires 2019[d]
Lancaster	19-AA-0050	Lancaster	6	1,000	—	~~338~~ 328	~~258~~ 264	~~596~~ 593	~~0.11~~ 0.10	~~0.08~~ 0.083	~~0.19~~ 0.18	0.47	0.69	Approximate closure date 4/98.
~~Lopez Canyon~~	~~19-AA-0820~~	~~Los Angeles~~	~~5~~	~~4,000~~	~~4,000~~	~~3,027~~ 2,968	~~—~~	~~3,027~~ 2,968	~~0.91~~ 0.98	~~—~~	~~0.91~~ 0.93	~~0.02~~	~~0.03~~	~~Closure on 7/1/96.~~ Closed
Pebbly Beach	19-AA-0061	Unincorporated	6	33	—	~~13~~ 8	—	~~13~~ 8	~~0.004~~ 0.003	—	~~0.004~~ 0.003	~~0.04~~ 0.042	~~0.06~~ 0.07	~~Summer time capacity~~ Facility annual average capacity is ~~30~~ 49 tpd.
Puente Hills	19-AA-0053	Unincorporated	6	13,200	13,200	~~10,334~~ 10,150	7	~~10,341~~ 10,157	~~3.22~~ 3.17	0.002	~~3.23~~ 3.17	29.33	62.40	LUP limits to 72,000 tons per week. LUP expires 11/01/2003. No wastes from City of Los Angeles or Orange County.

Table 2.3-1 (Revised - Cont.)
REMAINING PERMITTED DISPOSAL CAPACITY OF EXISTING SOLID WASTE DISPOSAL FACILITIES IN THE COUNTY OF LOS ANGELES
~~JANUARY 1996~~ DECEMBER 31, 1995

Landfill Facility	Solid Waste Facility Permit (SWFP)	Facility Location	Operation Days/ Week	~~January '94~~ December 31, 1995 SWFP Daily Capacity (tons)	LUP Daily Capacity (tons)	1995 Average Daily Disposal 6 Days/Week (tons)			Quantity of MSW in 1995 (million tons)			Estimated Remaining Permitted Capacity (Effective ~~Jan. 1996~~ Dec. 1995)		Comments
						Source			Source					
						In-County	Out-of-County	Total	In-County	Out-of-County	Total	Million Tons	Million Cubic Yards [a]	
San Clemente	19-AA-0063	Unincorporated	2	1.5	—	2	—	2	~~0.0007~~ 0.0006	—	~~0.0007~~ 0.0006	0.048	0.38	Landfill owned and operated by the U.S. Navy.
Scholl Canyon	19-AA-0012	Glendale	6	3,400	—	~~1,487~~ 1,448	0.39	~~1,487~~ 1,448	~~0.46~~ 0.45	0.0001	~~0.4641~~ 0.45	~~10.90~~ 10.91	~~22.71~~ 22.73	Limited to the Scholl Canyon wasteshed only.
Spadra	19-AA-0015	Unincorporated/ Pomona	6	3,700	—	~~1,994~~ 2,064	~~130~~ 158	~~2,124~~ 2,222	~~0.62~~ 0.64	~~0.040~~ 0.049	~~0.6626~~ 0.69	~~2.15~~ 2.12	~~5.08~~ 5.00	LUP limits to 15,000 tons per week. No wastes from City of Los Angeles or Orange County.[e]
Sunshine Canyon	19-AA0853	Unincorporated	6	6,600	6,600	—	—	—	—	—	—	16.90	23.72	~~Not operational as of 1/1/96.~~ Facility began accepting waste for disposal on ~~opening date~~ 8/5/96.[f]
Two Harbors	19-AA-0062	Unincorporated	5	—	—	~~0.54~~ 0.35	—	~~0.54~~ 0.35	~~0.0002~~ 0.0001	—	~~0.0002~~ 0.0001	—	—	Facility closed ~~9/30/96~~ 9/30/95.
Whittier (Savage Canyon)	19-AH-0001	Whittier	6	350	—	~~228.85~~ 232	—	~~229~~ 232	0.0724	—	~~0.0714~~ 0.072	2.66	4.44	Limited to the City of Whittier use only.
Total				67,527		~~35,793~~ 35,048	~~1,966~~ 2,281	~~37,758~~ 37,328	~~11.17~~ 10.93	~~0.61~~ 0.71	~~11.78~~ 11.68	~~102.19~~ 102.31	~~187.74~~ 187.92	

Source: Los Angeles County Department of Public Works, ~~Solid Waste Management Division~~ Environmental Programs Division, ~~January 1996~~ *Los Angeles Countywide Siting Element, Volume I: The Element,* Table 4-3. June 1997.

Notes:
1. Disposal quantities are based on actual tonnages reported by landfill owners/operators to the DPW as part of monthly monitoring reports and/or solid waste management fee invoice payments and a written survey conducted by the DPW.
2. Estimated remaining permitted capacity based on landfill owner/operator responses to a written survey conducted by the DPW, ~~in January 1996~~, as well as a review of site-specific permit criteria established by local land use agencies, LEAs, LARWQCB, and SCAQMD.

Footnotes:
(a) Conversion factor based on in-place solid waste density, if provided by landfill operators; otherwise, a conversion factor of 1,200 pounds/cu. yd. was used.
(b) ~~Permitted capacity of 6,500 tpd consists of 6,000 tpd of refuse and 500 tpd of inert waste. Refuse disposal is limited to the Class III portion of the landfill.~~ Antelope Valley Landfill's daily capacity of 1,400 tpd is based on the SWFP issued on 12/26/95.
(c) The Bradley West Landfill is anticipated to reach capacity in the year 2000, as stated in the revised SWFP 19-AR-0008, Bradley West Landfill and West Extension, p. 1, August 13, 1996.
(d) ~~The Chiquita Canyon Landfill has been approved a anticipated capacity expansion of 23 million tons, extending the life of the landfill operation until the year 2019.~~ The Chiquita Canyon Landfill has recently obtained a land use permit that provides for an anticipated disposal capacity of 23 million tons.
(e) The Spadra Landfill is anticipated to close in 1999 as stated in the *Preliminary Draft County Countywide Siting Element*, p. 3-32, January 1996.
(f) The Sunshine Canyon Landfill (County) is anticipated to reach capacity in 2006, based on landfill operations in the current footprint area.
(g) ~~Based on SWFP limit of 2,800 tons per week, expressed as a daily average, 6 days/week.~~

Table 2.3-1 (Revised - Cont.)
REMAINING PERMITTED DISPOSAL CAPACITY OF EXISTING SOLID WASTE DISPOSAL FACILITIES IN THE COUNTY OF LOS ANGELES
~~JANUARY 1996~~ DECEMBER 31, 1995

~~(h) Based on SWFP limit of 471,000 tons per year, expressed as a daily average, 6 days/week.~~

Abbreviations:

LARWQCB	Los Angeles Regional Water Quality Control Board
DPW	Los Angeles County Department of Public Works
LEA	Local Enforcement Agency
LUP	Land Use Permit
MSW	Municipal Solid Waste
SCAQMD	South Coast Air Quality Management District
SWFP	Solid Waste Facilities Permit
tpd-6	Tons per day, 6 days/week
	Denotes closed landfill facilities (i.e., Azusa, BKK, and Lopez Canyon Landfills)

of Public Works stated that the remaining combined permitted disposal capacity of all Class III landfills in Los Angeles County is estimated at approximately 86 million tons as of July 1, 1997.

Refer to Response 121 (Letter 3.5-3, Department of Public Works, County of Los Angeles) in Section 3.0, Response to Comments.

Section 2.6.3, City/County Landfill Design, p. 2-45, ¶5

... At the end of each working day, the final daily slopes would be graded to 3H:1V, and ~~9~~ 6 inches of clean, compacted daily cover material or approved alternative daily cover would be placed over the disposed refuse.

Refer to Response 84 (Letter 3.4-5, Metropolitan Water District of Southern California) in Section 3.0, Response to Comments.

Section 2.6.3 City/County Landfill Design, p. 2-50, ¶5

... When operational, it is anticipated that this same canyon area would be used as a stockpile area for the proposed City/County Landfill, until landfill footprint development occurs in this area. Once development occurs, the stockpiled area would be moved northwest to the anticipated northwest canyon stockpile area ~~or along flat deck areas of the existing landfill~~. For the existing north canyon stockpile area, ~~This area can accommodate stockpiled material, for example~~ an extensive dual line subgrade drainage system was installed. This system includes dual, perforated high-density polyethylene (i.e., plastic), drainage lines, surrounded by an aggregate drainage blanket and geotextile filter fabric. The subgrade drainage system was installed within a collector trench along the lowest point of the canyon area, prior to stockpile placement.

A similar subgrade drainage system would be installed for the anticipated northwest canyon stockpile area, prior to stockpile placement

Refer to Response 5 (Letter 3.3-1, California Integrated Waste Management Board) in Section 3.0, Response to Comments.

Section 2.7.4, Leachate Collection and Removal System, Figure 2.7-3, p. 2-59

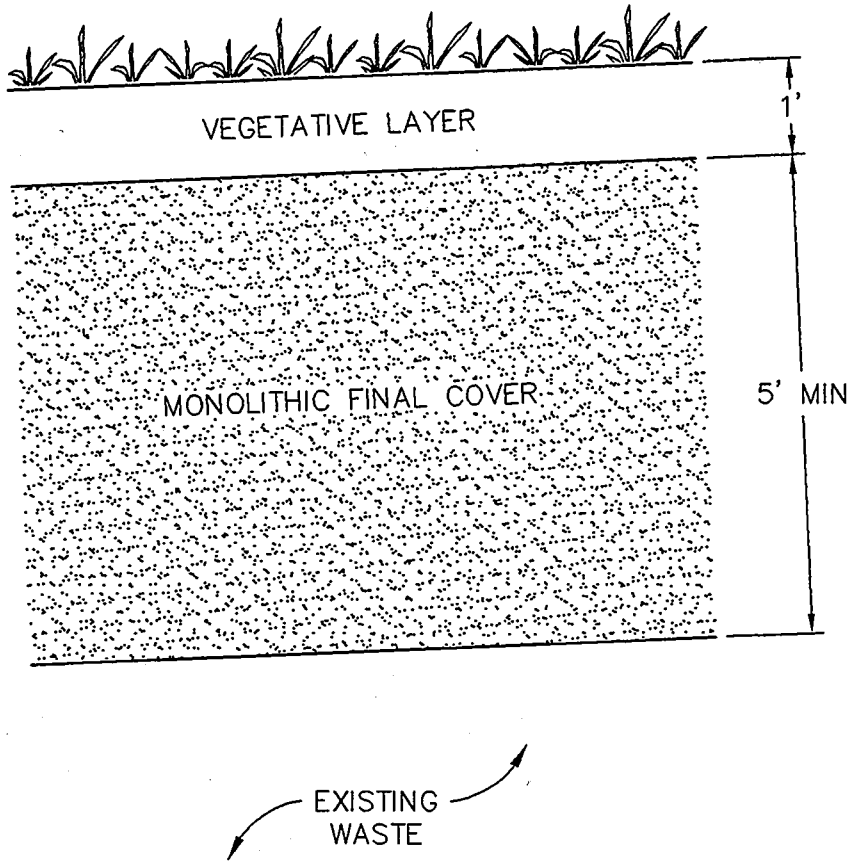
Figure 2.7-3 (Preferred Waste-on-Waste Liner) has been revised as Figures 2.7-3a (Monolithic Cover for Sunshine Canyon City Landfill Closure) and 2.7-3b (Preferred Waste-on-Waste Liner and Recompacted Monolithic Final Cover) to reflect the proposed monolithic final cover and the waste-on-waste liner.

Refer to Responses 198, 199, and 201 (Letter 3.6-6, Environmental Affairs Department, City of Los Angeles) in Section 3.0, Response to Comments.

Section 2.7.7, Landfill Gas Collection and Flaring System, p. 2-66, ¶6

... One probe per 1,000 ~~sq. ft.~~ feet (305 meters) of landfill perimeter is proposed to be installed in locations of greatest concern.

Refer to Response 196 (Letter 3.6-6, Environmental Affairs Department, City of Los Angeles) in Section 3.0, Response to Comments.

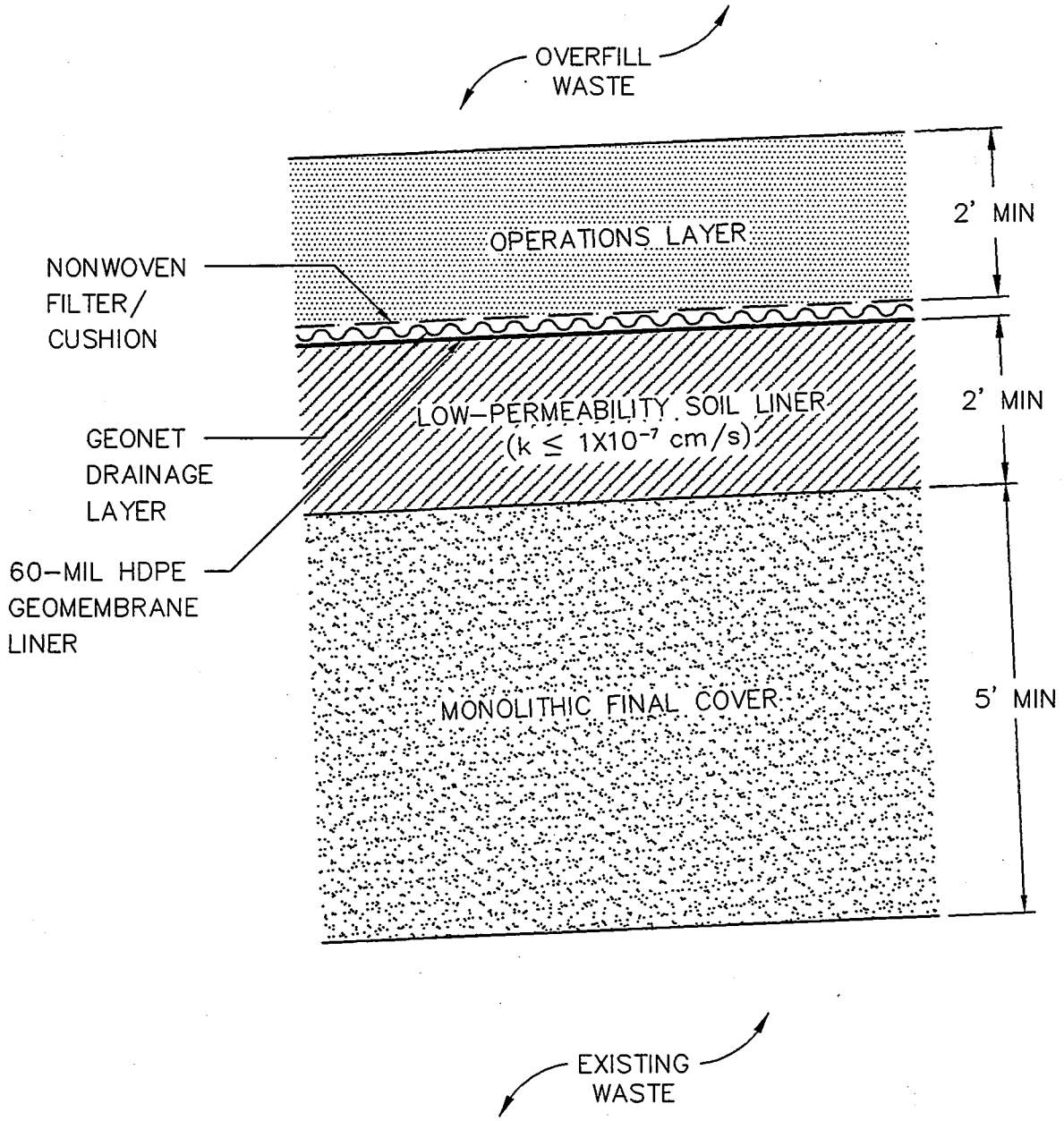


GeoSyntec Consultants

MONOLITHIC FINAL COVER FOR
SUNSHINE CANYON CITY LANDFILL CLOSURE
SUNSHINE CANYON LANDFILL
SYLMAR, CALIFORNIA

FIGURE NO.	2.7-3a (REVISED)
PROJECT NO.	HL0178-62-1
DATE:	6 MAY 1998

DWG: 0178F002.DWG 19980602143 LP



GeoSyntec Consultants

PREFERRED WASTE ON WASTE LINER AND RECOMPACTED MONOLITHIC FINAL COVER SUNSHINE CANYON LANDFILL SYLMAR, CALIFORNIA	FIGURE NO. 2.7-3b (REVISED)
	PROJECT NO. HL0178-62-1
	DATE: 6 MAY 1998

DWG: 0178F002.DWG 19980602143 LP

Section 2.7.8, Groundwater Protection, p. 2-70, ¶1

- deposited waste would be compacted and then covered daily with approximately ~~9~~ 6 inches of ~~loose~~, clean, compacted soil or approved alternative daily cover;

Refer to Response 84 (Letter 3.4-5, Metropolitan Water District of Southern California) in Section 3.0, Response to Comments.

Section 2.10.3, Unloading Waste Materials at the Landfill Working Face, p. 2-74, ¶8

During the unloading process, onsite landfill personnel (or landfill spotters) would observe the waste-hauling vehicles to ensure that safe disposal occurs. A load check program will be required as part of the City's solid waste facility permit (SWFP) and monitored by the onsite designated Local Enforcement Agency (LEA). Random loads would be periodically inspected by landfill personnel ~~and the onsite designated LEA~~ to prevent the unauthorized disposal of hazardous wastes.

Refer to Response 203 (Letter 3.6-6, Environmental Affairs Department, City of Los Angeles) in Section 3.0, Response to Comments.

Section 2.10.4, Spreading and Compacting Daily Cover on Refuse, p. 2-75, ¶4

All solid waste deposited in the proposed landfill footprint would be compacted and then covered on a daily basis with ~~approximately~~ ~~9~~ 6 inches ~~(exceeding the State minimum requirement of 6 inches)~~ of ~~loose~~, clean, compacted onsite soil or approved alternative daily cover ~~that would be spread and applied over the top of each cell~~.

Refer to Response 84 (Letter 3.4-5, Metropolitan Water District of Southern California) in Section 3.0, Response to Comments.

Section 2.11.3, Vector and Bird Control Measures, p. 2-84, ¶2

. . . All waste materials brought to the site would be unloaded at the active working face of the landfill, compacted, and covered with at least ~~9~~ 6 inches of clean, compacted soil or approved alternative daily cover by the end of the working day.

Refer to Response 84 (Letter 3.4-5, Metropolitan Water District of Southern California) in Section 3.0, Response to Comments.

Section 3.1.3, Air Quality, p. 3-2, ¶1

The project site is located in the County of Los Angeles within the South Coast Air Basin (SCAB). The SCAB is a 6,600-square-mile area that encompasses Los Angeles County, Orange County, Riverside County, and the western portion of San Bernardino County. ~~The entire SCAB is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD).~~ The South Coast Air Quality Management District's (SCAQMD) area of jurisdiction includes the four-county SCAB (e.g., Orange County and the nondesert portions of Los Angeles, Riverside, and San Bernardino Counties) and the Riverside County portions of the Salton Sea Air Basin (SSAB). The SCAB presently exceeds State and federal standards for ~~lead~~, carbon

monoxide, nitrogen dioxide, ozone, and particulate matter less than 10 microns in diameter (~~Pb~~, CO, NO_2, O_3, and PM_{10}, respectively).

Refer to Responses 56 and 57 (Letter 3.4-4, South Coast Air Quality Management District) in Section 3.0, Response to Comments.

Section 4.1.1, Grading Activities, Figure 4.1-1, p. 4-5

This figure has been revised to delete the previously proposed stockpile area on the top deck of the existing inactive City Landfill.

Refer to Response 5 (Letter 3.3-1, California Integrated Waste Management Board) in Section 3.0, Response to Comments.

Section 4.1.2, Geologic Hazards - Mudflow and Landslide, including Lithologic History, Figure 4.1-4, p. 4-17

The legend on Figure 4.1-4 (Site Geologic Map) has been revised to distinguish the represented geologic features with bolder and/or dashed-line symbols for the "Contact" and "Fault" designations. The "Mappable Bed within Mappable Units" designation has been removed. All other legend symbols and descriptions remain the same.

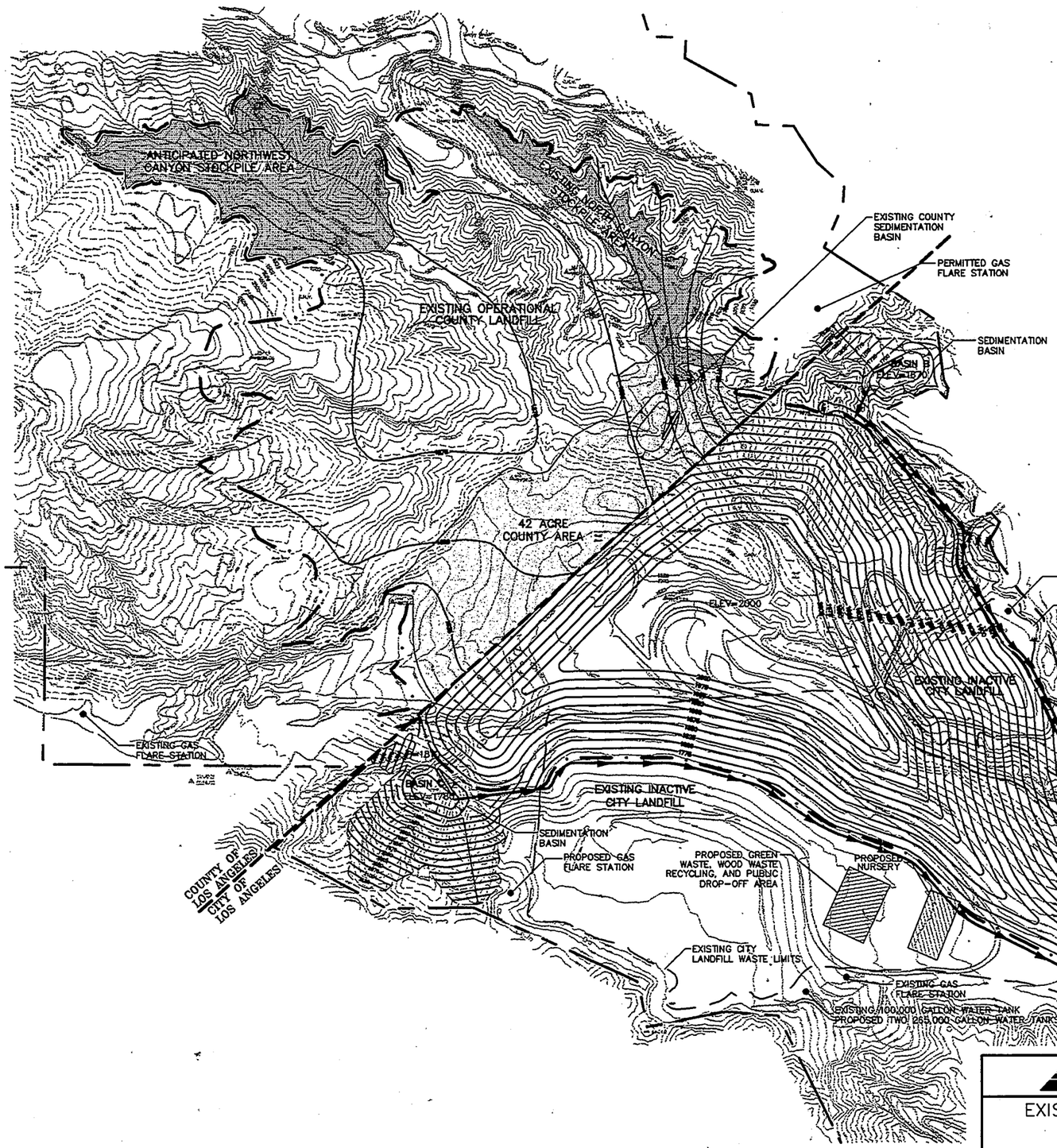
Refer to Response 358 (Letter 3.8-17, Wayde Hunter) in Section 3.0, Response to Comments.

Section 4.2, Air Quality

Revisions to Section 4.2, Air Quality are presented in Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality.

Several components of the air quality analyses in Section 4.2, Air Quality of the Draft SEIR have been revised to incorporate comments received by the SCAQMD, County LEA, and LAUSD. Many of the comments resulted in more refined emissions estimates and modeled impacts than shown in the Draft SEIR. Section 4.2, Air Quality, of the Draft SEIR has now been revised to incorporate these changes in one location, rather than simply reporting the revised estimates in the responses to comments. This information is incorporated into this Final SEIR as Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality.

Since the Draft SEIR was prepared, certain reference documents and analytical tools relied upon to conduct the air quality analyses have been updated. Specifically, the Draft SEIR circulated for public comment in July 1997 used a standard reference document (AP-42) to calculate emissions from certain operational and construction activities and to quantify the effectiveness of some mitigation measures. The 1985 version of AP-42 was used to calculate exhaust and fugitive dust emissions. However, AP-42 was updated in 1995. This version reflects more refined emission factors for fugitive dust emissions. (The exhaust emission factors in AP-42 have not yet been updated.) In the revised air quality analyses, the construction and operational emissions have been updated to reflect the new emission factors in the 1995 version of AP-42. This has resulted in an increase in emissions from some sources and in other cases estimates were reduced. For example, the emission factor for dust from vehicles driving over paved roads was reduced, and as a result, the estimate of PM_{10} emissions dropped substantially.



LEGEND

- 1800 — EXISTING GROUND ELEVATION
- 1800 — PROPOSED GRADE
- PROJECT SITE BOUNDARY LINE
- CITY/COUNTY LINE
- PROPOSED DRAINAGE CHANNEL
- EXISTING CITY LANDFILL WASTE LIMITS
- PROPOSED EDGE OF WASTE

800 0 800 1600

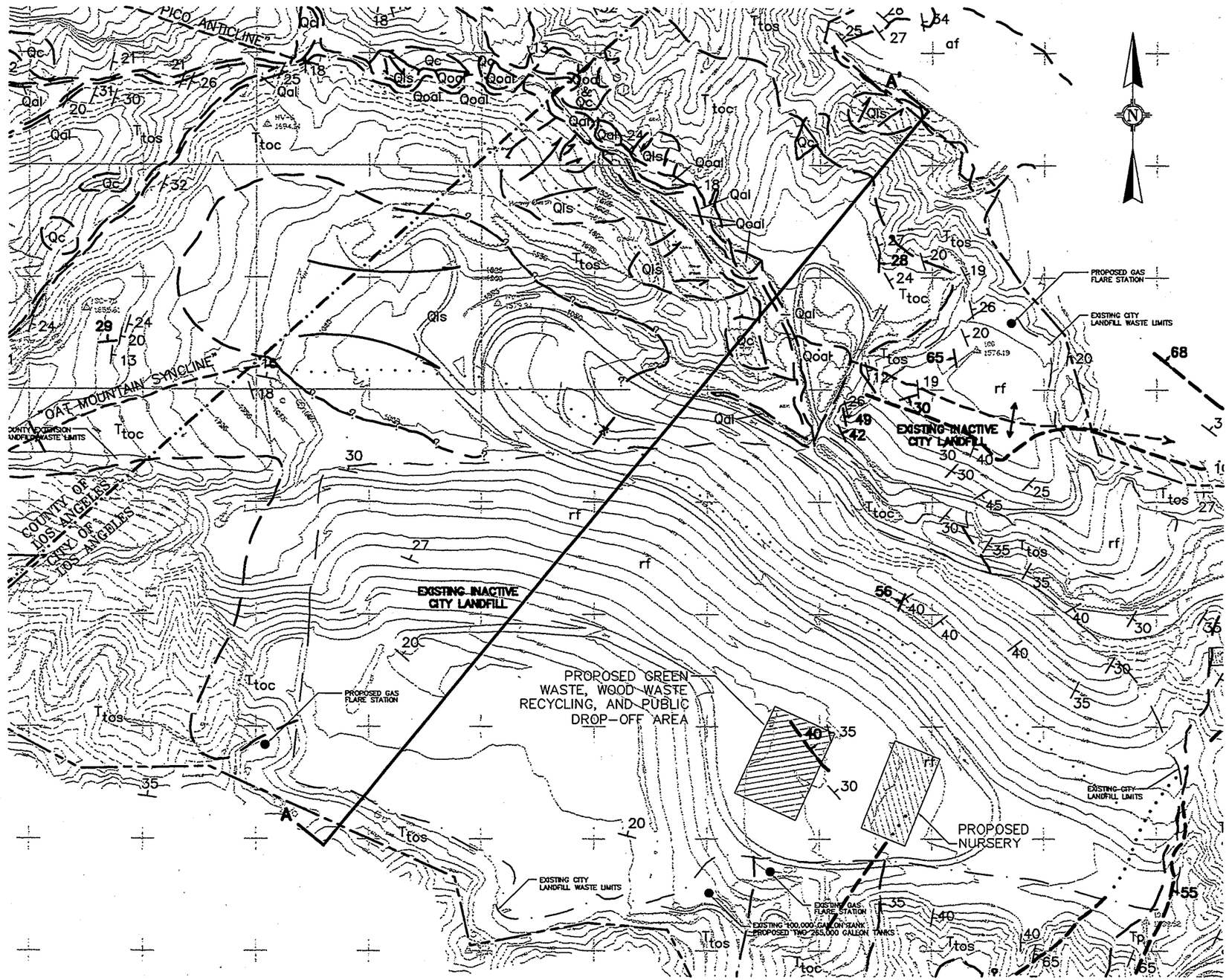
SCALE IN FEET

GeoSyntec Consultants

EXISTING AND ANTICIPATED SOILS STOCKPILE AREAS
SUNSHINE CANYON CITY/COUNTY LANDFILL
SYLMAR, CALIFORNIA

FIGURE NO. **4.1-1 (REVISED)**
PROJECT NO. HL0178-62-1
DATE: 15 JUNE 1998

DWG: 0178F009.DWG 199806151512 RCG



LEGEND

- rf — Refuse Fill
- af — Artificial Fill
  af is artificial cut and fill
- Qal — Recent Quaternary Alluvium
  Qal is Recent alluvial gravel, sand, and clay
- Qoal — Older Quaternary Alluvium
  Qoal is older alluvial gravel, sand, and clay
- Qc — Quaternary Colluvium
  Qc is loose, weathered material transported by gravity
- Qls — Quaternary Landslide material
- Tsr — Tertiary Saugus Formation (Sunshine Canyon Member)
- Tp — Tertiary Pico Formation
- Ttos / Ttoc — Tertiary Towsley Formation
  Ttos: light gray to tan coherent to semi-friable sandstone, medium grained to local gritty and pebbly, bedded; includes minor micaceous siltstone
  Ttoc: gray micaceous silty claystone; minor sandstone
- Geologic Contact, queried where not certain
- Fault, dotted where concealed
- Anticline, dotted where concealed
- Syncline, dotted where concealed
- Existing City Landfill Waste Limits
- 15 — Attitude of shear, showing plunge
- 30 — Strike and Dip of Bedding
- 1600 — Existing Ground Elevation (1996)
- City/County Line
- Property Boundary
- A — A' Cross Section Location
- Landslide — Arrows indicate direction of movement
- Landslide — "Queried where not certain"

500 250 0 500 1000
SCALE IN FEET

SOURCES:

1. Purcell, Rhodes & Associates (PRA), 1987, Report of Waste Discharge, Sunshine Canyon Sanitary Landfill, Sylmar California, April 14, pp. 22–26 and Figures 8 and 9 (used to refine geologic interpretation shown in Figure 4.1–5 of this report).
2. Dibblee, Thomas W., Jr, 1992, Geologic Map Of the Oat Mountain and Canoga Park (North 1/2) Quadrangles, Map No. DF–36, The Dibblee Geological Foundation, Santa Barbara, California, (used to enhance geologic interpretation).

GeoSyntec Consultants

SITE GEOLOGIC MAP
SUNSHINE CANYON CITY/COUNTY LANDFILL
SYLMAR, CALIFORNIA

FIGURE NO. **4.1–4 (REVISED)**
PROJECT NO. CE4085–25
DATE: JUNE–30–1997

DWG: 4085F744.DWG 199801281303 LP

In addition, the Draft SEIR used the SCREEN 2 model to perform the Health Risk Analysis for the flares and EMFAC7ED to model vehicle emissions. The SCAQMD in its comments recommended the use of the ISCST3 model and the 1998 version of EMFAC7G. Additional modeling studies were run using the suggested models and the results are included in Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality; and Appendix D3, Revisions to Draft SEIR, Appendix B6, Low-Level Health Risk Assessment in this document.

Landfill gas generation and gas composition rates have been revised to reflect current conditions at the project site. In regard to gas generation rates, the County FEIR used projections based on eight flares and gas composition characteristics typical of landfills in general. Based on experience gained from the gas collection system at the existing inactive City Landfill and the County Landfill, gas generation from the proposed project is now expected to be substantially lower than originally projected. Accordingly, the project proponent anticipates only five flares will be required to flare gas generated for the entire City/ County Landfill. (These will include the existing flare at the existing inactive City Landfill, two flares at the County Landfill [one now in operation and one permitted but not constructed] and two new flares associated with the proposed project.) The information on gas composition was also updated to reflect onsite data from the gas flared by the two flares already in operation. The revised modeling study now uses the maximum permitted capacity of five flares for the worst-case analysis and onsite gas composition data. As a result, emissions estimates from the flares have increased and SO_x emissions now exceed the SCAQMD's CEQA significance threshold. These results are included in Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality; and Appendix D3, Revisions to Draft SEIR, Appendix B6, Low-Level Health Risk Assessment of this document.

The revisions to Section 4.2, Air Quality, of the Draft SEIR do not identify any new emission sources or contaminants. These revisions provide a more accurate estimate of emissions from landfill construction and operation, and impact on air quality relating to the comments made by the SCAQMD, County LEA, and the LAUSD.

Refer to Responses 63 and 70 (Letter 3.4-4, SCAQMD), 97 (Letter 3.5.1, Department of Health Services County of Los Angeles), and 252 and 257 (Letter 3.8-1, Los Angeles Unified School District) in Section 3.0, Response to Comments.

Section 4.3.2, Groundwater, p. 4-125, ¶5

In addition to groundwater monitoring wells, the vadose zone is also monitored. This zone is defined as the area below the landfill and above groundwater where water may be present or suspended in the weathered bedrock or soil. The presence or absence of this water ~~is~~ has historically been monitored at the existing inactive City Landfill through the use of lysimeters, which are special ~~wells~~ monitoring points designed to permit the ~~measurement~~ collection of water that may be in the pores of the soil or weathered bedrock above the groundwater zone. These monitoring points are shown on Figure 4.3-4 in the Draft SEIR. ~~These wells provide monitoring of the alluvial deposits to detect seasonal flow within Sunshine Canyon.~~

For the proposed City/County Landfill, lysimeters will not be installed as part of the landfill's groundwater monitoring network. Instead, the vadose or unsaturated zone monitoring will be monitored through the gravel subdrain, which is constructed beneath the liner system. Continuous monitoring of the subdrain system will detect the migration of constituents beneath the liner system in a more comprehensive manner than using lysimeters.

Refer to Response 631 (Letter 3.8-19, Anne Ziliak) in Section 3.0, Response to Comments.

Section 4.3.2, Groundwater, p. 4-125, ¶6

Currently, vadose zone monitoring is accomplished by ~~five~~ four lysimeters that have been installed ~~within Sunshine Canyon~~ in the vadose zone at the existing inactive City Landfill. Quarterly monitoring ~~results~~ records (since lysimeter installation) have indicated that no liquid ~~or moisture is present~~ can generally be collected from the lysimeters. ~~Considering the historical lack of recovery of moisture, it appears that areas of the canyon remain unsaturated year round because the lysimeters have never yielded sufficient volumes of soil moisture for sampling and analysis.~~ Monitoring of the vadose zone is also conducted using a series of gas sampling probes installed around the waste mass. These probes are monitored on a monthly basis for the presence of methane, as required by the SCAQMD. One sample is collected in one of the probes exhibiting the highest methane concentration, as required by the SCAQMD. Monitoring at the County Landfill is accomplished by sampling the underdrain system outfall points instead of lysimeters. For both areas, sampling is performed quarterly and findings are reported to the LARWQCB. This would also occur for the proposed City/County Landfill.

Refer to Response 631 (Letter 3.8-19, Anne Ziliak) in Section 3.0, Response to Comments.

Section 4.3.2, Groundwater, p. 4-132, ¶2

Unsaturated Zone Monitoring Program (UZMP). Under this program the unsaturated zone is monitored to detect waste constituents that may escape from the waste management unit prior to reaching groundwater. ~~The UZMP consists of installing lysimeters within the vadose zone.~~ Monitoring the vadose zone for the proposed City/County Landfill would be accomplished by sampling the underdrain system outfall points and installing and sampling multi depth vadose zone gas monitoring probes. Sampling would be performed quarterly with findings reported to the LARWQCB.

Refer to Response 631 (Letter 3.8-19, Anne Ziliak) in Section 3.0, Response to Comments.

Section 4.9.1, Hazardous Materials, p. 4-293, ¶2

~~Similar to the program that is currently used at the County Landfill, i~~It is anticipated that of the total amount of incoming solid waste brought to the landfill each day, ~~one waste~~ 1.5 load checks per 1,000 tons of solid waste would be unloaded in a segregated (isolated) area of the landfill site for visual inspection.

Refer to Response 222 (Letter 3.6-6, Environmental Affairs Department, City of Los Angeles) in Section 3.0, Response to Comments.

Section 4.9.1, Hazardous Materials, p. 4-293, ¶3

. . . In addition, the supervisor would call the California Environmental Protection Agency (Cal-EPA), Department of Toxic Substances Control (DTSC), and the Los Angeles County Fire Department, Health Hazardous Materials Unit to correctly identify the material and, if necessary, take preventative steps to guarantee the highest level of safety.

Refer to Response 220 (Letter 3.6-6, Environmental Affairs Department, City of Los Angeles) in Section 3.0, Response to Comments.

Section 4.9.1, Hazardous Materials, p. 4-296, ¶5

Buildout of residential projects would increase the amount of solid waste generated, thereby increasing the amount of ~~HWW~~ HHW inadvertently disposed of in the solid waste stream. The implementation of both the City and County-designated ~~HWW~~ HHW collection programs would reduce the amount of HHW disposed within the municipal waste stream. No cumulative impacts are anticipated after the implementation of mitigation measures at the proposed City/County Landfill Project and the incorporation of City and Countywide programs designed to provide for the safe management, storage, collection, and disposal of hazardous wastes and jurisdictional programs designed to ensure the proper collection, recycling, and disposal of ~~HWW~~ HHW.

Refer to Response 221 (Letter 3.6-6, Environmental Affairs Department, City of Los Angeles) in Section 3.0, Response to Comments.

Section 4.9.1, Hazardous Materials, p. 4-297, ¶5

- The landfill operator shall implement a hazardous waste load-checking program. This program shall include inspecting random loads for hazardous wastes in a segregated area of the landfill, and landfill employees shall scan waste materials as they are being unloaded at the active working face. Hazardous waste load checks at the proposed City/County Landfill will be 1.5 load checks per 1,000 tons of solid waste received at the landfill for the first year of operation. However, after the first year of operation, BFI may request that the City LEA decrease the required load checking frequency to one load check per 1,000 tons of waste received at the City/County Landfill.

Refer to Response 222 (Letter 3.6-6, Environmental Affairs Department, City of Los Angeles) in Section 3.0, Response to Comments.

Section 4.9.1, Hazardous Materials, p. 4-297, ¶6

- If hazardous waste materials are discovered, emergency response shall include worker identification and notification procedures, cordoning off the area, and notifying Cal-EPA, DTSC, ~~for hazardous waste identification.~~ Once hazardous waste is identified, the material shall be removed, containerized, and temporarily stored onsite, if safe to handle. In the unlikely event that acutely hazardous material is discovered, the immediate area will be evacuated, and a qualified hazardous waste hauler shall be contacted for immediate collection and disposal of the material at a permitted Class I hazardous waste landfill. After any such incident, all necessary reports shall be completed and filed by the landfill operator with the following agencies: City of Los Angeles Police Department, County of Los Angeles Office of the District Attorney, Environmental Crimes Unit, City of Los Angeles Fire Department, City of Los Angeles Department of Environmental Affairs, and the LARWQCB.

Refer to Response 223 (Letter 3.6-6, Environmental Affairs Department, City of Los Angeles) in Section 3.0, Response to Comments.

Section 4.9.2, Vectors, p. 4-299, ¶6

. . . Similar to the existing County Landfill vector control practices, all waste materials brought to the site would be unloaded at an active working face area, compacted, and covered with at least ~~9~~ 6 inches of clean, compacted soil or approved alternative daily cover by the end of the working day.

Refer to Response 84 (Letter 3.4-5, Metropolitan Water District of Southern California) in Section 3.0, Response to Comments.

Section 4.9.3, Litter, p. 4-305, ¶2

- The landfill site shall be operated to minimize litter generation through implementation of the following measures: compaction of waste at the working face (i.e., 1,400 pounds of compaction per cu. yd.) ~~periodic application of cover material during the day and at the end of the working day~~, waste materials covered with at least 6 inches of clean, compacted soil or approved alternative daily cover by the end of the working day;~~,~~ and maintenance of the active working face areas as small as safely possible given the type and quantity of landfill equipment.

Refer to Response 226 (Letter 3.6-6, Environmental Affairs Department, City of Los Angeles) in Section 3.0, Response to Comments.

Section 4.9.5, Human Health, p. 4-317, ¶3

- A citizen's advisory committee shall be established, if deemed necessary by the City Council or Planning Commission through a project condition, to address area resident health concerns about the existing inactive and proposed City/County Landfill Project. The committee's mandate shall include discussions with appropriate technical experts and regulatory agencies responsible for the on- and offsite monitoring activities at the project site. The advisory committee would be responsible for presenting information and discussions of these regulatory agency members back to area residents through planned informational meetings.

Refer to Response 917 (Letter 3.8-24, LASER) in Section 3.0, Response to Comments.

Section 4.13.1, Traffic, Table 4.13-9, p. 4-372

A revised Table 4.13-9 (Project-Specific Mitigation Measures) is presented in this section to include mitigation measures and corrections identified by LADOT.

Refer to Responses 138 through 147 (Letter 3.6-4, Department of Transportation, City of Los Angeles) in Section 3.0, Response to Comments.

Table 4.13-9 (Revised)
PROJECT-SPECIFIC MITIGATION MEASURES

No.	Key Intersection	Mitigation Measure
1	Roxford Street at the I-5 Freeway (SB ramp)	Restripe ~~SB~~ WB approach on Roxford Street to provide dual left-turn lanes and one through lane.
2	Roxford Street at the Encinitas/ I-5 Freeway (NB ramp)	Restripe ~~WB through lane~~ NB approach on Encinitas Avenue to ~~left/through option lane~~ provide left-turn lane, shared through/ left-turn lane, and shared through/right-turn lane.
6	San Fernando Road at Balboa Boulevard	This key intersection features two through lanes in each direction on San Fernando Road and two NB approach lanes, striped as an exclusive left-turn lane and an option left-right turn lane, provided on Balboa connector. A separate WB left-turn lane as well as protected left-turn phasing is provided. Existing pavement widths and physical constraints (i.e., hillside encroachment) do not allow for any physical improvements, such as providing an exclusive EB right-turn lane on San Fernando Road for heavy existing and anticipated right-turn volumes. ~~Given the lack of available physical improvements, it is recommended that automatic traffic surveillance and control signal equipment be installed at this intersection. LADOT believes that the overall capacity of an intersection increases 7 percent by allowing a computer signal control system to improve the efficiency of operations. Preliminary discussions with LADOT staff indicate that this is a possible mitigation measure that could be implemented to offset the impact of Sunshine Canyon Landfill Project traffic.~~ Contribute to the design, construction, and operation of the Northeast Valley Automated Traffic Surveillance and Control (ATSAC) system for this intersection. The current cost of ATSAC for the Northeast Valley System is $79,000 per intersection. The contribution to ATSAC should be made prior to the start of construction for this ATSAC system, which is scheduled for the year 2003.
8	San Fernando Road at Sierra Highway	Restripe ~~NB through lane~~ NB approach on San Fernando Road to ~~through/right option lane~~ provide a shared through/right-turn lane and exclusive right-turn lane and restripe the WB approach of Sierra Highway for a 12-foot-wide curb lane.
9	San Fernando Road at project driveway	~~Restripe San Fernando Road to provide a second northbound left-turn lane. The installation of automatic traffic surveillance and control signal equipment is recommended at this intersection.~~ Install a new traffic signal at San Fernando Road/Project Driveway and widen and restripe the northbound approach of San Fernando Road at Project Driveway to provide a left-turn

Table 4.13-9 (Revised - Cont.)
PROJECT-SPECIFIC MITIGATION MEASURES

No.	Key Intersection	Mitigation Measure
		lane and through lane. Also contribute to the design, construction, and operation of the Northeast Valley ATSAC system for this intersection. The current cost of ATSAC for the Northeast Valley System is $79,000 per intersection. The contribution to ATSAC would be completed prior to the start of construction for this ATSAC system, which is scheduled for the year 2003. The required street improvements and signal modifications shall be guaranteed before the issuance of any building permit for this project through the B-permit process of the Bureau of Engineering, Department of Public Works, and the encroachment permit process of Caltrans (where applicable). Construction of the improvements to the satisfaction of the LADOT, the Bureau of Engineering, and Caltrans (where applicable) must be completed before issuance of any certificate of occupancy. Prior to setting the bond amount, the Bureau of Engineering shall require that the developer's engineer or contractor contact LADOT's B-Permit Coordinator, telephone (213) 580-5336, to arrange a predesign meeting to finalize the proposed geometric and traffic signal designs needed for the project.

Source: Linscott, Law & Greenspan, Engineers

Section 4.13.4, Parking and Safety Concerns, p. 4-379, ¶7

CITY MITIGATION MEASURE

Although no significant impacts are anticipated, the following mitigation measure is proposed by the project proponent to alleviate ~~any~~ potential safety concerns resulting from truck traffic at the landfill entrance:

- ~~Until the installation of a signal at the landfill entrance occurs, vehicular warning signs shall be placed in NB/SB directions along San Fernando Road (authorized by LADOT) to slow traffic along that roadway.~~

- Prior to issuance of any certificate of occupancy for the project, install a new traffic signal at San Fernando Road/Project Driveway and widen and restripe the northbound approach of San Fernando Road at Project Driveway to provide a left-turn lane and through lane. Also contribute to the design, construction, and operation of the Northeast Valley ATSAC system for this intersection. The current cost of ATSAC for the Northeast Valley System is $79,000 per intersection. The contribution to ATSAC would be completed prior to the start of construction for this ATSAC system, which is scheduled for the year 2003.

Refer to Responses 143 and 147 (Letter 3.6-4, Department of Transportation, City of Los Angeles) in Section 3.0, Response to Comments.

Section 4.14.1, Fire and Emergency Medical Services, p. 4-397, ¶6

. . . Impacts from a subsurface fire would result in accelerated local settlement in the vicinity of the fire or the venting of smoke or combustion of byproducts through the landfill cover material. Landfill personnel would receive training in the recognition of subsurface fires and procedures to be taken in order to respond to such an emergency.

Refer to Response 204 (Letter 3.6-6, Environmental Affairs Department, City of Los Angeles) in Section 3.0, Response to Comments.

Section 5.5, Reduced Volume Alternative, Figure 5.5-3

Figure 5.5-3 (Reduced Volume Alternative Showing Proposed Uses within the Project Site and Operational County Landfill) is included in this section at the request of the City of Los Angeles Environmental Affairs Department.

Refer to Response 187 (Letter 3.6-6, Environmental Affairs Department, City of Los Angeles) in Section 3.0, Response to Comments.

Volume II, Appendix B6, Low-Level Health Risk Assessment

This information has been revised to supplement revisions to Section 4.2, Air Quality as described above.

Volume II, Appendix B8, Air Quality Modeling and Wind Speed and Direction Summary

Additional wind speed and direction data are included for 1991, 1992, and 1997 in Appendix D4 of this document.

Refer to Response 400 (Letter 3.8-17, Wayde Hunter) in Section 3.0, Response to Comments.

Volume II, Appendix C13, Regulatory Overview of State-, County-, and City-Enacted Waste Management Acts, p. C13-2, ¶3

Countywide Integrated Waste Management Plan

As mandated by A.B. 939, counties throughout the State are now required to prepare a Countywide Integrated Waste Management Plan (CoIWMP) instead of a CoSWMP. The CoIWMP requires that each county and its incorporated cities cooperatively prepare the CoIWMP. The primary components of this solid waste management planning document, incorporate the following elements: (1) the Countywide Siting Element; (2) the Countywide Nondisposal Facility Siting Element (introduced as A.B. 3001 by Assemblyman Cortese and enacted by the California Legislature on September 30, 1992); (3) Source Reduction and Recycling Element (County SRRE), prepared for the County and each of the incorporated cities; and (4) Household Hazardous Waste Element (HHWE) also prepared for the County and each of the incorporated cities located within the County. The CoIWMP also includes the Countywide Integrated Waste

Management Summary Plan prepared by the County. In addition, the CoIWMP includes all non-disposal facility elements prepared for the County unincorporated area and each of the 88 cities located within the County.

Refer to Response 125 (Letter 3.5-3, Department of Public Works, County of Los Angeles) in Section 3.0, Response to Comments.

Volume II, Appendix C13, Regulatory Overview of State-, County-, and City-Enacted Waste Management Acts, p. C13-3, ¶2

Countywide Siting Element

As an integral part of the CoIWMP, counties are required to prepare a Countywide Siting Element, which describes the site areas to be developed as landfill disposal or waste management facilities. This element is based on the existing information provided by the individual SRRE of the unincorporated area of the County and the SRRE's of the incorporated cities located within the county's boundary. They would contain the following (A.B. 939 mandated) information: (1) goals and policies for the environmentally safe transformation or disposal of solid waste which cannot be reduced, recycled, or composted; (2) an estimation of the total transformation or disposal capacity (in cubic yards and in years) that will be needed for a 15-year planning period to handle safely solid wastes generated within the county which cannot be reduced, recycled, or composted; (3) a statement of the remaining capacity of existing solid waste transformation and disposal facilities (in cubic yards and years) at the time the element was prepared or revised; and (4) specified areas for new or expanded solid waste transformation or disposal facilities, consistent with the county or cities' General Plans (identification of new facilities is only required if the county determines that existing capacity will be exhausted within the 15-year planning horizon). The County of Los Angeles is mandated to prepare the Countywide Siting Element to specifically address the disposal capacity needs of the 88 cities in the County and the County unincorporated communities for a 15-year planning period.

Refer to Response 127 (Letter 3.5-3, Department of Public Works, County of Los Angeles) in Section 3.0, Response to Comments.

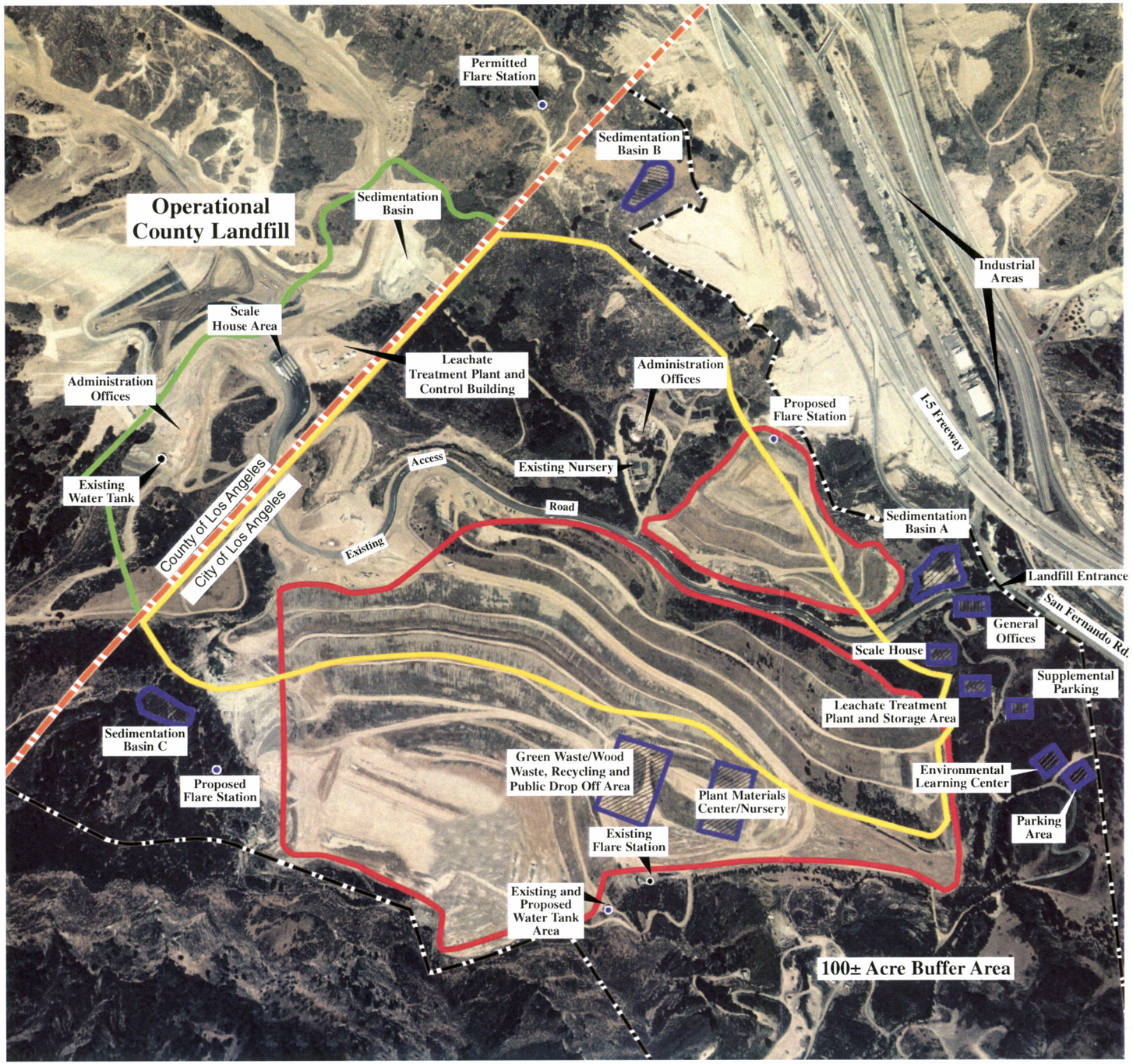
2.4 Revisions and/or Additions Requested by Project Proponent

The following revisions and/or additions have been requested by the project proponent since the completion of the Draft SEIR to incorporate revised information related to the proposed project and to respond to comments received on the Draft SEIR.

Section 1.5.1, Prior Environmental Record Pertaining to the Proposed City/County Landfill Project and Existing Inactive Landfill, p. 1-4, ¶5

. . . With respect to that condition, if the City denied necessary entitlements for landfilling in the City, the Board would consider approving the extension of landfilling into higher elevations in the County area of Sunshine Canyon~~, providing for development of the 70-million-ton landfill encompassing ±542 acres~~. However, even though this could result in the expansion of the County Landfill, up to a disposal capacity of 70 million tons, it cannot be simply assumed that such a request would be approved by the County. The purpose of this CUP condition (by the Board) was to minimize the destruction of ~~over 1,363~~ approximately 3,200 oak trees, and big-cone Douglas fir trees, as well as other significant biological resources in the upper

Reduced Volume Alternative Showing Proposed Uses within the Project Site and Operational County Landfill



Aerial photograph taken August 3, 1996

Legend

- Project Site Boundary
- County/City of Los Angeles Boundary
- Existing Inactive Landfill (2 fill areas)
- Reduced Volume Landfill Footprint (60± acres)
- Proposed Ancillary Facilities/Areas in City

NOTE:
Operational County Landfill Footprint is ±215 acres.

Source: Inland Aerial Surveys, Inc.
Ultrasystems Environmental Incorporated

ULTRASYSTEMS ENVIRONMENTAL INCORPORATED

FIGURE 5.5-3

reaches of Sunshine Canyon ~~and to provide additional landfill disposal capacity within Sunshine Canyon and the City's jurisdiction~~ by encouraging the city to provide additional landfill disposal capacity within the portion of the Sunshine Canyon that is already substantially disturbed.

Refer to Response 165 (Letter 3.6-5, Hal Bernson, Councilman 12th District, City of Los Angeles) in Section 3.0, Response to Comments.

Section 1.9.3, No Project, p. 1-19, ¶6

- potential for the future expansion of the County Landfill within the upper reaches of Sunshine Canyon (consistent with the current County Landfill CUP, with a disposal capacity of 70 million tons) resulting in significant impacts on biological resources (specifically, the loss of ~~an additional 1,363~~ approximately 3,200 oak trees, and big-cone Douglas fir trees, as well as other significant ~~ecological~~ biological resources within the project site);

Refer to Response 165 (Letter 3.6-5, Hal Bernson, Councilman 12th District, City of Los Angeles) in Section 3.0, Response to Comments.

Section 1.9.3, No Project, p. 1-20, ¶7

- recover, recycle, and/or reuse waste materials that would otherwise be disposed of in landfills by providing ~~a public "dropoff" and "buyback" area for recycling and~~ an onsite green waste/wood waste recycling area;

Refer to Response 190 (Letter 3.6-6, Environmental Affairs Department, City of Los Angeles) in Section 3.0, Response to Comments.

Section 2.2.3, Solid Waste Objectives, p. 2-3 , ¶4

- recover, recycle, and/or reuse waste materials that would otherwise be disposed of at the City/ County Landfill by providing ~~public "dropoff," "buyback," and~~ a green waste/wood waste recycling areas ~~for local residents~~;

Refer to Response 190 (Letter 3.6-6, Environmental Affairs Department, City of Los Angeles) in Section 3.0, Response to Comments.

Section 2.4.4, Surrounding Land Uses, Figure 2.4-5, p. 2-19

Revisions to this figure, made by the project proponent, are not in response to any of the comments included in Section 3.0 of this document.

Section 2.5.1, Proposed City/County Landfill Footprint, Figure 2.5-1, p. 2-27

Revisions to this figure, made by the project proponent, are not in response to any of the comments included in Section 3.0 of this document.

Section 2.5.1, Proposed City/County Landfill Footprint, Figure 2.5-2, p. 2-29

Revisions to this figure, made by the project proponent, are not in response to any of the comments included in Section 3.0 of this document.

Section 2.5.1, Proposed City/County Landfill Footprint, Figure 2.5-3, p. 2-31

Revisions to this figure, made by the project proponent, are not in response to any of the comments included in Section 3.0 of this document.

Section 2.5.1, Proposed City/County Landfill Footprint, Figure 2.5-5, p. 2-35

Revisions to this figure, made by the project proponent, are not in response to any of the comments included in Section 3.0 of this document.

Section 2.5.6, General Design Features of the City/County Landfill Facility, p. 2-39 , ¶4

. . . Onsite ancillary facilities or proposed environmental pollution and control features in the City include, but are not limited to, an access road; gate, scales, checker facilities, and general maintenance area; general administrative office; caretaker building; lunchroom/locker storage; employee parking; flaring stations; plant materials center; environmental learning center; green waste/wood waste recycling area ~~and buyback center~~; leachate treatment facility and storage tanks and control building; sedimentation basins; and water storage tanks.

Refer to Response 190 (Letter 3.6-6, Environmental Affairs Department, City of Los Angeles) in Section 3.0, Response to Comments.

Section 2.5.7, Proposed Landfill Ancillary Facilities, p. 2-42 , ¶4

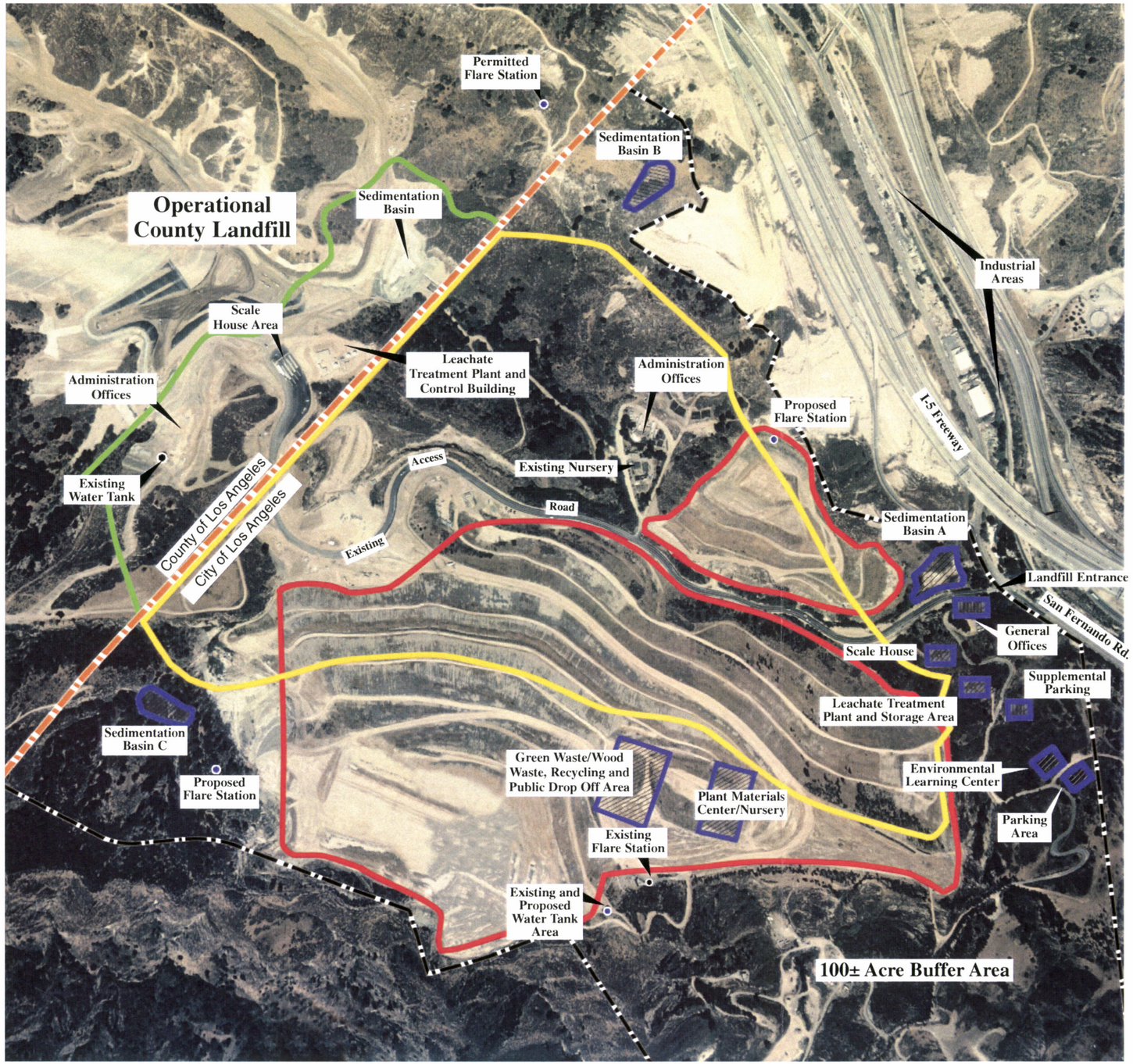
~~As a component of this general area, a dropoff and buyback recycling center would be established for use by the local community. Source-separated materials would be delivered to this area. Only nonhazardous materials, such as aluminum, metal, newsprint, office paper, glass, and plastics and would be accepted at this center for recycling.~~

Refer to Response 190 (Letter 3.6-6, Environmental Affairs Department, City of Los Angeles) in Section 3.0, Response to Comments.

Section 2.12, Proposed Hours of Operation, Table 2.12-1, p. 2-89, ¶1

Refer to Response 190 (Letter 3.6-6, Environmental Affairs Department, City of Los Angeles) in Section 3.0, Response to Comments.

Proposed Uses within the Project Site and Operational County Landfill



Aerial photograph taken August 3, 1996

Legend

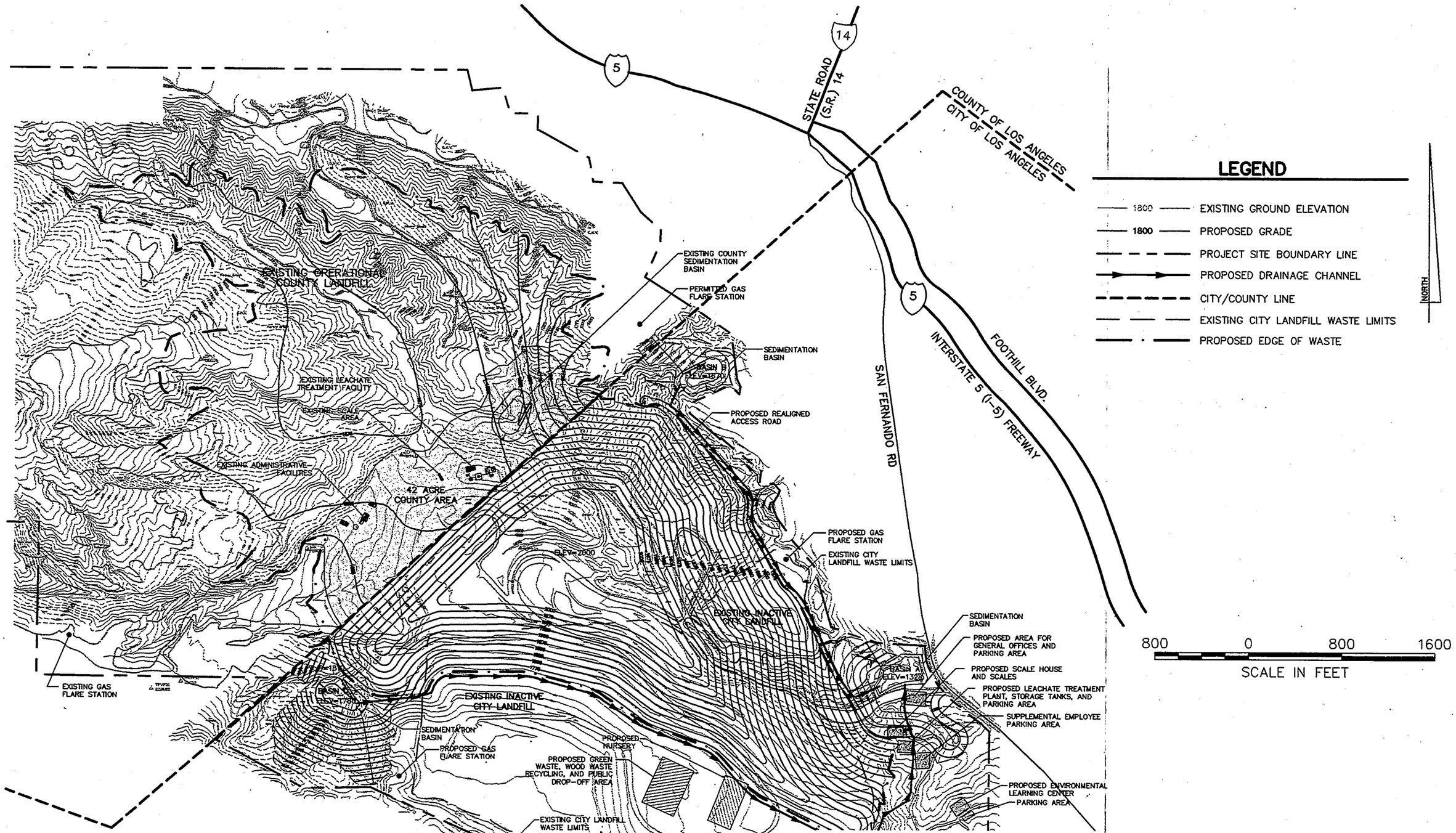
- Project Site Boundary
- County/City of Los Angeles Boundary
- Existing Inactive Landfill (2 fill areas)
- Proposed Landfill Footprint (194± acres)
- Proposed Landfill Area (42± acres)
- Proposed Ancillary Facilities/Areas in City

NOTE:
Operational County Landfill Footprint is ±215 acres.

Source: Inland Aerial Surveys, Inc.
Ultrasystems Environmental Incorporated

ULTRASYSTEMS ENVIRONMENTAL INCORPORATED

FIGURE 2.4-5 (Revised)

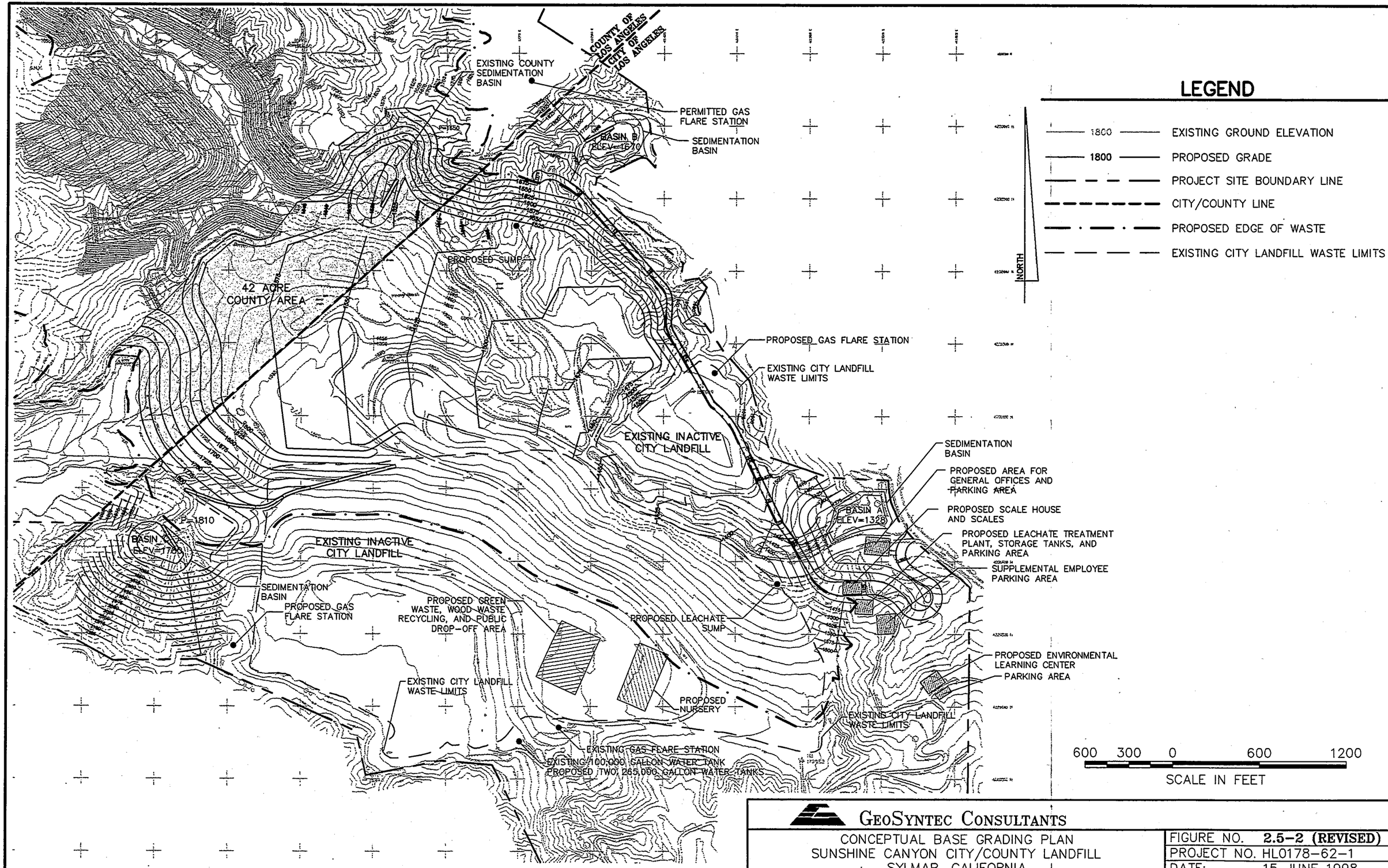


GeoSyntec Consultants

CITY/COUNTY LANDFILL CONCEPTUAL SITE PLAN
SUNSHINE CANYON CITY/COUNTY LANDFILL
SYLMAR, CALIFORNIA

FIGURE NO.	**2.5-1 (REVISED)**
PROJECT NO.	HL0178-62-1
DATE:	15 JUNE 1998

DWG: 0178F005.DWG 199806151433 RCG

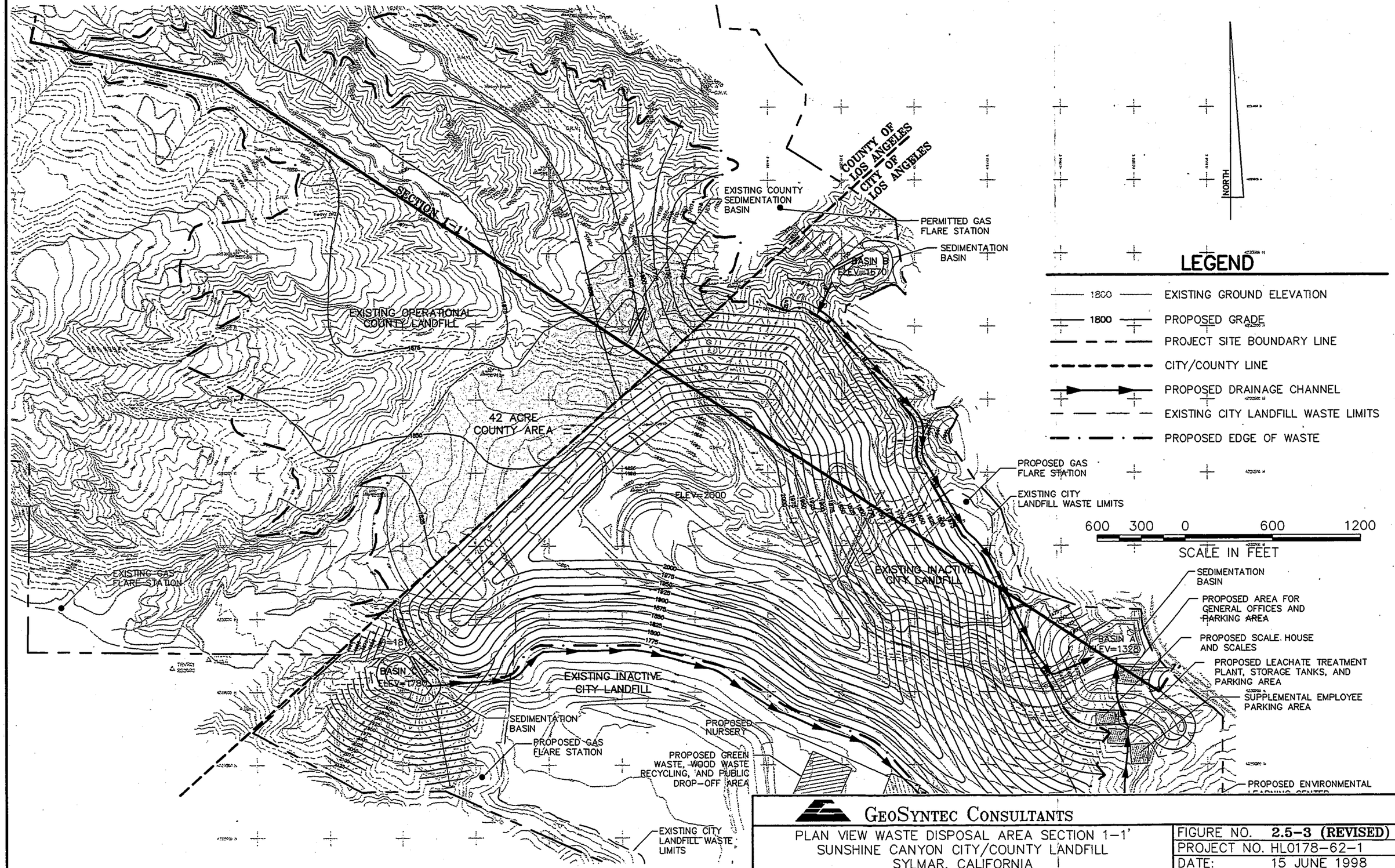


GeoSyntec Consultants

CONCEPTUAL BASE GRADING PLAN
SUNSHINE CANYON CITY/COUNTY LANDFILL
SYLMAR, CALIFORNIA

FIGURE NO.	**2.5-2 (REVISED)**
PROJECT NO.	HL0178-62-1
DATE:	15 JUNE 1998

DWG: 0178F006.DWG 199806151437 RCG



GeoSyntec Consultants

PLAN VIEW WASTE DISPOSAL AREA SECTION 1-1'
SUNSHINE CANYON CITY/COUNTY LANDFILL
SYLMAR, CALIFORNIA

FIGURE NO. **2.5-3 (REVISED)**
PROJECT NO. HL0178-62-1
DATE: 15 JUNE 1998

DWG: 0178F007.DWG 199806151448 RCG

EXISTING COUNTY SEDIMENTATION BASIN

SEDIMENTATION BASIN

BASIN B ELEV=1870

EXISTING OPERATIONAL COUNTY LANDFILL

42 ACRE COUNTY AREA

PROPOSED GAS FLARE STATION

EXISTING CITY LANDFILL WASTE LIMITS

ELEV=2000

SECTION 2-2'

EXISTING INACTIVE CITY LANDFILL

SEDIMENTATION BASIN

PROPOSED AREA FOR GENERAL OFFICES AND PARKING AREA

PROPOSED SCALE HOUSE AND SCALES

BASIN A ELEV=1328

PROPOSED LEACHATE TREATMENT PLANT, STORAGE TANKS, AND PARKING AREA

SUPPLEMENTAL EMPLOYEE PARKING AREA

P=1810

COUNTY OF LOS ANGELES

CITY OF LOS ANGELES

BASIN C ELEV=1760

EXISTING INACTIVE CITY LANDFILL

SEDIMENTATION BASIN

PROPOSED GAS FLARE STATION

PROPOSED GREEN WASTE, WOOD WASTE RECYCLING, AND PUBLIC DROP-OFF AREA

PROPOSED ENVIRONMENTAL LEARNING CENTER PARKING AREA

PROPOSED NURSERY

EXISTING CITY LANDFILL WASTE LIMITS

EXISTING GAS FLARE SYSTEM

EXISTING 100,000 GALLON WATER TANK
PROPOSED TWO 265,000 GALLON WATER TANKS

NORTH

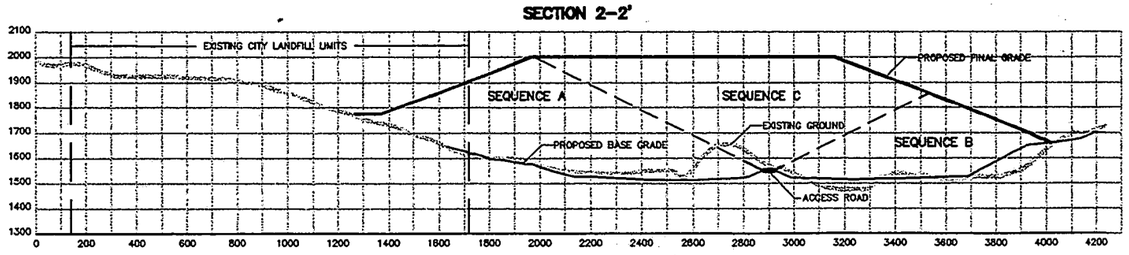
LEGEND

- 1800 — EXISTING GROUND ELEVATION
- 1800 — PROPOSED GRADE
- PROJECT SITE BOUNDARY LINE
- CITY/COUNTY LINE
- PROPOSED DRAINAGE CHANNEL
- EXISTING CITY LANDFILL WASTE LIMITS
- PROPOSED EDGE OF WASTE

600 300 0 600 1200

SCALE IN FEET

SECTION 2-2'



GeoSyntec Consultants

DISPOSAL AREA SEQUENCING SECTION 2-2'
FINAL ELEVATIONS
SUNSHINE CANYON CITY/COUNTY LANDFILL
SYLMAR, CALIFORNIA

FIGURE NO.	**2.5-5 (REVISED)**
PROJECT NO.	HL0178-62-1
DATE:	15 JUNE 1998

DWG: 0178F008.DWG 199806151454 RCG

Table 2.12-1 (Revised)
OPERATIONAL HOURS

Areas of Landfill	Weekdays	Operating Hours
Gates Open	Monday through Friday Saturday	5:00 a.m. 7:00 a.m.
Scales Open	Monday through Friday Saturday	6:00 a.m. 7:00 a.m.
Scales Close	Monday through Friday Saturday	6:00 p.m. 2:00 p.m.
General Office and Administrative Area	Monday through Friday Saturday	8:00 a.m. - 5:00 p.m. 8:00 a.m. - 2:00 p.m.
Green Waste/Wood Waste Recycling Area	Monday through Friday Saturday	6:00 a.m. - 6:00 p.m. 7:00 a.m. - 2:00 p.m.
~~Public Dropoff Area~~	~~Monday through Friday~~ ~~Saturday~~	~~6:00 a.m. - 6:00 p.m.~~ ~~7:00 a.m. - 2:00 p.m.~~

Source: BFI

Note: General maintenance activities are anticipated to take place immediately following landfilling operations during the hours of 6:00 to 9:00 p.m.

Section 4.2.10, Project Consistency with Applicable Plans, 4-83, ¶4

. . . The proposed project would include development of a green waste and wood waste recycling ~~and public drop-off~~ area to support recycling efforts.

Refer to Response 190 (Letter 3.6-6, Environmental Affairs Department, City of Los Angeles) in Section 3.0, Response to Comments.

Section 4.3.1, Surface Water, Figure 4.3-2, p. 4-107

Revisions to this figure, made by the project proponent, are not in response to any of the comments included in Section 3.0 of this document.

Section 4.3.2, Groundwater, Figure 4.3-4, p. 4-119

Revisions to this figure, made by the project proponent, are not in response to any of the comments included in Section 3.0 of this document.

Section 4.7.1, Community Plan, General Plan, Area Plan, and Zoning Designations

Under the City's PZC, § 12.20.37(I), the M3 zone permits landfilling uses. As further defined under that section, "None of those uses which may be obnoxious or offensive by reason of emission of odor, dust,

smoke, gas, noise, vibration and the like . . . shall be located nearer than 500 feet to a more restricted zone."[3] In this regard, ~~landfill operations would be located within 500 feet of the~~ although the property boundary would be adjacent to the more restrictive zoning designations of A1, OS, PF, and RMP the landfill footprint would be located more than 500 feet from these zones. The proposed landfill footprint as depicted on **Figure 2.5-1** would be approximately 1,700 feet from the nearest residential unit (located south of the project site). In addition, the ±100 acre buffer area provides open space between the proposed uses (i.e., landfill and ancillary facilities) and the residential areas within Granada Hills. Implementation of the ZC would remedy existing zoning inconsistencies that relate to the inactive landfill's closure and postclosure maintenance requirements.

Refer to Responses 1274 (Letter 3.8-27, North Valley Coalition) and 1623 (Letter 3.8-30, Barbara A. Fine Consultants) in Section 3.0, Response to Comments.

Section 4.9.1, Hazardous Materials, p. 4-297, ¶4

- A refuse inspection program that includes direct visual inspection, remote television monitors to inspect incoming rolloff-type loads and open-top vehicles and radiation-detecting devices, ~~and sensors capable of detecting volatile compounds~~ shall be implemented by the landfill operator to prohibit the illegal dumping or disposal of liquids and hazardous wastes at the landfill.

Refer to Response 1424 (Letter 3.8-27, North Valley Coalition) in Section 3.0, Response to Comments.

Section 4.16.1, Electricity, p. 4-440, ¶3 and 4

. . . The second transmission line (two circuits) is identified as the MacNeil-Newhall-San Fernando 66-kV and the Chatsworth-MacNeil-Newhall-San Fernando 66-kV (60-foot-wide) Transmission Line. This line runs along the easterly side of the project site boundary, parallel to the I-5 Freeway.[4] SCE currently has no plans to improve its facilities in the area of the proposed project.[5]

Electrical Tower No. ~~154~~ M15-T4 of the Chatsworth-MacNeil-Newhall-San Fernando Transmission Line is located in a slope area that has unstable soil conditions.

These changes, made by the project proponent, are not in response to any of the comments included in Section 3.0 of this document.

Section 4.16.1, Electricity, p. 4-443, ¶4

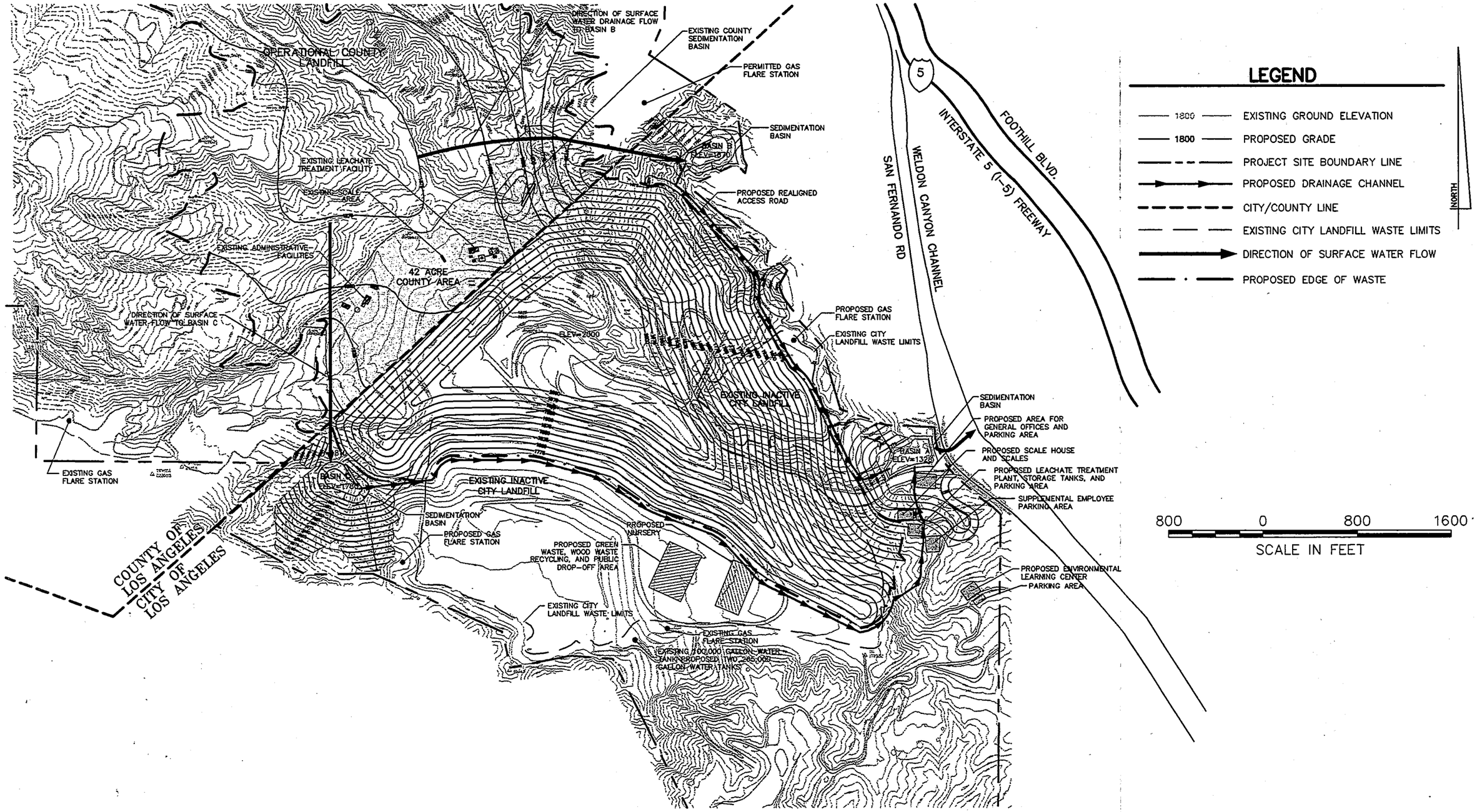
. . . Currently there are ~~four~~ six transmission towers that cross the project site at the City/County boundary. ~~The two interior towers, which currently lie in an area that would incorporate the proposed landfill footprint, are smaller than the two exterior towers~~. The project proponent is proposing to remove the ~~two interior~~ six

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3/ City of Los Angeles Municipal Code, § 12.20.37.

4/ Robert D. Crosby, Right of Way Agent, Southern California Edison. Letter. February 13, 1997. Telephone conversation. February 20, 1997.

5/ Rosemary Jones, Real Property Agent, Southern California Edison Company. Letter. February 10, 1993.

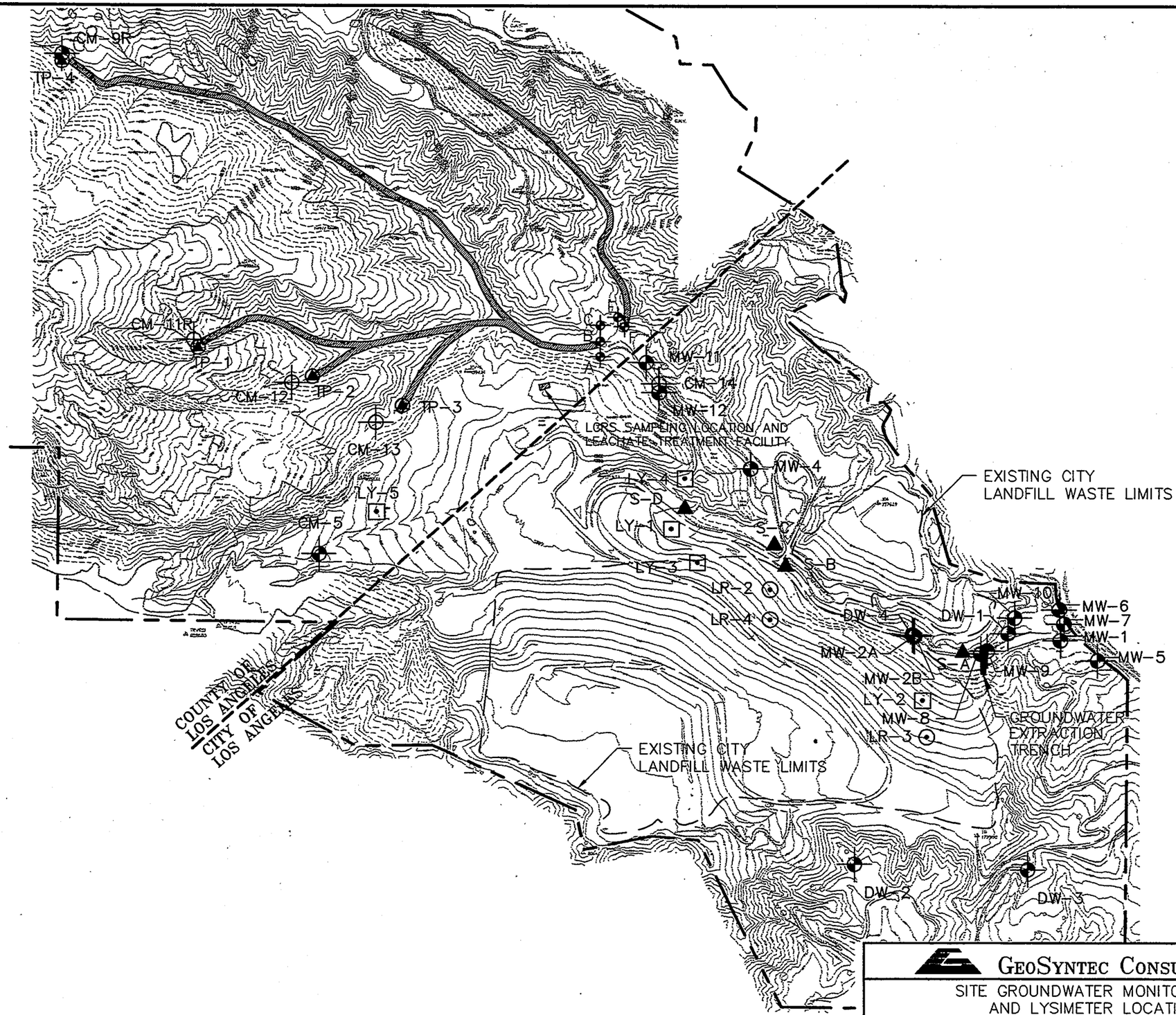


GeoSyntec Consultants

SITE DRAINAGE PLAN
SUNSHINE CANYON CITY/COUNTY LANDFILL
SYLMAR, CALIFORNIA

FIGURE NO.	**4.3-2 (REVISED)**
PROJECT NO.	HL0178-62-1
DATE:	15 JUNE 1998

DWG: 0178F010.DWG 199806151518 RCG



LEGEND

- 1300 — EXISTING GROUND ELEVATION
- PROJECT SITE BOUNDARY
- CITY/COUNTY LINE
- EXISTING CITY LANDFILL WASTE LIMITS
- MW-1 — GROUNDWATER MONITORING WELL
- CM-3 — EXPLORATORY BORING/ MONITORING WELL
- LY-2 — LYSIMETER
- LR-3 — LEACHATE MONITORING WELL
- S-D — SURFACE WATER STATION
- SUBDRAIN
- SUBDRAIN UPPER TERMINATION POINT
- SUBDRAIN OUTFALL AND SAMPLING LOCATION

800 400 0 800 1600

SCALE IN FEET

GeoSyntec Consultants

SITE GROUNDWATER MONITORING WELLS
AND LYSIMETER LOCATION MAP
SUNSHINE CANYON CITY/COUNTY LANDFILL
SYLMAR, CALIFORNIA

FIGURE NO.	**4.3-4 (REVISED)**
PROJECT NO.	HL0178-62-1
DATE:	15 JUNE 1998

DWG: 0178F004.DWG 199806181446 RCG

towers altogether and replace ~~the exterior~~ four towers with stronger, taller ~~towers~~ tabular steel poles so that the span of the transmission lines between the ~~two exterior towers~~ four tabular steel poles can be increased. Reconstruction of the ~~exterior~~ six towers would allow for the proposed City/County Landfill Project to be developed without adversely affecting power service in the long-term, nor would it result in landfill operations encroaching upon the transmission towers. In addition, as part of the reconstruction effort, Tower No. ~~154~~ M15-T4, located on the slope area near the northeast property boundary, would be removed, to prevent any impacts associated with the use of onsite transmission towers located on unstable slopes. This would allow for the proposed landfill project to be developed without creating any significant impacts to SCE transmission towers or power lines, or reduce the ability of SCE to provide regional power service. All construction would occur on property owned by the project proponent, and would last no longer than the duration of construction associated with initial landfill development. The project proponent has made an application with SCE and has provided funds necessary for completion of an SCE engineering study to delineate a specific design for the removal of the ~~two interior~~ six towers, the reconstruction of the ~~two exterior towers~~ four tabular steel poles , and the removal of Tower No. ~~154~~ M15-T4. Initial meetings between the project proponent and SCE, which occurred in the winter of 1996, have concluded that eliminating the ~~two interior power poles, removing the two exterior poles~~ six towers and replacing them with four stronger, taller tabular steel poles, and subsequently increasing the span of transmission lines across the area of the proposed project, would be feasible.

These changes, made by the project proponent, are not in response to any of the comments included in Section 3.0 of this document.

Section 5.4, No Project Alternative, 5-10, ¶6

- recover, recycle, and/or reuse waste materials that would otherwise be disposed of in landfills by providing ~~a public "dropoff" and "buyback" area for recycling and~~ an onsite green waste/wood waste recycling area;

Refer to Response 190 (Letter 3.6-6, Environmental Affairs Department, City of Los Angeles) in Section 3.0, Response to Comments.

Section 5.4, No Project Alternative, p. 5-5, ¶8

. . . ~~That landfill's anticipated operational site life is 10 years; however, that site life may be extended if future landfill development occurs within the upper reaches of Sunshine Canyon or if the proposed project is denied. Therefore, if authorized, this landfill has the future potential to increase its disposal capacity to 70 million tons.~~ It is anticipated that the County Landfill capacity will be exhausted by approximately the year 2006, based on its allowable daily intake rate.

If the No Project Alternative were to be approved, the project proponent would pursue future project entitlements pursuant to existing County Landfill CUP Conditions to expand landfill development in the upper reaches of the County portion of Sunshine Canyon. However, even though this could result in the expansion of the County Landfill, up to a disposal capacity of 70 million tons, it cannot be simply assumed that such a request would be approved by the County.

Refer to Response 165 (Letter 3.6-5, Hal Bernson, Councilman 12th District, City of Los Angeles) in Section 3.0, Response to Comments.

Section 5.4, No Project Alternative, p. 5-9, ¶4

- potential for the future expansion of the County Landfill within the upper reaches of Sunshine Canyon (consistent with the current County Landfill CUP, with a disposal capacity of 70 million tons) resulting in significant impacts on biological resources (specifically, the loss of ~~an additional 1,363~~ approximately 3,200 oak trees, big-cone Douglas fir trees, as well as ~~ecological~~ other significant biological resources within the project site);

Refer to Response 165 (Letter 3.6-5, Hal Bernson, Councilman 12th District, City of Los Angeles) in Section 3.0, Response to Comments.

Section 5.5, Reduced Volume Alternative, Figure 5.5-1, p. 13

These changes, made by the project proponent, are not in response to any of the comments included in Section 3.0 of this document.

Section 5.5, Reduced Volume Alternative, Figure 5.5-2, p. 15

These changes, made by the project proponent, are not in response to any of the comments included in Section 3.0 of this document.

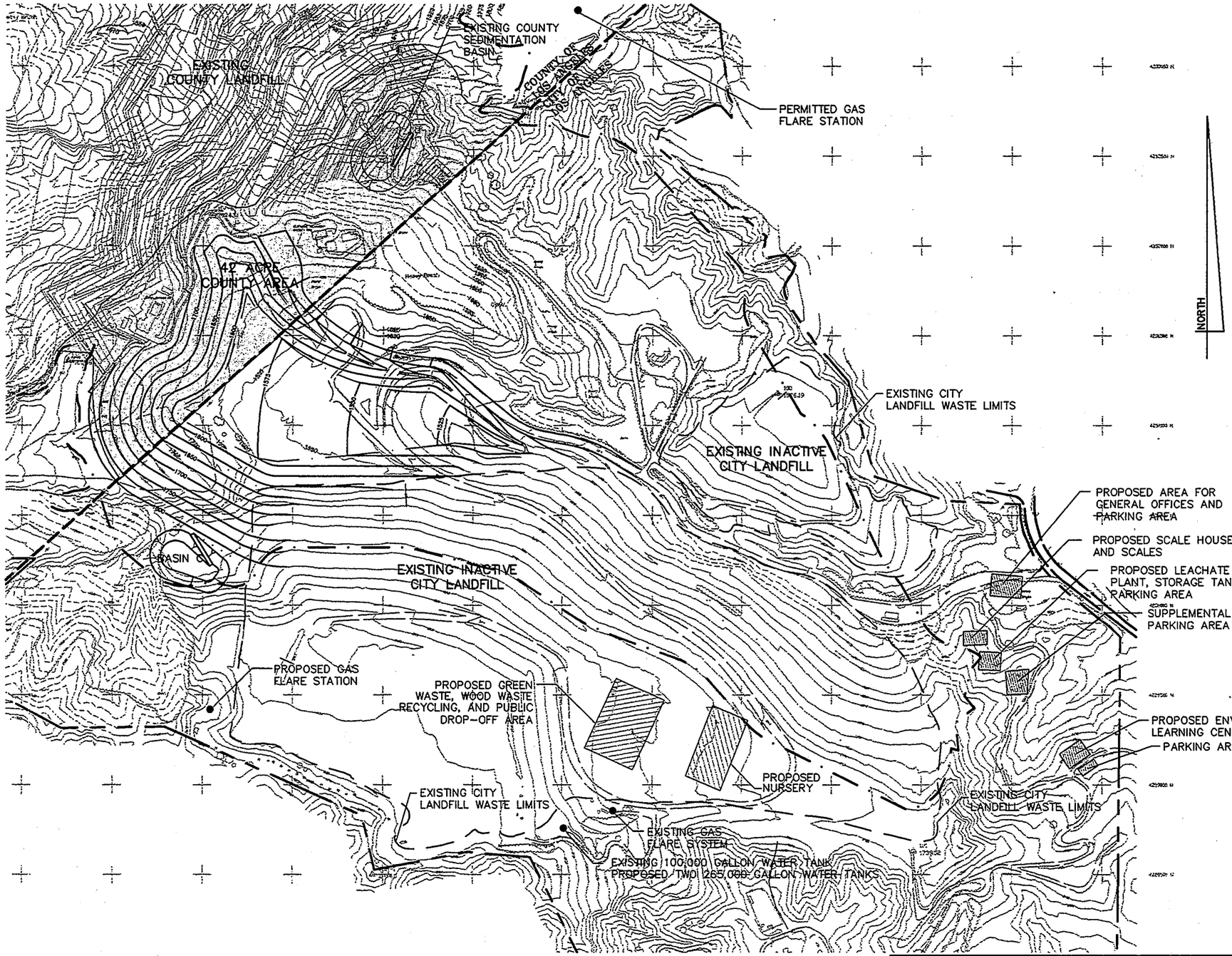
Section 5.6, Immediate Combined City/County Landfill Operations Alternative, p. 5-18, ¶2, 3, 4

This alternative would provide a net disposal capacity of 90 million tons, and unlike the proposed project, landfilling operations would occur immediately at one single working face during the first 18 to 24 months rather than at two separate working faces, and there would be a single, joint intake area with a single set of scales and supporting administrative facilities. Approximately 11,000 tpd of waste would be received at one landfill footprint. The site life would be approximately 26 years, assuming a constant intake rate of 11,000 tpd.[6]

Development sequencing for this alternative would result in three sequences similar to the proposed project, ~~and~~ as shown on **Figure 2.5-5** . Under this alternative, development of the landfill footprint would initiate in the City jurisdiction, abut and overlay portions of the inactive landfill (Sequence A), proceed in a northerly direction across the City and County boundary, and connect to the operational County Landfill (Sequence B). Once interim fill elevations are reached, the landfill footprint would extend back into the City jurisdiction (Sequence C).

Similar to the proposed project, implementation of this alternative would require some form of ~~working arrangement~~ agreement between the City and the County to authorize common power over the entire project site. This ~~arrangement~~ agreement would recognize existing discretionary approvals, contractual agreements, or other arrangements that were approved by the County Board of Supervisors and regulatory agencies in connection with the approved County Landfill. Therefore, existing permitting requirements and regulatory obligations in connection with that landfill would effectively be maintained and, if necessary, modified or amended to reflect the resulting provisions established under the ~~working arrangement~~ subject agreement.

6/ Based on 90,000,000 tons of disposal capacity ÷ 11,000 intake tonnage x 312 operating days = 26.22 years of anticipated site life.



LEGEND

- 1800 — EXISTING GROUND ELEVATION
- **1800** — PROPOSED GRADE
- PROJECT SITE BOUNDARY LINE
- CITY/COUNTY LINE
- PROPOSED EDGE OF WASTE
- EXISTING CITY LANDFILL WASTE LIMITS

600 300 0 600 1200

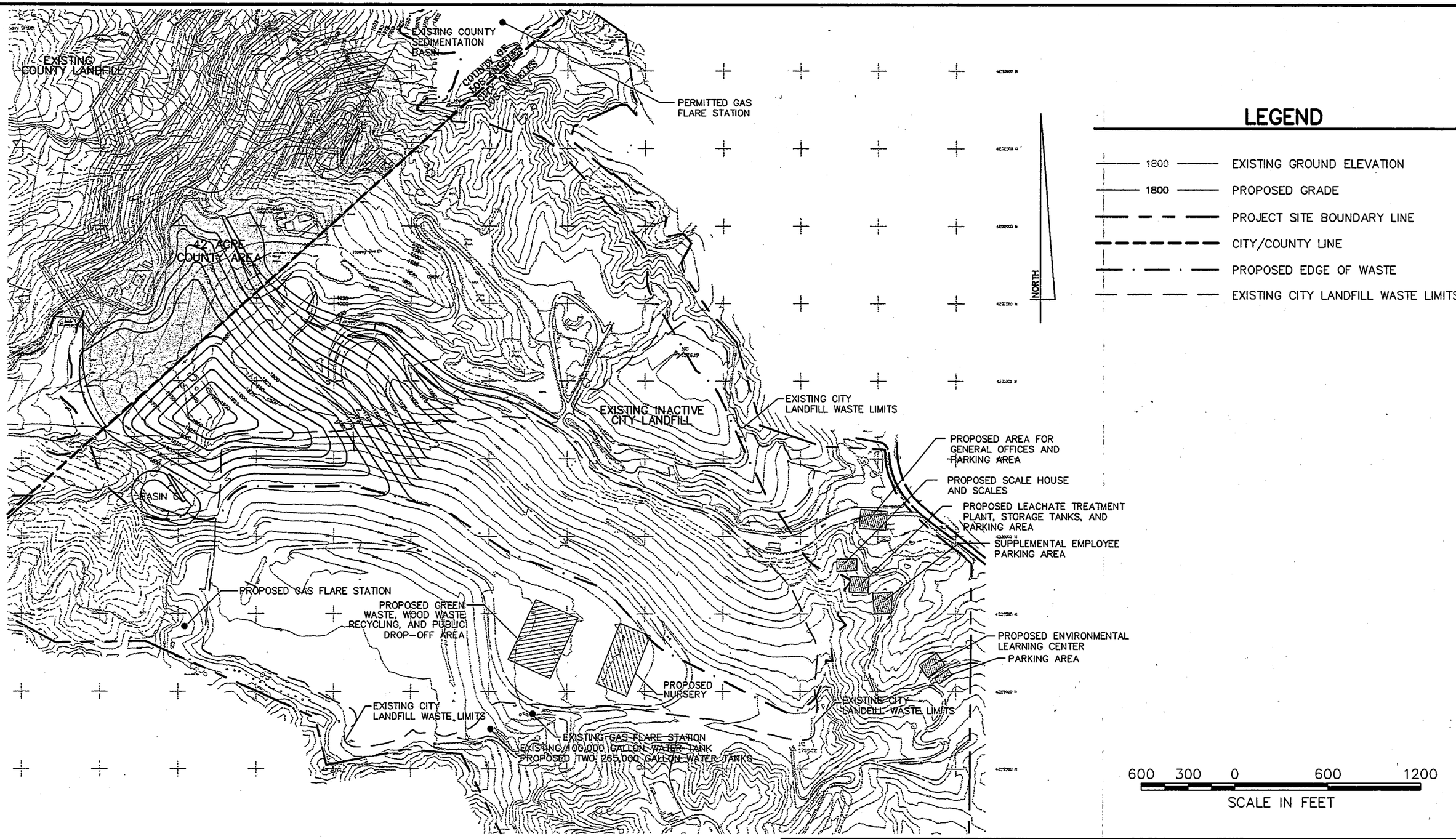
SCALE IN FEET

GeoSyntec Consultants

REDUCED VOLUME ALTERNATIVE
CONCEPTUAL BASE GRADING PLAN
SUNSHINE CANYON CITY/COUNTY LANDFILL
SYLMAR, CALIFORNIA

FIGURE NO. **5.5-1 (REVISED)**
PROJECT NO. HL0178-62-1
DATE: 15 JUNE 1998

DWG: 0178F011.DWG 199806151525 RCG



GeoSyntec Consultants

REDUCED VOLUME ALTERNATIVE
FINAL ELEVATIONS
SUNSHINE CANYON CITY/COUNTY LANDFILL
SYLMAR, CALIFORNIA

FIGURE NO.	**5.5-2 (REVISED)**
PROJECT NO.	HL0178-62-1
DATE:	15 JUNE 1998

DWG: 0178F012.DWG 199806151533 RCG

Refer to Response 188 (Letter 3.6-6, Environmental Affairs Department, City of Los Angeles) in Section 3.0, Response to Comments.

Section 5.6, Immediate Combined City/County Landfill Operations Alternative, Figure 5.6-1, p. 5-19

These changes, made by the project proponent, are not in response to any of the comments included in Section 3.0 of this document.

Section 5.11, Environmentally Superior Alternative, 5-70, ¶2

- recover, recycle, and/or reuse waste materials that would otherwise be disposed of in landfills by providing ~~a public "dropoff" and "buyback" area for recycling and~~ an onsite green waste/wood waste recycling area;

Refer to Response 190 (Letter 3.6-6, Environmental Affairs Department, City of Los Angeles) in Section 3.0, Response to Comments.

Section 6.1.2, Project Proponent's Justification for Implementing the Proposed Project Now, 6-2, ¶7

- recover, recycle, and/or reuse waste materials that would otherwise be disposed of at the City/ County Landfill by providing ~~public "dropoff," "buyback," and~~ an onsite green waste/wood waste recycling areas ~~for local residents~~;

Refer to Response 190 (Letter 3.6-6, Environmental Affairs Department, City of Los Angeles) in Section 3.0, Response to Comments.

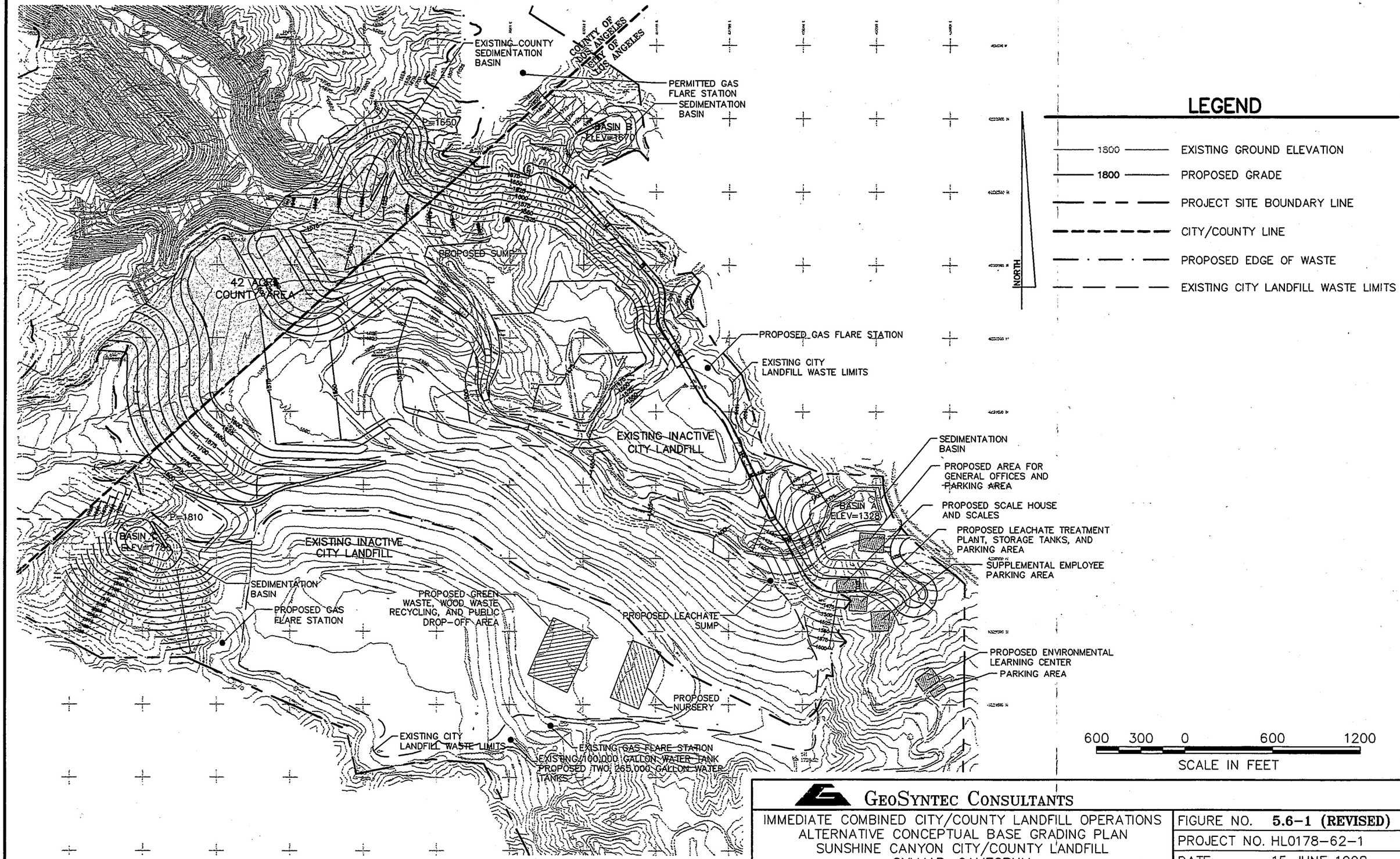
2.5 Revised Summary Matrix of Environmental Impacts, Mitigation Measures, and Monitoring Phasing for the Proposed Project

Table 1.10-1 (Revised) includes revisions to Table 1.10-1 in the Draft SEIR based on comments received during public review. Deletions to this table are indicated by ~~*strikeout*~~, and additions are indicated by *redlining*. This revised table constitutes a complete inventory of mitigation measures and monitoring agencies identified during the environmental review process.

2.6 Revised Mitigation Reporting and Monitoring Program

Table 7.4-1 (Revised) includes revisions to Table 7.4-1 in the Draft SEIR based on comments received during public review. Deletions to this table are indicated by ~~*strikeout*~~, and additions are indicated by *redlining*. This revised table constitutes the proposed mitigation reporting and monitoring program to be submitted for the decisionmakers review and approval.

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GeoSyntec Consultants

IMMEDIATE COMBINED CITY/COUNTY LANDFILL OPERATIONS
ALTERNATIVE CONCEPTUAL BASE GRADING PLAN
SUNSHINE CANYON CITY/COUNTY LANDFILL
SYLMAR, CALIFORNIA

FIGURE NO. **5.6-1 (REVISED)**
PROJECT NO. HL0178-62-1
DATE: 15 JUNE 1998

DWG: 0178F013.DWG 199806151536 RCG

Table 1.10-1 (Revised)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY, AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
4.1 EARTH RESOURCES					
4.1.1 Grading Activities	Grading activities resulting from implementation of the proposed project would occur within defined boundaries. Grading would be limited to the development of the landfill footprint, adjacent slopes, ancillary uses or facilities, and the realignment of the existing access road. The proposed project would extend laterally against the northern boundary of the existing inactive landfill until reaching the City/County jurisdictional boundary. At this location, the proposed project would connect with the operational County Landfill.	All grading activities shall be performed in accordance with the provisions of Division 70 of the City of Los Angeles Building Regulations, CCR Title 14, and with the rules and regulations as established by the City Department of Building and Safety.	None	Project Proponent	Monitoring Phase: Throughout landfill operations and on an on-going basis. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE
	The maximum vertical height of the landfill, at buildout, would result in an elevation estimated at 1,326± feet mean sea level (MSL) at the southeast boundary of the landfill footprint (near sedimentation basin A) and estimated at 2,000± feet MSL at the northwest portion of the landfill footprint near the City/County jurisdictional boundary.	Areas outside of and above the cut and fill as shown on the conceptual grading plan shall not be graded, except for the development of ancillary facilities or other related improvements. Additional grading may be necessary for slope stability or drainage purposes. Prior to undertaking any grading activities, the Department of Building and Safety shall be notified and approve any additional grading based on engineering studies (in accordance with CCR Title 14) provided by the project proponent and independently evaluated by the Department of Building and Safety.	None	Project Proponent	Monitoring Phase: Throughout landfill operations and on an on-going basis. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, and City B&S Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE
	Base area grading would alter the existing topography in Sunshine Canyon. The existing onsite topography would be altered significantly by excavation activities and the final development of a canyon fill landfill utilizing a cut-and-cover method of waste disposal. The foundation grade elevation would be prepared by excavating all alluvium, weathered rock, and other unsuitable foundation materials (e.g., loose landslide debris and colluvium) followed by placing the liner system. Site grading for the proposed landfill footprint would result in the direct development of 451± acres. All landslide material encountered during excavations would need to be removed to provide a solid foundation for the landfill.	During excavation, any unsuitable material encountered below the base grade for the landfill, including alluvium, organic material, and landslide debris, shall be removed. Engineered compacted fill shall be placed in those areas to restore the base grade for liner system construction. Excess material not used immediately for cover material shall be stockpiled onsite for future use. The unsuitable material shall be excavated, a portion at a time, as the working area of the landfill progresses to avoid opening large sections of potentially unstable material. A buffer area (i.e., 50-100 horizontal feet or as deemed appropriate to maintain safe working conditions) shall be used between the active cells receiving waste and areas under excavation. In accordance with CCR Title 14 a certified engineering geologist shall delineate the limits of the unsuitable material and associated "backcuts" to facilitate removals during excavation. Removal shall not occur during the rainy season (October 1 - April 30) or when the ground is saturated unless performed under the direction and specifications of a certified engineering geologist.	None	Project Proponent	Monitoring Phase: Throughout landfill operations and on an on-going basis. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE
	Grading will be accomplished (as necessary) to establish base grades for the liner system, facilitate leachate collection, provide collection and conveyance of surface water, provide	Grading that allows for construction of ancillary facilities outside of the landfill footprint or that has the potential to impact property beyond the boundary of the landfill shall be	None	Project Proponent	Monitoring Phase: Throughout landfill operations and on an on-going basis. Monitoring Agency: ~~Project Geologist/Engineer,~~

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	adequate stability for internal and external slopes, and establish acceptable grades for the landfill access roadway and perimeter maintenance corridor located along the northeast boundary of the project site.	approved by the Department of Building and Safety.			Enforcement Agency: LARWQCB, CIWMB, City LEA, and City B&S LARWQCB, CIWMB, and City B&S
	See above.	All grading activities shall be in compliance with specific requirements provided in a comprehensive geotechnical report prepared specifically for the proposed project, including provisions for excavation approved by the Department of Building and Safety, City Engineer, City LEA and other Responsible Agencies.	None	Project Proponent	Monitoring Phase: Throughout landfill operations and on an on-going basis. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE
	See above.	Revegetation and erosion control procedures on all exposed slopes shall be implemented. The erosion controls to be implemented at the site shall include soil stabilization measures and revegetation in accordance with the approved revegetation plan as approved by the City Building and Safety Department. Interceptor ditches shall be designed to divert storm runoff to a sedimentation basin.	None	Project Proponent	Monitoring Phase: Throughout landfill operations and on an on-going basis. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, and City LEA, and City B&S Enforcement Agency: LARWQCB, CIWMB, and City LEA, and City B&S
	Grading has the potential to uncover abandoned oil well-heads.	Prior to the initiation of grading activities, the project proponent shall undertake, if necessary, reabandonment procedures as required by the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources.	None	Project Proponent	Monitoring Phase: Throughout landfill operations and on an on-going basis. Monitoring Agency: ~~Project Geologist/Engineer and~~ California Dept. of Conservation Enforcement Agency: California Dept. of Conservation
4.1.2 Geologic Hazards - Mudflow and Landslide (Including lithologic history)	One large landslide deposit was mapped in the area of the City-County boundary where the proposed County Landfill and City/County Landfill Projects would connect. The long axis of the landslide trends approximately southeasterly and the maximum depth of the slides in that location ranges from approximately 40 to 70 feet. The landslide is a bedding plane block slide with movement along the bedding planes. Because operations will most likely begin in the lower elevations of the drainage basins, the lower portions (or toes), of the slide may be removed first, thus effectively weakening the support of the naturally stabilized slide. However, precautions will be taken during grading operations to mitigate this potential impact. The slide plane of this landslide is relatively shallow and will be excavated from the top down until it is completely removed.	When excavating for the landfill operation, if a landslide is encountered, all material constituting that landslide shall be removed. Excess landslide material not used immediately for cover material shall be stockpiled onsite for future use. If necessary, the landslide area shall be excavated a portion at a time to avoid opening large sections of potentially unstable material. A buffer area shall be maintained between the active landfill cells receiving waste and areas under excavation to remove overburden soils, landslide debris, and weathered bedrock. A qualified geologist shall delineate the limits of the landslide during excavation. Landslide removal shall not commence when the ground is saturated, unless removed under the direction and specifications of a certified engineering geologist.	None	Project Proponent	Monitoring Phase: Throughout landfill operations and on an on-going basis. Monitoring Agency: ~~Project Geologist/Engineer~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, and City BOE

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	See above.	Areas of excavation and areas of loose soil (i.e., around haul roads, etc.) shall be stabilized to prevent erosion before the onset of the rainy season.	None	Project Proponent	Monitoring Phase: Throughout landfill operations and on an on-going basis. Monitoring Agency: ~~Project Geologist/Engineer~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
4.1.3 Geologic Hazards - Subsidence	Refer to Section 4.1.2, Geologic Hazards - Mudflow and Landslide.				
4.1.4 Geologic Hazards - Seismicity	Seismic hazards that must be considered at the Sunshine Canyon site include primary fault rupture, secondary ground rupture, and strong shaking. The potential for primary fault rupture within the boundaries of Sunshine Canyon is minimal. The faults that exist onsite do not display evidence of Holocene movement, indicating they are inactive. There has been documented recent primary fault rupture near the site in the San Fernando Earthquake of 1971, but the evidence demonstrates that rupture did not extend across the San Fernando Pass and onto the site. The January 17, 1994 Northridge earthquake produced no significant adverse impacts within the project site area.	The landfill facility shall be designed and constructed to meet CCR, Title 14, Division 7, Chapter 3, Article 7.8, § 17777 (Final Site Face) and CCR, Title 23, Division 3, Chapter 15, Article 4, § 2547 (Seismic Design) requirements "to withstand the maximum probable earthquake without damage to the foundations or to the structures which control leachate, surface drainage, erosion, or gas." Design consideration shall include strong ground shaking and secondary ground rupture. In addition, the project proponent shall comply with RCRA, Subtitle D, 40 CFR Part 258, Subpart B, § 258.13 (Fault Areas) which states "new municipal solid waste landfill units and lateral expansions shall not be located within 200 feet (60 meters) of a fault that has had displacement in Holocene time . . ." The landfill design and seismic analysis will be reviewed by the RWQCB.	None	Project Proponent	Monitoring Phase: Prior to commencement of landfill development. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE
	Seismic activity occurring in the vicinity of the site can produce strong ground shaking. Strong shaking can result in damage to the landfill waste containment system due to seismically induced displacement of the waste mass. Strong shaking can also induce landsliding in natural geologic materials that could, in turn, result in damage to the landfill containment systems. Landfill containment systems are broadly defined in this respect to include the liner, cover, leachate collection and removal, gas extraction, and surface water drainage systems.	An operations checklist shall be used by a registered engineering geologist for surveys following all earthquake events measuring 5.0 on the Richter Scale or greater near the project site. A comparison of operating parameters and site conditions before and after major earthquake events shall be made to verify that systems are operational as designed. Final designs for major engineered structures shall be based on the results of the detailed stability analyses of potential seismic events.	None	Project Proponent	Monitoring Phase: After earthquake events of 5.0 magnitude or greater. Monitoring Agency: ~~Project Geologist/Engineer,~~ SCAQMD, LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: SCAQMD, LARWQCB, CIWMB, City B&S, City LEA, and City BOE
4.1.5 Geologic Hazards - Liquefaction	No liquefaction occurred at the project site during either the San Fernando or Northridge earthquake events. However, saturated alluvium in canyon bottoms, if left in place, could pose a potential threat of liquefaction-induced ground displacements in a seismic event. Such displacements could impair the integrity of landfill containment systems. Since the alluvium in the canyon bottom would be removed during site	Alluvium in the canyon bottoms beneath the footprint of the waste containment system and beneath ancillary structures shall be excavated and, if necessary, replaced with compacted structural fill during construction. A qualified geologist shall be onsite during construction activities to observe removal and replacement of alluvium and verify that all alluvium within the landfill footprint has been removed prior to	None	Project Proponent	Monitoring Phase: Prior to commencement of landfill development. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, and City BOE

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	preparation, liquefaction would not pose a threat to the integrity of the landfill's waste containment systems or operating facilities.	placement of any compacted fill or construction of any containment system elements.			
	See above.	The landfill facility shall be designed and constructed in accordance with RCRA, Subtitle D, 40 CFR, Part 258, Subpart B, § 258.14 (Unstable Areas) so that there would be no liquefaction related impacts.	None	Project Proponent	Monitoring Phase: Prior to commencement of landfill development. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
	See above.	The landfill facility shall be designed and constructed in accordance with CCR, Title 23, Division 3, Chapter 15, Article 3, § 2530(d) (Classification and Siting Criteria), which requires that "all containment structures at waste management units shall have a foundation or base capable of providing support for the structures and capable of withstanding hydraulic pressure gradients to prevent failure due to settlement, compression, or uplift as certified by a registered civil engineer or certified engineering geologist."	None	Project Proponent	Monitoring Phase: Prior to commencement of landfill development. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, and City BOE
4.1.6 Geologic Hazards - Slope Stability	The existing slopes on the site are considered to be relatively stable although future seismicity is expected to generate additional minor downslope failures. Little evidence has been found that might indicate the presence of recent downslope failures in the larger, older landslide deposits. These deposits are believed to have formed during a period when precipitation was much higher than at present times. The absence of instability in the older landslide deposits indicates that their present configurations are in static equilibrium.	Final maximum refuse slope gradient at the site shall be no steeper than 2H:1V (horizontal to vertical) for the landfill.	None	Project Proponent	Monitoring Phase: Prior to commencement of landfill development. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
	Canyon slopes at the project site are sometimes steeper than 1H:1V (horizontal to vertical), although they are typically 2H:1V. Stability analysis of existing landfills indicates that, unless adverse (out of slope) bedding conditions are present, 1H:1V slopes in the native material are stable under both static and seismic loading. When adverse bedding is present, slope angles of 2H:1V or flatter may be required to provide adequate static stability. Pseudo-static stability analyses for seismic loading and observations of the performance of natural slopes at the site during the San Fernando and Northridge earthquakes indicate that, when natural slopes at the project site have adequate static stability, the natural slopes perform well under seismic loading.	Final cut and fill slopes shall have an overall slope gradient no steeper than 1.5H:1V.	None	Project Proponent	Monitoring Phase: Prior to commencement of landfill development. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	See above.	Final slopes shall be engineered to have a static factor of safety of at least 1.5.	None	Project Proponent	Monitoring Phase: Prior to commencement of landfill development. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
	See above.	Survey monuments shall be installed around the perimeters of the outer fill areas at points where they would not be subject to disturbance by landfill development. The exact spacing, location, and characteristics of the survey monuments shall be submitted to and approved by the City Local Enforcement Agency (LEA).	None	Project Proponent	Monitoring Phase: Prior to commencement of landfill development. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE
4.2 AIR QUALITY **4.2.1 Existing Conditions**	Refer to Section 4.2.11, Construction, within this table.	Refer to Section 4.2.11, Construction, within this table.			
4.2.2 California's SCAB Regional Climatic Characteristics	Refer to Section 4.2.11, Construction, within this table.	Refer to Section 4.2.11, Construction, within this table.			
4.2.3 Criteria Air Pollutants	Refer to Section 4.2.11, Construction, within this table.	Refer to Section 4.2.11, Construction, within this table.			
4.2.4 Ambient Air Quality Standards and Annual Statistics	Refer to Section 4.2.11, Construction, within this table.	Refer to Section 4.2.11, Construction, within this table.			
4.2.5 Air Quality Management Plan	Refer to Section 4.2.11, Construction, within this table.	Refer to Section 4.2.11, Construction, within this table.			
4.2.6 Proposed Project Overview	Refer to Section 4.2.11, Construction, within this table.	Refer to Section 4.2.11, Construction, within this table.			
4.2.7 Site Preparation/ Construction Phase	Refer to Section 4.2.11, Construction, within this table.	Refer to Section 4.2.11, Construction, within this table.			
4.2.8 Air Quality Operational Phase (Long-Term)	Refer to Section ~~4.2.11~~ 4.2.12, ~~Construction~~ Operations, within this table.	Refer to Section ~~4.2.11~~ 4.2.12, ~~Construction~~ Operations, within this table.			
4.2.9 Health Risk Analysis	No significant impacts are anticipated.	No mitigation measures would be required.			

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
4.2.10 Project Consistency with Applicable Plans	Refer to Section ~~4.2.11~~ 4.2.12, ~~Construction~~ Operations, within this table.	Refer to Section ~~4.2.11~~ 4.2.12, ~~Construction~~ Operations, within this table.			
4.2.11 Construction	Project construction would include the removing of existing vegetation, excavating and grading, and constructing of the landfill, ancillary facilities (may require relocation), and environmental protection and control systems. Construction-related air pollutant emissions are associated with the site preparation and construction phasing of the proposed project and include fugitive dust emissions and exhaust emissions from construction equipment, material delivery trucks, and workers' vehicles. Construction aspects of the project, such as the installation of the liner system and access road improvements, will be constructed in phases as landfill development occurs. Diesel-powered, earthmoving vehicles or other heavy equipment would be utilized during the grading and construction phasing of the proposed City/County Landfill Project.	The following mitigation measures will reduce emissions to the maximum extent reasonably feasible. • The project proponent will maintain equipment in tune per manufacturer's specifications. • The project proponent will use catalytic converters on gasoline-powered equipment. • The project proponent will retard diesel engine injection timing by 2 degrees. • High-pressure fuel injectors will be installed. • Heavy equipment will use reformulated, low-emission diesel fuel. • The project proponent will substitute electric and gasoline-powered equipment for diesel-powered equipment where feasible. • Where applicable, equipment will not be left idling for prolonged periods.	Adverse (NO_x and PM_{10})	Project Proponent	Monitoring Phase: During project construction Monitoring Agency: ~~Project Site Manager, SCAQMD, and City LEA~~ City B&S Enforcement Agency: ~~SCAQMD and City LEA~~ City B&S
	See above.	• The project proponent will curtail (cease or reduce) construction during periods of high ambient pollutant concentrations (i.e., Stage II smog alerts).	Adverse	Project Proponent	Monitoring Phase: During project construction Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
	As a reasonable worst-case scenario, grading operations are expected to occur during a 10-hour workday. ~~Diesel fuel consumption for heavy equipment is calculated at approximately 2,800 gallons per day (gpd). Fuel consumption for the eight material delivery trucks is based on 320 miles per day at 5.9 miles per gallon (mpg), and an additional 54 gallons are projected. Gasoline will also be necessary for fueling worker vehicles. Based on 70 workers each traveling 20 miles per day, 1,400 miles would be traveled on a daily basis.~~ The following vehicles would create emissions during project construction: dozers, an excavator, compactors, scrapers, loaders, rock trucks, water trucks, materials delivery trucks, and construction worker cars and trucks. ~~These vehicles would create the following estimated daily emissions during project construction before the incorporation of mitigation measures: 504.7 474.4 pounds of CO, 893.8 899.2 pounds of NO_x, 55.5 53.4 pounds of ROG, 93.9 92.9 pounds of SO_x, and 60.8 58.9 pounds of PM_{10}.~~	See the above mentioned mitigation measure.	Adverse	Project Proponent	Monitoring Phase: During project construction. Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	Fugitive dust during construction is generated either by a mechanical disturbance to soil (i.e., associated with human activities such as grading operations or agricultural tilling) or by wind-related entrainment of dust particles. Site preparation, clearing, surface grading, excavation, and the use of heavy equipment and trucks on unpaved surfaces have the potential to generate significant quantities of dust during initial site preparation activities. ~~The projected PM_{10} emissions from fugitive dust, when added to the projected PM_{10} emissions attributable to vehicle exhausts (60.8 pounds/day), produce approximately 230.8 pounds of PM_{10} emissions per day.~~	Daily watering of active construction areas, active soil stockpiles, and all traveled unpaved roads shall be performed to minimize dust lofting from construction disturbances. Construction areas will also receive a soil stabilization (sealant) product if they are to be left unattended for periods in excess of 5 days and control is required.	Adverse	Project Proponent	Monitoring Phase: During project construction. Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD
	See above.	Wind speed shall be continually monitored using onsite anemometers. Excavation within construction areas shall be halted when the 15-minute average wind speed exceeds 15 mph or when the instantaneous wind speed exceeds 25 mph.	Adverse	Project Proponent	Monitoring Phase: During project construction. Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD
	See above.	Graded areas shall be watered as necessary to reduce dust emissions.	Adverse	Project Proponent	Monitoring Phase: During project construction. Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD
	See above.	Disturbed areas shall be revegetated with an interim ground cover as specified in the proposed revegetation program. Excavation will proceed in a manner to reduce the amount of graded areas at any given time.	Adverse	Project Proponent	Monitoring Phase: During project construction. Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD
	~~See above.~~	~~Public streets (i.e., San Fernando Road) shall be swept at the conclusion of construction work.~~	~~Adverse~~	~~Project Proponent~~	~~Monitoring Phase: During project construction~~ ~~Monitoring Agency: Project Site Manager, SCAQMD, and City LEA~~ ~~Enforcement Agency: SCAQMD and City LEA~~
4.2.12 Operations	During operation, vehicles will be utilized to transport refuse to the landfill. Wastes are deposited within prepared cells and covered daily with cover material. The cells are then compacted before the next lift is applied. When landfill capacity of a working cell is exhausted, a new area is excavated and lined with an impermeable membrane, and cells are formed. Heavy equipment would be used to excavate and prepare new landfill cells, and cover and compact refuse on a daily basis. ~~Onsite equipment and machinery would utilize approximately 900 gpd of diesel fuel.~~	See the mitigation measures below.			
	All equipment is projected to operate 10 hours per day. The following heavy equipment would create daily emissions: bulldozers, a grader, compactors, scrapers and water trucks.	See the mitigation measures below.			

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	~~It is estimated that heavy equipment would result in the following daily emissions before the incorporation of mitigation measures: 233.7 pounds of CO, 414.9 pounds of NO_x, 35.3 pounds of ROG, 41.9 pounds of SO_x, and 26.3 pounds of PM_{10}.~~				
	Volatile organic emissions are associated with the storage and transfer of fuel to project-generated vehicles. The 220 transfer trucks and 640 refuse collection trucks are anticipated to travel approximately 34,280 miles per day. Based on an average fuel consumption of 5.9 mpg, an estimated 5,810 gallons of fuel may be used daily. All of these vehicles are all assumed to use diesel fuel. ~~During operation, waste transfer trucks and curbside collection trucks are anticipated to generate the following daily emissions. before the incorporation of mitigation measures: 1,231.6 pounds of CO, 388 pounds of NO_x, 132 pounds of ROG, 24.2 pounds of SO_x, and 38.6 pounds of PM_{10}.~~	See the mitigation measures below.			
	Gasoline will be utilized by landfill employees who would be commuting to the site and service vehicles and light-duty vehicles that would transport wastes to the site. ~~Employees are anticipated to generate approximately 1,740 commuter miles per day. Onsite service vehicle use is assumed to be minimal and is therefore conservatively projected to generated 100 miles per day. Light-duty trucks are projected to travel approximately 5,000 miles per day. Fuel economy for employee commute vehicles is projected to be 25 mpg; therefore, the daily fuel consumption for all employees is estimated to be approximately 70 gpd. The fuel economy for both onsite service vehicles and light-duty trucks is projected to be 20 mpg; therefore, these vehicles will consume approximately 255 gpd. During operation, employee commutes and local trucks are anticipated to result in the following daily air emissions before the incorporation of mitigation measures: 152.4 pounds of CO, 11.4 pounds of NO_x, 11.2 pounds of ROG, 0.8 pounds of SO_x, and 1.7 pounds of PM_{10}.~~	See the mitigation measures below.			
	Collected landfill gas (LFG) would be burned in a total of five high-efficiency flares, each with a total volume disposal capacity of approximately 6 million standard cubic feet per day (scf/day) or 4,167 standard cubic feet per minute (scf/min). ~~During operations, the combustion of LFG would result in the following daily air emissions before the incorporation of mitigation measures: 1,440 pounds of CO, 289.4 pounds of~~	See the mitigation measures below.			

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	~~NO_x, 30.4 pounds of ROG, 68.4 pounds of SO_x, and 36 pounds of PM_{10}.~~				
Construction Equipment	See above.	• The project proponent will maintain equipment in tune per manufacturer's specifications. • The project proponent will use catalytic converters on gasoline-powered equipment. • The project proponent will retard diesel engine injection timing by 2 degrees.	Adverse ~~(CO, NO_x, and ROG)~~ (CO, NO_x, SO_x, ROG, and PM_{10})	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager, SCAQMD, and City LEA~~ City B&S Enforcement Agency: ~~SCAQMD and City LEA~~ City B&S
		• High-pressure fuel injectors will be installed. • Heavy equipment will use reformulated, low-emission diesel fuel. • The project proponent will substitute electric and gasoline-powered equipment for diesel-powered equipment where feasible. • Where applicable, equipment will not be left idling for prolonged periods.			
	See above.	• The project proponent will curtail (cease or reduce) construction during periods of high ambient pollutant concentrations (i.e., Stage II smog alerts).	Adverse	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ SCAQMD~~, and City LEA~~ Enforcement Agency: SCAQMD
Refuse Trucks	See above	The following measures will be applied to the project proponent's operated trucks that utilize the project site. • Refuse trucks shall be maintained in proper tune. Trucks observed to emit excessive amounts of smoke (particulate matter) shall either be tuned up or repaired, as applicable.	Adverse	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager, and SCAQMD~~ City B&S Enforcement Agency: ~~SCAQMD~~ City B&S
	See above	• Where applicable, high-pressure fuel injector nozzles shall be used, and diesel engine timing shall be retarded by 2 degrees.	Adverse	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager, and SCAQMD~~ City B&S Enforcement Agency: ~~SCAQMD~~ City B&S
	See above.	• Using a progressive fee schedule, the project proponent shall encourage trucks to carry full loads.	Adverse	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
					~~SCAQMD, and City LEA~~ City B&S Enforcement Agency: ~~SCAQMD~~ City B&S
	See above.	• The project proponent shall encourage trucking to be performed during off-peak hours. This shall be accomplished through coordination of deliveries with the transfer stations that supply refuse, restrictions in the hours of operation, and/or a fee schedule that penalizes haul trucks arriving during peak congestion periods. This will reduce emissions by increasing truck speeds and eliminating prolonged idling in traffic.	Adverse	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager, SCAQMD, and City LEA~~ City B&S Enforcement Agency: ~~SCAQMD and City LEA~~ City B&S
	See above.	• When operating onsite, trucks shall not be left idling for periods in excess of 5 minutes.	Adverse	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager, SCAQMD, and City LEA~~ City B&S Enforcement Agency: ~~SCAQMD~~ City B&S
	Fugitive dust is produced by daily site operations, including landfilling operations, such as the excavation of new cells, procurement of cover material, wind action on material that has been stockpiled during the initial construction, and truck travel on both the paved access roadway and the unpaved haul route surface to the active working face. ~~Following initial site preparation, normal operations would be confined to approximately 40 acres.~~ Heavy equipment would be utilized to excavate and prepare new landfill cells, procure cover materials, and compact refuse on a daily basis. ~~Of the 40-acre area, up to 10 acres would be used for active landfilling. It is anticipated that 10 acres would be used for the procurement of cover materials. The entire 40 acres~~ These activities would be subject to erosion and potential fugitive dust emissions. Because dust generally settles on horizontal surfaces, onsite vehicular travel over paved surfaces would also produce fugitive dust emission. Dust is also associated with vehicular travel over unpaved or hard-packed surfaces such as the haul road. ~~The proposed project would generate a total of 3,594 pounds of PM_{10} emissions per day during operations, before the incorporation of mitigation measures.~~	• Private owner-operators shall be warned that, if their trucks emit excessive amounts of smoke as determined by scale house workers, they will not be allowed future access to the landfill facility.	Adverse	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager, SCAQMD, and City LEA~~ City B&S Enforcement Agency: ~~SCAQMD~~ City B&S
Truck Travel and Fugitive Dust Emissions	See above.	• To minimize fugitive dust emissions, the access roadways shall be paved, as necessary, and haul roads to the working face areas shall be hard packed and or covered with ~~gravel~~ a crushed stone layer. Paved and/or ~~gravel~~ crushed stone roadways shall extend up to new	Adverse	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
		active fill areas as development of the landfill progresses.			
	See above.	• Curbs and gutters shall be used. At least twice daily watering or wet sweeping of paved roads to remove windblown surface dust shall occur. AP-42 assigns a control efficiency of 50 percent for twice weekly cleaning of industrial paved roads. With twice daily cleaning, a control efficiency in excess of ~~95~~ 90 percent is predicted.	Adverse	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
	See above.	• ~~The regular application of an~~ For unpaved clay roads, mitigation shall include an SCAQMD-approved chemical dust suppressant with a manufacturer's demonstrated control efficiency ~~of 80~~ in excess of 90 percent ~~and subsequent watering~~ shall be regularly applied to inactive areas, during windy periods. Note that this control efficient is less than (i.e., more conservative than) the 95-percent value used at the El Sobrante Landfill. (*Draft South Coast Air Quality Management District Consultation No. 4, Work in Progress Air Quality Analysis Refinements, El Sobrante Landfill Expansion*, TRC Environmental Solutions, Inc., May 2, 1997).	Adverse	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
	~~See above.~~	~~• The placement and proper operation of a wheel washer for trucks at the site exit to minimize dust and dirt entrainment prior to trucks leaving the site.~~	~~Adverse~~	~~Project Proponent~~	~~Monitoring Phase: Throughout landfill operations.~~ ~~Monitoring Agency: Project Site Manager, SCAQMD, and City LEA~~ ~~Enforcement Agency: SCAQMD and City LEA~~
	See above.	• For unpaved crushed stone covered roads, mitigation shall include the use of a crushed stone topcoat in addition to the regular application of a SCAQMD-approved chemical dust suppressant and subsequent watering, a control efficiency in excess of 95 percent is predicted.	Adverse	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: Project Site Manager, SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
Heavy Equipment Operations	See above.	• Operations shall be restricted to encompass no more than a 10-acre active working face area.	Adverse	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
	See above.	• To the extent technically feasible, material excavated from one portion of the project site shall be used as daily	Adverse	Project Proponent	Monitoring Phase: Throughout landfill operations.

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
		cover material in an adjacent area to minimize travel distances for such cover material.			Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
Site Erosion	See above.	• Subject to approval by the California Integrated Waste Management Board (CIWMB), filling in each active area shall be prolonged through the utilization of a 20-foot maximum cell height. This would reduce the area of excavation and minimize the disturbances to the landfill, thereby providing an effective control of fugitive dust.	Adverse	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB~~, SCAQMD,~~ and City LEA Enforcement Agency: CIWMB~~, SCAQMD,~~ and City LEA
	See above.	• A temporary vegetation cover shall be established on all slopes that are to remain inactive for a period longer than 180 days.	Adverse	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
	See above	• An SCAQMD approved soil stabilization (sealant) product shall be used to retard soil erosion and enhance revegetation. Soil sealant shall be applied when necessary to selected working areas of the landfill. The sealant will also be used as a binder or tackifier to hold seed during revegetation, mulch, and fertilizers in-place until grasses become established and stabilize on the landfill surface.	Adverse	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
4.2.13 Odor Impacts	Waste materials received on a daily basis at the proposed City/County Landfill have the potential to emit detectable odors prior to the application of daily cover material.	The natural biological processes that generate odors in a landfill through anaerobic decomposition cannot be prevented or avoided. However, the LFGs shall be prevented from escaping to the atmosphere through the use of control measures. These measures include using daily and intermediate cover material over deposited wastes, filling any surface cracks with clean dirt as necessary, and extracting LFG through the use of an LFG collection and recovery system and destroying collected gases by combustion.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
	See above.	Operational techniques shall be utilized to control odor sources at the landfill. The size of the working face shall be limited so that the area of waste exposed to the atmosphere is kept to a minimum.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
	See above.	Solid waste shall be compacted within 1 hour of its arrival at the working face.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager, SCAQMD,~~ and City LEA

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
					Enforcement Agency: ~~SCAQMD and~~ City LEA
	The second source of odor is produced by the anaerobic microbial decomposition of organic matter in refuse that produces natural LFGs. Carbon dioxide (38 to 46 percent) and methane (53 to 60 percent) are the two main constituents of the natural gases produced, neither of which has a perceptible odor to humans. However, trace amounts of other gases that are malodorous are also produced during anaerobic decomposition. Odors can occur when the landfill surface, due to differential settlement or subsidence and cracks, allows the LFGs to escape into the atmosphere.	The LFG collection and recovery system shall be installed in phases as each portion of the landfill site is filled. The final system shall contain a network of gas extraction wells, collection system piping, and flaring facilities. Because the LFG generation begins at lower levels of volume and increases during the landfill site life, the gas will be flared initially until sufficient quantities are available for processing into electricity.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
	See above.	If an odor problem should develop, appropriate control measures shall be implemented. These measures include the application of daily cover material or more frequent application of the cover material to seal the landfill surface, or adjustments to the wells, equipment, and operation of the LFG collection and recovery system.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
	See above.	To ensure that odors are kept to a minimum, the following odor/LFG monitoring program shall be implemented for the proposed landfill project. The monitoring program shall comply with the requirements of SCAQMD Rule 1150.1 and include: Sample Probe Installation: One monitoring probe per 1,000 feet of landfill perimeter shall be installed to identify potential areas of subsurface LFG migration. These probes shall be monitored to ensure that large quantities of LFG do not vent offsite through subsurface soils. - Integrated Landfill Surface Sampling: The landfill surface shall be monitored to ensure that the average concentration of total organic compounds over the landfill surface does not exceed SCAQMD's standard of 50 ppm. - Ambient Air Samples: 24-hour integrated gas samples and required meteorological data shall be taken to assess any impact the landfill is having on the ambient air quality at the landfill perimeter. - Instantaneous Landfill Surface Monitoring: Spot checks on the landfill surface shall be made to determine the maximum concentration of total organic compounds measured as methane, measured at any one point on the	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
		surface of the landfill does not exceed the SCAQMD's standard of 500 ppm. - Regular Monitoring and Annual Testing: LFG concentrations at perimeter probes, gas collection system headers, the landfill surface, and in ambient air downwind of the landfill shall be monitored once per month or less frequently (but no less than quarterly) as required by the SCAQMD. The LFG collection system shall be adjusted and improved based on quarterly monitoring data and annual stack testing results.			
	See above.	LFG flaring systems shall be sited as required by the SCAQMD and constructed using BACT. The flames shall be totally contained within the stack. Flame arresters shall be provided to the satisfaction of the City Local Enforcement Agency. To the extent technically and economically feasible, gas recovered at the landfill site shall be converted to energy or developed for other beneficial uses rather than flared.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
4.3 SURFACE AND GROUNDWATER **4.3.1 Surface Water**	Implementation of the proposed project would change the existing surface water patterns and hydrologic conditions at the project site. Construction grading and the removal of surficial vegetation would remove existing barriers that currently act to dissipate (i.e., slow down and reduce) water runoff from the site. As a result, the proposed project has the potential to increase the surface water runoff and peak discharge, increase erosion and sediment transport, and decrease surface water quality due to increased sediment loads until new improvements are developed as a result of project implementation. Leachate from saturated refuse has the potential to become contaminated and potentially migrate.	To ensure that infiltration of surface water into the closed landfill cells is minimized, surface runoff shall be intercepted and diverted around the landfill. The method of diversion used at the project site shall include the use of lined interceptor ditches placed along the edges of the landfill areas. This system of ditches shall flow into monitored sedimentation basins. After sediment content has been reduced, surface waters shall flow into the existing flood control channel directly east of the project site entrance.	None	Project Proponent	Monitoring Phase: Prior to commencement of landfill development. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
	See above.	As development of the site proceeds, surface drainage systems shall be maintained so that surface runoff is diverted away from working slopes and isolated from landfilled refuse. Onsite drainage channels would be designed per CCR, Title 23, Division 3, Chapter 15, Article 3, § 2533(C), and County of Los Angeles Public Works Department, Flood Control Division requirements.	None	Project Proponent	Monitoring Phase: Prior to commencement of landfill development. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE
	See above.	Permanent bench drainage ditches shall be installed when final cover is placed on completed portions of the landfill. These ditches shall be lined. Temporary unlined drainage	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Geologist/Engineer,~~

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
		facilities consisting of diversion ditches (V-ditches) where necessary shall directly intercept natural surface runoff. Any intermittent channel flow in the existing canyon bottom shall be captured, channelized, and conveyed into Sedimentation Basin A. Diversion ditches shall convey surface runoff from the undisturbed areas to the permanent perimeter ditches for safe transport around the landfill footprint. Surface covers of various types, from mulches to vegetation, shall be used to retard erosion from areas of disturbance. In addition, areas of disturbance shall be kept at a minimum during active filling operations.			Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE
	See above.	As filling operations progress upward in elevation and laterally across the canyon, both permanent and temporary drainage facilities shall be used to provide appropriate drainage protection. The lower elevation portions of the landfill working face shall be placed under final cover as soon as final grade is attained, and bench ditches shall be installed that will connect to adjacent, permanent perimeter ditches. These ditches shall connect directly to the temporary diversion drainage ditches that will protect the active landfill areas from natural surface runoff.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE
	The development of the project could potentially impact surface water runoff during onsite grading and construction activities. In addition to changes in stormwater runoff volume and velocities resulting from the proposed project implementation, there exists the potential for non-stormwater discharges to be transported into the stormwater conveyance systems. Potential soil sediments and pollutants could be conveyed into the existing localized stormwater system from construction activities. Small quantities of pollutants, such as oils, lubricants, or diesel fuels used during construction, have the potential to enter the existing storm drainage system, thereby degrading water quality.	In order to monitor the effectiveness of those measures designed to prevent pollution from entering the offsite stormwater system, the project proponent shall be required to apply for coverage under the SWRCB's General Construction Activities Stormwater Permit Programs.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, and City BOE
	See above.	The surface water collection system shall be designed to collect runoff and collect/retain suspended solids. Water leaving the sedimentation basins shall be monitored in accordance with NPDES requirements.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, and City BOE

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	See above.	Surface water quality shall be monitored by collecting water samples from the sedimentation basins to ensure that water quality protection standards (contaminant levels) as determined for the site by the LARWQCB are not exceeded.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, and City BOE
	The 100-year, 24-hour rainfall depth for the design storm is 9.80 inches. The anticipated post-construction peak runoff flow at the mouth of the canyon is estimated at 2,000 cubic feet per second. Expected sediment production is 24,000 cubic yards/square mile (cu. yd./sq. mi.). For Sunshine Canyon (890 acres or area of watershed) this equates into about 33,375 cu. yds. or 20.7 acre-feet. This is the amount of sediment load expected from within Sunshine Canyon from a single design storm event.	Sediment shall be cleaned out of the sedimentation basins after every significant storm.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE
	See above.	The final landfill cover shall be compacted and graded with a minimum 3-percent gradient to preclude percolation of rainwater and direct surface water runoff away from the landfilled refuse and into drains that ultimately discharge into the monitored sedimentation basins.	None	Project Proponent	Monitoring Phase: Throughout landfill operations and on an on-going basis. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE
	See above.	An erosion control plan would be implemented by the project proponent to prevent stormwater pollution from construction activity. Construction materials, equipments and vehicles would be stored or parked in areas protected from stormwater runoff. Construction material loading and unloading would be in designated areas to minimize any washout due to stormwater runoff. Pre-construction controls would be implemented to include the use of a sandbagging system, including sandbag check dams and sandbag desilting basins, which would be used to limit runoff velocities and minimize sediment in stormwater runoff.	None	Project Proponent	Monitoring Phase: Throughout landfill operations and on an on-going basis. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, and City BOE
	See above.	A preventive maintenance program would be implemented by the project proponent, including inspection of facility equipment, systems, and stormwater management devices to detect conditions that may cause breakdowns or failures resulting in discharge of materials into stormwater. This program applies to the onsite drainage ditches; rip-rap; berms and dikes; dust control; silt fences; diversion grading; and pavement surfaces. Each system and piece of equipment would be inspected monthly. Procedures for inspection would	None	Project Proponent	Monitoring Phase: Throughout landfill operations and on an on-going basis. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, and City BOE

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
		vary, due to the piece of equipment or system. However, the major elements of the inspection program would include checking for cracks or structural failures, inspecting parts or pieces of equipment nonfunctioning, checking for the degradation or deterioration of operating units, and investigating the need for cleaning or emptying units.			
4.3.2 Groundwater	The site is located within the San Fernando Hydrologic Subarea of the San Fernando Valley Groundwater Basin. Groundwaters within the subarea are beneficially used for municipal, industrial, and agricultural water supply. Based on site studies, groundwater appears restricted to the alluvial material beneath Sunshine Canyon. Based upon published literature, field hydrogeology tests, geologic mapping and water quality data, consulting geologists have concluded that landfilling within Sunshine Canyon and specifically within the City portion of Sunshine Canyon would not create a significant impact on beneficial groundwaters of the San Fernando Valley Groundwater Basin.	In compliance with the Resource Conservation and Recovery Act (RCRA), Subtitle D, 40 CFR, Part 258, Subpart D, § 258.40 (Design Criteria), the proposed City/County Landfill shall install a composite liner system consisting of two components: (1) the upper component shall consist of a minimum 30-mil flexible membrane liner (FML) and (2) the lower component shall consist of a low-permeability soil layer equivalent to at least a 2-foot layer of compacted low-permeability soil with a hydraulic conductivity of no more than 1×10^{-7} centimeters per second. If an FML component consisting of high-density polyethylene is utilized, it shall be at least 60 mils thick. If a thinner soil barrier layer of lower permeability is utilized, it shall have equal or superior containment capability. The FML component shall be installed in direct and uniform contact with the underlying low-permeability soil component. In addition, the landfill shall have a LCRS that shall consist of either a granular layer 1-foot minimum in thickness or a geosynthetic alternative with an equivalent flow capacity, and a minimum 2-foot thick protective soil cover over which refuse will be placed. There shall also be a protective toe berm at the landfill terminus.	None	Project Proponent	Monitoring Phase: Prior to commencement of landfill development. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB
	See above.	In accordance with RCRA Subtitle D, 40 CFR, Part 258, the composite liner system shall be placed under the entire landfill footprint, including the canyon bottom and side slopes. Design details of each site-specific liner system that shall be constructed shall be described in detail in the project proponent's ROWD for the landfill facility. The liner systems shall be constructed and field tested in accordance with strict Quality Assurance/Quality Control (QA/QC) procedures pursuant to criteria submitted to and approved by the LARWQCB prior to construction.	None	Project Proponent	Monitoring Phase: Prior to commencement of landfill development. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB
	Numerous springs and seeps have been discovered in and around Sunshine Canyon, primarily in the County portion of the canyon. The potential exists for these springs and seeps within the project site. Generally, these springs and seeps are exposed during construction, grading, and the removal of the alluvial materials during excavation activities.	Areas of natural groundwater seepage shall be intercepted by the installation of a subgrade gravel drainage blanket. A series of underdrains shall be placed in areas where seeps and springs have been identified, and they shall collect and convey any water from these sources to the sedimentation basin. In the event any chemical constituents are in the seep water, the seep waters will be sampled, analyzed, collected,	None	Project Proponent	Monitoring Phase: Prior to commencement of landfill development. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
		and then sent either to the onsite leachate treatment facility or offsite for proper treatment and disposal. The nature and the source of the seep would be investigated including additional sampling and laboratory testing.			
	Excess water use or water spreading at or near the landfill may result in leachate generation and have an adverse impact on the existing groundwater conditions. Excess water used for irrigation on slopes to support vegetative growth and dust control could create the potential for leachate formation within the landfill mass.	The LCRS shall be installed at the base and side slopes of the landfill. This system shall be designed and installed to collect generated leachate for disposal consistent with LARWQCB requirements. The collection system shall consist of a filter rock blanket embedded with a system of collection pipes or a geosynthetic alternative that collects and transports the fluid to a holding tank. In accordance with RCRA, Subtitle D, 40 CFR, Part 258, the collection systems shall be designed to limit the hydraulic head on the liner to less than 12 inches. Collection pipes shall be sized and spaced to reduce the hydraulic head in the leachate collection system as specified in WDRs. Leachate shall be recovered and treated onsite. The treated leachate shall be sampled on a regular basis to affirm suitability for reuse onsite.	None	Project Proponent	Monitoring Phase: Prior to commencement of landfill development. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, and City ~~of~~ LEA Enforcement Agency: LARWQCB
	See above.	Final design and operating conditions for the leachate removal and treatment system shall be as specified by the LARWQCB in the proposed landfill's WDRs. The LCRS shall be designed and installed in accordance with CCR, Title 23, Division 3, Chapter 15, Article 4, § 2543 (Leachate Collection and Removal Systems), which requires that the LCRS be designed, constructed, maintained, and operated in a manner that collects and removes twice the maximum anticipated daily volume of leachate from the waste management unit.	None	Project Proponent	Monitoring Phase: Prior to commencement of landfill development. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB
	Volatile organic compounds have been detected sporadically in one groundwater monitoring well. Subsurface gas migration can adversely affect groundwater quality.	A gas collection layer shall be placed beneath the liner system where it overlies the existing inactive landfill to mitigate the potential for LFG migration.	None	Project Proponent	Monitoring Phase: Prior to commencement of landfill development and throughout landfill operations. Monitoring Agency: ~~Project Geologist/Engineer,~~ SCAQMD, LARWQCB, CIWMB, and City LEA Enforcement Agency: SCAQMD and LARWQCB
	Results of the testing on both surface and groundwater samples indicated that the waters of the Sunshine Canyon watershed are of poor quality and unfit for use as a drinking water source. Concentrations of constituents in the groundwater; including chloride and VOCs have been detected at the project site. Elevated chloride concentrations have been detected in groundwater at the mouth of the canyon.	The existing groundwater monitoring wells located within the City portion of Sunshine Canyon shall continue to be monitored during the development of the proposed project. The monitoring system may be revised as construction progresses in the areas where wells are located as approved by the LARWQCB.	None	Project Proponent	Monitoring Phase: Prior to commencement of landfill development. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	See above.	A preliminary closure/postclosure plan shall be provided as part of the operating permit for the landfill. Closure regulations are contained in the CCR, Title 23, Division 3, Chapter 15, Article 8 (Closure and Postclosure Maintenance), § 2580 (General Closure Requirements) et seq. Completion of landfilling operations will occur once final approved elevations are reached.	None	Project Proponent	Monitoring Phase: Prior to commencement of landfill development and throughout landfill operations. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB, CIWMB, and City LEA
	See above.	The design, operation, and final closure of the landfill project shall be monitored by the City LEA, CIWMB, and LARWQCB to ensure that the landfill will not create significant environmental impacts to local or regional water supplies.	None	Project Proponent	Monitoring Phase: Prior to commencement of landfill development and throughout landfill operations. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB, CIWMB, and City LEA
	See above.	Application of daily, intermediate, and final covers in accordance with applicable regulatory requirements shall aid to restrict leachate formation by inhibiting the infiltration of water into the landfill waste prism.	None	Project Proponent	Monitoring Phase: Prior to commencement of landfill development and throughout landfill operations. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB, CIWMB, and City LEA
	See above.	Dust control water shall be applied to wet only the upper soil surface.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB, CIWMB, and City LEA
	See above.	The project shall be operated as a Class III landfill and shall not accept hazardous materials or liquid waste. Further restrictions will be identified in the future WDRs required prior to project development.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Geologist/Engineer, Project. Horticulturalist/ Forester,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB, CIWMB~~, and City LEA~~
	Potential impacts could occur as a result of the installation of a 12,000 gallon underground diesel fuel storage tank.	Underground diesel fuel storage tanks will be installed, monitored and inspected in compliance with CCR Title 23, Division 3, Chapters 16 and 17 and City of Los Angeles			Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager, City~~

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
		Municipal Code Sections 57.31.34 through 57.39.18. Underground tanks would be double-walled and have sufficient secondary containment and a leak interception and detection system to prevent fluid migration.			Enforcement Agency: ~~Fire Dept.~~, LAFD, and City LEA ~~City Fire Dept.~~ LAFD
4.3.3 Flood Hazard/ Mudflow Hazard	Refer to Section 4.3.1, Surface Water within this table.				
4.4 BIOLOGICAL RESOURCES					
4.4.1 Vegetation and Wildlife Habitat	Implementation of the project would impact ±3 acres of arroyo willow series, ±0.3 acres of southern willow scrub, ±31 acres of Coast live oak woodland, ±82 Venturan coastal sage scrub, ±5 acres of chamise chaparral, ±3 acres of big-cone Douglas fir and ±9 acres of nonnative grassland. Other areas include ±0.7 acres of ornamental plantings, .03 acres of mitigation area, and ±125 acres of the existing inactive landfill.	Venturan Coastal Sage Scrub A detailed conceptual mitigation plan shall be prepared by the project proponent and contain specific information on planting, maintenance, and monitoring. A revegetation plan, that includes Coastal sage scrub restoration can feasibly occur onsite. The implementation of this plan will provide onsite mitigation greater than 1:1 to offset the loss of coastal sage scrub. Surface soils and seed source will be gathered from areas of the project site and spread within onsite mitigation areas.	None	Project Proponent	Monitoring Phase: Throughout landfill operations and on an on-going basis. Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
	Two populations of slender mariposa lily would be directly impacted by project development. These populations are located within the northern portion of the project site within City jurisdiction.	Slender Mariposa Lily A conceptual mitigation plan for transplanting relocated lilies shall be developed by consulting biologists. That plan shall describe transplantation techniques, monitoring, and provide data required by Responsible Agencies during a 5-year monitoring period.	None	Project Proponent	Monitoring Phase: Throughout landfill operations and on an on-going basis. Monitoring Agency: City Planning Dept. Enforcement Agency: USFWS and City Planning Dept.
	Development of the project within the City portion of Sunshine Canyon could potentially disturb suitable habitat ~~for~~ where the San Diego Horned lizard resides. This species has been observed onsite during surveys.	San Diego Horned Lizard Impacts on the San Diego horned lizard can be mitigated to a level of less than significant by restoring coastal sage scrub habitat. This will create a temporal loss of the species, but the population should recover following restoration of this habitat. Topsoils should be selected that are friable to suit lizard habitat requirements.	None	Project Proponent	Monitoring Phase: Throughout landfill operations and on an on-going basis. Monitoring Agency: City Planning Dept. Enforcement Agency: USFWS and City Planning Dept.
	Because disturbances would occur to sensitive plant communities, such as the Venturan coastal sage scrub and this habitat is suitable for California gnatcatchers, potential impacts may result. However, no gnatcatchers have been observed onsite during the numerous field surveys that have conducted by consulting biologists.	California Gnatcatcher Surveys shall be conducted for California gnatcatchers prior to onsite grading to determine the status of this species within development areas. Surveys shall be conducted in accordance with USFWS protocol, and if present, a Section 10(a) permit	None	Project Proponent	Monitoring Phase: Prior to onsite construction grading. Monitoring Agency: City Planning Dept. Enforcement Agency: USFWS and City Planning Dept.

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
		from USFWS would be obtained by the project proponent. If grading activities occur during the nesting season (i.e., March through July), a federally permitted biologist will survey areas of project development to determine if the species is present. If California gnatcatchers are present, onsite grading activities shall cease until USFWS officials are notified. Either additional coastal sage scrub restoration or the purchase of suitable offsite habitat will be required, if California gnatcatchers are found onsite.			
	Potential breeding habitat for the least Bell's Vireo exists onsite within the southern willow scrub and arroyo willow series habitats. This species was not observed during focused field studies conducted by consulting biologists.	Least Bell's Vireo Surveys shall be conducted for least Bell's vireo prior to onsite grading to determine the status of this species within development areas. Surveys shall be conducted in all areas of potential habitat. If this species is present onsite, a Section 10(a) permit from USFWS would be obtained by the project proponent. If grading activities occur during the nesting season (i.e., April through July), a biologist will survey areas of project development to determine if the species is present. If present, onsite grading activities shall cease until USFWS officials are notified.	None	Project Proponent	Monitoring Phase: Prior to onsite construction grading. Monitoring Agency: City Planning Dept. Enforcement Agency: USFWS and City Planning Dept.
	Potential breeding habitat exists onsite for the western burrowing owls. This species was not observed during field studies by consulting biologists.	Western Burrowing Owl Preconstruction surveys shall be conducted by a consulting biologist at least 30 days prior to project grading to determine if the species is within the project site. If surveys indicate the presence of western burrowing owls, a relocation program shall be implemented.	None	Project Proponent	Monitoring Phase: Prior to onsite construction grading. Monitoring Agency: City Planning Dept. Enforcement Agency: USFWS and City Planning Dept.
	Native migratory birds are protected during breeding seasons. Potential impacts could occur to birds and their nest during the breeding season.	Migratory Bird Treaty Act To prevent the loss of an active migratory bird nest, vegetation shall not be cleared during the breeding season (i.e., March 15 to August 1). If vegetation clearing needs to occur, surveys shall be conducted by biologists to determine active migratory bird nests. All active migratory bird nests shall be protected until the young become independent.	None	Project Proponent	Monitoring Phase: Prior to onsite construction grading. Monitoring Agency: City Planning Dept. Enforcement Agency: USFWS and City Planning Dept.
	Project development could result in the removal of active raptor nests.	Raptor Nests If habitat removal is proposed during the raptor breeding season (i.e., March to July), a survey shall be conducted for active nesting areas. If active nests are found, no construction activity shall take place within 500 feet of an active nest, until	None	Project Proponent	Monitoring Phase: Prior to onsite construction grading. Monitoring Agency: City Planning Dept. Enforcement Agency: USFWS and City Planning Dept.

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
		the young have fledged. The 500-foot perimeter around each active nest shall be fenced. Trees containing nests shall only be removed during the non-breeding season.			
4.4.2 Wetlands and Riparian Habitat	Streamzones and wetland areas located within the proposed landfill footprint and external to that area (to provide for ancillary facility construction) would be graded, filled, or disturbed as a result of landfilling. Approximately 2.95 acres of potential jurisdictional waters and wetlands and ±3.75 acres of riparian habitat would be affected.	Offsite Mitigation Sites Potential candidate mitigation sites have been identified by the project proponent in conjunction with resource agencies for consideration to compensate for impacts on riparian and wetland resources as a result of project development. These sites include Bull Creek, Bee Canyon and East Canyon, which are located proximate to the project site. Prior to the development of any detailed mitigation plans and drawings, the final selection will be determined cooperatively by the CDFG, Corps, SWRCB, and other regulatory agencies in conjunction with the City and project proponent.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: USFWS, CDFG and City Planning Dept. Enforcement Agency: USFWS, CDFG, and City Planning Dept.
	See above.	*Purchasing Wetland Credit* If a potential candidate site is unavailable, the project proponent would purchase wetland credit through an established mitigation bank. The project proponent would be required to pay an amount established by the mitigation bank developer (i.e., public, non-profit, or private entity) as compensatory mitigation.	Significant Impact	Project Proponent	Monitoring Phase: Prior to commencement of landfill development. Monitoring Agency: USFWS, CDFG, and City Planning Dept. Enforcement Agency: USFWS, CDFG, and City Planning Dept.
	See above.	*Funding of an Invasive Species Eradication Program* Under the direction of the Corps, the project proponent would seek authorization under Regional General Permit No. 41, which would allow the mechanized removal of invasive, exotic plants (e.g., giant reeds [*Arundo donax*] and salt cedar [*Tamarix* spp.]) from waters of the U.S., including wetlands within the jurisdiction of the Los Angeles District of the Corps.	Significant Impact	Project Proponent	Monitoring Phase: Prior to commencement of landfill development. Monitoring Agency: USFWS, CDFG, and City Planning Dept. Enforcement Agency: USFWS, CDFG, and City Planning Dept.
4.4.3 Native and Nonnative Tree Resources	Implementation of the proposed project would require the removal of 675 native and nonnative trees. Approximately 545 Coast live oak trees and 19 canyon live oak trees would be removed. Development would also directly impact 14 Southern California black walnut trees.	Native tree species shall be replaced at a 2:1 (replacement: removal) ratio, consisting of 15-gallon or 5:1 3-gallon container trees. Mitigation trees shall be planted prior to impacted trees being removed, thus allowing trees to grow to specimen size in the field. A specimen-size tree shall be defined as a 15-gallon tree with a minimum trunk caliper of 1 inch measured 1 foot above ground. All mitigation trees shall be specimen size within 1 year after tree removal.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	See above.	Nonnative tree species shall be replaced at a 2:1 ratio, consisting of 3-gallon Coast live oak trees.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.
	See above.	A total of 100 24-inch box and 25 36-inch box size Coast live oak trees shall be planted in areas identified by the City. These trees shall be natural in form. The total mitigation tree count obtained using the 5:1 replacement ratio, shall be reduced by 125 trees to account for the inclusion of these larger trees.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.
	See above.	Mitigation tree planting shall occur within the 100± acre open space buffer area located south of the existing inactive landfill. Appropriate planting locations shall be selected within the buffer area based on soil type, steepness of the slope, and aspect (i.e., location and or direction of the sun).	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.
	See above.	Prior to tree planting, the mitigation site shall be prepped to create an environment favorable for native and nonnative tree growth and survival. The initial step in tree planting is to clear away unwanted grass, weeds, or brush. A minimum 3-foot radius of vegetation shall be cleared around the planting location. All planting holes shall be dug to a minimum depth of 24 inches. If soil conditions cannot accommodate the minimum depth, planting holes shall be relocated to a more suitable location. Trees will be spaced 15 to 20 feet in a random, nongeometic pattern. Row or grid spacing will be avoided to provide a natural look to the mitigation planting.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.
	See above.	A poultry wire screen with 1-inch-diameter holes shall be installed around the outside wall of the tree planting hole and folded closed on the bottom. The screen shall extend downward to enclose the root ball of the tree that will protrude 1 foot above final grade.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.
	See above.	Backfill material shall be used for planting material and shall consist of loose friable soil. The planting shall be backfilled to a depth that allows the root crown of the plant to be even with or slightly higher than the surrounding grade. All planting locations shall be preirrigated to ensure that moisture levels are at or near capacity.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.
	See above.	Prior to tree planting, all containers shall be thoroughly soaked. Once at the mitigation site, trees shall not be removed from their containers until all site preparation work has been completed. The wire cage shall be installed around	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
		the planting hole, and backfill material shall be filled to one-half the depth of the root wod. A 27-gram Agriform fertilizer tablet shall be placed approximately 1 inch from the root wod. Backfilled soil shall be tamped and soaked to remove any air pockets.			
	See above.	Following tree planting, the area shall be mulched with either wood chip or recycled green waste. The mulch shall be applied in an even layer approximately 6 inches or more in thickness.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.
	See above.	Drip irrigation shall be provided for all planted trees to ensure adequate growth and allow year-round planting. The irrigation system shall include a liquid fertilizer injection system to maintain optimum plant health and growth.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.
	See above.	The irrigation system shall utilize plastic polyvinyl chloride piping as its main supply lines. Distribution lines shall consist of ½-inch-diameter polyethylene drip tubing. Water shall be delivered to the plants via conventional drip spot emitters. Vortex emitters rated at 1 to 3 gallons per hour shall be used for the emitters. All irrigation water shall be filtered through a "Y" filter containing a 150 mesh screen. The irrigation systems shall be controlled automatically with remote battery-powered controllers and electrical irrigation valves. Watering frequency and duration shall be adjusted as necessary, depending on soil condition, weather, and plant requirements.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.
	See above.	To assure successful establishment and survival of the mitigation trees, a 3-year monitoring and maintenance program shall be implemented. Each year the mitigation planting shall be monitored for growth and survival.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.
	See above.	An annual monitoring report shall be prepared and submitted to the City Department of Public Works, Street Tree Division by the project proponent. This report shall detail the growth and survival record for each mitigation tree planted. The report will provide an accounting of the number of trees required for mitigation versus the number of qualifying trees planted. Maintenance recommendations will be included in the annual report.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.
4.5 NOISE					
4.5.1 Construction Noise Impacts	Construction noise can cause short-term impacts on ambient noise levels because the levels produced by construction	Sensitive land uses would not be impacted by project construction; therefore, no mitigation measures would be			

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	activities can reach high volumes over a short period of time. Heavy equipment would be the primary emitters of noise during short-term construction phasing. A value of 89 dBA at a distance of 50 feet is the predicted average noise for excavation involved in the construction of industrial and commercial facilities, and a similar level is expected for project construction. At a distance of 1,700 feet, the nearest residential units would be exposed to a noise level of 54 dBA. Because the existing ambient noise level near the closest receptor (located 1,700 feet southwest of the nearest point of the construction area onsite) is 52.4 dBA, a construction noise increase to 54 dBA at that location would not be considered a significant increase according to thresholds criteria.	required.			
	Noise would also be produced by construction workers and delivery trucks accessing the site. Construction traffic would be largely limited to that produced by construction worker commute trips. The main point of potential impact would be at the landfill entrance, because all construction workers would use this access roadway and receptors are located directly across the street, along San Fernando Road. It is anticipated that 70 trips would be added to the existing 1,970 vehicles that already use San Fernando Road during the a.m. peak hour. An additional 70 vehicles would add less than 0.2 dBA to the peak hour traffic noise (and far less to the CNEL). This impact would not be considered audible or present a significant noise impact on sensitive receptors in the immediate area. The total project contribution to the p.m. peak hour traffic noise level would be considered even less since the existing p.m. peak hour traffic volumes are greater than a.m. peak hour volumes.	No mitigation measures required.			
4.5.2 Operational Noise Impacts	The noise generated from landfilling operations is expected to be similar to noise produced during construction activities, since construction activities and landfilling activities (or operational characteristics) would utilize the same types of equipment. The noise emanating from the existing, inactive landfill (associated with routine maintenance) is not audible to the residential developments located south of the project site unless maintenance equipment is operating near the top of the ridgelines. All proposed operational activity related to the proposed project would take place within the confines of Sunshine Canyon and below the existing ridgelines. Any sound from landfilling operations would be blocked from these areas by intervening terrain and landscaping within the 100± acre buffer zone.	Landfilling operations shall be limited to the hours of 6:00 a.m. to 6:00 p.m., Monday through Friday, and from 7:00 a.m. to 2:00 p.m. on Saturday. However, the landfill entrance gate shall be open to waste-hauling vehicles at 5:00 a.m., Monday through Friday, and at 7:00 a.m. on Saturday to provide for truck and vehicle queuing.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ City Planning Dept., and City LEA Enforcement Agency: City Planning Dept. and City LEA

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	Potentially significant noise increases are projected to occur along Sepulveda between the I-5 Freeway and San Fernando Road and along San Fernando Road between Sepulveda and Balboa. However, neither of these routes contain any sensitive receptors; therefore, the impact is not considered significant. Although the model predicts that San Fernando Road would show a as much as 3 dBA CNEL increase near the trailers located immediately northeast of the landfill entrance, the actual increase would be somewhat reduced from this value. This reduction is due to site-bound vehicles moving slower than the modeled speed of 40 mph, which results in traffic-generated noise being less than presented. Furthermore, any increase in traffic-generated noise would be largely masked by traffic traveling on the I-5 Freeway, and in actuality, ambient noise at this location is only projected to increase by approximately 1 dBA. When additional ambient noises are considered (e.g., the railroad and the firewood chopping operation), the CNEL increase would be further reduced. Based on the presented significance criteria, a noise impact is considered significant when it exceeds a 3 dBA CNEL increase; therefore, the proposed project traffic would not result in a significant impact at this location.	Because of the proximity of the landfill site to residential areas, citizens, small commercial, and private users of the landfill shall be encouraged by the project proponent (e.g., onsite signage, flyers, mailers) to use alternate routes (other than Balboa Boulevard).	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ City Planning Dept., and City LEA Enforcement Agency: City Planning Dept. and City LEA
	See the above mentioned operational noise impacts.	All landfill equipment shall be equipped with air flow silencers on intake systems and low-noise mufflers on exhaust systems that shall be properly maintained.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ City Planning Dept., and City LEA Enforcement Agency: City Planning Dept. and City LEA
4.6 LIGHT AND GLARE	The proposed City/County Landfill Project would require the relocation of several onsite building structures, such as the administrative/general office, the scale house area, and the environmental control center. These structures would be relocated short distances from their existing locations. The relocation and/or the development of new environmental control features, such as the flaring stations and leachate treatment plant, will require lighting for security and maintenance purposes. Therefore, several new light sources would be created onsite.	All lighting shall be shielded and directed onto the site. No floodlighting shall be located that can be seen directly by adjacent residents, motorists on adjacent public streets or highways, or pilots within the "airport approach zone." This condition shall not preclude the installation of low-level security lighting.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ City Planning Dept., and City LEA Enforcement Agency: City Planning Dept. and City LEA
	Onsite security lighting and security operations would reintroduce both limited night-lighting (stationary) and other associated lighting (vehicle headlights) during nightly security patrols. Since the landfill would only be operational during day and early evening hours (5:00 a.m. - 6:00 p.m.), very low levels of artificial light will be introduced. Onsite nighttime	See the above mentioned mitigation measure.			

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	illumination is anticipated to be of very limited duration and confined to specific maintenance areas at the project site. Truck traffic associated with early morning refuse disposal would be a potential light source (headlights) to motorists along San Fernando Road.				
4.7 LAND USE					
4.7.1 Community Plan and Zoning Designations	Development of the proposed project would require a general plan amendment from the current "Open Space" land use designation to a "Heavy Industrial" designation and also require a zone change from the current zoning designation of "A1-1-O" (Agricultural Zone, Height District 1, and Oil District Overlay) to a zoning designation of "M3-1-O" (Heavy Industrial Zone). Potential inconsistency with the adopted general plan and zoning designation could result, if proposed use is permitted.	Maintain and enhance the 100± acre open space buffer area in the southern portion of the site by implementing revegtation programs in conjunction with onsite programs	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager and~~ City Planning Dept. Enforcement Agency: City Planning Dept.
4.7.2 General Plan Elements	No significant impacts are anticipated.	No mitigation measures would be required.			
4.7.3 Regional, State and Federal Plans	No significant impacts are anticipated.	No mitigation measures would be required.			
4.7.4 Other Landfill and Transfer Station Facilities	No significant impacts are anticipated.	No mitigation measures would be required.			
4.8 NATURAL RESOURCES	Historically, the project site served as an area for oil drilling operations. The proposed project has the potential to uncover abandoned oil wellheads. Abandonment procedures included welding a steel plate at the surface of each abandoned wellhead. Proposed landfill operations will not involve placing new or reusing existing oil or gas wells and will not deplete any of these resources. Similarly, no gravel or soil extraction is proposed and, with the exception of excavation for the placement of refuse and obtaining cover material, no excavation of subsurface materials is proposed. Therefore, the project will not result in any significant impact on natural resources.	Refer to Section 4.9.6, Risk of Explosion for a discussion of potential re-abandonment mitigation measures.			
4.9 RISK OF UPSET					
4.9.1 Hazardous Materials	Hazardous waste haulers may attempt to dispose of hazardous wastes at the proposed solid waste landfill project. Significant environmental impacts could occur without the implementation of a hazardous waste load-checking program. The inadvertent acceptance of hazardous waste at the landfill	The landfill shall be operated as a Class III landfill; no liquid, acutely hazardous, radioactive material, or infectious medical wastes will be accepted.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LARWQCB, and City LEA

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	has the potential to result in significant impacts on facility workers (e.g., dermal exposure, or inhalation) if proper hazardous waste identification, training and handling procedures are not implemented. It is expected that small volumes of HHWs will remain undetected and disposed of at the proposed landfill. These wastes are generally inadvertently mixed in with residential solid wastes by residential customers. HHW materials removed from the waste stream and stored onsite have the potential to result in impacts to facility workers, if proper handling and storage procedures are not employed.				Enforcement Agency: CIWMB, and City LEA
	See the above mentioned impact.	Haulers disposing of drums (i.e., 55-gallon) shall have drums triple-rinsed with tops and bottoms removed prior to acceptance.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ DTSC, CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
	See above.	Notices shall be posted at prominent locations onsite to notify waste haulers about hazardous waste policies of the landfill operator and to inform haulers that hazardous waste cannot be disposed of at the facility. Signage shall help inform waste haulers of the rules and regulations governing the disposal of hazardous waste.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
	See above.	A refuse inspection program that includes direct visual inspection, remote television monitors to inspect incoming rolloff-type loads and open-top vehicles, and radiation detecting devices~~, and sensors capable of detecting volatile compounds~~ shall be implemented by the landfill operator to prohibit the illegal dumping or disposal of liquids and hazardous wastes at the landfill.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, CIWMB, and City LEA Enforcement Agency: SCAQMD, CIWMB, and City LEA
	See above.	The landfill operator shall implement a hazardous waste load-checking program. This program shall include inspecting random loads for hazardous wastes in a segregated area of the landfill, and landfill employees shall scan waste materials as they are being unloaded at the active working face. Hazardous waste load checks at the proposed City/County Landfill will be 1.5 load checks per 1,000 tons of solid waste received at the landfill for the first year of operation. However, after the first year of operation, BFI may request that the City LEA decrease the required load checking frequency to one load check per 1,000 tons of waste received at the City/County Landfill.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	See above.	If hazardous waste materials are discovered, emergency response shall include worker identification and notification procedures, cordoning off the area, and notifying Cal-EPA, DTSC~~ for hazardous waste identification.~~ Once hazardous waste is identified, the material shall be removed, containerized, and temporarily stored onsite, if safe to handle. In the unlikely event that acutely hazardous material is discovered, the immediate area will be evacuated, and a qualified hazardous waste hauler shall be contacted for immediate collection and disposal of the material at a permitted Class I hazardous waste landfill. After any such incident, all necessary reports shall be completed and filed by the landfill operator with the following agencies: City of Los Angeles Police Department, County of Los Angeles Office of the District Attorney, Environmental Crimes Unit, City of Los Angeles Fire Department, City of Los Angeles Department of Environmental Affairs, and the LARWQCB.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ DTSC, CIWMB, ~~City Police Dept.~~, LAPD, and City LEA Enforcement Agency: CIWMB and City LEA
	See above.	Landfill employee training programs on hazardous waste detection shall be conducted. These programs shall be presented during preemployment and for subsequent annual review for all employees.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ DTSC, CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
	The proposed operation of the landfill also has the potential to result in small spills of potentially hazardous liquids (e.g., diesel fuel, oil, propane, ammonia) used in landfill operations. Landfill employees must be trained to respond to leaks that may arise from leaking cargo or equipment failure, engine or transmission leaks, fuel and hydraulic tank or hose leaks (as well as seals), or other failures.	The spill response program shall be part of required training for all facility employees. In the event of a spill, containment is paramount. All landfill employees shall be trained to use dirt and/or other absorbent materials to pick up and/or contain small spills of oils, solvents, and/or other materials that may be harmful to the public, facility workers, or the environment. Training in the use of personal protective equipment, fire extinguishing aids (e.g., hoses or extinguishers), and spill containment/mitigation (e.g., absorbents) shall be provided.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB, CIWMB, and City LEA
	See the above mentioned hazardous materials impacts.	Full-time inspectors shall be employed onsite for inspection of waste materials. Full-time inspectors shall be deemed by the City to be qualified through training and experience to perform assigned duties.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
4.9.2 Vectors	The proposed City/County Landfill Project has the potential to attract several different types of vectors to the project site. Certain types of vectors, such as rodents and insects, can be transported to the site via collection vehicles or self-haul trucks. If the proposed project was operated inadequately and provided a potential food source for common scavenging birds such as pigeons, crows, and sea gulls, potential impacts	The landfill operator shall monitor the site on a regular basis for vector activity. In addition, the site shall be inspected by the City LEA on a regular schedule. Corrective measures shall be immediately taken should a vector problem be detected.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	could result in food and other wastes being carried to nearby properties, feathers and excrement deposited in proximity to the point of origin, and ticks, mites, lice, and fleas associated with the birds could transmit disease to humans. Many items that would be stored and utilized at the landfill facilities (e.g., administrative and employee ancillary buildings) have the potential to attract vectors (e.g., food, seed, office supplies).				
	See above.	Vectors (bird activity) shall be effectively eliminated by stringing wire or monofilament line (15 to 20 pound test) above the active landfill working areas at intervals of 100 to 150 feet, or by other approved means. This disrupts the birds' circling patterns to the extent that they do not attempt to land or congregate to feed on the refuse.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
	See above.	Flies shall be controlled at the project site by a trap-and-destroy program. The use of sprays shall be avoided to the fullest extent possible.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
	See above.	Rodent-related problems shall be controlled by operational techniques that are in accordance with recommendations from the City LEA and the Cal-EPA.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
	See above.	Operational techniques shall be utilized to limit vector activity, including compacting waste at the landfill active working face, properly applying cover material; keeping the active working face as small as safely possible given the type and number of landfill equipment, properly grading interim fill surfaces and final fill slopes, and eliminating ponding areas at the project site.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
	See above.	All equipment shall be in good condition and cleaned in a frequency and manner so as to prevent the propagation or attraction of flies, rodents, or other vectors, and the creation of nuisances.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
	See above.	Items used at the landfill facility that could attract vectors (e.g., food, seed, office supplies, etc.) shall be stored in closed containers and/or within an enclosed structure. These containers shall be inspected regularly and shall be disposed of if they appear to be an attraction to any vectors.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	See above.	Salvaged materials generated onsite or imported shall be placed away from storage areas, other activity areas, and limited to a volume approved by the City LEA, local land use authority, or other approval agencies, minimizing the harborage or attraction of flies, rodents, or other vectors, and the creation of nuisances.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
	See above.	All buildings, paved areas, landscaped areas, and perimeter areas shall be inspected regularly for signs of vectors. Any building openings, ground holes, and deficiencies shall be repaired as they are discovered during routine inspections to prevent the intrusion of any ground vectors.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
	See above.	In the event that vectors may occur onsite, appropriate measures shall be implemented (e.g., the use of a professional exterminator).	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
4.9.3 Litter	Solid waste landfills have the potential to generate litter, which can result in potential nuisance or aesthetic impacts. Because the project site is located in the eastern edge of the Santa Susana Mountains near the entrance of the Newhall Pass area, wind conditions within this area could potentially transport litter offsite into surrounding land uses.	The landfill site shall be operated to minimize litter generation through implementation of the following measures: compaction of waste at the working face (i.e., 1,400 pounds of compaction per cubic yard) ~~periodic application of cover material during the day and at the end of the working day,~~ waste materials covered with at least 6 inches of clean, compacted soil or approved alternative daily cover by the end of the working day; and maintenance of the active working face areas as small as safely possible given the type and quantity of landfill equipment.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
	See above.	Litter and debris shall be contained within the landfill property boundaries by the use of secondary litter fences (located along the outside perimeter of the landfill) and by portable litter fences placed adjacent to the active working face areas.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
	See above.	The landfill operator shall inform owners of registered vehicles, by signage, to comply with vehicle tarping requirements under § 23114 and 23115 of the California Vehicle Code. Those waste haulers who repeatedly violate this code shall not be allowed to dispose of their waste loads at the facility or shall be fined until corrective measures are taken.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
	See above.	~~On a once a week~~ On a once-a-week basis, or as needed, the landfill operator shall mobilize cleanup crews to provide litter pickup services within the O'Melveny Park area, along	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ City

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
		Balboa Boulevard and San Fernando Road, and in other residential areas located in proximity to the landfill, that may be affected by offsite litter migration. On a daily basis, the cleanup crews shall inspect the surrounding area to assess if more frequent cleanups are required.			Enforcement Agency: Planning Dept., and City LEA City Planning Dept. and City LEA
	See above.	Landfill employees shall watch for any illegal dumping activities on or around the project site. The landfill litter control crew shall provide cleanup service for areas surrounding the project site.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
	See above.	The administrative offices shall be equipped with a radio dispatch system that can quickly engage crews to respond to perceived litter complaints in the surrounding neighborhoods.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB
	See above.	The onsite City LEA shall inspect the landfill on a regular basis, at which time the effectiveness of the litter control program shall be documented and any necessary improvements shall be made, including: - Landfill personnel shall continuously patrol the access road to the scales from the time the landfill opens until the time of closure in the evening. - Improperly covered or contained loads that may result in a significant release of litter shall be immediately detained and the condition corrected, if practical, before the load proceeds to the active working face areas. If correction cannot be made, the load shall be conducted under escort to the working face. - All debris found on or along the landfill entrance and working face access roads shall be immediately removed. - Operating areas shall be located in wind-shielded portions of the landfill during windy periods. - Litter fences shall be installed in operating active working face areas, as deemed necessary by the LEA.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
4.9.4 Employee Safety and Site Security	The proposed project has the potential to result in serious workplace accidents due to the movement of heavy equipment and accidents to workers performing maintenance or repair work on heavy machinery. Failure to lock out and block machinery before working on such equipment can result in serious injury or possible death. The proposed project has the potential to create safety risks to landfill workers or visiting refuse haulers if onsite safety measures are not implemented.	The landfill operator shall implement an IIP program in compliance with CCR, Title 8, § 3203, designed to protect employees from work-related hazards associated with operation of the landfill site. Unsafe or unhealthful work conditions, practices, or procedures shall be immediately corrected by the landfill operator.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB and Cal/OSHA
	See above.	Each supervisor or manager shall conduct regular periodic inspections to identify less-than-adequate or unsafe working conditions, improper or unsafe work practices, or procedures in their work areas. The maintenance supervisor shall be notified of needed repairs or corrective measures using a "safety inspection report" form. Additional inspections shall be accomplished whenever new processes, procedures, substances, or equipment are introduced into the workplace or when a supervisor becomes aware of a new, potential, or previously unrecognized hazard.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB and Cal/OSHA
	See above.	Appropriate inspection checklists shall be developed, used, and maintained to accurately reflect various exposures in different work areas. Daily observation of the workplace environment by employees, supervisors, managers, and the safety director shall occur. Discrepancies shall be reported. Records of inspections, deficiencies, and corrective measures shall be maintained in the safety/maintenance offices.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB and Cal/OSHA
	See above.	If a problem or discrepancy is identified, an inspection report shall be prepared. The report shall identify the priority assigned to each discrepancy, as follows: Priority One, resolve the problem immediately; Priority Two, resolve the problem by the end of the working day; Priority Three, resolve the problem within 48 to 72 hours; and Priority Four, resolve the problem within 1 week as soon as the part(s) and/or materials are available. Unsafe work practices shall be interrupted immediately by the observing supervisor. Appropriate training shall be implemented. If the unsafe practice continues, progressive discipline shall be employed.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB and Cal/OSHA
	See above.	Communication of safety and health methods to employees shall include verbal communication with employees at quarterly safety meetings; small group meetings conducted by first-line supervisors with their respective employee groups that shall be weekly "tailgate," "toolbox," or operations and safety meetings; written safety and health issues posted on	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB and Cal/OSHA

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
		employee bulletin boards; safety posters; suggestion boxes for employees to anonymously utilize; and action by management to evaluate and implement the pertinent employee safety suggestions.			
	See above.	Accident/injury reports, inspections, and findings, including corrections and training records, shall be kept for 3 years. The OSHA Log 200 shall be retained by the landfill operator for a period of 5 years. Medical records for those employees involved in handling of hazardous wastes shall be maintained for a period of 30 years after employment termination.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB and Cal/OSHA
	See above.	First-aid kits shall be located in dispatch, maintenance, scale houses, and corporate administrative offices, in addition to all supervisor vehicles. These kits shall contain "Band-Aids," bandages, sprays, miscellaneous ointments, and minor treatment supplies. These supplies are intended for treatment of small or nonserious cuts, burns, scrapes, etc. Injuries requiring medical attention shall be treated at the Holy Cross Medical Center. This hospital shall also provide ambulance service.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB and Cal/OSHA
	See above.	The landfill operator shall implement an emergency action plan in compliance with CCR, Title 8, § 3220. This plan shall designate emergency escape routes and procedures, rescue and medical duties, methods for reporting fires and other emergencies; and names of persons and departments to contact during an emergency.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, Cal/OSHA, ~~City Fire Dept.~~ LAFD, and City LEA Enforcement Agency: CIWMB, Cal/OSHA, and ~~City Fire Dept.~~ LAFD
	See above.	The landfill operator shall implement a fire prevention plan in compliance with CCR, Title 8, § 3221. Components of this written fire prevention plan shall include potential fire hazards and their proper handling and storage procedures; potential ignition sources (i.e., welding or smoking), their control procedures, and the type of fire protection equipment or systems that can control a fire involving them; names or regular job titles of those responsible for maintenance of equipment and systems installed to prevent or control ignitions or fires; and names or regular job titles of those responsible for the control of accumulation of flammable or combustible waste materials.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, Cal/OSHA, ~~City Fire Dept.~~ LAFD, and City LEA Enforcement Agency: CIWMB, Cal/OSHA, and ~~City Fire Dept.~~ LAFD
	See above.	In compliance with CCR, Title 8, § 3314, lockout/blockout procedures shall be implemented at the proposed project. Machinery or equipment capable of movement shall be	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
		stopped and the power source deenergized or disengaged: if necessary, the moveable parts shall be mechanically blocked or locked out to prevent inadvertent movement during cleaning, servicing, or adjusting operations. If the machinery or equipment must be capable of movement during this period in order to perform the specific task, the designated station manager or supervisor shall minimize the hazard of movement by providing and requiring the use of extension tools or other methods to protect employees from injury. Prime movers, equipment, or power-driven machines equipped with lockable controls or readily adaptable to lockable controls shall be locked out or positively sealed in the "off " position during repair work and setting-up operations. The operator shall provide a sufficient number of accident prevention signs or tags and padlocks, seals or other similarly effective means to safely conduct repairs.			Enforcement Agency: CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB and Cal/OSHA
	See above.	Personal protective equipment shall be provided to all operations employees and will include hard hats, heavy gloves, ear plugs, dust masks, safety boots, goggles, and safety vests.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB, Cal/OSHA, and City LEA
	See above.	The landfill operator shall comply with all applicable safety ordinances contained in the City of Los Angeles Municipal Code.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ City B&S, ~~City Police Dept.~~ LAPD, and City LEA Enforcement Agency: City B&S, ~~City Police Dept.~~ LAPD, and City LEA
	Potential problems from a breach of site security along the perimeter of the project proponent's boundary could involve unauthorized dumping, scavenging, vandalism, or arson. If security measures are not implemented, unauthorized entry to the landfill could result in potential injuries, vandalism to equipment, buildings, and other resources.	The landfill operator shall maintain perimeter fencing in and around the site in accordance with CCR, Title 14, § 17658 to discourage illegal entry to the landfill. Where existing topography conditions create an effective barrier, no perimeter fencing shall be installed. Entrance and access gates shall remain locked when the landfill facility is not in operation. All existing perimeter fencing shall be inspected on a routine basis by the landfill operator, and necessary repairs shall be made to ensure a continued deterrent for unauthorized entry to the project site. Additionally, the landfill operator shall maintain posted "no trespassing" signage at the exterior perimeter fencing nearest the project site entrance.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ City B&S, ~~City Police Dept.~~ LAPD, and City LEA Enforcement Agency: City B&S, ~~City Police Dept.~~ LAPD, and City LEA

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	See worker safety potential impacts above.	All landfill equipment shall be properly maintained and operated to minimize the health and safety impacts on landfill personnel and the public. Standby equipment shall be made available during periods of vehicle maintenance or breakdown.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, CIWMB, and City LEA Enforcement Agency: SCAQMD, CIWMB, and City LEA
4.9.5 Human Health	The proposed project could potentially create a significant human health impact if the proposed landfill operation were to create carcinogenic risks or other related human health impacts to surrounding area residents. Results from the proposed project's low-level air quality health risk assessment indicate that no significant impacts would be anticipated.	A citizen's advisory committee shall be established, if deemed necessary by the City Council or Planning Commission through a project condition, to address area resident health concerns about the existing inactive and proposed City/ County Landfill Project. The committee's mandate shall include discussions with appropriate technical experts and regulatory agencies responsible for the on- and offsite monitoring activities at the project site. The advisory committee would be responsible for presenting information and discussions of these regulatory agency members back to area residents through planned informational meetings.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager and~~ City ~~LEA~~ Planning Dept. Enforcement Agency: City Planning Dept.
4.9.6 Risk of Explosion Landfill Gas and Collection System	Potentially, the LFGs could be vented into the ambient atmosphere. One type of LFG, methane, is highly volatile and has the potential to explode. During a significant seismic event, the LFG collection and flaring system could malfunction and cause an explosion.	Onsite structures shall be continuously monitored for the presence of unsafe levels of methane gas.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Air Quality Engineer,~~ CIWMB, SCAQMD, ~~City Fire Dept.~~ LAFD, and City LEA Enforcement Agency: CIWMB, SCAQMD, ~~City Fire Dept.~~ LAFD, and City LEA
	See above.	If necessary, the landfill operator shall install electrical (e.g., battery backup) combustible gas detectors in habitable structures. Employees shall be trained in all applicable safety requirements to prevent any upset conditions from occurring.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Air Quality Engineer,~~ CIWMB, SCAQMD, and City LEA Enforcement Agency: CIWMB, SCAQMD, and City LEA
	See above.	Risks associated with the gas collection and flaring system shall be mitigated through use of flexible piping, flame arrestors, sensors, and automatic shutoff controls. Numerous safety shutdown devices have been designed and installed into the flare station, including a telephone auto-dialer, to provide emergency notification. All gas extraction equipment, including gas condensate and propane tanks, shall be	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Air Quality Engineer,~~ CIWMB, SCAQMD, and City LEA Enforcement Agency: CIWMB, SCAQMD, and City LEA

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
		adequately secured to prevent damage during a seismic event. Inspections of the gas collection and flaring system shall be performed after ground shaking from an earthquake, and necessary action shall be taken to correct any potential problems.			
Abandoned Well Sites	Excavation activities for landfill construction have the remote potential to unearth an unrecorded, abandoned oil or natural gas well. If not properly identified, and sheared off by heavy equipment during excavation activities, the well could release explosive gas into the atmosphere, thereby exposing construction workers, refuse haulers, or the public to a hazardous situation.	Equipment operators involved in excavation shall be made cognizant of the potential presence of existing unrecorded, subsurface wellheads. If a wellhead (or other unidentifiable obstruction) is encountered during construction all excavation activities shall cease. The area will be cordoned off, and the landfill supervisor shall be called to determine whether the obstruction is an abandoned wellhead.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Air Quality Engineer, Onsite Safety Monitor,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
	See above.	A portable explosive gas detection device shall be utilized to determine whether the obstruction is a wellhead that may be leaking natural gas. If this is the case, all personnel shall be evacuated within a 500-foot radius and a representative from the California Department of Conservation, Division of Oil, ~~and~~ Gas, and Geothermal Resources shall be notified. Excavation activities shall cease until further instruction from ~~Department of~~ Division of Oil, ~~and~~ Gas, and Geothermal Resources is received. If gas is not detected, a backhoe or similar type of equipment shall be brought in to further expose the obstruction. If necessary, proper abandonment procedures will be utilized following ~~Department of~~ Division of Oil, ~~and~~ Gas, and Geothermal Resources protocol.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Air Quality Engineer, Onsite Safety Monitor,~~ Cal. Dept. of Conservation, Division of Oil, ~~and~~ Gas, and Geothermal Resources SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
Trenches and Excavations	Landfill employees working within trenches and excavations have the potential to be exposed to methane gas from the inactive City Landfill or from naturally occurring hydrogen sulfide gasses found in areas of former oil-drilling operations.	A portable explosive gas detection device shall be utilized in trenches and excavations to determine the presence of methane gases. If unsafe concentrations of gas exist, all employees would be immediately removed from the area of unsafe gas concentration. The safety monitor would be responsible for ensuring that appropriate worker safety equipment is operable, as well as worker education and instruction correctly implemented, to prevent the potential for methane gas explosions.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Air Quality Engineer, Onsite Safety Monitor,~~ Cal. Dept. of Conservation, Division of Oil, ~~and~~ Gas, and Geothermal Resources SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
4.9.7 Airport Safety (Bird Strikes)	Because Whiteman Air Park is located approximately 5 miles southeast of the project site in Pacoima a remote potential impact could occur. This small field supports approximately 300 operations per day. No recorded bird strikes at Whiteman Air Park have been attributed to past landfill operations.	In accordance with CCR § 17258.10 and 40 CFR Section 258.10, the project proponent will notify Whiteman Air Park and the FAA of the proposed project and projected startup date.	None	Project Proponent	Monitoring Phase: Before project construction. Monitoring Agency: ~~Project Site Manager and~~ City LEA Enforcement Agency: City LEA
4.9.8 Electromagnetic Fields	No significant environmental impacts are anticipated.	No mitigation measures would be required.			

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
4.10 POPULATION	Environmental impacts determined not to be significant in the Initial Study and Checklist, dated July 25, 1991.	No mitigation measures would be required.			
4.11 HOUSING	Environmental impacts determined not to be significant in the Initial Study and Checklist, dated July 25, 1991.	No mitigation measures would be required.			
4.12 RIGHT-OF-WAY AND ACCESS	Refer to Section 4.13, Transportation and Circulation, for discussion of this topical issue.	No mitigation measures would be required.			
4.13.1 Traffic	Roxford Street at the I-5 Freeway (SB onramp) operates at an existing LOS "F" during the a.m. peak hour, and San Fernando Road at Balboa Boulevard operates at an existing LOS "E" during the p.m. peak hour. The remaining key intersections all operate at LOS "D" or better. For the proposed project, 10 of the 13 key intersections are anticipated to operate at a LOS "D" or better during a.m./p.m. peak hours. However, the remaining three intersections are expected to operate at LOS "E" or LOS "F" during one or both of the a.m./p.m. peak hours in Year 1998 prior to the addition of cumulative traffic. Based on the forecast Year 1998 background traffic volumes, the following three intersections are anticipated to operate at LOS "E" or LOS "F" during either the a.m. or p.m. peak hours: Roxford Street at the I-5 Freeway (SB offramp), San Fernando Road at Balboa Boulevard, and San Fernando Road at Sierra Highway.	See mitigation measures below.			
	With the addition of cumulative traffic, significant impacts to traffic conditions will occur at Year 1998, at the following three key intersections: Roxford Street at the I-5 Freeway (SB ramp), San Fernando Road at Balboa Boulevard, and San Fernando Road at Sierra Highway. Furthermore, with the addition of project-generated traffic, conditions will deteriorate Year 1998 LOS conditions at two key intersections and include Roxford Street at Encinitas and the I-5 Freeway (NB ramp), and San Fernando Road at the project entrance. Five key intersections will experience "significant" CMA (V/C) increases in the a.m./p.m. peak hours. These intersections include the following: Roxford Street at the I-5 Freeway (SB offramp), Roxford Street at Encinitas and I-5 Freeway (NB offramp), San Fernando Road at Balboa Boulevard, San Fernando Road at Sierra Highway, and San Fernando Road at project driveway.	See mitigation measures below.			
	As part of the key intersection capacity analysis, a queuing evaluation was performed on the following four key intersections that intersect with the I-5 Freeway: (1) Roxford Street at I-5 Freeway (SB offramps), (2) Roxford Street at	See mitigation measures below.			

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	Encinitas Avenue and the I-5 Freeway (NB offramp), (3) Roxford Street at the I-5 Freeway (NB offramp), and (4) San Fernando Road at the I-5 Freeway (SB offramp). The results of the queuing analysis indicate that existing ramp storage is sufficient to accommodate forecasted Year 1998 traffic volumes. Each ramp location currently provides over 1,000 feet of queuing capacity. Roxford Street at I-5 Freeway (NB offramp) would be used regularly by project-generated traffic. It is anticipated that 971 and 1,152 vehicles would use this offramp during the a.m. and p.m. peak hours, respectively. A maximum queue length for 14 vehicles per lane can be provided. This equates into a total queue length of approximately 700 feet. Approximately 1,000 feet of storage is provided at this ramp location.				
	Mitigation measures would be required at the five key intersections to offset significant impacts resulting from project-related traffic and mitigate for unsatisfactory operating conditions. Acceptable service levels are anticipated to occur during both the a.m. and p.m. peak hours with these roadway improvements. In March 1996, LADOT verified that the mitigation measures proposed and conceptual mitigation improvements to alleviate significant environmental impacts at the five key intersections for the proposed project were deemed "acceptable" to that City department. These mitigation measures would reduce cumulative impacts resulting from development of the proposed project. These measures are intended to offset the cumulative impacts due to project implementation. Cumulative traffic is not expected to impact either local area streets or the freeway systems within the region on either a project-specific basis or cumulative basis with the implementation of these mitigation measures. Therefore, no significant impacts are anticipated as a result of project implementation.	For those intersections where project-related traffic volumes are expected to create poor operating conditions and/or significantly impact the operating conditions of the study area intersections, mitigation is designed to improve and/or change the existing intersection geometry, thereby, increasing existing intersection capacity. Capacity improvements shall include roadway widening, roadway restriping, reconfigurating roadways, or providing additional lanes to various approaches of a key intersection. <u>Roxford Street at the I-5 Freeway, (SB ramp)</u> • Restripe ~~southbound~~ westbound approach on Roxford Street to provide dual left-turn lanes and one through lane. <u>Roxford Street at the Encinitas/I-5 Freeway (NB ramp)</u> • Restripe ~~westbound through lane~~ northbound approach on Encinitas Avenue to ~~left/through option lane~~ provide left-turn lane, shared through/left-turn lane, and shared through/right-turn lane.	None	Project Proponent	Monitoring Phase: Prior to commencement of landfill development. Monitoring Agency: LADOT Enforcement Agency: LADOT
		<u>San Fernando Road at Balboa Boulevard</u> • This key intersection features two through lanes in each direction on San Fernando Road and two northbound approach lanes, striped as an exclusive left-turn lane and an option left-right turn lane, are provided on Balboa Connector. A separate westbound left-turn lane as well as protected left-turn phasing is provided. Existing			

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
		pavement widths and physical constraints (i.e., hillside encroachment) do not allow for any physical improvements, such as providing an exclusive eastbound right-turn lane on San Fernando Road for heavy existing and anticipated right-turn volumes. ~~Given the lack of available physical improvements, it is recommended that automatic traffic surveillance and control signal equipment be installed at this intersection. LADOT believes that the overall capacity of an intersection increases 7 percent by allowing a computer signal control system to improve the efficiency of operations. Preliminary discussions with LADOT staff indicate that this is a possible mitigation measure that could be implemented to offset the impact of Sunshine Canyon Landfill Project traffic.~~ Contribute to the design, construction, and operation of the Northeast Valley Automated Traffic Surveillance and Control (ATSAC) system for this intersection. The current cost of ATSAC for the Northeast Valley System is $79,000 per intersection. The contribution to ATSAC should be made prior to the start of construction for this ATSAC system, which is scheduled for the year 2003. <u>San Fernando Road at Sierra Highway</u> • Restripe ~~northbound through lane~~ northbound approach on San Fernando Road to ~~through/right option lane~~ provide a shared through/right-turn lane and exclusive right-turn lane and restripe the westbound approach of Sierra Highway for a 12-foot-wide curb lane. <u>San Fernando Road at project driveway</u> • ~~Restripe San Fernando Road to provide a second northbound left-turn lane. The installation of automatic traffic surveillance and control signal equipment is recommended at this intersection.~~ • Install a new traffic signal at San Fernando Road/Project Driveway and widen and restripe the northbound approach of San Fernando Road at Project Driveway to provide a left-turn lane and through lane. Also contribute to the design, construction, and operation of the Northeast Valley ATSAC system for this intersection. The current cost of ATSAC for the			

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
		Northeast Valley System is $79,000 per intersection.] The contribution to ATSAC would be completed prior to the start of construction for this ATSAC system, which is scheduled for the year 2003. • The required street improvements and signal modifications shall be guaranteed before the issuance of any building permit for this project through the B-permit process of the Bureau of Engineering, Department of Public Works, and the encroachment permit process of Caltrans (where applicable). Construction of the improvements to the satisfaction of LADOT, the Bureau of Engineering, and Caltrans (where applicable) must be completed before issuance of any certificate of occupancy. Prior to setting the bond amount, the Bureau of Engineering shall require that the developer's engineer or contractor contact LADOT's B-Permit Coordinator, telephone (213) 580-5336, to arrange a pre-design meeting to finalize the proposed geometric and traffic signal designs needed for the project.			
4.13.2 Los Angeles County Congestion Management Program	No significant impacts are anticipated.	No mitigation measures would be required.			
4.13.3 Construction-Related Traffic	No significant impacts are anticipated.	No mitigation measures would be required.			
4.13.4 Parking and Safety Concerns	Although no significant impacts are anticipated, the following mitigation measure is proposed by the project proponent to alleviate any potential safety concerns resulting from truck traffic at the landfill entrance.	~~Until the installation of a signal at the landfill entrance occurs, vehicular warning signs shall be placed in NB/SB directions along San Fernando Road (authorized by LADOT) to slow traffic along that roadway~~. Prior to issuance of any certificate of occupancy for the project, install a new traffic signal at San Fernando Road/ Project Driveway and widen and restripe the northbound approach of San Fernando Road at Project Driveway to provide a left-turn lane and through lane. Also contribute to the design, construction, and operation of the Northeast Valley ATSAC system for this intersection. The current cost of ATSAC for the Northeast Valley System is $79,000 per intersection. The contribution to ATSAC would be completed prior to the start of construction for this ATSAC system, which is scheduled for the year 2003.			Monitoring Phase: Prior to commencement of landfill development. Monitoring Agency: LADOT Enforcement Agency: LADOT
4.13.5 Access Road in Sunshine Canyon	No significant impacts are anticipated.	No mitigation measures would be required.			

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
4.13.6 Public Transportation	No significant impacts are anticipated.	No mitigation measures would be required.			
Rail and Light Rail	No significant impacts are anticipated.	No mitigation measures would be required.			
Bicycle Routes	While the conflict between trucks and bicycles could be a potential localized impact, it is anticipated that bicyclists would utilize safe designated bicycle lanes for commuting to and from work or for recreational use. No significant impacts are anticipated.	The following mitigation measure is proposed by the project proponent to address any potential localized impact along the San Fernando Road bicycle lane from increased truck traffic at or near the project site: • Signs acceptable to the City shall be posted at or near the entrance to the landfill facility. These signs shall caution the public that heavy truck traffic exists in the area.	None	Project Proponent	Monitoring Phase: Prior to commencement of landfill development. Monitoring Agency: LADOT Enforcement Agency: LADOT
4.14 PUBLIC SERVICES **4.14.1 Fire and Emergency Medical Services**	The development of the proposed project will introduce additional workers onsite and would have the potential to place a greater demand on existing fire protection and paramedic resources. The proposed project would require a fire flow of 5,000 gallons per minute, at 20 pounds per square inch (psi) for a 5-hour duration.	Onsite water trucks shall provide sufficient water storage and pumping capabilities to extinguish fires. Tracked dozers and scrapers shall be utilized to smother any onsite fires. Easily accessible soil stockpile areas for daily cover shall be used by landfill personnel to smother onsite fires.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
	Based on a required fire flow of 2,000 GPM, the first-due engine company should be within 1½ miles and the first fire truck company should be within 2 miles of a project. The first-due engine company is 2½ miles from the project site and the first-due truck company is approximately 4.3 miles from the site.	Definitive plans and specifications shall be submitted to the LAFD and requirements for necessary permits satisfied prior to commencement of landfill development.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
	See the above mentioned fire impacts.	The project proponent shall maintain and expand existing onsite fire response capabilities by using heavy operating equipment and readily available fire-extinguishing equipment. A 200-foot-long, 1½-inch-diameter fire hose shall be available on water trucks for firefighting at the landfill working face area. If necessary, earth moving equipment shall be used to control fires by smothering fires with dirt.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
	See the above mentioned fire impacts.	Hydrants shall be installed in conformance with LAFD requirements and Los Angeles City Fire Code § 57.09.06.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB and LAFD
	See the above mentioned fire impacts.	New construction and placement of water tanks, water mains, and fire hydrants shall be completed prior to landfilling	None	Project Proponent	Monitoring Phase: Throughout landfill operations.

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
		operations and shall meet final fire flow requirements determined by the LAFD.			Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
	Brush fires have the potential to occur within the project site area. The proposed project has the potential to result in landfill surface fires. The primary hazard caused by a landfill surface fire is burn injuries and smoke inhalation to individuals near the fire area.	The project proponent shall maintain brush clearance within 100 feet of landfill operations and structures as specified in the Los Angeles City Fire Code § 57.21.07 and 57.25.01. Fire-resistant native plants shall be maintained free of combustible litter (i.e., partly decayed/organic matter). These plants shall be used without restriction within this brush clearance zone.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB and LAFD
	See the above mentioned fire impacts.	Fire breaks, roads, and fire trails shall be maintained by the project proponent in accordance with the Los Angeles City Fire Code § 57.09.04 and 57.25.03.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB and LAFD
	See the above mentioned fire impacts.	No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, City BOE, City B&S, and City LEA Enforcement Agency: CIWMB, LAFD, City BOE, and City B&S
	See the above mentioned fire impacts.	Any person owning or having control of any facility, structure, or group of structures on the premises shall provide and maintain LAFD access.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, City BOE, City B&S, and City LEA Enforcement Agency: CIWMB, LAFD, City BOE, and City B&S
	See the above mentioned fire impacts.	Access for LAFD apparatus and personnel to and into all structures shall be required.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, City BOE, City B&S, and City LEA Enforcement Agency: LAFD, City BOE, and City B&S
	See the above mentioned fire impacts.	Construction of the realigned access roadway shall not exceed 15 percent in grade. An access road shall be constructed and maintained around the working area of the landfill for	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
		emergency access for fire fighting equipment.			CIWMB, City BOE, City B&S, and City LEA Enforcement Agency: CIWMB, City BOE, and City B&S
	See the above mentioned fire impacts.	The project proponent shall temporarily close the landfill if a fire of regional significance is located near the project area and poses an imminent threat to the safety of landfill employees.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
	See the above mentioned fire impacts.	A detailed fire response plan shall be prepared by the project proponent that incorporates LAFD requirements.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB and LAFD
	See the above mentioned fire impacts.	Fire extinguishers shall be maintained in all heavy equipment, onsite work vehicles, and all structures as required by the Los Angeles LAFD.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
	See the above mentioned fire impacts.	Signs shall be posted onsite and in a manner approved by the City Fire Chief prohibiting open burning within the project area, as specified under City of Los Angeles Fire Code, § 57.25.02.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB and LAFD
	See the above mentioned fire impacts.	All internal combustion engines used in landfilling operations shall be equipped with spark arresters.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB and LAFD
	See the above mentioned fire impacts.	Landfill equipment shall be cleaned regularly to reduce the potential for equipment fires.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
					Enforcement Agency: CIWMB, LAFD, and City LEA
	See the above mentioned fire impacts.	Vehicle and mechanical inspections shall be performed on a regular basis, and focus on the electrical system, hydraulic, and fuel lines.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
	The acceptance of hot loads at the project site has the potential to create a significant fire hazard without the implementation of mitigation measures. Another potential fire source at a landfill site is subsurface refuse fires. Impacts from a subsurface fire would result in accelerated local settlement in the vicinity of the fire and the venting of smoke or combustion of by-products through the landfill cover material.	The project proponent shall provide fire control in compliance with CCR, Title 14, Division 7, Chapter 3, Article 7.6, § 17741 (Burning Wastes). If burning waste is received at the landfill site it shall be deposited in a safe, isolated area of the landfill and extinguished. If burning waste has been deposited at the working face area, it shall immediately be excavated, spread, and extinguished.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
	See the above mentioned impact.	In the event the project proponent detects of settlement or venting of smoke, the City LEA shall be contacted. The project proponent under the direction of the City LEA shall undertake appropriate measures to identify the location of the subsurface fire and implement the appropriate fire control techniques to assure the fire has been extinguished.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
4.14.2 Police	Environmental impacts determined not to be significant in the Initial Study and Environmental Checklist, dated July 25, 1991.	No mitigation measures would be required.			
4.14.3 Schools	Potential indirect impacts would occur as a result of project development. Approximately eight new students may be generated. Nonresidential development would produce jobs that may stimulate residential growth that could generate students. Based on available student capacity at these schools this amount of additional students is considered less than significant.	Prior to the issuance of an occupancy permit, the project proponent shall submit proof to the City's Department of Building and Safety that all applicable school impact fees have been paid.	None	Project Proponent	Monitoring Phase: Prior to landfill development. Monitoring Agency: LAUSD Enforcement Agency: LAUSD
4.14.4 Parks and Recreational Resources	As referenced from the Framework Element, parkland deficiencies are projected to increase in both the Granada Hills-Knollwood Community area and Northwest Valley area of the City. In addition, the planning area within the unincorporated County (closest to the project site) has a parkland deficiency of approximately 13 acres. According to the County Department of Parks and Recreation there is a deficiency of 13,296 acres of regional park land including	No significant impact on park and recreational resources are anticipated, and no mitigation measures are required. Refer to the following mitigation measures included within this Draft SEIR: Section 4.2.11, Air Quality-Construction; Section 4.2.12, Air Quality-Operations; Section 4.9.3, Litter; and Section 4.18, Aesthetics/Views.			

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	publicly owned "natural areas" in the County. The proposed project is located in close proximity to O'Melveny Park, Bee Canyon Park and the proposed Santa Clarita Woodlands State Park. The proposed construction and operation of the City/ County Landfill has the potential to generate fugitive dust and create offsite migrating litter onto land uses if not properly mitigated.				
4.14.5 Hiking and Equestrian Trails	The development of both the City/County Landfill Project would not allow for two potential local trails to be developed that are identified in the Rim of The Valley Trail Corridor Master Plan. This would include a potential trail extending east of Bee Canyon onto the existing County Landfill. This potential trail is incorrectly identified as providing a wildlife habitat or corridor and could be used as a potential Scenic Resource Preservation Area. In addition, the Master Plan identifies another potential trail at the northern end of Sunshine Canyon. This potential trail would connect with the above described potential trail, and would extend southeast across both City and County boundaries onto the City Landfill and County Landfill area. As noted in the Master Plan, this potential trail could be utilized as a trail/trail corridor, wildlife habitat or corridor, or use as a park, park facility, or picnic area. The development of hiking and equestrian trails within Sunshine Canyon with or without the development of the proposed project would be in conflict with an existing, heavy industrial land use and would therefore not be feasible.	No significant environmental impact on hiking and equestrian trails is anticipated; therefore, no mitigation measures are required. Refer to the following mitigation measures included within this Draft SEIR: Section 4.2.11, Air Quality-Construction; Section 4.2.12, Air Quality-Operations; Section 4.9.3, Litter; and Section 4.18, Aesthetics/Views.			
4.14.6 Libraries	Environmental impacts determined not to be significant in the Initial Study and Environmental Checklist, dated July 25, 1991.	The topical issue of libraries was determined not to be significant in the Initial Study and Checklist dated July 25, 1991.			
4.15 ENERGY CONSERVATION	No significant impacts on energy resources are anticipated as a result of project development.	There will not be any significant impacts on energy resources as a result of project development; therefore, no mitigation measures are required. Specific energy conservation mitigation measures for the proposed implementation and development of onsite buildings and ancillary facilities are provided in Section 4.16.1, Electricity.			
4.16 UTILITIES 4.16.1 Electricity	If the project is implemented, there would be an onsite increase in electrical consumption due to the installation of new mechanical equipment and environmental control systems. It is estimated that the proposed project would consume approximately 500 kWh of electricity per day due to	The project proponent shall incorporate measures that will exceed minimum efficiency standards for Title 24 of the CCR.	None	Project Proponent	Monitoring Phase: Before project occupancy of the buildings. Monitoring Agency: ~~Project Site Manager,~~ City B&S, and DWP Enforcement Agency: City B&S and DWP

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	the addition of environmental control systems and two additional flares. Equipment would be fed from a proposed onsite electrical system, owned and maintained by the project proponent, that would connect to the 4.8-kV DWP electrical distribution system located along San Fernando Road.				
	See the above mentioned impact.	Built-in appliances, refrigerators, and air conditioning equipment shall exceed the minimum efficiency standards for Title 24 of the CCR.	None	Project Proponent	Monitoring Phase: Before project occupancy of the buildings. Monitoring Agency: ~~Project Site Manager,~~ City B&S, and DWP Enforcement Agency: City B&S and DWP
	See the above mentioned impact.	Buildings shall be well sealed to prevent outside air from infiltrating and increasing interior air conditioning and space heating loads. A performance check of the installed air conditioning and space heating systems shall be completed by the project proponent prior to the issuance of the certificate of occupancy to ensure the system properly operates.	None	Project Proponent	Monitoring Phase: Before project occupancy of the buildings. Monitoring Agency: ~~Project Site Manager,~~ City B&S, and DWP Enforcement Agency: City B&S and DWP
	See the above mentioned impact.	Thermal insulation that exceeds requirements established by the CCR shall be installed in walls and ceilings.	None	Project Proponent	Monitoring Phase: Before project occupancy of the buildings. Monitoring Agency: ~~Project Site Manager,~~ City B&S, and DWP Enforcement Agency: City B&S and DWP
	See the above mentioned impact.	Window systems shall be designed to reduce thermal gain and loss, thus reducing cooling loads during warm weather and heating loads during cool weather.	None	Project Proponent	Monitoring Phase: Before project occupancy of the buildings. Monitoring Agency: ~~Project Site Manager,~~ City B&S, and DWP Enforcement Agency: City B&S and DWP
	See the above mentioned impact.	Heat-reflective draperies shall be installed on appropriate exposures.	None	Project Proponent	Monitoring Phase: Before project occupancy of the buildings. Monitoring Agency: ~~Project Site Manager,~~ City B&S, and DWP Enforcement Agency: City B&S and DWP
	See the above mentioned impact.	Fluorescent and high-intensity-discharge lamps, which give the highest light output per watt of electricity consumed, shall be installed wherever possible, including all parking lot and site lighting to reduce electricity consumption.	None	Project Proponent	Monitoring Phase: Before project occupancy of the buildings. Monitoring Agency: ~~Project Site Manager,~~ City B&S, and DWP Enforcement Agency: City B&S and DWP
	See the above mentioned impact.	Occupant-controlled light switches and thermostats shall be installed to permit individual adjustment of lighting, heating, and cooling to avoid unnecessary energy consumption.	None	Project Proponent	Monitoring Phase: Before project occupancy of the buildings. Monitoring Agency: ~~Project Site Manager,~~ City B&S, and DWP Enforcement Agency: City B&S and DWP

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	See the above mentioned impact.	Time-controlled interior and exterior public area lighting limited to that necessary for safety and security shall be installed.	None	Project Proponent	Monitoring Phase: Before project occupancy of the buildings. Monitoring Agency: ~~Project Site Manager,~~ City B&S, and DWP Enforcement Agency: City B&S and DWP
4.16.2 Natural Gas	Environmental Impacts determined not to be significant in the Initial Study and Environmental Checklist, dated July 25, 1991.	No mitigation measures would be required.			
4.16.3 Communication Systems	Environmental Impacts determined not to be significant in the Initial Study and Environmental Checklist, dated July 25, 1991.	No mitigation measures would be required.			
4.16.4 Water	The proposed City/County Landfill Project would increase the amount of water currently being utilized onsite during construction and operation. Based on an assessment, approximately 221.4 acre-feet of water would be consumed per year. This equates into an approximate monthly usage of 18.45 acre-feet (or 6,027,600 gallons) or 200,920 gallons per day).	The project proponent shall coordinate with DWP in advance to efficiently obtain potable water for delivery to the construction site and to meet any restrictions imposed.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager and~~ DWP Enforcement Agency: DWP
	See the above mentioned impacts.	When reclaimed water lines are extended into the project area, and if economically feasible, reclaimed water would be utilized onsite for irrigation and dust suppression. Prior to the submittal of design plans to the City's Building and Safety Department, the project proponent shall investigate the possibility of utilizing reclaimed water at the project site.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager and~~ DWP Enforcement Agency: DWP
	See the above mentioned impacts.	During the site life of the landfill and ancillary facilities, the landfill operator shall effectively utilize water conservation measures at the project site. These measures shall include the following: - The project proponent shall install an efficient drip irrigation system that minimizes runoff and evaporation, and provides water distribution in an efficient manner. - A dust suppression additive shall be utilized onsite to minimize water usage. - Green waste/wood waste (after grinding) will be used onsite as mulch material for revegetation purposes. Mulch shall be applied on the top layers of revegetation areas to improve the water-holding capacity of the soil. - Onsite revegetation shall include the use of water-conserving plant materials to the greatest extent possible.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Site Manager,~~ City LEA, and DWP Enforcement Agency: DWP

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
4.16.5 Sewers	Environmental impacts determined not to be significant in the Initial Study and Environmental Checklist, dated July 25, 1991.	No mitigation measures would be required.			
4.16.6 Stormwater Drainage	Refer to Section 4.3.1, Surface Water in this table.	No mitigation measures would be required.			
4.16.7 Solid Waste	Environmental impacts determined not to be significant in the Initial Study and Environmental Checklist, dated July 25, 1991.	No mitigation measures would be required.			
4.17 SAFETY	Refer to Section 4.9.4, Employee Safety and Site Security, within this table, for a discussion of safety impacts as they relate to landfill operations, worker safety, and site security procedures.	Refer to Section 4.9.4, Employee Safety and Site Security, within this table.			
4.18 AESTHETICS/VIEWS	Project development would alter the existing physical character of the onsite topography, thereby changing the visual character within the project site. The interior of the project site would substantially change in appearance (become sloping surface instead of a canyon area). When landfilling operations are located in the southern portion of Sunshine Canyon, motorists traveling northbound on the I-5 Freeway would have a clear view of operational activities. Landfilling operations within the canyon would be visible from greater distances to the southeast, within the areas of Sylmar, and from the westbound lanes of the I-210 Freeway. Potential impacts could result at the latter stages of project development, the proposed project would be visible from the upper elevations only of the existing O'Melveny Park hiking and equestrian trail.	The maximum permitted elevations for the landfill shall not be allowed to be exceeded at any time during landfill development and shall be verified through survey control points.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Geologist/Engineer,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
	See the above mentioned impact.	The cover-material excavation areas shall be confined as much as possible to areas that will later be landfilled.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Geologist/Engineer,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
	See the above mentioned impact.	As part of revegetation efforts for the landfill, the upper ridges of the canyon shall be planted with native species (both trees and scrubs) to supplement existing vegetation on the ridgelines and reestablish naturally bare areas.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Horticulturist/Forester,~~ CIWMB, City Planning Dept., and City LEA Enforcement Agency: CIWMB, City Planning Dept., and City LEA

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	See the above mentioned impact.	The final cover of landfilled areas shall be landscaped with a ground cover mix and plant species that are compatible with the immediate area and shall be maintained in a natural setting until it is converted to its final use.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Horticulturist/Forester,~~ CIWMB, City Planning Dept., and City LEA Enforcement Agency: CIWMB, City Planning Dept., and City LEA
	See the above mentioned impact.	The 100± acre open space buffer zone on the southern boundary of the project site shall continue to be maintained and enhanced with both native and nonnative vegetation.	None	Project Proponent	Monitoring Phase: Throughout landfill operations. Monitoring Agency: ~~Project Horticulturist/Forester,~~ CIWMB, City Planning Dept., and City LEA Enforcement Agency: CIWMB, City Planning Dept., and City LEA
4.19 CULTURAL/ SCIENTIFIC RESOURCES **4.19.1 Archaeological**	Only one of the four archaeological surveys conducted onsite resulted in one archaeological site (CA-LAN-816) being recorded within the boundaries of Sunshine Canyon. No archeological or historic resources were observed in the City portion of the property. Project implementation would not have the potential to disturb CA-LAN-816 because it is located in the County portion of Sunshine Canyon.	Prior to the commencement of initial earth excavation, specific sections of the project area shall be resurveyed as a precautionary measure to minimize potential loss of undiscovered archaeological resources. Specific areas within the project site to be resurveyed shall be determined by the intended cut-and-fill areas proposed for landfill development. As new areas for excavation are identified, an evaluation of those areas shall be made based on the prior survey results and consultation with appropriate technical specialists. Factors to be considered for delineation of areas to be resurveyed will be known site selection factors associated with aboriginal groups suspected of having inhabited the general area. These factors include proximity to water, the type of vegetation (e.g., food source, shelter, and fuel), and the topography (e.g., slope and aspect).	None	Project Proponent	Monitoring Phase: Prior to landfill construction and excavation. Monitoring Agency: ~~Project Archaeologist and~~ City Planning Dept. Enforcement Agency: City Planning Dept.
	See the above mentioned impact.	An archaeologist shall be present onsite during major infrastructure work which requires significant surface disturbance.	None	Project Proponent	Monitoring Phase: Prior to landfill construction and excavation. Monitoring Agency: ~~Project Archaeologist and~~ City Planning Dept. Enforcement Agency: City Planning Dept.
	See the above mentioned impact.	The landfill operator shall instruct landfill equipment operators how to identify archaeological resources and upon discovery of such findings immediately report the location of the site to their supervisor. If any evidence of aboriginal habitation is discovered during earthmoving activities, landfill operations will cease in that particular location until a	None	Project Proponent	Monitoring Phase: Prior to landfill construction and excavation. Monitoring Agency: ~~Project Archaeologist and~~ City Planning Dept. Enforcement Agency: City Planning Dept.

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
		qualified archaeologist has made a determination as to the significance of the site or findings. Any significant archaeological resources shall be recovered to the extent practicable prior to resuming activities in that area of the landfill.			
	See the above mentioned impact.	Archaeological resources recovered during surface collection, subsurface excavations, and monitoring, with related records, notes, and technical reports shall be curated at a regional repository approved by the City.	None	Project Proponent	Monitoring Phase: Prior to landfill construction and excavation. Monitoring Agency: ~~Project Archaeologist and~~ City Planning Dept. Enforcement Agency: City Planning Dept.
4.19.2 Paleontological Resources	There is a high degree of probability that significant fossil resources will be recovered from areas underlain by marine sedimentary rocks. The fossils encountered within Sunshine Canyon during survey walkovers by consultants are not considered significant. However, there is a probability that the marine sedimentary rocks that underlie the canyon may contain undiscovered paleontological resources. These resources have the potential of being scientifically valuable.	Prior to the commencement of initial earth excavation, specific sections of the City/County Landfill Project area shall be resurveyed as a precautionary measure to minimize potential loss of undiscovered paleontological resources. Specific sections of the project area to be resurveyed shall be as determined by the intended cut-and-fill areas proposed for landfill development. As new areas for excavation are identified by the project proponent, an evaluation of those areas shall be made based on the prior survey results and consultation with appropriate technical specialists.	None	Project Proponent	Monitoring Phase: Prior to landfill construction and excavation. Monitoring Agency: ~~Project Paleontologist and~~ City Planning Dept. Enforcement Agency: City Planning Dept.
	See the above mentioned impact.	A paleontologist shall be onsite during major infrastructure work that requires significant excavation. In the event that paleontological resources are discovered during grading or excavation, the paleontologist shall be allowed to redirect grading away from the area of exposed fossils to allow sufficient time for inspection, evaluation, and recovery.	None	Project Proponent	Monitoring Phase: Prior to landfill construction and excavation. Monitoring Agency: ~~Project Paleontologist and~~ City Planning Dept. Enforcement Agency: City Planning Dept.
	See the above mentioned impact.	The landfill operator shall instruct landfill equipment operators how to identify paleontological resources and upon discovery of such findings immediately report the location of the site to their supervisor. If any evidence of paleontological resources is discovered during earthmoving activities, landfill operations shall cease in that particular location until a qualified paleontologist has made a determination as to the significance of the findings.	None	Project Proponent	Monitoring Phase: Prior to landfill construction and excavation. Monitoring Agency: ~~Project Paleontologist and~~ City Planning Dept. Enforcement Agency: City Planning Dept.
	See the above mentioned impact.	Any significant paleontological resources shall be recovered to the extent practicable. Due to the potential for rapid deterioration of exposed surface fossils, preservation by avoidance is not an appropriate measure. When fossils cannot be removed immediately, the site shall be stabilized to prevent further deterioration prior to data recovery or the fossil location as directed by a professional paleontologist.	None	Project Proponent	Monitoring Phase: Prior to landfill construction and excavation. Monitoring Agency: ~~Project Paleontologist and~~ City Planning Dept. Enforcement Agency: City Planning Dept.

Table 1.10-1 (Revised - Cont.)
SUMMARY MATRIX OF POTENTIAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, NET UNMITIGATED ADVERSE IMPACTS, MITIGATION COMPLIANCE RESPONSIBILITY AND MONITORING PHASING AND ENFORCEMENT PROGRAM

Environmental Issue	Potential Environmental Impact(s)	Mitigation Measures	Net Unmitigated Adverse Impact(s)	Mitigation Compliance Responsibility	Monitoring Phase/Monitoring Agency Enforcement Agency
	See the above mentioned impact.	The paleontologist shall be retained to perform inspection of the excavation and salvage exposed fossils. Collected fossils shall be curated at a public institution with an educational/ research interest in the material. Any ~~curation~~ curatorial expenses shall be borne by the landfill operator.	None	Project Proponent	Monitoring Phase: Prior to landfill construction and excavation. Monitoring Agency: ~~Project Paleontologist and~~ City Planning Dept. Enforcement Agency: City Planning Dept.
4.19.3 Historical	Environmental impacts determined not to be significant in the Initial Study and Environmental Checklist, dated July 25, 1991.	No significant impacts on historical resources were identified; therefore, no mitigation measures are proposed.			

Table 7.4-1 (Revised)
MITIGATION REPORTING AND MONITORING PROGRAM (MRMP)
SUNSHINE CANYON LANDFILL - CITY OF LOS ANGELES

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
4.1 EARTH RESOURCES **4.1.1 Grading Activities** All grading activities shall be performed in accordance with the provisions of Division 70 of the City of Los Angeles Building Regulations, CCR Title 14, and with the rules and regulations as established by the City Department of Building and Safety.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE
Areas outside of and above the cut and fill as shown on the conceptual grading plan shall not be graded, except for the development of ancillary facilities or other related improvements. Additional grading may be necessary for slope stability or drainage purposes. Prior to undertaking any grading activities, the Department of Building and Safety shall be notified and approve any additional grading based on engineering studies (in accordance with CCR Title 14) provided by the project proponent and independently evaluated by the Department of Building and Safety.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, and City B&S Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE
During excavation, any unsuitable material encountered below the base grade for the landfill, including alluvium, organic material, and landslide debris, shall be removed. Engineered compacted fill shall be placed in those areas to restore the base grade for liner system construction. Excess material not used immediately for cover material shall be stockpiled onsite for future use. The unsuitable material shall be excavated, a portion at a time, as the working area of the landfill progresses to avoid opening large sections of potentially unstable material. A buffer area (i.e., 50-100 horizontal feet or as deemed appropriate to maintain safe working conditions) shall be used between the active cells receiving waste and areas under excavation. In accordance with CCR Title 14 a certified engineering geologist shall delineate the limits of the unsuitable material and associated "backcuts" to facilitate removals during excavation. Removal shall not occur during the rainy season (October 1 - April 30) or when the ground is saturated unless performed under the direction and specifications of a certified engineering geologist.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE
Grading that allows for construction of ancillary facilities outside of the landfill footprint or that has the potential to impact property beyond the boundary of the landfill shall be approved by the Department of Building and Safety.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, and City B&S Enforcement Agency: LARWQCB, CIWMB, and City B&S

Table 7.4-1 (Revised - Cont.)
MITIGATION REPORTING AND MONITORING PROGRAM (MRMP)
SUNSHINE CANYON LANDFILL - CITY OF LOS ANGELES

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
All grading activities shall be in compliance with specific requirements provided in a comprehensive geotechnical report prepared specifically for the proposed project, including provisions for excavation approved by the Department of Building and Safety, City Engineer, City LEA and other Responsible Agencies.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE
Revegetation and erosion control procedures on all exposed slopes shall be implemented. The erosion controls to be implemented at the site shall include soil stabilization measures and revegetation in accordance with the approved revegetation plan as approved by the City Building and Safety Department. Interceptor ditches shall be designed to divert storm runoff to a sedimentation basin.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, and City LEA ,and City B&S Enforcement Agency: LARWQCB, CIWMB, and City LEA, and City B&S
Prior to the initiation of grading activities, the project proponent shall undertake, if necessary, reabandonment procedures as required by the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: ~~Project Geologist/Engineer and~~ California Dept. of Conservation Enforcement Agency: California Dept. of Conservation
4.1.2 Geologic Hazards - Mudflow and Landslide (including lithologic history) When excavating for the landfill operation, if a landslide is encountered, all material constituting that landslide shall be removed. Excess landslide material not used immediately for cover material shall be stockpiled onsite for future use. If necessary, the landslide area shall be excavated a portion at a time to avoid opening large sections of potentially unstable material. A buffer area shall be maintained between the active landfill cells receiving waste and areas under excavation to remove overburden soils, landslide debris, and weathered bedrock. A qualified geologist shall delineate the limits of the landslide during excavation. Landslide removal shall not commence when the ground is saturated, unless removed under the direction and specifications of a certified engineering geologist.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: ~~Project Geologist/Engineer~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, and City BOE
Areas of excavation and areas of loose soil (i.e., around haul roads, etc.) shall be stabilized to prevent erosion before the onset of the rainy season.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: ~~Project Geologist/Engineer~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
4.1.3 Geologic Hazards - Subsidence Refer to Section 4.1.2, Geologic Hazards - Mudflow and Landslide.			

Table 7.4-1 (Revised - Cont.)
MITIGATION REPORTING AND MONITORING PROGRAM (MRMP)
SUNSHINE CANYON LANDFILL - CITY OF LOS ANGELES

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
4.1.4 Geologic Hazards - Seismicity The landfill facility shall be designed and constructed to meet CCR, Title 14, Division 7, Chapter 3, Article 7.8, § 17777 (Final Site Face) and CCR, Title 23, Division 3, Chapter 15, Article 4, § 2547 (Seismic Design) requirements "to withstand the maximum probable earthquake without damage to the foundations or to the structures which control leachate, surface drainage, erosion, or gas." Design consideration shall include strong ground shaking and secondary ground rupture. In addition, the project proponent shall comply with RCRA, Subtitle D, 40 CFR Part 258, Subpart B, § 258.13 (Fault Areas) which states "new municipal solid waste landfill units and lateral expansions shall not be located within 200 feet (60 meters) of a fault that has had displacement in Holocene time . . ." The landfill design and seismic analysis will be reviewed by the RWQCB.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE
An operations checklist shall be used by a registered engineering geologist for surveys following all earthquake events measuring 5.0 on the Richter Scale or greater near the project site. A comparison of operating parameters and site conditions before and after major earthquake events shall be made to verify that systems are operational as designed. Final designs for major engineered structures shall be based on the results of the detailed stability analyses of potential seismic events.	Project Proponent	After earthquake events of 5.0 magnitude or greater.	Monitoring Agency: ~~Project Geologist/Engineer,~~ SCAQMD, LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: SCAQMD, LARWQCB, CIWMB, City B&S, City LEA, and City BOE
4.1.5 Geologic Hazards - Liquefaction Alluvium in the canyon bottoms beneath the footprint of the waste containment system and beneath ancillary structures shall be excavated and, if necessary, replaced with compacted structural fill during construction. A qualified geologist shall be onsite during construction activities to observe removal and replacement of alluvium and verify that all alluvium within the landfill footprint has been removed prior to placement of any compacted fill or construction of any containment system elements.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, and City BOE
The landfill facility shall be designed and constructed in accordance with RCRA, Subtitle D, 40 CFR, Part 258, Subpart B, § 258.14 (Unstable Areas) so that there would be no liquefaction related impacts.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE

Table 7.4-1 (Revised - Cont.)
MITIGATION REPORTING AND MONITORING PROGRAM (MRMP)
SUNSHINE CANYON LANDFILL - CITY OF LOS ANGELES

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
The landfill facility shall be designed and constructed in accordance with CCR, Title 23, Division 3, Chapter 15, Article 3, § 2530(d) (Classification and Siting Criteria), which requires that "all containment structures at waste management units shall have a foundation or base capable of providing support for the structures and capable of withstanding hydraulic pressure gradients to prevent failure due to settlement, compression, or uplift as certified by a registered civil engineer or certified engineering geologist."	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, and City BOE
4.1.6 Geologic Hazards - Slope Stability Final maximum refuse slope gradient at the site shall be no steeper than 2H:1V (horizontal to vertical) for the landfill.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
Final cut and fill slopes shall have an overall slope gradient no steeper than 1.5H:1V.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
Final slopes shall be engineered to have a static factor of safety of at least 1.5.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
Survey monuments shall be installed around the perimeters of the outer fill areas at points where they would not be subject to disturbance by landfill development. The exact spacing, location, and characteristics of the survey monuments shall be submitted to and approved by the City Local Enforcement Agency (LEA).	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE
4.2 AIR QUALITY **4.2.1 Existing Conditions** Refer to Section 4.2.11, Construction, within this table.			

Table 7.4-1 (Revised - Cont.)
MITIGATION REPORTING AND MONITORING PROGRAM (MRMP)
SUNSHINE CANYON LANDFILL - CITY OF LOS ANGELES

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
4.2.2 California's SCAB Regional Climatic Characteristics Refer to Section 4.2.11, Construction, within this table.			
4.2.3 Criteria Air Pollutants Refer to Section 4.2.11, Construction, within this table.			
4.2.4 Ambient Air Quality Standards and Annual Statistics Refer to Section 4.2.11, Construction, within this table.			
4.2.5 Air Quality Management Plan Refer to Section 4.2.11, Construction, within this table.			
4.2.6 Proposed Project Overview Refer to Section 4.2.11, Construction, within this table.			
4.2.7 Site Preparation/Construction Phase Refer to Section 4.2.11, Construction, within this table.			
4.2.8 Air Quality Operational Phase (Long-Term) ~~Refer to Section 4.2.11, Construction, within this table.~~ No mitigation measures would be required.]			
4.2.9 Health Risk Analysis Refer to Section 4.2.~~11~~ 12, ~~Construction~~ Operations, within this table.			
4.2.10 Project Consistency with Applicable Plans Refer to Section 4.2.~~11~~ 12, ~~Construction~~ Operations, within this table.			
4.2.11 Construction The following mitigation measures will reduce emissions to the maximum extent reasonably feasible. • The project proponent will maintain equipment in tune per manufacturer's specifications.	Project Proponent	During project construction.	Monitoring Agency: ~~Project Site Manager, SCAQMD, and City LEA~~ City B&S Enforcement Agency: ~~SCAQMD~~ City B&S

Table 7.4-1 (Revised - Cont.)
MITIGATION REPORTING AND MONITORING PROGRAM (MRMP)
SUNSHINE CANYON LANDFILL - CITY OF LOS ANGELES

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
• The project proponent will use catalytic converters on gasoline-powered equipment. • The project proponent will retard diesel engine injection timing by 2 degrees. • High-pressure fuel injectors will be installed. • Heavy equipment will use reformulated, low-emission diesel fuel. • The project proponent will substitute electric and gasoline-powered equipment for diesel-powered equipment where feasible. • Where applicable, equipment will not be left idling for prolonged periods.			
• The project proponent will curtail (cease or reduce) construction during periods of high ambient pollutant concentrations (i.e., Stage II smog alerts).	~~Project Proponent~~	~~During project construction.~~	~~Monitoring Agency:~~ SCAQMD ~~Enforcement Agency:~~ SCAQMD
Daily watering of active construction areas, active soil stockpiles, and all traveled unpaved roads shall be performed to minimize dust lofting from construction disturbances. Construction areas will also receive a soil stabilization (sealant) product if they are to be left unattended for periods in excess of 5 days ~~and control is required~~.	Project Proponent	During project construction.	Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD
Wind speed shall be continually monitored using onsite anemometers. Excavation within construction areas shall be halted when the 15-minute average wind speed exceeds 15 mph or when the instantaneous wind speed exceeds 25 mph.	Project Proponent	During project construction.	Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD
Graded areas shall be watered as necessary to reduce dust emissions.	Project Proponent	During project construction.	Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD
Disturbed areas shall be revegetated with an interim ground cover as specified in the proposed revegetation program. Excavation will proceed in a manner to reduce the amount of graded areas at any given time.	Project Proponent	During project construction.	Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD
~~Public streets (i.e., San Fernando Road) shall be swept at the conclusion of construction work.~~	~~Project Proponent~~	~~During project construction.~~	~~Monitoring Agency: Project Site Manager, SCAQMD, and City LEA~~ ~~Enforcement Agency: SCAQMD~~

Table 7.4-1 (Revised - Cont.)
MITIGATION REPORTING AND MONITORING PROGRAM (MRMP)
SUNSHINE CANYON LANDFILL - CITY OF LOS ANGELES

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
4.2.12 Operations			
Construction Equipment • The project proponent will maintain equipment in tune per manufacturer's specifications. • The project proponent will use catalytic converters on gasoline-powered equipment. • The project proponent will retard diesel engine injection timing by 2 degrees. • High-pressure fuel injectors will be installed. • Heavy equipment will use reformulated, low-emission diesel fuel. • The project proponent will substitute electric and gasoline-powered equipment for diesel-powered equipment where feasible. • Where applicable, equipment will not be left idling for prolonged periods.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager, SCAQMD, and City LEA~~ City B&S Enforcement Agency: ~~SCAQMD and City LEA~~ City B&S
• The project proponent will curtail (cease or reduce) construction during periods of high ambient pollutant concentrations (i.e., Stage II smog alerts).	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
Refuse Trucks The following measures will be applied to the project proponent's operated trucks that utilize the project site. • Refuse trucks shall be maintained in proper tune. Trucks observed to emit excessive amounts of smoke (particulate matter) shall either be tuned up or repaired, as applicable.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager, SCAQMD, and City LEA~~ City B&S Enforcement Agency: ~~SCAQMD~~ City B&S
• Where applicable, high-pressure fuel injector nozzles shall be used, and diesel engine timing shall be retarded by 2 degrees.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager, SCAQMD, and City LEA~~ City B&S Enforcement Agency: ~~SCAQMD~~ City B&S
• Using a progressive fee schedule, the project proponent shall encourage trucks to carry full loads.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager, SCAQMD, and City LEA~~ City B&S Enforcement Agency: ~~SCAQMD~~ City B&S

Table 7.4-1 (Revised - Cont.)
MITIGATION REPORTING AND MONITORING PROGRAM (MRMP)
SUNSHINE CANYON LANDFILL - CITY OF LOS ANGELES

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
• The project proponent shall encourage trucking to be performed during off-peak hours. This shall be accomplished through coordination of deliveries with the transfer stations that supply refuse, restrictions in the hours of operation, and/or a fee schedule that penalizes haul trucks arriving during peak congestion periods. This will reduce emissions by increasing truck speeds and eliminating prolonged idling in traffic.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager, SCAQMD, and City LEA~~ City B&S Enforcement Agency: ~~SCAQMD and City LEA~~ City B&S
• When operating onsite, trucks shall not be left idling for periods in excess of 5 minutes.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager, SCAQMD, and City LEA~~ City B&S Enforcement Agency: ~~SCAQMD~~ City B&S
• Private owner-operators shall be warned that, if their trucks emit excessive amounts of smoke as determined by scale house workers, they will not be allowed future access to the landfill facility.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager, SCAQMD, and City LEA~~ City B&S Enforcement Agency: ~~SCAQMD~~ City B&S
Truck Travel and Fugitive Dust Emissions • To minimize fugitive dust emissions, the access roadways shall be paved, as necessary, and haul roads to the working face areas shall be hard packed and or covered with ~~gravel~~ a crushed stone layer. Paved and/or ~~gravel~~ crushed stone roadways shall extend up to new active fill areas as development of the landfill progresses.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
• Curbs and gutters shall be used. At least twice daily watering or wet sweeping of paved roads to remove windblown surface dust shall occur. AP-42 assigns a control efficiency of 50 percent for twice weekly cleaning of industrial paved roads. With twice daily cleaning, a control efficiency in excess of ~~95~~ 90 percent is predicted.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
• ~~The regular application of an~~ For unpaved clay roads, mitigation shall include an SCAQMD-approved chemical dust suppressant with a manufacturer's demonstrated control efficiency ~~of 80~~ in excess of 90 percent ~~and subsequent watering~~ shall be regularly applied to inactive areas, during windy periods. Note that this control efficient is less than (i.e., more conservative than) the 95-percent value used at the El Sobrante Landfill (*Draft South Coast Air Quality Management District Consultation No. 4, Work in Progress Air Quality Analysis Refinements, El Sobrante Landfill Expansion*, TRC Environmental Solutions, Inc., May 2, 1997).	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
~~• The placement and proper operation of a wheel washer for trucks at the site exit to minimize dust and dirt entrainment prior to trucks leaving the site.~~	~~Project Proponent~~	~~Throughout landfill operations.~~	~~Monitoring Agency: Project Site Manager, SCAQMD, and City LEA~~ ~~Enforcement Agency: SCAQMD and City LEA~~

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency	
• For unpaved crushed stone covered roads, mitigation shall include the use of a crushed stone topcoat in addition to the regular application of a SCAQMD-approved chemical dust suppressant and subsequent watering; a control efficiency in excess of 95 percent is predicted.	Project Proponent	Throughout landfill operations.	Monitoring Agency: Enforcement Agency:	Project Site Manager, SCAQMD, and City LEA SCAQMD and City LEA
Heavy Equipment Operations • Operations shall be restricted to encompass no more than a 10-acre active working face area.	Project Proponent	Throughout landfill operations.	Monitoring Agency: Enforcement Agency:	~~Project Site Manager,~~ SCAQMD, and City LEA SCAQMD and City LEA
• The disturbed area (subject to the surface erosion) shall be reduced from 40 acres to 20 acres when operations occur south of the smaller former filling area of the existing inactive City Landfill.	Project Proponent	Throughout landfill operations.	Monitoring Agency: Enforcement Agency:	SCAQMD, and City LEA SCAQMD and City LEA
Site Erosion • To the extent technically feasible, material excavated from one portion of the project site shall be used as daily cover material in an adjacent area to minimize travel distances for such cover material.	Project Proponent	Throughout landfill operations.	Monitoring Agency: Enforcement Agency:	~~Project Site Manager,~~ SCAQMD, and City LEA SCAQMD and City LEA
• Subject to approval by the California Integrated Waste Management Board (CIWMB), filling in each active area shall be prolonged through the utilization of a 20-foot maximum cell height. This would reduce the area of excavation and minimize the disturbances to the landfill, thereby providing an effective control of fugitive dust.	Project Proponent	Throughout landfill operations.	Monitoring Agency: Enforcement Agency:	~~Project Site Manager,~~ CIWMB, ~~SCAQMD~~, and City LEA CIWMB, ~~SCAQMD,~~ and City LEA
• A temporary vegetation cover shall be established on all slopes that are to remain inactive for a period longer than 180 days.	Project Proponent	Throughout landfill operations.	Monitoring Agency: Enforcement Agency:	~~Project Site Manager,~~ SCAQMD, and City LEA SCAQMD and City LEA
• An SCAQMD approved soil stabilization (sealant) product shall be used to retard soil erosion and enhance revegetation. Soil sealant shall be applied when necessary to selected working areas of the landfill. The sealant will also be used as a binder or tackifier to hold seed during revegetation, mulch, and fertilizers in-place until grasses become established and stabilize on the landfill surface.	Project Proponent	Throughout landfill operations.	Monitoring Agency: Enforcement Agency:	~~Project Site Manager,~~ SCAQMD, and City LEA SCAQMD and City LEA
4.2.13 Odor Impacts The natural biological processes that generate odors in a landfill through anaerobic decomposition cannot be prevented or avoided. However, the LFGs shall be prevented from	Project Proponent	Throughout landfill operations.	Monitoring Agency:	~~Project Site Manager,~~ SCAQMD, and City LEA

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
escaping to the atmosphere through the use of control measures. These measures include using daily and intermediate cover material over deposited wastes, filling any surface cracks with clean dirt as necessary, and extracting LFG through the use of an LFG collection and recovery system and destroying collected gases by combustion.			Enforcement Agency: SCAQMD and City LEA
Operational techniques shall be utilized to control odor sources at the landfill. The size of the working face shall be limited so that the area of waste exposed to the atmosphere is kept to a minimum.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
Solid waste shall be compacted within 1 hour of its arrival at the working face.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager, SCAQMD~~, and City LEA Enforcement Agency: ~~SCAQMD and~~ City LEA
The LFG collection and recovery system shall be installed in phases as each portion of the landfill site is filled. The final system shall contain a network of gas extraction wells, collection system piping, and flaring facilities. Because the LFG generation begins at lower levels of volume and increases during the landfill site life, the gas will be flared initially until sufficient quantities are available for processing into electricity.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
If an odor problem should develop, appropriate control measures shall be implemented. These measures include the application of daily cover material or more frequent application of the cover material to seal the landfill surface, or adjustments to the wells, equipment, and operation of the LFG collection and recovery system.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
To ensure that odors are kept to a minimum, the following odor/LFG monitoring program shall be implemented for the proposed landfill project. The monitoring program shall comply with the requirements of SCAQMD Rule 1150.1 and include: - Sample Probe Installation: One monitoring probe per 1,000 feet of landfill perimeter shall be installed to identify potential areas of subsurface LFG migration. These probes shall be monitored to ensure that large quantities of LFG do not vent offsite through subsurface soils. - Integrated Landfill Surface Sampling: The landfill surface shall be monitored to ensure that the average concentration of total organic compounds over the landfill surface does not exceed SCAQMD's standard of 50 ppm.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
- Ambient Air Samples: 24-hour integrated gas samples and required meteorological data shall be taken to assess any impact the landfill is having on the ambient air quality at the landfill perimeter. - Instantaneous Landfill Surface Monitoring: Spot checks on the landfill surface shall be made to determine the maximum concentration of total organic compounds measured as methane, measured at any one point on the surface of the landfill does not exceed the SCAQMD's standard of 500 ppm. - Regular Monitoring and Annual Testing: LFG concentrations at perimeter probes, gas collection system headers, the landfill surface, and in ambient air downwind of the landfill shall be monitored once per month or less frequently (but no less than quarterly) as required by the SCAQMD. The LFG collection system shall be adjusted and improved based on quarterly monitoring data and annual stack testing results.			
LFG flaring systems shall be sited as required by the SCAQMD and constructed using BACT. The flames shall be totally contained within the stack. Flame arresters shall be provided to the satisfaction of the City Local Enforcement Agency. To the extent technically and economically feasible, gas recovered at the landfill site shall be converted to energy or developed for other beneficial uses rather than flared.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
4.3 SURFACE AND GROUNDWATER **4.3.1 Surface Water** To ensure that infiltration of surface water into the closed landfill cells is minimized, surface runoff shall be intercepted and diverted around the landfill. The method of diversion used at the project site shall include the use of lined interceptor ditches placed along the edges of the landfill areas. This system of ditches shall flow into monitored sedimentation basins. After sediment content has been reduced, surface waters shall flow into the existing flood control channel directly east of the project site entrance.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
As development of the site proceeds, surface drainage systems shall be maintained so that surface runoff is diverted away from working slopes and isolated from landfilled refuse. Onsite drainage channels would be designed per CCR, Title 23, Division 3, Chapter 15, Article 3, § 2533(C), and County of Los Angeles Public Works Department, Flood Control Division requirements.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
Permanent bench drainage ditches shall be installed when final cover is placed on completed portions of the landfill. These ditches shall be lined. Temporary unlined drainage facilities consisting of diversion ditches (V-ditches) where necessary shall directly intercept natural surface runoff. Any intermittent channel flow in the existing canyon bottom shall be captured, channelized, and conveyed into Sedimentation Basin A. Diversion ditches shall convey surface runoff from the undisturbed areas to the permanent perimeter ditches for safe transport around the landfill footprint. Surface covers of various types, from mulches to vegetation, shall be used to retard erosion from areas of disturbance. In addition, areas of disturbance shall be kept at a minimum during active filling operations.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE
As filling operations progress upward in elevation and laterally across the canyon, both permanent and temporary drainage facilities shall be used to provide appropriate drainage protection. The lower elevation portions of the landfill working face shall be placed under final cover as soon as final grade is attained, and bench ditches shall be installed that will connect to adjacent, permanent perimeter ditches. These ditches shall connect directly to the temporary diversion drainage ditches that will protect the active landfill areas from natural surface runoff.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE
In order to monitor the effectiveness of those measures designed to prevent pollution from entering the offsite stormwater system, the project proponent shall be required to apply for coverage under the SWRCB's General Construction Activities Stormwater Permit Programs.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, and City BOE
The surface water collection system shall be designed to collect runoff and collect/retain suspended solids. Water leaving the sedimentation basins shall be monitored in accordance with NPDES requirements.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, and City BOE
Surface water quality shall be monitored by collecting water samples from the sedimentation basins to ensure that water quality protection standards (contaminant levels) as determined for the site by the LARWQCB are not exceeded.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, and City BOE
Sediment shall be cleaned out of the sedimentation basins after every significant storm.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA,

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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
			and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE
The final landfill cover shall be compacted and graded with a minimum 3-percent gradient to preclude percolation of rainwater and direct surface water runoff away from the landfilled refuse and into drains that ultimately discharge into the monitored sedimentation basins.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE.
An erosion control plan would be implemented by the project proponent to prevent stormwater pollution from construction activity. Construction materials, equipments and vehicles would be stored or parked in areas protected from stormwater runoff. Construction material loading and unloading would be in designated areas to minimize any washout due to stormwater runoff. Pre-construction controls would be implemented to include the use of a sandbagging system, including sandbag check dams and sandbag desilting basins, which would be used to limit runoff velocities and minimize sediment in stormwater runoff.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB and City BOE.
A preventive maintenance program would be implemented by the project proponent, including inspection of facility equipment, systems, and stormwater management devices to detect conditions that may cause breakdowns or failures resulting in discharge of materials into stormwater. This program applies to the onsite drainage ditches; rip-rap; berms and dikes; dust control; silt fences; diversion grading; and pavement surfaces. Each system and piece of equipment would be inspected monthly. Procedures for inspection would vary, due to the piece of equipment or system. However, the major elements of the inspection program would include checking for cracks or structural failures, inspecting parts or pieces of equipment nonfunctioning, checking for the degradation or deterioration of operating units, and investigating the need for cleaning or emptying units.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, and City BOE.
4.3.2 Groundwater In compliance with the Resource Conservation and Recovery Act (RCRA), Subtitle D, 40 CFR, Part 258, Subpart D, § 258.40 (Design Criteria), the proposed City/County Landfill shall install a composite liner system consisting of two components: (1) the upper component shall consist of a minimum 30-mil flexible membrane liner (FML) and (2) the lower component shall consist of a low-permeability soil layer equivalent to at least a 2-foot layer of compacted low-permeability soil with a hydraulic conductivity of no more than 1×10^{-7} centimeters per second. If an FML component consisting of high-density polyethylene is	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
utilized, it shall be at least 60 mils thick. If a thinner soil barrier layer of lower permeability is utilized, it shall have equal or superior containment capability. The FML component shall be installed in direct and uniform contact with the underlying low-permeability soil component. In addition, the landfill shall have a LCRS that shall consist of either a granular layer 1-foot minimum in thickness or a geosynthetic alternative with an equivalent flow capacity, and a minimum 2-foot thick protective soil cover over which refuse will be placed. There shall also be a protective toe berm at the landfill terminus.			
In accordance with RCRA Subtitle D, 40 CFR, Part 258, the composite liner system shall be placed under the entire landfill footprint, including the canyon bottom and side slopes. Design details of each site-specific liner system that shall be constructed shall be described in detail in the project proponent's ROWD for the landfill facility. The liner systems shall be constructed and field tested in accordance with strict Quality Assurance/Quality Control (QA/QC) procedures pursuant to criteria submitted to and approved by the LARWQCB prior to construction.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB
Areas of natural groundwater seepage shall be intercepted by the installation of a subgrade gravel drainage blanket. A series of underdrains shall be placed in areas where seeps and springs have been identified, and they shall collect and convey any water from these sources to the sedimentation basin. In the event any chemical constituents are in the seep water, the seep waters will be sampled, analyzed, collected, and then sent either to the onsite leachate treatment facility or offsite for proper treatment and disposal. The nature and the source of the seep would be investigated including additional sampling and laboratory testing.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB
The LCRS shall be installed at the base and side slopes of the landfill. This system shall be designed and installed to collect generated leachate for disposal consistent with LARWQCB requirements. The collection system shall consist of a filter rock blanket embedded with a system of collection pipes or a geosynthetic alternative that collects and transports the fluid to a holding tank. In accordance with RCRA, Subtitle D, 40 CFR, Part 258, the collection systems shall be designed to limit the hydraulic head on the liner to less than 12 inches. Collection pipes shall be sized and spaced to reduce the hydraulic head in the leachate collection system as specified in WDRs. Leachate shall be recovered and treated onsite. The treated leachate shall be sampled on a regular basis to affirm suitability for reuse onsite.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB
Final design and operating conditions for the leachate removal and treatment system shall be as specified by the LARWQCB in the proposed landfill's WDRs. The LCRS shall be designed and installed in accordance with CCR, Title 23, Division 3, Chapter 15, Article 4, § 2543 (Leachate Collection and Removal Systems), which requires that the LCRS be	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
designed, constructed, maintained, and operated in a manner that collects and removes twice the maximum anticipated daily volume of leachate from the waste management unit.			
A gas collection layer shall be placed beneath the liner system where it overlies the existing inactive landfill to mitigate the potential for LFG migration.	Project Proponent	Prior to commencement of landfill development and throughout landfill operations.	Monitoring Agency: ~~Project Geologist/Engineer,~~ SCAQMD, LARWQCB, CIWMB, and City LEA Enforcement Agency: SCAQMD and LARWQCB
The existing groundwater monitoring wells located within the City portion of Sunshine Canyon shall continue to be monitored during the development of the proposed project. The monitoring system may be revised as construction progresses in the areas where wells are located as approved by the LARWQCB.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB
A preliminary closure/postclosure plan shall be provided as part of the operating permit for the landfill. Closure regulations are contained in the CCR, Title 23, Division 3, Chapter 15, Article 8 (Closure and Postclosure Maintenance), § 2580 (General Closure Requirements) et seq. Completion of landfilling operations will occur once final approved elevations are reached.	Project Proponent	Prior to commencement of landfill development and throughout landfill operations.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB, CIWMB, and City LEA
The design, operation, and final closure of the landfill project shall be monitored by the City LEA, CIWMB, and LARWQCB to ensure that the landfill will not create significant environmental impacts to local or regional water supplies.	Project Proponent	Prior to commencement of landfill development and throughout landfill operations.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB, CIWMB, and City LEA
Application of daily, intermediate, and final covers in accordance with applicable regulatory requirements shall aid to restrict leachate formation by inhibiting the infiltration of water into the landfill waste prism.	Project Proponent	Prior to commencement of landfill development and throughout landfill operations.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB, CIWMB, and City LEA
Dust control water shall be applied to wet only the upper soil surface.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Geologist/Engineer,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB, CIWMB, and City LEA

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
The project shall be operated as a Class III landfill and shall not accept hazardous materials or liquid waste. Further restrictions will be identified in the future WDRs required prior to project development.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Geologist/Engineer, Project. Horticulturalist/Forester,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB, CIWMB, and City LEA
Underground diesel fuel storage tanks will be installed, monitored and inspected in compliance with CCR Title 23, Division 3, Chapters 16 and 17 and City of Los Angeles Municipal Code Sections 57.31.34 through 57.39.18. Underground tanks would be double-walled and have sufficient secondary containment and a leak interception and detection system to prevent fluid migration.		Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager, City Fire Dept.,~~ LAFD and City LEA Enforcement Agency: ~~City Fire Dept.~~ LAFD
4.3.3 Flood Hazard/ Mudflow Hazard Refer to Section 4.3.1, Surface Water within this table.			
4.4 BIOLOGICAL RESOURCES **4.4.1 Vegetation and Wildlife Habitat** Venturan Coastal Sage Scrub A detailed conceptual mitigation plan shall be prepared by the project proponent and contain specific information on planting, maintenance, and monitoring. A revegetation plan, that includes Coastal sage scrub restoration can feasibly occur onsite. The implementation of this plan will provide onsite mitigation greater than 1:1 to offset the loss of coastal sage scrub. Surface soils and seed source will be gathered from areas of the project site and spread within onsite mitigation areas.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: City Planning Dept. Enforcement Agency: City Planning Dept.
Slender Mariposa Lily A conceptual mitigation plan for transplanting relocated lilies shall be developed by consulting biologists. That plan shall describe transplantation techniques, monitoring, and provide data required by Responsible Agencies during a 5-year monitoring period.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: City Planning Dept. Enforcement Agency: USFWS and City Planning Dept.

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
San Diego Horned Lizard Impacts on the San Diego horned lizard can be mitigated to a level of less than significant by restoring coastal sage scrub habitat. This will create a temporal loss of the species, but the population should recover following restoration of this habitat. Topsoils should be selected that are friable to suit lizard habitat requirements.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: City Planning Dept. Enforcement Agency: USFWS and City Planning Dept.
California Gnatcatcher Surveys shall be conducted for California gnatcatchers prior to onsite grading to determine the status of this species within development areas. Surveys shall be conducted in accordance with USFWS protocol, and if present, a Section 10(a) permit from USFWS would be obtained by the project proponent. If grading activities occur during the nesting season (i.e., March through July), a federally permitted biologist will survey areas of project development to determine if the species is present. If California gnatcatchers are present, onsite grading activities shall cease until USFWS officials are notified. Either additional coastal sage scrub restoration or the purchase of suitable offsite habitat will be required, if California gnatcatchers are found onsite.	Project Proponent	Prior to onsite construction grading.	Monitoring Agency: City Planning Dept. Enforcement Agency: USFWS and City Planning Dept.
Least Bell's Vireo Surveys shall be conducted for least Bell's vireo prior to onsite grading to determine the status of this species within development areas. Surveys shall be conducted in all areas of potential habitat. If this species is present onsite, a Section 10(a) permit from USFWS would be obtained by the project proponent. If grading activities occur during the nesting season (i.e., April through July), a biologist will survey areas of project development to determine if the species is present. If present, onsite grading activities shall cease until USFWS officials are notified.	Project Proponent	Prior to onsite construction grading.	Monitoring Agency: City Planning Dept. Enforcement Agency: USFWS and City Planning Dept.
Western Burrowing Owl Preconstruction surveys shall be conducted by a consulting biologist at least 30 days prior to project grading to determine if the species is within the project site. If surveys indicate the presence of western burrowing owls, a relocation program shall be implemented.	Project Proponent	Prior to onsite construction grading.	Monitoring Agency: City Planning Dept. Enforcement Agency: USFWS and City Planning Dept.

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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
Migratory Bird Treaty Act To prevent the loss of an active migratory bird nest, vegetation shall not be cleared during the breeding season (i.e., March 15 to August 1). If vegetation clearing needs to occur, surveys shall be conducted by biologists to determine active migratory bird nests. All active migratory bird nests shall be protected until the young become independent.	Project Proponent	Prior to onsite construction grading.	Monitoring Agency: City Planning Dept. Enforcement Agency: USFWS and City Planning Dept.
Raptor Nests If habitat removal is proposed during the raptor breeding season (i.e., March to July), a survey shall be conducted for active nesting areas. If active nests are found, no construction activity shall take place within 500 feet of an active nest, until the young have fledged. The 500-foot perimeter around each active nest shall be fenced. Trees containing nests shall only be removed during the non-breeding season.	Project Proponent	Prior to onsite construction grading.	Monitoring Agency: City Planning Dept. Enforcement Agency: USFWS and City Planning Dept.
4.4.2 Wetlands and Riparian Habitat **Offsite Mitigation Sites** Potential candidate mitigation sites have been identified by the project proponent in conjunction with resource agencies for consideration to compensate for impacts on riparian and wetland resources as a result of project development. These sites include Bull Creek, Bee Canyon and East Canyon, which are located proximate to the project site. Prior to the development of any detailed mitigation plans and drawings, the final selection will be determined cooperatively by the CDFG, Corps, SWRCB, and other regulatory agencies in conjunction with the City and project proponent.	Project Proponent	Throughout landfill operations.	Monitoring Agency: USFWS, CDFG, and City Planning Dept. Enforcement Agency: USFWS, CDFG, and City Planning Dept.
Purchasing Wetland Credit If a potential candidate site is unavailable, the project proponent would purchase wetland credit through an established mitigation bank. The project proponent would be required to pay an amount established by the mitigation bank developer (i.e., public, non-profit, or private entity) as compensatory mitigation.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: USFWS, CDFG, and City Planning Dept. Enforcement Agency: USFWS, CDFG, and City Planning Dept.
Funding of an Invasive Species Eradication Program Under the direction of the Corps, the project proponent would seek authorization under	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: USFWS, CDFG, and City Planning Dept. Enforcement Agency: USFWS, CDFG, and City

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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
Regional General Permit No. 41, which would allow the mechanized removal of invasive, exotic plants (e.g., giant reeds [*Arundo donax*] and salt cedar [*Tamarix* spp.]) from waters of the U.S., including wetlands within the jurisdiction of the Los Angeles District of the Corps.			Planning Dept.
4.4.3 Native and Nonnative Tree Resources Native tree species shall be replaced at a 2:1 (replacement:removal) ratio, consisting of 15-gallon or 5:1 3-gallon container trees. Mitigation trees shall be planted prior to impacted trees being removed, thus allowing trees to grow to specimen size in the field. A specimen-size tree shall be defined as a 15-gallon tree with a minimum trunk caliper of 1 inch measured 1 foot above ground. All mitigation trees shall be specimen size within 1 year after tree removal.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.
Nonnative tree species shall be replaced at a 2:1 ratio, consisting of 3-gallon Coast live oak trees.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.
A total of 100 24-inch box and 25 36-inch box size Coast live oak trees shall be planted in areas identified by the City. These trees shall be natural in form. The total mitigation tree count obtained using the 5:1 replacement ratio, shall be reduced by 125 trees to account for the inclusion of these larger trees.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.
Mitigation tree planting shall occur within the 100± acre open space buffer area located south of the existing inactive landfill. Appropriate planting locations shall be selected within the buffer area based on soil type, steepness of the slope, and aspect (i.e., location and or direction of the sun).	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.
Prior to tree planting, the mitigation site shall be prepped to create an environment favorable for native and nonnative tree growth and survival. The initial step in tree planting is to clear away unwanted grass, weeds, or brush. A minimum 3-foot radius of vegetation shall be cleared around the planting location. All planting holes shall be dug to a minimum depth of 24 inches. If soil conditions cannot accommodate the minimum depth, planting holes shall be relocated to a more suitable location. Trees will be spaced 15 to 20 feet in a random, nongeometic pattern. Row or grid spacing will be avoided to provide a natural look to the mitigation planting.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.
A poultry wire screen with 1-inch-diameter holes shall be installed around the outside wall of the tree planting hole and folded closed on the bottom. The screen shall extend downward to enclose the root ball of the tree that will protrude 1 foot above final grade.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.

Table 7.4-1 (Revised - Cont.)
MITIGATION REPORTING AND MONITORING PROGRAM (MRMP)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
Backfill material shall be used for planting material and shall consist of loose friable soil. The planting shall be backfilled to a depth that allows the root crown of the plant to be even with or slightly higher than the surrounding grade. All planting locations shall be preirrigated to ensure that moisture levels are at or near capacity.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.
Prior to tree planting, all containers shall be thoroughly soaked. Once at the mitigation site, trees shall not be removed from their containers until all site preparation work has been completed. The wire cage shall be installed around the planting hole, and backfill material shall be filled to one-half the depth of the root wod. A 27-gram Agriform fertilizer tablet shall be placed approximately 1 inch from the root wod. Backfilled soil shall be tamped and soaked to remove any air pockets.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.
Following tree planting, the area shall be mulched with either wood chip or recycled green waste. The mulch shall be applied in an even layer approximately 6 inches or more in thickness.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.
Drip irrigation shall be provided for all planted trees to ensure adequate growth and allow year-round planting. The irrigation system shall include a liquid fertilizer injection system to maintain optimum plant health and growth.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.
The irrigation system shall utilize plastic polyvinyl chloride piping as its main supply lines. Distribution lines shall consist of ½-inch-diameter polyethylene drip tubing. Water shall be delivered to the plants via conventional drip spot emitters. Vortex emitters rated at 1 to 3 gallons per hour shall be used for the emitters. All irrigation water shall be filtered through a "Y" filter containing a 150 mesh screen. The irrigation systems shall be controlled automatically with remote battery-powered controllers and electrical irrigation valves. Watering frequency and duration shall be adjusted as necessary, depending on soil condition, weather, and plant requirements.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.
To assure successful establishment and survival of the mitigation trees, a 3-year monitoring and maintenance program shall be implemented. Each year the mitigation planting shall be monitored for growth and survival.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.
An annual monitoring report shall be prepared and submitted to the City Department of Public Works, Street Tree Division by the project proponent. This report shall detail the growth and survival record for each mitigation tree planted. The report will provide an accounting of the number of trees required for mitigation versus the number of qualifying trees planted. Maintenance recommendations will be included in the annual report.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City Planning Dept. Enforcement Agency: City ~~Forester~~ Planning Dept.

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
4.5 NOISE **4.5.1 Construction Noise Impacts** Sensitive land uses would not be impacted by project construction; therefore, no mitigation measures would be required.			
4.5.2 Operational Noise Impacts Landfilling operations shall be limited to the hours of 6:00 a.m. to 6:00 p.m., Monday through Friday, and from 7:00 a.m. to 2:00 p.m. on Saturday. However, the landfill entrance gate shall be open to waste-hauling vehicles at 5:00 a.m., Monday through Friday, and at 7:00 a.m. on Saturday to provide for truck and vehicle queuing.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ City Planning Dept., and City LEA Enforcement Agency: City Planning Dept., and City LEA.
Because of the proximity of the landfill site to residential areas, citizens, small commercial, and private users of the landfill shall be encouraged by the project proponent (e.g., onsite signage, flyers, mailers) to use alternate routes (other than Balboa Boulevard).	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ City Planning Dept., and City LEA Enforcement Agency: City Planning Dept.
All landfill equipment shall be equipped with air flow silencers on intake systems and low-noise mufflers on exhaust systems that shall be properly maintained.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ City Planning Dept., and City LEA Enforcement Agency: City Planning Dept.
4.6 LIGHT AND GLARE All lighting shall be shielded and directed onto the site. No floodlighting shall be located that can be seen directly by adjacent residents, motorists on adjacent public streets or highways, or pilots within the "airport approach zone." This condition shall not preclude the installation of low-level security lighting.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager and~~ City Planning Dept. Enforcement Agency: City Planning Dept.
4.7 LAND USE **4.7.1 Community Plan and Zoning Designations** Maintain and enhance the 100± acre open space buffer area in the southern portion of the site by implementing revegtation programs in conjunction with onsite programs	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager and~~ City Planning Dept. Enforcement Agency: City Planning Dept.
4.7.2 General Plan Elements No mitigation measures would be required.			

Table 7.4-1 (Revised - Cont.)
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4.7.3 Regional, State and Federal Plans No mitigation measures would be required.			
4.7.4 Other Landfill and Transfer Station Facilities No mitigation measures would be required.			
4.8 NATURAL RESOURCES Refer to Section 4.9.6, Risk of Explosion for a discussion of potential re-abandonment mitigation measures.			
4.9 RISK OF UPSET **4.9.1 Hazardous Materials** The landfill shall be operated as a Class III landfill; no liquid, acutely hazardous, radioactive material, or infectious medical wastes will be accepted.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LARWQCB, and City LEA Enforcement Agency: CIWMB, and City LEA
Haulers disposing of drums (i.e., 55-gallon) shall have drums triple-rinsed with tops and bottoms removed prior to acceptance.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ DTSC, CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
Notices shall be posted at prominent locations onsite to notify waste haulers about hazardous waste policies of the landfill operator and to inform haulers that hazardous waste cannot be disposed of at the facility. Signage shall help inform waste haulers of the rules and regulations governing the disposal of hazardous waste.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
A refuse inspection program that includes direct visual inspection, remote television monitors to inspect incoming rolloff-type loads and open-top vehicles, and radiation detecting devices, ~~and sensors capable of detecting volatile compounds~~ shall be implemented by the landfill operator to prohibit the illegal dumping or disposal of liquids and hazardous wastes at the landfill.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, CIWMB, and City LEA Enforcement Agency: SCAQMD, CIWMB, and City LEA
The landfill operator shall implement a hazardous waste load-checking program. This program shall include inspecting random loads for hazardous wastes in a segregated area of the landfill, and landfill employees shall scan waste materials as they are being unloaded at the active working face. Hazardous waste load checks at the proposed City/County Landfill will be 1.5 load checks per 1,000 tons of solid waste received at the landfil for the first year	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
of operation. However, after the first year of operation, BFI may request that the City LEA decrease the required load checking frequency to one load check per 1,000 tons of waste received at the City/County Landfill.			
If hazardous waste materials are discovered, emergency response shall include worker identification and notification procedures, cordoning off the area, and notifying Cal-EPA, DTSC, ~~for hazardous waste identification~~. Once hazardous waste is identified, the material shall be removed, containerized, and temporarily stored onsite, if safe to handle. In the unlikely event that acutely hazardous material is discovered, the immediate area will be evacuated, and a qualified hazardous waste hauler shall be contacted for immediate collection and disposal of the material at a permitted Class I hazardous waste landfill. After any such incident, all necessary reports shall be completed and filed by the landfill operator with the following agencies: City of Los Angeles Police Department, County of Los Angeles Office of the District Attorney, Environmental Crimes Unit, City of Los Angeles Fire Department, City of Los Angeles Department of Environmental Affairs, and the LARWQCB.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ DTSC, CIWMB, ~~City Police Dept.~~ LAPD, and City LEA Enforcement Agency: CIWMB and City LEA
Landfill employee training programs on hazardous waste detection shall be conducted. These programs shall be presented during preemployment and for subsequent annual review for all employees.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ DTSC, CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
The spill response program shall be part of required training for all facility employees. In the event of a spill, containment is paramount. All landfill employees shall be trained to use dirt and/or other absorbent materials to pick up and/or contain small spills of oils, solvents, and/or other materials that may be harmful to the public, facility workers, or the environment. Training in the use of personal protective equipment, fire extinguishing aids (e.g., hoses or extinguishers), and spill containment/mitigation (e.g., absorbents) shall be provided.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ LARWQCB, CIWMB, and City LEA Enforcement Agency: LARWQCB, CIWMB, and City LEA
Full-time inspectors shall be employed onsite for inspection of waste materials. Full-time inspectors shall be deemed by the City to be qualified through training and experience to perform assigned duties.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
4.9.2 Vectors The landfill operator shall monitor the site on a regular basis for vector activity. In addition, the site shall be inspected by the City LEA on a regular schedule. Corrective measures shall be immediately taken should a vector problem be detected.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
Vectors (bird activity) shall be effectively eliminated by stringing wire or monofilament line (15 to 20 pound test) above the active landfill working areas at intervals of 100 to 150 feet, or by other approved means. This disrupts the birds' circling patterns to the extent that they do not attempt to land or congregate to feed on the refuse.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
Flies shall be controlled at the project site by a trap-and-destroy program. The use of sprays shall be avoided to the fullest extent possible.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
Rodent-related problems shall be controlled by operational techniques that are in accordance with recommendations from the City LEA and the Cal-EPA.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
Operational techniques shall be utilized to limit vector activity, including compacting waste at the landfill active working face, properly applying cover material; keeping the active working face as small as safely possible given the type and number of landfill equipment, properly grading interim fill surfaces and final fill slopes, and eliminating ponding areas at the project site.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
All equipment shall be in good condition and cleaned in a frequency and manner so as to prevent the propagation or attraction of flies, rodents, or other vectors, and the creation of nuisances.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
Items used at the landfill facility that could attract vectors (e.g., food, seed, office supplies, etc.) shall be stored in closed containers and/or within an enclosed structure. These containers shall be inspected regularly and shall be disposed of if they appear to be an attraction to any vectors.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
Salvaged materials generated onsite or imported shall be placed away from storage areas, other activity areas, and limited to a volume approved by the City LEA, local land use authority, or other approval agencies, minimizing the harborage or attraction of flies, rodents, or other vectors, and the creation of nuisances.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
All buildings, paved areas, landscaped areas, and perimeter areas shall be inspected regularly for signs of vectors. Any building openings, ground holes, and deficiencies shall be repaired as they are discovered during routine inspections to prevent the intrusion of any ground vectors.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
In the event that vectors may occur onsite, appropriate measures shall be implemented (e.g., the use of a professional exterminator).	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
4.9.3 Litter The landfill site shall be operated to minimize litter generation through implementation of the following measures: compaction of waste at the working face (i.e., 1,400 pounds of compaction per cubic yard); ~~periodic application of cover material during the day and at the end of the working day,~~ waste materials covered with at least 6 inches of clean, compacted soil or approved alternative daily cover by the end of the working day; and maintenance of the active working face areas as small as safely possible given the type and quantity of landfill equipment.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
Litter and debris shall be contained within the landfill property boundaries by the use of secondary litter fences (located along the outside perimeter of the landfill) and by portable litter fences placed adjacent to the active working face areas.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
The landfill operator shall inform owners of registered vehicles, by signage, to comply with vehicle tarping requirements under § 23114 and 23115 of the California Vehicle Code. Those waste haulers who repeatedly violate this code shall not be allowed to dispose of their waste loads at the facility or shall be fined until corrective measures are taken.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
On-a-once a week basis, or as needed, the landfill operator shall mobilize cleanup crews to provide litter pickup services within the O'Melveny Park area, along Balboa Boulevard and San Fernando Road, and in other residential areas located in proximity to the landfill, that may be affected by offsite litter migration. On a daily basis, the cleanup crews shall inspect the surrounding area to assess if more frequent cleanups are required.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ City Planning Dept., and City LEA Enforcement Agency: City Planning Dept. and City LEA
Landfill employees shall watch for any illegal dumping activities on or around the project site. The landfill litter control crew shall provide cleanup service for areas surrounding the project site.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
The administrative offices shall be equipped with a radio dispatch system that can quickly engage crews to respond to perceived litter complaints in the surrounding neighborhoods.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA Enforcement Agency: CIWMB
The onsite City LEA shall inspect the landfill on a regular basis, at which time the effectiveness of the litter control program shall be documented and any necessary	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, and City LEA

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
improvements shall be made, including: - Landfill personnel shall continuously patrol the access road to the scales from the time the landfill opens until the time of closure in the evening. - Improperly covered or contained loads that may result in a significant release of litter shall be immediately detained and the condition corrected, if practical, before the load proceeds to the active working face areas. If correction cannot be made, the load shall be conducted under escort to the working face. - All debris found on or along the landfill entrance and working face access roads shall be immediately removed. - Operating areas shall be located in wind-shielded portions of the landfill during windy periods. - Litter fences shall be installed in operating active working face areas, as deemed necessary by the LEA.			Enforcement Agency: CIWMB and City LEA
4.9.4 Employee Safety and Site Security The landfill operator shall implement an IIP program in compliance with CCR, Title 8, § 3203, designed to protect employees from work-related hazards associated with operation of the landfill site. Unsafe or unhealthful work conditions, practices, or procedures shall be immediately corrected by the landfill operator.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB and Cal/OSHA
Each supervisor or manager shall conduct regular periodic inspections to identify less-than-adequate or unsafe working conditions, improper or unsafe work practices, or procedures in their work areas. The maintenance supervisor shall be notified of needed repairs or corrective measures using a "safety inspection report" form. Additional inspections shall be accomplished whenever new processes, procedures, substances, or equipment are introduced into the workplace or when a supervisor becomes aware of a new, potential, or previously unrecognized hazard.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB and Cal/OSHA
Appropriate inspection checklists shall be developed, used, and maintained to accurately reflect various exposures in different work areas. Daily observation of the workplace	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, Cal/OSHA, and City LEA

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
environment by employees, supervisors, managers, and the safety director shall occur. Discrepancies shall be reported. Records of inspections, deficiencies, and corrective measures shall be maintained in the safety/maintenance offices.			Enforcement Agency: CIWMB and Cal/OSHA
If a problem or discrepancy is identified, an inspection report shall be prepared. The report shall identify the priority assigned to each discrepancy, as follows: Priority One, resolve the problem immediately; Priority Two, resolve the problem by the end of the working day; Priority Three, resolve the problem within 48 to 72 hours; and Priority Four, resolve the problem within 1 week as soon as the part(s) and/or materials are available. Unsafe work practices shall be interrupted immediately by the observing supervisor. Appropriate training shall be implemented. If the unsafe practice continues, progressive discipline shall be employed.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB and Cal/OSHA
Communication of safety and health methods to employees shall include verbal communication with employees at quarterly safety meetings; small group meetings conducted by first-line supervisors with their respective employee groups that shall be weekly "tailgate," "toolbox," or operations and safety meetings; written safety and health issues posted on employee bulletin boards; safety posters; suggestion boxes for employees to anonymously utilize; and action by management to evaluate and implement the pertinent employee safety suggestions.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB and Cal/OSHA
Accident/injury reports, inspections, and findings, including corrections and training records, shall be kept for 3 years. The OSHA Log 200 shall be retained by the landfill operator for a period of 5 years. Medical records for those employees involved in handling of hazardous wastes shall be maintained for a period of 30 years after employment termination.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB and Cal/OSHA
First-aid kits shall be located in dispatch, maintenance, scale houses, and corporate administrative offices, in addition to all supervisor vehicles. These kits shall contain "Band-Aids," bandages, sprays, miscellaneous ointments, and minor treatment supplies. These supplies are intended for treatment of small or nonserious cuts, burns, scrapes, etc. Injuries requiring medical attention shall be treated at the Holy Cross Medical Center. This hospital shall also provide ambulance service.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB and Cal/OSHA
The landfill operator shall implement an emergency action plan in compliance with CCR, Title 8, § 3220. This plan shall designate emergency escape routes and procedures, rescue and medical duties, methods for reporting fires and other emergencies; and names of persons and departments to contact during an emergency.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, Cal/OSHA, ~~City Fire Dept.~~ LAFD and City LEA Enforcement Agency: CIWMB, Cal/OSHA, and ~~City Fire Dept.~~ LAFD

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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
The landfill operator shall implement a fire prevention plan in compliance with CCR, Title 8, § 3221. Components of this written fire prevention plan shall include potential fire hazards and their proper handling and storage procedures; potential ignition sources (i.e., welding or smoking), their control procedures, and the type of fire protection equipment or systems that can control a fire involving them; names or regular job titles of those responsible for maintenance of equipment and systems installed to prevent or control ignitions or fires; and names or regular job titles of those responsible for the control of accumulation of flammable or combustible waste materials.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, Cal/OSHA, ~~City Fire Dept.~~ LAFD and City LEA Enforcement Agency: CIWMB, Cal/OSHA, and ~~City Fire Dept.~~ LAFD
In compliance with CCR, Title 8, § 3314, lockout/blockout procedures shall be implemented at the proposed project. Machinery or equipment capable of movement shall be stopped and the power source deenergized or disengaged: if necessary, the moveable parts shall be mechanically blocked or locked out to prevent inadvertent movement during cleaning, servicing, or adjusting operations. If the machinery or equipment must be capable of movement during this period in order to perform the specific task, the designated station manager or supervisor shall minimize the hazard of movement by providing and requiring the use of extension tools or other methods to protect employees from injury. Prime movers, equipment, or power-driven machines equipped with lockable controls or readily adaptable to lockable controls shall be locked out or positively sealed in the "off" position during repair work and setting-up operations. The operator shall provide a sufficient number of accident prevention signs or tags and padlocks, seals or other similarly effective means to safely conduct repairs.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, Cal/OSHA, and City LEA Enforcement Agency: CIWMB and Cal/OSHA
Personal protective equipment shall be provided to all operations employees and will include hard hats, heavy gloves, ear plugs, dust masks, safety boots, goggles, and safety vests.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB and Cal/OSHA, and City LEA Enforcement Agency: CIWMB, Cal/OSHA, and City LEA
The landfill operator shall comply with all applicable safety ordinances contained in the City of Los Angeles Municipal Code.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ City B&S, ~~City Police Dept.~~ LAPD, and City LEA Enforcement Agency: City B&S, ~~City Police Dept.~~ LAPD, and City LEA
The landfill operator shall maintain perimeter fencing in and around the site in accordance with CCR, Title 14, § 17658 to discourage illegal entry to the landfill. Where existing topography conditions create an effective barrier, no perimeter fencing shall be installed. Entrance and access gates shall remain locked when the landfill facility is not in operation.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ City B&S, ~~City Police Dept.~~ LAPD, and City LEA Enforcement Agency: City B&S, ~~City Police Dept.~~

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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
All existing perimeter fencing shall be inspected on a routine basis by the landfill operator, and necessary repairs shall be made to ensure a continued deterrent for unauthorized entry to the project site. Additionally, the landfill operator shall maintain posted "no trespassing" signage at the exterior perimeter fencing nearest the project site entrance.			LAPD, and City LEA
All landfill equipment shall be properly maintained and operated to minimize the health and safety impacts on landfill personnel and the public. Standby equipment shall be made available during periods of vehicle maintenance or breakdown.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ SCAQMD, CIWMB, and City LEA Enforcement Agency: SCAQMD, CIWMB, and City LEA
4.9.5 Human Health A citizen's advisory committee shall be established, if deemed necessary by the City Council or Planning Commission through a project condition, to address area resident health concerns about the existing inactive and proposed City/County Landfill Project. The committee's mandate shall include discussions with appropriate technical experts and regulatory agencies responsible for the on- and offsite monitoring activities at the project site. The advisory committee would be responsible for presenting information and discussions of these regulatory agency members back to area residents through planned informational meetings.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager and City LEA~~ City Planning Dept. Enforcement Agency: City Planning Dept.
4.9.6 Risk of Explosion Landfill Gas and Collection System Onsite structures shall be continuously monitored for the presence of unsafe levels of methane gas.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Air Quality Engineer,~~ CIWMB, SCAQMD, ~~City Fire Dept.~~ LAFD, and City LEA Enforcement Agency: CIWMB, SCAQMD, ~~City Fire Dept.~~ LAFD, and City LEA
If necessary, the landfill operator shall install electrical (e.g., battery backup) combustible gas detectors in habitable structures. Employees shall be trained in all applicable safety requirements to prevent any upset conditions from occurring.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Air Quality Engineer,~~ CIWMB, SCAQMD, and City LEA Enforcement Agency: CIWMB, SCAQMD, and City LEA
Risks associated with the gas collection and flaring system shall be mitigated through use of flexible piping, flame arrestors, sensors, and automatic shutoff controls. Numerous safety	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Air Quality Engineer,~~ CIWMB, SCAQMD, and City LEA

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
shutdown devices have been designed and installed into the flare station, including a telephone auto-dialer, to provide emergency notification. All gas extraction equipment, including gas condensate and propane tanks, shall be adequately secured to prevent damage during a seismic event. Inspections of the gas collection and flaring system shall be performed after ground shaking from an earthquake, and necessary action shall be taken to correct any potential problems.			Enforcement Agency: CIWMB, SCAQMD, and City LEA
Abandoned Well Sites Equipment operators involved in excavation shall be made cognizant of the potential presence of existing unrecorded, subsurface wellheads. If a wellhead (or other unidentifiable obstruction) is encountered during construction all excavation activities shall cease. The area will be cordoned off, and the landfill supervisor shall be called to determine whether the obstruction is an abandoned wellhead.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Air Quality Engineer, Onsite Safety Monitor,~~ SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
A portable explosive gas detection device shall be utilized to determine whether the obstruction is a wellhead that may be leaking natural gas. If this is the case, all personnel shall be evacuated within a 500-foot radius and a representative from the California Department of Conservation, Division of Oil, ~~and~~ Gas, and Geothermal Resources shall be notified. Excavation activities shall cease until further instruction from ~~Department of~~ Division of Oil, ~~and~~ Gas, and Geothermal Resources is received. If gas is not detected, a backhoe or similar type of equipment shall be brought in to further expose the obstruction. If necessary, proper abandonment procedures will be utilized following ~~Department of~~ Division of Oil, ~~and~~ Gas, and Geothermal Resources protocol.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Air Quality Engineer, Onsite Safety Monitor,~~ Cal. Dept. of Conservation, Division of Oil, ~~and~~ Gas, and Geothermal Resources SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
Trenches and Excavations A portable explosive gas detection device shall be utilized in trenches and excavations to determine the presence of methane gases. If unsafe concentrations of gas exist, all employees would be immediately removed from the area of unsafe gas concentration. The safety monitor would be responsible for ensuring that appropriate worker safety equipment is operable, as well as worker education and instruction correctly implemented, to prevent the potential for methane gas explosions.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Air Quality Engineer, Onsite Safety Monitor,~~ Cal. Dept. of Oil and Gas, SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
4.9.7 Airport Safety (Bird Strikes) In accordance with CCR § 17258.10 and 40 CFR Section 258.10, the project proponent will notify Whiteman Air Park and the FAA of the proposed project and projected startup date.	Project Proponent	Before project construction.	Monitoring Agency: ~~Project Site Manager and~~ City LEA Enforcement Agency: City LEA

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
4.9.8 Electromagnetic Fields No mitigation measures would be required.			
4.10 POPULATION No mitigation measures would be required.			
4.11 HOUSING No mitigation measures would be required.			
4.12 RIGHT-OF-WAY AND ACCESS No mitigation measures would be required.			
4.13 TRANSPORTATION AND CIRCULATION **4.13.1 Traffic** For those intersections where project-related traffic volumes are expected to create poor operating conditions and/or significantly impact the operating conditions of the study area intersections, mitigation is designed to improve and/or change the existing intersection geometry, thereby, increasing existing intersection capacity. Capacity improvements shall include roadway widening, roadway restriping, reconfigurating roadways, or providing additional lanes to various approaches of a key intersection. Roxford Street at the I-5 Freeway, (SB ramp) • Restripe ~~southbound~~ westbound approach on Roxford Street to provide dual left-turn lanes and one through lane. Roxford Street at the Encinitas/I-5 Freeway (NB ramp) • Restripe ~~westbound through lane~~ northbound approach on Encinitas Avenue to ~~left/ through option lane~~ provide left-turn lane, shared through/left-turn lane, and shared through/right-turn lane.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LADOT Enforcement Agency: LADOT

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
San Fernando Road at Balboa Boulevard • This key intersection features two through lanes in each direction on San Fernando Road and two northbound approach lanes, striped as an exclusive left-turn lane and an option left-right turn lane, are provided on Balboa Connector. A separate westbound left-turn lane as well as protected left-turn phasing is provided. Existing pavement widths and physical constraints (i.e., hillside encroachment) do not allow for any physical improvements, such as providing an exclusive eastbound right-turn lane on San Fernando Road for heavy existing and anticipated right-turn volumes. ~~Given the lack of available physical improvements, it is recommended that automatic traffic surveillance and control signal equipment be installed at this intersection. LADOT believes that the overall capacity of an intersection increases 7 percent by allowing a computer signal control system to improve the efficiency of operations. Preliminary discussions with LADOT staff indicate that this is a possible mitigation measure that could be implemented to offset the impact of Sunshine Canyon Landfill Project traffic.~~ Contribute to the design, construction, and operation of the Northeast Valley Automated Traffic Surveillance and Control (ATSAC) system for this intersection. The current cost of ATSAC for the Northeast Valley System is $79,000 per intersection. The contribution to ATSAC should be made prior to the start of construction for this ATSAC system, which is scheduled for the year 2003. San Fernando Road at Sierra Highway • Restripe ~~northbound through lane~~ northbound approach on San Fernando Road to ~~through/right option lane~~ provide a shared through/right-turn lane and exclusive right-turn lane and restripe the westbound approach of Sierra Highway for a 12-foot-wide curb lane. San Fernando Road at Project Driveway • ~~Restripe San Fernando Road to provide a second northbound left-turn lane. The installation of automatic traffic surveillance and control signal equipment is recommended at this intersection.~~			

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
• Install a new traffic signal at San Fernando Road/Project Driveway and widen and restripe the northbound approach of San Fernando Road at Project Driveway to provide a left-turn lane and through lane. Also contribute to the design, construction, and operation of the Northeast Valley ATSAC system for this intersection. The current cost of ATSAC for the Northeast Valley System is $79,000 per intersection. The contribution to ATSAC would be completed prior to the start of construction for this ATSAC system, which is scheduled for the year 2003. • The required street improvements and signal modifications shall be guaranteed before the issuance of any building permit for this project through the B-permit process of the Bureau of Engineering, Department of Public Works, and the encroachment permit process of Caltrans (where applicable). Construction of the improvements to the satisfaction of LADOT, the Bureau of Engineering, and Caltrans (where applicable) must be completed before issuance of any certificate of occupancy. Prior to setting the bond amount, the Bureau of Engineering shall require that the developer's engineer or contractor contact LADOT's B-Permit Coordinator, telephone (213) 580-5336, to arrange a pre-design meeting to finalize the proposed geometric and traffic signal designs for the project.			
4.13.2 Los Angeles County Congestion Management Program No mitigation measures would be required.			
4.13.3 Construction-Related Traffic No mitigation measures would be required.			
4.13.4 Parking and Safety Concerns ~~Until the installation of a signal at the landfill entrance occurs, vehicular warning signs shall be placed in NB/SB directions along San Fernando Road (authorized by LADOT) to slow traffic along that roadway.~~ Prior to issuance of any certificate of occupancy for the project, install a new traffic signal at San Fernando Road/Project Driveway and widen and restripe the northbound approach of San Fernando Road at Project Driveway to provide a left-turn lane and through lane. Also contribute to the design, construction, and operation of the Northeast Valley ATSAC system for this intersection. The current cost of ATSAC for the Northeast Valley System is $79,000	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LADOT Enforcement Agency: LADOT

Table 7.4-1 (Revised - Cont.)
MITIGATION REPORTING AND MONITORING PROGRAM (MRMP)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
per intersection. The contribution to ATSAC would be completed prior to the start of construction for this ATSAC system, which is scheduled for the year 2003.			
4.13.5 Access Road in Sunshine Canyon No mitigation measures would be required.			
4.13.6 Public Transportation No mitigation measures would be required.			
Rail and Light Rail No mitigation measures would be required.			
Bicycle Routes The following mitigation measure is proposed by the project proponent to address any potential localized impact along the San Fernando Road bicycle lane from increased truck traffic at or near the project site: • Signs acceptable to the City shall be posted at or near the entrance to the landfill facility. These signs shall caution the public that heavy truck traffic exists in the area.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LADOT Enforcement Agency: LADOT
4.14 PUBLIC SERVICES **4.14.1 Fire and Emergency Medical Services** Onsite water trucks shall provide sufficient water storage and pumping capabilities to extinguish fires. Tracked dozers and scrapers shall be utilized to smother any onsite fires. Easily accessible soil stockpile areas for daily cover shall be used by landfill personnel to smother onsite fires.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
Definitive plans and specifications shall be submitted to the LAFD and requirements for necessary permits satisfied prior to commencement of landfill development.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
The project proponent shall maintain and expand existing onsite fire response capabilities by using heavy operating equipment and readily available fire-extinguishing equipment. A 200-	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
foot long, 1½-inch-diameter fire hose shall be available on water trucks for firefighting at the landfill working face area. If necessary, earth moving equipment shall be used to control fires by smothering fires with dirt.			
Hydrants shall be installed in conformance with LAFD requirements and Los Angeles City Fire Code § 57.09.06.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB and LAFD
New construction and placement of water tanks, water mains, and fire hydrants shall be completed prior to landfilling operations and shall meet final fire flow requirements determined by the LAFD.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
The project proponent shall maintain brush clearance within 100 feet of landfill operations and structures as specified in the Los Angeles City Fire Code § 57.21.07 and 57.25.01. Fire-resistant native plants shall be maintained free of combustible litter (i.e., partly decayed/ organic matter). These plants shall be used without restriction within this brush clearance zone.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB and LAFD
Fire breaks, roads, and fire trails shall be maintained by the project proponent in accordance with the Los Angeles City Fire Code § 57.09.04 and 57.25.03.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB and LAFD
No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, City BOE, City B&S, and City LEA Enforcement Agency: CIWMB, LAFD, City BOE, and City B&S
Any person owning or having control of any facility, structure, or group of structures on the premises shall provide and maintain LAFD access.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, City BOE, City B&S, and City LEA Enforcement Agency: CIWMB, LAFD, City BOE, and City B&S
Access for LAFD apparatus and personnel to and into all structures shall be required.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, City BOE, City B&S, and City LEA Enforcement Agency: LAFD, City BOE, and City B&S

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
Construction of the realigned access roadway shall not exceed 15 percent in grade. An access road shall be constructed and maintained around the working area of the landfill for emergency access for fire fighting equipment.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, City BOE, City B&S, and City LEA Enforcement Agency: CIWMB, City BOE, City B&S
The project proponent shall temporarily close the landfill if a fire of regional significance is located near the project area and poses an imminent threat to the safety of landfill employees.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
A detailed fire response plan shall be prepared by the project proponent that incorporates LAFD requirements.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB and LAFD
Fire extinguishers shall be maintained in all heavy equipment, onsite work vehicles, and all structures as required by the Los Angeles LAFD.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
Signs shall be posted onsite and in a manner approved by the City Fire Chief prohibiting open burning within the project area, as specified under City of Los Angeles Fire Code, § 57.25.02.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB and LAFD
All internal combustion engines used in landfilling operations shall be equipped with spark arresters.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB and LAFD
Landfill equipment shall be cleaned regularly to reduce the potential for equipment fires.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
Vehicle and mechanical inspections shall be performed on a regular basis, and focus on the electrical system, hydraulic, and fuel lines.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
The project proponent shall provide fire control in compliance with CCR, Title 14, Division 7, Chapter 3, Article 7.6, § 17741 (Burning Wastes). If burning waste is received at the landfill site it shall be deposited in a safe, isolated area of the landfill and extinguished. If burning waste has been deposited at the working face area, it shall immediately be excavated, spread, and extinguished.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
In the event the project proponent detects of settlement or venting of smoke, the City LEA shall be contacted. The project proponent under the direction of the City LEA shall undertake appropriate measures to identify the location of the subsurface fire and implement the appropriate fire control techniques to assure the fire has been extinguished.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ CIWMB, LAFD, and City LEA Enforcement Agency: CIWMB, LAFD, and City LEA
4.14.2 Police No mitigation measures would be required.			
4.14.3 Schools Prior to the issuance of an occupancy permit, the project proponent shall submit proof to the City's Department of Building and Safety that all applicable school impact fees have been paid.	Project Proponent	Prior to landfill development.	Monitoring Agency: LAUSD Enforcement Agency: LAUSD
4.14.4 Parks and Recreational Resources No significant impact on park and recreational resources are anticipated, and no mitigation measures are required. Refer to the following mitigation measures included within this Draft SEIR: Section 4.2.11, Air Quality-Construction; Section 4.2.12, Air Quality-Operations; Section 4.9.3, Litter; and Section 4.18, Aesthetics/Views.			
4.14.5 Hiking and Equestrian Trails No significant environmental impact on hiking and equestrian trails is anticipated; therefore, no mitigation measures are required. Refer to the following mitigation measures included within this Draft SEIR: Section 4.2.11, Air Quality-Construction; Section 4.2.12, Air Quality-Operations; Section 4.9.3, Litter; and Section 4.18, Aesthetics/Views.			
4.14.6 Libraries The topical issue of libraries was determined not to be significant in the Initial Study and Checklist dated July 25, 1991.			
4.15 ENERGY CONSERVATION There will not be any significant impacts on energy resources as a result of project development; therefore, no mitigation measures are required. Specific energy conservation mitigation measures for the proposed implementation and development of onsite buildings and ancillary facilities are provided in Section 4.16.1, Electricity.			

Table 7.4-1 (Revised - Cont.)
MITIGATION REPORTING AND MONITORING PROGRAM (MRMP)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
4.16 UTILITIES **4.16.1 Electricity** The project proponent shall incorporate measures that will exceed minimum efficiency standards for Title 24 of the CCR.	Project Proponent	Before project occupancy of the buildings.	Monitoring Agency: ~~Project Site Manager,~~ City B&S, and DWP Enforcement Agency: City B&S and DWP
Built-in appliances, refrigerators, and air conditioning equipment shall exceed the minimum efficiency standards for Title 24 of the CCR.	Project Proponent	Before project occupancy of the buildings.	Monitoring Agency: ~~Project Site Manager,~~ City B&S, and DWP Enforcement Agency: City B&S and DWP
Buildings shall be well sealed to prevent outside air from infiltrating and increasing interior air conditioning and space heating loads. A performance check of the installed air conditioning and space heating systems shall be completed by the project proponent prior to the issuance of the certificate of occupancy to ensure the system properly operates.	Project Proponent	Before project occupancy of the buildings.	Monitoring Agency: ~~Project Site Manager,~~ City B&S, and DWP Enforcement Agency: City B&S and DWP
Thermal insulation that exceeds requirements established by the CCR shall be installed in walls and ceilings.	Project Proponent	Before project occupancy of the buildings.	Monitoring Agency: ~~Project Site Manager,~~ City B&S, and DWP Enforcement Agency: City B&S and DWP
Window systems shall be designed to reduce thermal gain and loss, thus reducing cooling loads during warm weather and heating loads during cool weather.	Project Proponent	Before project occupancy of the buildings.	Monitoring Agency: ~~Project Site Manager,~~ City B&S, and DWP Enforcement Agency: City B&S and DWP
Heat-reflective draperies shall be installed on appropriate exposures.	Project Proponent	Before project occupancy of the buildings.	Monitoring Agency: ~~Project Site Manager,~~ City B&S, and DWP Enforcement Agency: City B&S and DWP
Fluorescent and high-intensity-discharge lamps, which give the highest light output per watt of electricity consumed, shall be installed wherever possible, including all parking lot and site lighting to reduce electricity consumption.	Project Proponent	Before project occupancy of the buildings.	Monitoring Agency: ~~Project Site Manager,~~ City B&S, and DWP Enforcement Agency: City B&S and DWP
Occupant-controlled light switches and thermostats shall be installed to permit individual adjustment of lighting, heating, and cooling to avoid unnecessary energy consumption.	Project Proponent	Before project occupancy of the buildings.	Monitoring Agency: ~~Project Site Manager,~~ City B&S, and DWP Enforcement Agency: City B&S and DWP
Time-controlled interior and exterior public area lighting limited to that necessary for safety and security shall be installed.	Project Proponent	Before project occupancy of the buildings.	Monitoring Agency: ~~Project Site Manager,~~ City B&S, and DWP Enforcement Agency: City B&S and DWP

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
4.16.2 Natural Gas No mitigation measures would be required.			
4.16.3 Communication Systems No mitigation measures would be required.			
4.16.4 Water The project proponent shall coordinate with DWP in advance to efficiently obtain potable water for delivery to the construction site and to meet any restrictions imposed.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager and~~ DWP Enforcement Agency: DWP
When reclaimed water lines are extended into the project area, and if economically feasible, reclaimed water would be utilized onsite for irrigation and dust suppression. Prior to the submittal of design plans to the City's Building and Safety Department, the project proponent shall investigate the possibility of utilizing reclaimed water at the project site.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager and~~ DWP Enforcement Agency: DWP
During the site life of the landfill and ancillary facilities, the landfill operator shall effectively utilize water conservation measures at the project site. These measures shall include the following: - The project proponent shall install an efficient drip irrigation system that minimizes runoff and evaporation, and provides water distribution in an efficient manner. - A dust suppression additive shall be utilized onsite to minimize water usage. - Green waste/wood waste (after grinding) will be used onsite as mulch material for revegetation purposes. Mulch shall be applied on the top layers of revegetation areas to improve the water-holding capacity of the soil. - Onsite revegetation shall include the use of water-conserving plant materials to the greatest extent possible.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Site Manager,~~ City LEA, and DWP Enforcement Agency: DWP
4.16.5 Sewers No mitigation measures would be required.			

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
4.16.6 Stormwater Drainage No mitigation measures would be required.			
4.16.7 Solid Waste No mitigation measures would be required.			
4.17 SAFETY Refer to Section 4.9.4, Employee Safety and Site Security, within this table.			
4.18 AESTHETICS/VIEWS The maximum permitted elevations for the landfill shall not be allowed to be exceeded at any time during landfill development and shall be verified through survey control points.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Geologist/Engineer,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
The cover-material excavation areas shall be confined as much as possible to areas that will later be landfilled.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Geologist/Engineer,~~ CIWMB, and City LEA Enforcement Agency: CIWMB and City LEA
As part of revegetation efforts for the landfill, the upper ridges of the canyon shall be planted with native species (both trees and scrubs) to supplement existing vegetation on the ridgelines and reestablish naturally bare areas.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Horticulturist/Forester,~~ CIWMB, City Planning Dept., and City LEA Enforcement Agency: CIWMB, City Planning Dept., and City LEA
The final cover of landfilled areas shall be landscaped with a ground cover mix and plant species that are compatible with the immediate area and shall be maintained in a natural setting until it is converted to its final use.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Horticulturist/Forester,~~ CIWMB, City Planning Dept., and City LEA Enforcement Agency: CIWMB, City Planning Dept., and City LEA
The 100± acre open space buffer zone on the southern boundary of the project site shall continue to be maintained and enhanced with both native and nonnative vegetation.	Project Proponent	Throughout landfill operations.	Monitoring Agency: ~~Project Horticulturist/Forester,~~ CIWMB, City Planning Dept., and City LEA Enforcement Agency: CIWMB, City Planning Dept., and City LEA

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
4.19 CULTURAL/SCIENTIFIC RESOURCES **4.19.1 Archaeological** Prior to the commencement of initial earth excavation, specific sections of the project area shall be resurveyed as a precautionary measure to minimize potential loss of undiscovered archaeological resources. Specific areas within the project site to be resurveyed shall be determined by the intended cut-and-fill areas proposed for landfill development. As new areas for excavation are identified, an evaluation of those areas shall be made based on the prior survey results and consultation with appropriate technical specialists. Factors to be considered for delineation of areas to be resurveyed will be known site selection factors associated with aboriginal groups suspected of having inhabited the general area. These factors include proximity to water, the type of vegetation (e.g., food source, shelter, and fuel), and the topography (e.g., slope and aspect).	Project Proponent	Prior to landfill construction and excavation.	Monitoring Agency: ~~Project Archaeologist and~~ City Planning Dept. Enforcement Agency: City Planning Dept.
An archaeologist shall be present onsite during major infrastructure work which requires significant surface disturbance.	Project Proponent	Prior to landfill construction and excavation.	Monitoring Agency: ~~Project Archaeologist and~~ City Planning Dept. Enforcement Agency: City Planning Dept.
The landfill operator shall instruct landfill equipment operators how to identify archaeological resources and upon discovery of such findings immediately report the location of the site to their supervisor. If any evidence of aboriginal habitation is discovered during earthmoving activities, landfill operations will cease in that particular location until a qualified archaeologist has made a determination as to the significance of the site or findings. Any significant archaeological resources shall be recovered to the extent practicable prior to resuming activities in that area of the landfill.	Project Proponent	Prior to landfill construction and excavation.	Monitoring Agency: ~~Project Archaeologist and~~ City Planning Dept. Enforcement Agency: City Planning Dept.
Archaeological resources recovered during surface collection, subsurface excavations, and monitoring, with related records, notes, and technical reports shall be curated at a regional repository approved by the City.	Project Proponent	Prior to landfill construction and excavation.	Monitoring Agency: ~~Project Archaeologist and~~ City Planning Dept. Enforcement Agency: City Planning Dept.
4.19.2 Paleontological Resources Prior to the commencement of initial earth excavation, specific sections of the City/County Landfill Project area shall be resurveyed as a precautionary measure to minimize potential loss of undiscovered paleontological resources. Specific sections of the project area to be resurveyed shall be as determined by the intended cut-and-fill areas proposed for landfill	Project Proponent	Prior to landfill construction and excavation.	Monitoring Agency: ~~Project Paleontologist and~~ City Planning Dept. Enforcement Agency: City Planning Dept.

Table 7.4-1 (Revised - Cont.)
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Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
development. As new areas for excavation are identified by the project proponent, an evaluation of those areas shall be made based on the prior survey results and consultation with appropriate technical specialists.			
A paleontologist shall be onsite during major infrastructure work that requires significant excavation. In the event that paleontological resources are discovered during grading or excavation, the paleontologist shall be allowed to redirect grading away from the area of exposed fossils to allow sufficient time for inspection, evaluation, and recovery.	Project Proponent	Prior to landfill construction and excavation.	Monitoring Agency: ~~Project Paleontologist and~~ City Planning Dept. Enforcement Agency: City Planning Dept.
The landfill operator shall instruct landfill equipment operators how to identify paleontological resources and upon discovery of such findings immediately report the location of the site to their supervisor. If any evidence of paleontological resources is discovered during earthmoving activities, landfill operations shall cease in that particular location until a qualified paleontologist has made a determination as to the significance of the findings.	Project Proponent	Prior to landfill construction and excavation.	Monitoring Agency: ~~Project Paleontologist and~~ City Planning Dept. Enforcement Agency: City Planning Dept.
Any significant paleontological resources shall be recovered to the extent practicable. Due to the potential for rapid deterioration of exposed surface fossils, preservation by avoidance is not an appropriate measure. When fossils cannot be removed immediately, the site shall be stabilized to prevent further deterioration prior to data recovery or the fossil location as directed by a professional paleontologist.	Project Proponent	Prior to landfill construction and excavation.	Monitoring Agency: ~~Project Paleontologist and~~ City Planning Dept. Enforcement Agency: City Planning Dept.
The paleontologist shall be retained to perform inspection of the excavation and salvage exposed fossils. Collected fossils shall be curated at a public institution with an educational/ research interest in the material. Any ~~curation~~ curatorial expenses shall be borne by the landfill operator.	Project Proponent	Prior to landfill construction and excavation.	Monitoring Agency: ~~Project Paleontologist and~~ City Planning Dept. Enforcement Agency: City Planning Dept.
4.19.3 Historical			
No significant impacts on historical resources were identified; therefore, no mitigation measures are proposed.			

3.0 RESPONSE TO COMMENTS

3.1 INTRODUCTION AND KEY RESPONSE MATRIX

All written comments submitted in response to the publication of the City's legal notice and/or dissemination of the Draft SEIR or NOCA during the public review period (July 25 through December 5, 1997) are responded to in this document. Each written comment is excerpted verbatim from its original submission letter.

Letters are categorized by commenting agency or other interested parties. For example, as listed in the Final SEIR's table of contents, the section numbers correspond with the following agencies/individuals: 3.3, State Agencies; 3.4, Regional Agencies; 3.5, County Agencies; 3.6, City Departments; 3.7, Local Agencies; 3.8, Other Interested Parties/Organizations; and 3.9, Comments Received after December 5, 1997. Each letter received is numbered based on the commenting agency (i.e., State, regional, local) or commenting individual/interested party and its date of receipt. For example, the Southern California Association of Governments (SCAG) was the first regional agency to comment on the Draft SEIR; therefore, its letter is numbered 3.4-1. All comments are numbered sequentially.

All original comment letters received by the City are included in Appendix C, Original Comments Received on the Draft SEIR, in this document. Comments are bracketed and numbered to correspond with comments and responses within this section.

In order to facilitate review by the reader the following **Table 3-1**, Final SEIR Key Response Matrix, has been included in this document. Key responses are listed in numerical order and by the specific issue discussed in that response. Section 4.0, **Table 4-1**, Environmental Issue Key Response Index, is an alphabetical listing of the issues and includes the corresponding key responses.

Table 3-1
FINAL SEIR KEY RESPONSE MATRIX

Issue	Response Number
Project Description, Operations - Proposed City/County Landfill peak and average daily waste intake rates	1, 186
Project Description, Landfill Environmental Protection and Control Systems Design - Thickness of HDPE geomembrane for proposed landfill liner	2
Project Description, Operations - Anticipated volume of material to be excavated	3
Project Description, Operations - Anticipated methods of excavation	4
Project Description, Operations - Existing and anticipated soils stockpile areas	5
Earth Resources, Slope Stability - Potential slope stability impacts and mitigation measures	6
Transportation/Circulation - Potential impacts of the proposed project on the CMP network (I-5 or I-405 Freeways) within the immediate vicinity of the project site	26

Table 3-1 (Cont.)
FINAL SEIR KEY RESPONSE MATRIX

Issue	Response Number
Transportation/Circulation - Project consistency with regional growth forecasts/current traffic counts	30
Alternatives - Ability of alternative waste management technologies and strategies to accommodate the volume of solid waste generated in the City and County of Los Angeles	39
CEQA Requirements - Mitigation monitoring requirements, A.B. 3180	47
Air Quality, Assessment Methodology - Vehicle miles traveled (VMT) that City and County generated solid wastes would be required to travel for final disposal at the proposed project and for alternative solid waste landfill projects	55
Air Quality, Assessment Methodology - Incorporation of 1997 AQMP into Final SEIR	58
Air Quality, Assessment Methodology - Duration of construction activities, construction and operations occurring at same time	59
Air Quality, Assessment Methodology - Clarification of the number of hours per day heavy equipment would be in use (e.g., 10-hour working day, worst-case scenario)	61
Air Quality, Assessment Methodology - 1998 EMFAC7G model used to determine mobile source emissions from the proposed City/County Landfill	62
Air Quality, Fugitive Dust - Using 1995 AP-42 emission factors to calculate fugitive dust emissions	63
Air Quality, Assessment Methodology - Mitigation for heavy equipment exhaust emissions	66
Air Quality, Fugitive Dust - Distance of travel over onsite paved roads	67
Air Quality, Assessment Methodology - Clarification of the determination for proposed City/County Landfill Project of an unavoidably significant adverse impact for air quality	68
Air Quality, Health Risk - Data that has been changed in the Draft SEIR air quality health risk analysis, due to the use of the ISCST3 model and revised flare emissions estimates	70
Air Quality, Odors - Required odor control measures to be implemented at the proposed City/County Landfill; historical effectiveness of odor control measures at project site	73, 101
Groundwater, Leachate - Potential for proposed City/County Landfill to impact Balboa Inlet Tunnel or MWD Joseph Jensen Filtration Plant	77-79
Surface Water, Surface Water Leaving Project Site - Surface water leaving project site potentially causing redirection of storm water runoff patterns	83
Risk of Upset, Vectors - Vector prevention and control measures	84
Project Description, Operations - Green Waste/Wood Waste location, public access and safety	86
Project Description, Operations - Green Waste/Wood Waste unloading, length of storage, and onsite uses for tub-grinded materials	88

Table 3-1 (Cont.)
FINAL SEIR KEY RESPONSE MATRIX

Issue	Response Number
Air Quality, Assessment Methodology - Data that has been changed in the Draft SEIR air quality assessment, to reflect the maximum permitted emissions from five flares	97
Air Quality, Fugitive Dust - Areas where most fugitive dust would be generated onsite (e.g., haul roads)	98
Noise - Noise from heavy equipment on top deck of landfill	104
Noise - Noise from green waste tub grinding	105
Transportation/Circulation - Prohibition of heavy trucks on Balboa Boulevard	106
CEQA Requirements - County Landfill as a related project	107
Air Quality, Assessment Methodology - Methodology for determining cumulative air quality emissions	108
Alternatives - Status of proposed Elsmere Solid Waste Management Facility	124
Earth Resources, Geologic Hazards - Potential for secondary displacement due to earthquakes	131
Utilities, Electrical and Water Service - Use of existing electrical power and water lines at the project site, eventual onsite relocation	136
Transportation/Circulation - Interim and ultimate traffic improvements at San Fernando Road/Project entrance	138, 207
Transportation/Circulation - Methodology used for Draft SEIR traffic study	151
Transportation/Circulation - Project-generated truck trips	153
Transportation/Circulation - Draft SEIR transportation/circulation study potentially containing outdated information	154
Transportation/Circulation - Potential need for Draft SEIR transportation/circulation study to analyze Year 2003 traffic conditions	155
Transportation/Circulation - Draft SEIR traffic study including all associated vehicle trips from City and County Landfill operations; cumulative transportation/circulation analysis	156
Introduction, Project History - Allegations that the previous City Landfill operation resulted in contaminated particulates polluting the Los Angeles Reservoir and other water treatment and storage systems	157
Introduction, Project History - Fire alleged to have started at the previous City Landfill operation	159
Air Quality, Odors - Effectiveness of odor control measures at County Landfill	162
Air Quality, Odors - Allegations that landfill operator has been cited by SCAQMD for odor generation	163
Alternatives - No Project Alternative; potential for future development of a 70 million ton landfill in the County	165

Table 3-1 (Cont.)
FINAL SEIR KEY RESPONSE MATRIX

Issue	Response Number
Alternatives - Description of all alternatives analyzed in Draft SEIR	**168**
Alternatives - Draft SEIR analysis of alternative waste management technologies and strategies City Department of Public Works, Bureau of Sanitation RFQ/RFP for a new alternative solid waste technology/transformation project	**169**
Introduction, Alternatives Not Evaluated - Importation of City generated solid wastes to Orange County landfills	**170**
Introduction, Alternatives Not Evaluated - Status of Chiquita Canyon Landfill Expansion final approval	**172**
Surface Water, Surface Water Leaving Project Site - Quality of drainage system onsite, potential for breakage	**175**
Surface Water, Surface Water Leaving Project Site - Release of surface water from project site into City Weldon Canyon Flood Control Channel	**176**
Project Description, Landfill Environmental Protection and Control Systems Design - Seismic displacement of a landfill liner system during a major earthquake	**177**
Housing, Property Values - Affects of proposed project on property values	**180**
Land Use - Permitted uses in ± 100 acre open space area	**181**
Introduction, Project History - Compliance record for the previous City Landfill operation	**182**
Air Quality, Health Risk - Potential requirement for health survey/completed health risk assessments	**183, 184**
Project Description, Enforcement - Requirement for some form of agreement between the City and the County to authorize common power over the entire project site	**188**
Project Description, Operations - Public buyback/recycling center no longer part of proposed project	**190**
Project Description, Operations - Onsite ancillary facilities, length and width of access road, future relocation of access road/scales	**191**
Project Description, Operations - Potential environmental impacts associated with the use of alternative daily cover materials (ADCMs) for the proposed City/County Landfill	**195**
Air Quality, Odors - Required spacing of landfill gas monitoring probes	**196**
Project Description, Closure and Postclosure Maintenance After Completion of Proposed Project - Land use at the project site after the completion of 30-year postclosure maintenance	**205, 1296**
Light and Glare - Artificial lighting sources at the project site	**206, 219**
CEQA Requirements - Regulatory compliance measures used as mitigation measures	**208**
Introduction, Closure of Existing Inactive City Landfill - Proposed "monolithic" alternative final cover design, vegetative layer	**210**

Table 3-1 (Cont.)
FINAL SEIR KEY RESPONSE MATRIX

Issue	Response Number
Earth Resources, Geologic Hazards - Request for back-up generator to power landfill gas collection and flaring system during times of emergencies (e.g., after a major earthquake)	211
Air Quality, Odors - Potential for segregated green waste as an odor source; proposed onsite uses for tub-grinded green waste/wood wastes	214
Energy Conservation - Potential for future gas-to-energy system at project site	217
Project Description, Operations - City frequency of hazardous waste load checks at proposed City/County Landfill	222
Project Description, Operations -Oversized tires, potential for vector attraction	225
Project Description, Operations - Sufficient queuing length for vehicles, realigned access road	227
Public Services, Fire and Emergency Medical Services - Fire control measures	228
Project Description, Operations - Discussion of reasons why the project proponent is not proposing an onsite materials recovery facility/transfer station as part of the proposed project; BFI as one of the world's largest recyclers of solid waste	243
Air Quality, Assessment Methodology - SCAB exceedance of State and federal ambient air quality standards; if a project is located in the SCAB, and the project results in emissions in excess of a CEQA significance level, the project has not violated State or federal law	245
Air Quality, Fugitive Dust - PM_{10} generation for roadway surfaces	252
Air Quality, Health Risk - Inhalation of particulate matter, potential health implications	254
Air Quality, Health Risk - Inhalation of nitrous oxides (NO_x), potential health implications	255
Air Quality, Health Risk - Inhalation of carbon monoxide (CO), potential health implications	256
Air Quality, Health Risk - LAUSD request that the project proponent provide for the installation of local air purification systems at Van Gogh Street Elementary, El Oro Way Elementary and Robert Frost Middle school sites	257
Air Quality, Health Risk - LAUSD requests that the project proponent provide for the periodic cleaning of outdoor ancillary structures used by students and staff at Van Gogh Street and El Oro Way Elementary and Robert Frost Middle school sites	260
Public Services, Parks and Recreation - Potential impacts to O'Melveny and Bee Canyon Parks	272
Public Services, Schools - Potential impacts to schools	273
Introduction, Project History - Discussion of allegations that the previous City Landfill operation resulted in allergy, sinus, bronchitis and asthma problems	278
Air Quality, Environmental Setting -Estimated number of high Santa Ana wind events per year	287

Table 3-1 (Cont.)
FINAL SEIR KEY RESPONSE MATRIX

Issue	Response Number
Air Quality, Environmental Setting - High winds in relation to proposed City/County Landfill final elevations	288
CEQA Requirements - Preparation of Executive Summary and Summary Matrix; distribution at public libraries	295
Introduction, Project History - Discussion of alleged violations at other BFI landfills and BFI's corporate environmental health and safety policies, as well as actions and programs designed to implement these policies	305
Project Description, Operations - Public tours of the project site	309
Air Quality, Health Risk - Potential for the proposed City/County Landfill to cause acute or chronic health risks to residents in the community of Granada Hills	316
Project Description, Operations - Anticipated wasteshed area for the proposed project	333
Air Quality, Assessment Methodology - Types of fuels used by proposed project heavy equipment and waste-hauling vehicles	334
Project Description, Enforcement -Federal, State, regional, County and City regulations and monitoring agencies with enforcement power over the proposed City/County Landfill; assurance of project proponent compliance with these regulations	336
Project Description, Operations - Permitted daily and weekly waste intake rates at County Landfill	339
CEQA Requirements - Availability of County FEIR and Draft SEIR and Technical Appendices during Draft SEIR public review period	342
CEQA Requirements - Length of CEQA public review period for the Draft SEIR and the public's opportunity to comment	344
CEQA Requirements - Closest libraries to North Valley Coalition (NVC) with complete sets of FEIR and SEIR, reason for NVC non-inclusion on City mailing list	345
CEQA Requirements - Locations where City Closure/Postclosure Maintenance Plans, Old Geology reports, County Report of Waste Discharge, County Report of Disposal Site Information can be reviewed	346
CEQA Requirements - County FEIR background technical studies/analyses incorporated into the Draft SEIR	348
Introduction, Previous History - Approved engineering design/operational modifications that have occurred at the County Landfill, subsequent to County Conditional Use Permit (CUP) approval	349
CEQA Requirements - Draft SEIR preparer; project proponent providing technical information; responsiveness of County FEIR and Draft SEIR to public concerns	350
CEQA Requirements - CEQA definition of incorporation by reference	351

Table 3-1 (Cont.)
FINAL SEIR KEY RESPONSE MATRIX

Issue	Response Number
Air Quality, Fugitive Dust - PM_{10} emissions associated with movement of soils stockpile areas over the life of the project	354
Introduction, Closure of Existing Inactive City Landfill - Status of the Final Closure and Postclosure Maintenance Plan (FCPMP) for the required closure of the existing inactive City Landfill	356
Groundwater, Monitoring and Testing Requirements - Number of groundwater monitoring wells near the landfill entrance	357
Air Quality, Fugitive Dust - Effects of surficial soils on air quality; definition of fugitive dust	359
Earth Resources, Geologic Hazards - Potential landslide impacts at project site	361-369
Earth Resources, Seismicity - Methodology used for measuring the site-to-source distance from the project site to the Santa Susana Fault	370
Air Quality, Environmental Setting - Temperature data in Draft SEIR	392, 393
Air Quality, Environmental Setting - Wind directions, speeds, and windroses that have been recorded at the project site	400
Air Quality, Assessment Methodology - Explanation of ozone precursors	408, 410
Air Quality, Project Consistency with Applicable Plans - Proposed Project's consistency with the most recently approved SCAQMD Air Quality Management Plan (AQMP)	453-456
Air Quality, Project Consistency with Applicable Plans - Proposed Project's consistency with the City of Los Angeles Air Quality Element	466
Project Description, Operations - Potential acceptance/enforcement of partial waste loads at County Landfill	472, 473
Project Description, Operations - Anticipated daily intake volume of segregated loads of green waste/wood waste	475
Energy Conservation - Recycling as an energy efficient measure	476
Project Description, Operations - Proposed City/County Landfill active working face area of disturbance	493
Project Description, Operations - Conveyance of weather information to the BFI foreman during high wind events; authority of BFI foreman to cease construction activities or close the landfill if warranted	499
CEQA Requirements - City requirements for cumulative impact analyses	509
CEQA Requirements - Alleged project "piecemealing", and "incremental approval"	510, 577
CEQA Requirements - Likelihood/assurances of mitigation measure implementation	511

Table 3-1 (Cont.)
FINAL SEIR KEY RESPONSE MATRIX

Issue	Response Number
Project Description, Landfill Environmental Protection and Control Systems Design - Discussion of how the use of alternative daily cover materials (ADCMs), could potentially affect the design and engineering of the proposed City/County Landfill Project	520
Project Description, Landfill Environmental Protection and Control Systems Design - Discussion of the engineering design and technical feasibility of placing drainage culverts on the top deck and side slopes of the proposed City/County Landfill	521
Alternatives - Discussion of City BOS Citywide single-family residential refuse collection and curbside recycling	528
Surface Water, Environmental Setting - Historic rainfall conditions in the project area and how this information was utilized by project engineers to determine the required capacities of surface water collection and conveyance structures for the proposed City/County Landfill	532, 536
Groundwater, Environmental Setting - Existing groundwater quality conditions of the San Fernando Valley Groundwater Basin	533
Groundwater, Environmental Setting - Groundwater extraction in the San Fernando Valley Groundwater Basin	534
Surface Water, Engineered Collection and Control - Surface water conveyance and collection at the project site and surface water conveyance from the project site into offsite City and County flood control channels	535
Surface Water, Environmental Setting - NPDES regulatory history and permitting requirements	549
Surface Water, Engineered Collection and Control - Ability of proposed sedimentation basins to contain the maximum anticipated surface water flow in Sunshine Canyon	562
Surface Water, Engineered Collection and Control - Continuous maintenance of surface water conveyance and collection structures	564
Groundwater, Monitoring and Testing Requirements - Standards for certified laboratories conducting testing of surface and groundwater samples taken at the project site	570-572
Surface Water, Environmental Setting - County designated debris production zones	574
Project Description, Operations - Tipping fee revenues split between City and County	579
Surface Water, Engineered Collection and Control - Pre-development maximum value of peak discharge	584
Surface Water, Engineered Collection and Control - Reduction of sediment loads	588
Surface Water, Environmental Setting - NPDES point and non-point sources	591
Surface Water, Monitoring and Testing Requirements - Locations in Sunshine Canyon where surface water samples are taken and constituents that have been discovered in surface water samples	592
Surface Water, Engineered Collection and Control - Erosion Control	594, 597

Table 3-1 (Cont.)
FINAL SEIR KEY RESPONSE MATRIX

Issue	Response Number
Project Description, Closure and Postclosure Maintenance After Completion of Proposed Project - Gradient for landfill final cover	596
Project Description, Landfill Environmental Protection and Control Systems Design - Potential for volatile organic compounds (VOCs) to pass through an HDPE geomembrane liner; barriers and systems that prohibit leachate from impacting groundwater resources; U.S. EPA's response to the solid waste landfill design, and engineering concerns of Dr. G. Fred Lee	602
Groundwater, Monitoring and Testing Requirements - Ongoing monitoring for groundwater quality at the project site	603
Groundwater, Environmental Setting - Groundwater studies to date	605
Groundwater, Environmental Setting - Groundwater velocity and flow	606-608
Groundwater, Extraction and Treatment - Extraction trench installed at "mouth" of Sunshine Canyon	613
Groundwater, Environmental Setting - Restricted movement of groundwater within alluvial soils at the project site	616
Introduction, Project History - Wetlands/springs and seeps in the County	624
Project Description, Landfill Environmental Protection and Control Systems Design - Proposed gravel subdrain system for the proposed City/County Landfill for capturing springs and seeps	625
Groundwater, Monitoring and Testing Requirements - Unsaturated zone monitoring at proposed City/County Landfill Project	631
Earth Resources, Geologic Hazards - Alquist-Priolo Special Study Zone	635
Earth Resources, Geologic Hazards - Discussion of Santa Susana Fault and siting and designing a solid waste landfill above a thrust fault	636
Earth Resources, Geologic Hazards - Earthquake faults as potential conduits for groundwater flow	637
Groundwater, Extraction and Treatment - Discussion of the feasibility of treating groundwater in Sunshine Canyon for human consumption (i.e., potable)	641, 643
Land Use - Oil drilling activities adjacent to the project site	649
Groundwater, Monitoring and Testing Requirements - Trihalomethanes (e.g., chloroform) discovered in surface water samples taken at project site	655
Groundwater, Monitoring and Testing Requirements - VOCs found in monitoring well 10 (MW-10)	663

Table 3-1 (Cont.)
FINAL SEIR KEY RESPONSE MATRIX

Issue	Response Number
Groundwater, Monitoring and Testing Requirements - Definition of leachate; VOCs and inorganic compounds typically found in landfill leachate; and the existing inactive City Landfill's compliance with all mandated LARWQCB programs to ensure the quality of groundwater	666
Groundwater, Monitoring and Testing Requirements - Naturally occurring chlorides found in groundwater samples taken at project site	674
Surface Water, Monitoring and Testing Requirements - Surface water quality monitoring and testing requirements at the project site	678
Project Description, Landfill Environmental Protection and Control Systems Design - Discussion of the HELP model used to estimate leachate production	680-683
Project Description, Closure and Postclosure Maintenance After Completion of Proposed Project - Integrity of final cover as infiltration barrier	684
Project Description, Closure and Postclosure Maintenance After Completion of Proposed Project - Final cover infiltration barrier diverting surface water to drainage structures	685
Project Description, Landfill Environmental Protection and Control Systems Design - Connection of LCRS at existing County Landfill to proposed City/County Landfill to ensure continuous collection and treatment of leachate	690
Earth Resources, Geologic Hazards - Potential for damage to LCRS during MCE earthquake event; LCRS leak detection	692
CEQA Requirements - Findings of Fact	704
Project Description, Landfill Environmental Protection and Control Systems Design - Estimated amount of leachate generation annually; ability of LCRS and treatment system to accommodate this volume	712
Project Description, Closure and Postclosure Maintenance After Completion of Proposed Project - Potential for dessication cracks in the closure cap of the proposed City/County Landfill	713
Project Description, Landfill Environmental Protection and Control Systems Design - Potential for desiccation cracking of the clay layer of a composite landfill liner system	716, 717
Groundwater, Extraction and Treatment - Leachate treatment technologies commonly used for groundwater treatment	723
Project Description, Enforcement - Enforcement actions taken by Responsible Agencies in the event of detected releases at solid waste landfills	725
Project Description, Operations - BFI refuse contract with City	731
Transportation/Circulation - Truck traffic conversion to passenger car equivalents (PCEs)	735
Earth Resources, Slope Stability - 2H:1V (horizontal:vertical) refuse slope gradient that will be utilized for the proposed project, versus a more conservative 3H:1V	744

Table 3-1 (Cont.)
FINAL SEIR KEY RESPONSE MATRIX

Issue	Response Number
Earth Resources, Slope Stability - Long-term settlement of solid waste landfills and potential impacts to slope stability; discussion of how the proposed City/County Landfill design and engineering incorporate long-term landfill settlement	745-749
Alternatives - County Alternate Site Study	751
Alternatives - Methodology used for selecting and analyzing alternatives	752
Alternatives - Alternatives selected; development objectives	753
CEQA Requirements - Environmental consultant objectivity in the preparation of the Draft SEIR	757
Air Quality, Assessment Methodology - Dispersion rates	759
Air Quality, Environmental Setting - Discussion of ozone	767, 772
Air Quality, Assessment Methodology - PM_{10} sampler used to measure particulates	787
CEQA Requirements - Inclusion of mitigation measures in Draft SEIR that were not previously included in County FEIR	875, 876
Project Description, Landfill Environmental Protection and Control Systems Design - Ability of side-slope liner to accommodate landfill settlement/damage to side-slope liner at Chiquita Canyon Landfill	879
Project Description, Landfill Environmental Protection and Control Systems Design - Seam-strength test for landfill liner	880
Project Description, Operations - Prohibition of liquid wastes at proposed City/County Landfill	887
Project Description, Project Consistency with City and County Solid Waste Management Plans - Inclusion of potentially "outdated" Los Angeles County solid waste disposal capacity projections in the Draft SEIR to support the City/County Landfill Project	891
Alternatives - Environmental comparison between the proposed project and waste-by-rail alternatives	893
Project Description, Project Consistency with City and County Solid Waste Management Plans - City/County Landfill Project consistency with A.B. 939 and Los Angeles County Countywide Siting Element	895
Project Description, Project Need - CUP solid waste tonnage limitations for Puente Hills and Chiquita Canyon Landfills	897
Introduction, Alternatives Not Evaluated - Transformation technologies not evaluated (e.g., co-composting, pyrolysis, landfill mining, high-volume shredding)	903
Alternatives - Environmental comparison between proposed Eagle Mountain Landfill and proposed City/County Landfill Project	905
CEQA Requirements - Non-inclusion of Chiquita Canyon Landfill as a related project	908

Table 3-1 (Cont.)
FINAL SEIR KEY RESPONSE MATRIX

Issue	Response Number
Alternatives - Environmental comparison between the Reduced Volume Alternative and the proposed City/County Landfill Project	910
Biological Resources - Potential impacts to California Gnatcatcher habitat	911, 1559, 1560, 1573
Project Description, Enforcement - Citizen's Advisory Committee review of landfill activities	917
Project Description, Project Need - Consistency with County Landfill Condition 10 (b) requirements, consistency with City and County solid waste management plans	923
CEQA Requirements - Summary Matrix of Environmental Impacts, Mitigation Measures and Monitoring Phasing for the proposed City/County Landfill Project, Mitigation Reporting and Monitoring Program (MRMP)	926
Alternatives - Transformation technologies (e.g., composting, waste-to-energy) as potential alternatives to the proposed project	936
CEQA Requirements/Alternatives - CEQA definition of reasonable range of alternatives, feasibility of alternatives	938
Project Description, Project Need - Regulatory authority for Los Angeles County Countywide Siting Element	942
Project Description, Project Need - Recent closure of major Los Angeles County solid waste landfills and projected future solid waste disposal capacity shortfall in Los Angeles County	943
Groundwater, Monitoring and Testing Requirements - Requirements for the project proponent's protection of water resources during the life of the proposed project and throughout the 30-year postclosure maintenance period	965
Project Description, Closure and Postclosure Maintenance After Completion of Proposed Project - Solid waste decomposition inside a landfill after the completion of closure, during the mandated 30-year postclosure maintenance period	971
Project Description, Landfill Environmental Protection and Control Systems Design - Long-term viability of HDPE as a containment material	974
Project Description, Landfill Environmental Protection and Control Systems Design - Warranties for landfill liners	976, 977
Project Description, Landfill Environmental Protection and Control Systems Design - Landfill owner responsibility in the event of groundwater impacts	979
Groundwater, Monitoring and Testing Requirements - Spacing of groundwater monitoring wells at the point of compliance	986, 999
Groundwater, Monitoring and Testing Requirements - Definition of point of compliance for groundwater monitoring	991

Table 3-1 (Cont.)
FINAL SEIR KEY RESPONSE MATRIX

Issue	Response Number
Groundwater, Monitoring and Testing Requirements - Potential for unregulated chemicals in landfill leachate	**1013**
Groundwater, Monitoring and Testing Requirements - Requirement for the landfill owner to monitor the landfill after the 30-year postclosure maintenance period if the municipal solid waste still poses a threat to human health and the environment	**1017**
Project Description, Landfill Environmental Protection and Control Systems Design - Evaluation of the performance of landfill liner systems constructed in compliance with Subtitle D requirements	**1035**
Project Description, Landfill Environmental Protection and Control Systems Design - Discussion why the proposed City/County Landfill would not require a double-composite liner system	**1041**
Project Description, Closure and Postclosure Maintenance After Completion of Proposed Project - Discussion of proposed final cover design to be provided in the Final Closure and Postclosure Maintenance Plan (FCPMP) to be implemented after the completion of the proposed project; closure and postclosure maintenance of proposed City/County Landfill is not part of the proposed project and therefore was not analyzed in the Draft SEIR	**1050**
Project Description, Landfill Environmental Protection and Control Systems Design - Solid waste landfill sites where waste-on-waste liner systems have been successfully designed, permitted and constructed	**1112**
Earth Resources, Geologic Hazards - Maximum credible earthquake (MCE) magnitudes cited in the Draft SEIR	**1117**
Earth Resources, Geologic Hazards - Peak ground acceleration (PGA) values cited in the Draft SEIR	**1120**
Project Description, Project Need - County of Los Angeles, Department of Public Works, Environmental Programs Division's analysis of GBB report for alternatives to solid waste landfills	**1154**
Project Description, Project Need - Inert waste recycling and unclassified landfill disposal capacity (e.g., for inert waste disposal) in Los Angeles County	**1157**
Land Use - Environmental justice	**1190**
Air Quality, Permits - Potential requirement for NSR permitting	**1206**
Air Quality, Odors - Collection efficiency for LFG collection system	**1214**
Risk of Upset, Hazardous Materials - Potential for household hazardous waste disposal at the proposed City/County Landfill	**1248**
Introduction - Time extensions for document preparation	**1267, 1268**
Introduction - Previous administrative draft databases submitted to City	**1270**
Land Use - Proposed City/County Landfill relationship to Granada Hills-Knollwood Community Plan	**1274**

Table 3-1 (Cont.)
FINAL SEIR KEY RESPONSE MATRIX

Issue	Response Number
Land Use - Granada Hills-Knollwood Community Plan open space and conservation goals and objectives	1275
Land Use - Land uses historically permitted in ±100 acre open space area	1278, 1279
Land Use - Zone change inclusion of Q classification provisions	1280
Introduction, Project History - Status of BFI's purchasing of acreage in upper Bee Canyon for wildlife preservation and recreational use	1347, 1348
CEQA Requirements - April 1992 Public Scoping Meeting	1363
Aesthetics/Views - Dates of photographs included in Draft SEIR figures showing views of project site	1368
Alternatives - City's compliance with A.B. 939; language in A.B. 939 encouraging the siting of new and expanded solid waste disposal facilities (e.g., landfilling or transformation) to provide for short-, medium-, and long-term disposal capacity	1371
Transportation/Circulation - Discussion of traffic mitigation measures for the proposed City/County Landfill	1383
Introduction, Project History - County Landfill transportation/circulation improvements at the landfill entrance and along the internal access roadway	1384
Transportation/Circulation - Transfer truck queuing space on I-5/Roxford Avenue offramps	1387, 1388
Transportation/Circulation - Traffic safety conditions at San Fernando Road/Project Entrance	1391
Biological Resources - Proposed City/County Landfill environmental impacts to wetlands and riparian habitat	1397
Introduction, Closure of Existing Inactive City Landfill - Proposed drainage improvements for closure of existing inactive City Landfill	1398
Biological Resources - Oak tree monitoring	1401, 1402
Biological Resources - Oak tree diameter measurements	1405
Biological Resources - Annual oak tree monitoring report	1410
Introduction, Project History - Deletion of the Significant Ecological Area (SEA) 20 designation for the project site, associated with the approval of the County Landfill; discussion of the determination for the County Landfill that impacts to biological resources were considered unavoidably significant and a discussion of the County Landfill Findings of Fact and Statement of Overriding Considerations	1412
Introduction, Project History - Alleged unauthorized oak tree removal	1413
Risk of Upset, Hazardous Materials - Discussion of hazardous waste roundups	1418, 1419

Table 3-1 (Cont.)
FINAL SEIR KEY RESPONSE MATRIX

Issue	Response Number
Risk of Upset, Hazardous Materials - Percentage of household hazardous waste in municipal solid waste stream	1420
Risk of Upset, Litter - Potential for litter migration into O'Melveny Park and community of Granada Hills	1433
Aesthetics/Views - Views of project site from I-5 and I-210 Freeways	1515
Introduction, Project History - Number of trees planted by BFI in ± 100 acre open space area; number of coast live oak trees planted by BFI in ± 100 acre open space area	1519
Biological Resources - Dates of biological field surveys for proposed project	1547
Biological Resources - Discussion of mountain lions and coyotes in project area	1555, 1561
Biological Resources - Listing of threatened and endangered animal species expected in the project area, included in the Draft SEIR	1556
Biological Resources - Discussion of California condor	1557
Biological Resources - Discussion of golden eagle	1562
Biological Resources - Potential for wildlife movement	1564, 1565, 1572
Biological Resources - Conclusion in Draft SEIR that the proposed project would not result in unavoidably significant adverse impacts to biological resources after the implementation of mitigation measures	1568
Biological Resources - Mitigation for active raptor nesting areas during the breeding season	1569
Noise - Potential for noise standards at local receptors to change if GPA/ZC for proposed project is approved	1598
Introduction, Project History - Approval dates for the Solid Waste Facilities Permit (SWFP) for the operational County Landfill	1607
Introduction, Project History - Approval date for the CUP for the operational County Landfill	1608
Land Use - Discussion why the proposed project would require a general plan amendment (GPA) and zone change (ZC) rather than a variance	1623
Land Use - City's processing steps for GPA/ZC	1624
Land Use - November 18, 1997 GPA/ZC Key Group Meeting/Open House	1625
Project Description, Operations - Final Landfill Elevations	1632
Introduction, Project History - Access Road in City	1634
Introduction, Project History - First Settlement Agreement between County/BFI and City	1635-1637
Introduction, Project History - Number of oak trees removed in the County portion of Sunshine Canyon/number of oak trees planted in mitigation areas	1638

Table 3-1 (Cont.)
FINAL SEIR KEY RESPONSE MATRIX

Issue	Response Number
Introduction, Project History - Second Settlement Agreement between County/BFI and City	**1640**
Introduction, Project History - Lower Arroyo Seco Restoration in the City of Pasadena	**1642**
Introduction, Project History - BFI dedication of acreage in East Canyon for open space and recreational purposes	**1644**
CEQA Requirements - Discussion of the reasons why Newhall Ranch was not included in the Draft SEIR as a related project; discussion of the effects of Newhall Ranch and other northern Los Angeles County projects on regional solid waste generation	**1649**
Alternatives - Environmental comparison between El Sobrante Landfill expansion and proposed City/County Landfill	**1698**

3.2 TOPICAL ISSUES

The following Topical Issues provide detailed technical information and clarification in response to comments or requests for information from State and regional agencies, County and City departments, local jurisdictions, and other interested parties or organizations that were received as written comments during the Draft SEIR public review period. In the course of reviewing and responding to the written comments on the Draft SEIR, certain topical issues emerged more than once and are addressed for the decisionmakers to consider during their deliberations on the proposed City/County Landfill. Specific areas of concern are summarized at the beginning of each Topical Issue with responses to those issues. In addition, the Topical Issues provided below are referenced (where applicable) throughout the main body of this Final SEIR.

Topical Issue 1: Seismicity

Questions have been raised regarding the design of the proposed City/County Landfill to resist the effects of seismic ground shaking and whether potential active faults would result in the failure of the landfill liner or other proposed environmental control systems.

Response

Two east-west trending, eastward-plunging folds were mapped within the site area and are shown on Figures 4.1-4 and 4.1-7 in the Draft SEIR. The Oat Mountain Syncline lies in the southern portion of the site, adjacent to the Pico Anticline, which lies to the north. The coincidental occurrence of inclined rocks and steep topography has resulted in dip-slope conditions (e.g., a slope of the land surface that is roughly parallel to the dip of the underlying rocks) within Sunshine Canyon. In the main canyon of the project site, a dip-slope condition exists for north-facing slopes, while in adjacent canyons to the south, dip-slope conditions exist on south-facing slopes. The varying orientations of the dip slopes are a result of the broad anticlinal fold that traverses the northern and central portions of the project site.

Several faults in the vicinity of the project site have been mapped by various consulting geologists.[1] The orientations and sense of movement of the faults on the project site, as well as their proximity to the Santa Susana thrust fault system, suggest that they all may be related tectonically. A group of faults with a northeasterly trend is clustered in the southeastern portion of the project site. These faults are delineated by offset beds and the faulted contact between the Towsley and Pico Formations, and were shown on Figures 4.1-4 and 4.1-7 in the Draft SEIR. Another group of faults lies in the northern portion of the site as shown on Figures 4.1-4 and 4.1-7 in the Draft SEIR. The northern fault traces have an east-west trend. The proximity of the three northern fault traces indicate that they may, in part, be the same fault. These faults were mapped by different geologists[2] and may have been located slightly differently between various authors' maps (Richard B. Saul, State Geologist, personal communication). The longest fault trace in the northern part of the site was examined closely by Geolabs (1981). It reported the fault to be gently northward dipping with features indicative of both large-scale and minor reverse-slip offsets. The fault becomes a bedding-plane fault in a westward direction. There is no evidence to indicate that this fault is active.

Professional geologists conducted a trenching investigation in 1982 in addition to a seismic survey at several localities along the fault trace and determined that the fault is not active.[3] When these trenches were open, exposing the fault plane, independent inspection by a private consulting geologist (formerly of the State Water Resources Control Board [SWRCB]) and a geologist from the California Division of Mines and Geology (CDMG) also determined that the suspected fault showed no evidence of being active (Dr. Alvin L. Franks, Consulting Geologist, written communication, 1982; Richard B. Saul, State Geologist, written communication, 1982).[4]

All of the fault traces found on the project site are not traceable across streambed alluvium where they cross gullies, indicating that they are at least older than those deposits. In addition, no other features indicative of recent faulting (e.g., fault scarps or offset structures) were detected from field investigations and detailed analyses of aerial photographs. The deformation that produced the folds and faults within the site area may have taken place during the mid-Pleistocene period (750,000 to 125,000 years ago). The local geologic features that formed during the Pleistocene deformation include the Pico Anticline, Oat Mountain Syncline,

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1/ *Geology of Southeastern Ventura Basin, Los Angeles County, California*, U.S. Geological Survey Professional Paper 334-H, E.L. Winterer and D.L. Durham, pp. 275-336, 1962. *Geologic Map of the San Fernando Earthquake Area*, A.G. Barrows, J.E. Kahle, R.B. Saul, and F.H. Weber Jr., in *San Fernando, California, Earthquake of 9 February 1971:* California Department of Conservation, Division of Mines and Geology Bulletin 196, Plate 2, ed. G.B. Oakshott, 1975a. *Geology of the S.E. 1/4, Oat Mountain Quadrangle, Los Angeles County, California*, Richard B. Saul, California Department of Conservation, Division of Mines and Geology, Map Sheet 30, 1979; *Preliminary Geotechnical Feasibility Study - Proposed Class I Disposal Site, Los Angeles, California*, Geolabs, unpublished report, February 1981.

2/ *Geologic Map of the San Fernando Earthquake Area*, op. cit.; and *Preliminary Geotechnical Feasibility Study - Proposed Class I Disposal Site, Los Angeles, California,* op. cit.

3/ *Sunshine Canyon Project Reflection/Refraction Seismic Survey*, Gasch and Associates. 1982.

4/ *FEIR Sunshine Canyon Landfill Extension, Appendices*, Volume IIA, Ultrasystems Engineers & Constructors, Inc., Appendix B, Geology Technical Report, Exploratory Boring and Trench Logs, p. 11. April 1989.

and most or all of the mapped faults on the site.[5] The overall east-west trends of the resulting geomorphic features were produced by north-south crustal shortening.

Figure 4.1-5 in the Draft SEIR depicts regional earthquake faults, and Figure 4.1-6 shows the tectonic setting of the project site. Active and potentially active faults that have the potential to generate significant strong ground motions at the site include the Santa Susana, San Fernando-Sierra Madre, San Gabriel, and Northridge Blind Thrust Faults in the near field (less than 6 miles from the site); the Simi-Santa Rosa, Oakridge, Elysian Park, and Malibu Coast-Santa Monica-Raymond Faults in the midfield (between 6 and 20 miles from the site); and the Whittier-North Elsinore and San Andreas Faults in the far field (greater than 20 miles from the site). The most important of these sources with respect to the intensity of strong ground motions at the site are the Santa Susana, San Fernando-Sierra Madre, and Northridge Blind Thrust Faults near field sources, and the San Andreas far-field source.

The San Fernando-Sierra Madre Fault, with a site-to-source distance of 3.0 miles and the closest fault to the project site, was the source of the 1971 San Fernando earthquake (Magnitude [M] 6.6). This fault stretches approximately 52 miles along the base of the San Gabriel Mountains from the vicinity of the Newhall Pass southeasterly toward San Bernardino. The northwestern end of this fault ruptured in 1971. Ground rupture associated with the San Fernando earthquake of 1971 is known to have occurred throughout the San Fernando Valley region. Two such occurrences lie east of the project site across San Fernando Road and the I-5 Freeway. Offsets of between 2.4 to 3.9 inches were detected after this event. For this reason, the most recent version of the Alquist-Priolo Special Study Zone (SSZ) map (Oat Mountain Quadrangle, 1976) had extended the SSZ boundaries westward into the Sunshine Canyon site and were depicted on Figures 4.1-4 and 4.1-7 in the Draft SEIR. However, studies by consulting geologists in 1982 and 1988 and inspections by independent geologists all concur that there is no evidence of active faulting onsite. It is also significant to note that neither of the faults located across the I-5 Freeway, easterly of the project site (showing movement in the 1971 earthquake event), were found to displace the alluvium in the San Fernando Pass area, suggesting that they do not extend onto Sunshine Canyon. Additionally, the landfill sustained no physical damage in 1971 as a result of that earthquake.[6]

The Santa Susana Fault is a steeply dipping thrust fault that passes beneath the site at a depth of between 3.1 and 6.2 miles. The shortest distance between the ground surface at the project site and the Santa Susana Fault is approximately 3.1 miles. This is referred to as the "site-to-source" distance used in evaluating the intensity of ground motions expected at the site should an earthquake occur on the Santa Susana Fault. The fault stretches approximately 17 miles from the edge of the San Gabriel Mountains, where it interacts with the San Fernando-Sierra Madre Fault, westward into Ventura County. The Santa Susana Fault is a complex structure with numerous strands mapped by field investigators. The eastern edge of the Santa Susana Fault, where it interacts with the San Fernando-Sierra Madre Fault, was active during and following the 1971 San Fernando earthquake, and that fault may have been the source of the 1893 Pico Canyon earthquake (Yeats, 1987). Yeats et al. (1993) divided the fault into three discrete segments, each of which could rupture independently.

5/ "Geology of the Southwest Slope of the Santa Susana Mountains and Geologic Effects of the San Fernando Earthquake," Richard B. Saul in *San Fernando, California Earthquake of February 1971*, California Department of Conservation, Division of Mines and Geology Bulletin 196, ed. G.B. Oakshott. 1975.

6/ *FEIR Sunshine Canyon Landfill Extension, Appendices*, Volume IIA, Appendix B, Geology Technical Report, Exploratory Boring and Trench Logs, op. cit., p. 10.

The San Gabriel Fault, with a site-to-source distance of approximately 5 miles, is the closest major fault (capable of an earthquake of M 7.0 or greater) to the site. Regional geologic studies of the San Gabriel Fault led to the conclusion that it is the ancestral segment of the San Andreas Fault within the Transverse Ranges. Although abandoned as the primary dislocation between plate boundaries in Pliocene time, offset geologic units indicate right lateral slip on the order of 0.6 mile within Quaternary time. Evidence of dip slip is also documented but is likely only localized. The fault trace extends for approximately 45 miles and is capable of generating up to M 7.0 earthquakes. The CDMG has suggested the San Gabriel Fault may also be a possible source of the 1893 Pico Canyon earthquake.

Seismic hazards that must be considered at the Sunshine Canyon site include primary fault rupture, secondary ground rupture, and strong ground shaking.

The potential for primary fault rupture within the boundaries of Sunshine Canyon is considered minimal. The faults that intersect the ground surface onsite do not display evidence of Holocene movement (e.g., within the last 11,000 years), indicating they are inactive. One relatively major inactive fault has been exposed to date during excavation for the County Landfill. This inactive fault, located in the ridge between the northwest and north canyons, was recognized and shown on site geologic maps prior to landfill development. These site geologic maps do not indicate that any major inactive faults would be exposed during construction of the proposed City/County Landfill. However, all excavations would be mapped by a professional geologist, and any inactive faults encountered during excavation would be recognized and shown on site geologic maps. Additionally, the mapped geology would be field checked by a Los Angeles Regional Water Quality Control Board (LARWQCB) geologist prior to placement of any engineered fill or liner in the excavated areas. Based on observations of ground rupture in the vicinity of the I-5/SR-14 Freeway interchange following the San Fernando earthquake (1971), the Alquist-Priolo SSZ demarcating the 1971 fault rupture extends west across the I-5 Freeway and onto the project site at its northern extremity and was shown on Figures 4.1-4 and 4.1-7 in the Draft SEIR. However, extensive field investigation, including geologic mapping and logging of exploratory trenches by both consulting geologists and CDMG representatives, indicates that fault rupture from the 1971 San Fernando earthquake did not occur within the boundary of the project site and that known fault traces within the site boundaries show positive evidence that there has not been fault displacement onsite in Holocene time.

No analytical methods are available to estimate either the potential of occurrence of secondary ground rupture or its magnitude. Therefore, for design purposes, the potential for secondary ground rupture in the epicentral region (the area above the buried fault plane) must be evaluated by comparison to observations of past earthquakes. Based on the above-cited observations of secondary ground rupture in the Northridge earthquake, vertical displacements due to secondary ground rupture on the order of 4 to 8 inches could occur within Sunshine Canyon in the event of a major earthquake on a thrust fault underlying the site.

The design of a landfill above a thrust fault accommodates the ground deformation associated with thrusting (i.e., development of folds and fractures). This is referred to as secondary ground rupture. In comparison with other types of faults, design models for predicting the effects of thrust faults are somewhat different. Thrust faults are neither more nor less dangerous than other types of faults with respect to the integrity of the liner and environmental control systems.

Seismic activity occurring in the site vicinity can produce strong ground shaking, which could result in damage to the landfill waste containment system, due to seismically induced displacement of the waste mass if these systems were designed, engineered, or installed incorrectly. Strong shaking can also induce

landsliding in natural geologic materials that could, in turn, result in damage to the landfill containment and surface water control systems. Landfill containment systems are broadly defined in this respect to include the liner, cover, leachate collection and removal system (LCRS), and gas extraction system. Surface water drainage systems include drainage channels, down drains on slopes, and sedimentation/stormwater retention basins. Seismic design of the landfill system includes providing mitigation for landslide potential by appropriate grading of the waste mass and natural slopes, designing the containment system to resist the effects of strong shaking, providing an emergency response plan to mitigate damage to containment systems that may occur (e.g., cracking of pipes or drainage channels, loss of power), and providing redundant systems where damage is not readily observable or repairable (e.g., use of a composite liner system).

No cumulative impacts for seismic exposure are anticipated. No primary fault rupture or significant slope displacement due to strong ground motions is expected. It is not anticipated that the landfill would create seismic-related risks to other local area land uses. Nonetheless, a regional earthquake of high magnitude could temporarily impact landfilling operations and other projects in the regional area; however, any disruption to the proposed landfill facility (e.g., cracked concrete lining of drainage structures, broken gas collection pipes, power loss, office building damage) will be repaired immediately by the project proponent.

With the implementation of City Mitigation Measures identified in the Draft SEIR, Section 4.1.4, Geologic Hazards-Seismicity, pp. 4-40 and 4-41, no significant impacts would occur.

Topical Issue 2: Landfill Stability During Northridge Earthquake

> *Questions have been raised regarding the performance and stability of solid waste landfills that experienced strong ground shaking during the January 17, 1994, Northridge earthquake. Additionally, the performance and stability of the inactive City Landfill in Sunshine Canyon during the Northridge earthquake have been questioned.*

Response

The Northridge earthquake occurred on January 17, 1994 (at 4:30 a.m. local time), and the main shock of the earthquake was centered near Northridge. This event was assessed by the University of California at Berkeley seismographic station to have a moment magnitude (M_w) of 6.7. Damage resulting from the earthquake was widespread within Los Angeles County. Damage in the epicentral region included the collapse of highway structures, damaged and/or destroyed residential and commercial structures, widespread disruption of utilities and other facilities, and numerous landslides.[7]

The performance of Class III nonhazardous landfills in the Southern California area affected by the earthquake was excellent. Several landfill facilities were subjected to peak bedrock accelerations of 0.2 to over 0.5 g. No landfills affected by the Northridge earthquake showed any physical signs of major instability, although several facilities experienced minor levels of lateral deformation and/or cracking at the

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7/ *Preliminary Report on the Principal Geotechnical Aspects of the January 17, 1994, Northridge Earthquake*, eds. Jonathan P. Stewart, Jonathan D. Bray, Raymond B. Seed, and Nicholas Sitar, University of California at Berkeley, Earthquake Engineering Research Center Report No. UCB/EERC, p. 1. June 1994.

surface. Additionally, many landfills experienced a temporary shutdown of their gas flare systems due to the loss of power after the earthquake.[8]

At the inactive landfill in the City, longitudinal cracks were observed along the top of the waste fill where it interfaces with the natural canyon walls. These cracks varied in width from less than 0.8 inch to as much as 12 inches wide, exhibiting in some areas 6 to 12 inches of differential vertical offset. This cracking did not appear to represent any threat of overall instability to the integrity of the landfill. Instead, cracking may have been caused by the differential settlement of the waste fill itself, which occurred as a result of the earthquake shaking.[9] During this period, the landfill gas (LFG) extraction system was temporarily shut down due to a loss of power. Power to the LFG collection and flaring system was restored 2 days after this seismic event. No damage to the landfill's ancillary structures resulted.

Detailed landslide mapping from aerial photographs by the U.S. Geological Survey (USGS, 1995b) indicated that no significant earthquake-induced landslides occurred at the project site. However, the USGS map does show several small landslides within the footprint of the approved County Landfill (this landfill was not operational at the time) generally located in steep canyons adjacent to the major drainage area. In addition, a relatively concentrated accumulation of landslides occurred along the south-facing slopes of Aliso Canyon, south of the project site. This is consistent with previous postearthquake reconnaissance surveys of Sunshine Canyon where several small earthquake-induced or reactivated landslides were observed in both County and City areas of the project site. Several rockfalls occurred on steep bedrock cliffs, including one located within the ±100 acre open-space area, south of the inactive City Landfill.

The Northridge earthquake produced no significant adverse impacts on the proposed project site. No cracking or deformation in the waste mass was found at the base of the existing inactive landfill by consulting geotechnical engineers or the University of California at Berkeley's reconnaissance team. The minor cracking observed was limited to the landfill's surface cover area, and no waste was exposed. This cracking was repaired immediately by placing additional cover material over the cracks. Similarly, no significant seismically induced displacement was observed in the natural slopes surrounding the existing inactive landfill.

The performance of the existing landfill in the Northridge earthquake and observations of the performance of other solid waste landfills in major earthquakes indicate that solid waste is extremely resistant to the effects of strong ground motions and is not susceptible to loss of strength or large internal displacements due to earthquake shaking (as is the case for some earthen materials, e.g., loose, saturated sand). Therefore, the waste mass of the existing landfill and solid waste placed within the proposed fill areas is expected to perform well when subjected to strong shaking from earthquakes, with no loss of strength and little internal deformation.

In regard to other solid waste landfills after the Northridge earthquake, cracks were observed in all waste cells of the Chiquita Canyon Landfill. Tears were also discovered in the landfill liner. They were caused by a combination of factors, including stress concentrations and inadequate shear resistance at the base of the landfill. The tears occurred adjacent to an anchor trench at the crest of a slope where the largest static (preseismic) stresses in the high-density polyethylene (HDPE) geomembrane would be expected as a result

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[8]/ Ibid., p. 200.

[9]/ Ibid., p. 218.

of the settlement and compaction of the waste fill. This is generally recognized as one of the locations where the stress on the liner is the greatest. The tear initiated from the corner of a rectangular "cutout" where a quality assurance/quality control (QA/QC) sample was collected during construction for destructive testing. Rectangular holes in the liner are points of stress concentration. A smooth liner was used at the base of the landfill, providing inadequate shear resistance to restrain the base from sliding, thereby resulting in a large deformation. Several feet of sliding displacement at the base resulted in slumping along the side slope, and additional stress was applied to the liner in the vicinity of the rectangular cutout. For additional information, refer to the Draft SEIR, Appendix C16, Assessment of the Performance of Class III Nonharzardous Solid Waste Landfills in Recent Earthquakes.

The Lopez Canyon Landfill liner system performed extremely well during the Northridge earthquake and sustained no damage despite being subjected to stronger shaking than the Chiquita Canyon Landfill. A similar liner design for the Sunshine Canyon County Landfill was used. Measures used in the design of the Lopez Canyon Landfill liner system that prevented rupture or tearing of the liner system included anchor trenches used above or outside (laterally) of the waste for temporary anchorage and abandoned whenever the landfill was expanded laterally or vertically, no destructive samples collected within 5 feet of the crest or toe of a slope or an anchor trench, and a textured liner at the base of the landfill to limit permanent seismic displacement to less than 12 inches. Similar design methods would be incorporated for the City/County Landfill. For additional information, refer to the Draft SEIR, Appendix C16, Assessment of the Performance of Class III Nonharzardous Solid Waste Landfills in Recent Earthquakes.

Topical Issue 3: Landfill Fugitive Dust Emissions During High Wind Conditions

> *Concerns have been raised regarding the proposed City/County Landfill and the potential for fugitive dust emissions to occur during high wind conditions, potentially creating significant impacts on sensitive land uses within the community of Granada Hills.*

Response

The discussion of local wind patterns was included in the Draft SEIR in accordance with data provided in *A Climatological Air Quality Profile, California South Coast Air Basin (SCAB)* (South Coast Air Quality Management District [SCAQMD], January 1980), as well as data and methodology provided in the *CEQA Air Quality Handbook* (SCAQMD, April 1993).

As stated in the Draft SEIR, Section 4.2.2, California's SCAB Regional Climate Conditions, p. 4-47, during the winter months the project area experiences a frequent wind flow from the north and northwest through the Newhall Pass into the western San Fernando Valley. These winds predominate between 11:00 a.m. through 5:00 p.m. The speeds (16.5 mph average in the Newhall Pass) reflect the influence of Santa Ana winds, which are strongest during those hours of the day and blow in a similar direction. Onsite measurement has shown the overall average wind speed to be 9.9 mph with a maximum 1-hour measurement of 45 mph. It should be noted that the overall average wind speed and maximum 1-hour wind speed do not preclude the presence of very low or high wind speeds, especially during Santa Ana conditions.

The National Weather Service's description of Santa Ana winds includes the following:

> Santa Ana winds are generally defined as warm, dry winds that blow from the east or northeast (offshore). These winds occur below the passes and canyons of the coastal ranges

of Southern California and in the Los Angeles Basin. Santa Ana winds often blow with exceptional speed in the Santa Ana Canyon (the canyon from which it derives its name). Forecasters at the National Weather Service in Oxnard and San Diego usually place speed minimums on these winds and reserve the use of "Santa Ana" for winds greater than 25 knots (or approximately 29 mph).

The complex topography of Southern California combined with various atmospheric conditions create numerous scenarios that may cause widespread or isolated Santa Ana events. Commonly, Santa Ana winds develop when a region of high pressure builds over the great basin (the high plateau east of the Sierra Mountains and west of the Rocky Mountains including most of Nevada and Utah). Clockwise circulation around the center of this high pressure area forces air downslope from the high plateau. The air warms as it descends toward the California coast at the rate of 5 degrees F per 1,000 feet due to compressional heating. Thus, compressional heating provides the primary source of warming. The air is dry since it originated in the desert, and it dries out even more as it is heated.

Santa Ana winds commonly occur between October and February with December having the highest frequency of events. Summer events are rare. Wind speeds are typically north to east at 35 (approximately 40 mph) knots through and below passes and canyons with gusts to 50 knots (approximately 58 mph). Stronger Santa Ana winds can have gusts greater than 60 knots (approximately 69 mph) over widespread areas and gusts greater than 100 knots (approximately 115 mph) in favored areas. Frequently, the strongest winds in the Basin occur during the night and morning hours due to the absence of a sea breeze. The sea breeze which typically blows onshore daily, can moderate the Santa Ana winds during the late morning and afternoon hours.[10]

Dust from construction activities, including physical site disturbance, material deliveries, employee commuting, and potential wind erosion during high wind episodes, may create a visual and soiling nuisance beyond the property line. Because dust impacts are expected to be significant during the construction phase, standard mitigation measures (by project design) will be implemented to control fugitive dust emissions during construction as required by SCAQMD Rules 402 (Nuisance) and 403 (Fugitive Dust).

In addition, fugitive dust emissions in combination with PM_{10} emissions generated from vehicular exhaust are anticipated to create a significant impact. Past operations have shown that the higher-elevation upper plateau and southern berm areas of the existing inactive landfill have experienced greater wind-generated fugitive dust occurrences than the lower elevations within the canyon. However, the project proponent has successfully implemented enhanced soil treatment measures to stabilize soil conditions and further enhance onsite revegetation.

In addition, fugitive dust emissions in combination with particulate matter less than 10 microns in diameter (PM_{10}), generated from vehicular exhaust, are anticipated to create a significant impact.

[10]/ "Santa Ana Winds." www.nimbo.wrh.noaa.gov/sandiego/sanwind.htm; INTERNET.

The closest residential area in the community of Granada Hills to the proposed landfill footprint would be approximately 1,700 feet. During high wind events, monitoring of weather conditions is conducted by BFI personnel stationed in the existing environmental control center. Weather information is conveyed by radio transmission from environmental control system personnel to the BFI foreman and the onsite construction contractors and/or operating personnel. The BFI foreman has control over construction activities and landfilling operations, and has the authority to cease construction activities and/or close the landfill if warranted.

It should be noted that the project proponent will use soil sealant to control fugitive dust emissions. The soil sealant is a nonpetroleum, high-bonding-strength emulsion developed specifically for dust and erosion control. Selected fractions of natural tree resins are combined into a strong and versatile bonding agent. The soil sealant is a biocatalyst formulation designed to improve the resistance to erosive forces of traffic and weather. The soil sealant is supplied as a highly concentrated liquid catalyst and applied in dilute water solutions.

The soil sealant treatment enables water to rapidly wet and penetrate soils. Treatment of soil materials facilitates the achievement of the highest density possible with available compaction effort. The soil sealant increases cohesion of water with soil and between soil agglomerates. Improved bonding of water with soil during construction retards evaporation and reduces the volume of water required for compaction. Increased cohesion in soil and aggregate mixtures makes them easier to process and handle with construction equipment and reduces segregation problems. The soil sealant increases density in compacted soils and aggregate mixtures over that achieved when working only with water. The soil sealant treatment directs an alignment of soil particles and soil agglomerates during processing and compaction that cures into a structure with increased density, cementation, and bearing strength. Unpaved surfaces are hardened against the abrasive effects of traffic and against the erosive effects of wind and water.

Water trucks are currently used to apply soil sealant at the project site. The soil sealant solution is blended into the soil and standard depths of treatment range from 6 to 12 inches. Thorough mixing and blending are essential to ensure uniform dispersion of the solution. A grader would be used to manipulate the mixture until it is uniformly wetted and blended. Compaction is essential for the effectiveness of the soil sealant treatment. After soil is blended to an optimum moisture content with the soil sealant solution, a compactor would be used to thoroughly compact the treated material. Perimeter drainage would be provided to maximize water flow off of and away from the stabilized area.

The soil sealant requires no special safety precautions in handling or storage and will not harm personnel or equipment. The soil sealant is supplied as a liquid concentrate in 55-gallon sealed plastic drums. The sealant is both nonhazardous and nonflammable.

The following mitigation measures will reduce fugitive dust emissions during construction activities at the project site:

- Daily watering of active construction areas, active soil stockpiles, and all traveled unpaved roads shall be performed to minimize dust lofting from construction disturbances. Construction areas will also receive a soil stabilization (sealant) product if they are to be left unattended for periods in excess of 5 days and control is required.

- Wind speed shall be continually monitored using onsite anemometers. Excavation within construction areas shall be halted when the 15-minute average wind speed exceeds 15 mph or when the instantaneous wind speed exceeds 25 mph.

- Graded areas shall be watered as necessary to reduce dust emissions.

- Disturbed areas shall be revegetated with an interim ground cover as specified in the proposed revegetation plan. Excavation will proceed in a manner to reduce the amount of graded areas at any given time.

The following mitigation measures will reduce fugitive dust emissions during operational activities at the project site:

For truck travel and fugitive dust emissions, mitigation shall include:

- To minimize fugitive dust emissions, the access roadways shall be paved as necessary and haul roads to the working face areas shall be hard packed and/or covered with gravel a crushed stone layer. Paved and/or crushed stone roadways shall extend up to new active fill areas as development of the landfill progresses.

For paved roads, mitigation shall include:

- Curbs and gutters will be used. At least twice daily watering or wet sweeping of paved roads to remove windblown surface dust shall occur. AP-42 assigns a control efficiency of 50 percent for twice weekly cleaning of industrial paved roads. With twice daily cleaning, a control efficiency in excess of 90 percent is predicted.

For unpaved clay roads, mitigation shall include:

- An SCAQMD-approved chemical dust suppressant with a manufacturer's demonstrated control efficiency in excess of 90 percent shall be regularly applied to inactive areas during windy periods. Note that this control efficiency is less than (i.e., more conservative than) the 95 percent value used at the El Sobrante Landfill (Draft South Coast Air Quality Management District Consultation No. 4, Work in Progress Air Quality Analysis Refinements El Sobrante Landfill Expansion, TRC Environmental Solutions, Inc., May 2, 1997).

For unpaved crushed stone covered roads, mitigation shall include:

- With the use of a crushed stone topcoat in addition to the regular application of a SCAQMD-approved chemical dust suppressant and subsequent watering, a control efficiency in excess of 95 percent is predicted.

Mitigation pertaining to heavy equipment operations shall include the following:

- Operations shall be restricted to encompass no more than a 10-acre active working face area.

- To the extent technically feasible, material excavated from one portion of the project site shall be used as daily cover material in an adjacent area to minimize travel distances for such cover material.

Additionally, mitigation pertaining to site erosion shall include the following:

- Subject to approval by the California Integrated Waste Management Board (CIWMB), filling in each active area shall be prolonged through the utilization of a 20-foot maximum cell height. This would reduce the area of excavation and minimize the disturbances to the landfill, thereby providing an effective control of fugitive dust.

- A temporary vegetation cover shall be established on all slopes that are to remain inactive for a period longer than 180 days.

- An SCAQMD approved soil stabilization (sealant) product shall be used to retard soil erosion and enhance revegetation. Soil sealant shall be applied when necessary to selected working areas of the landfill. The sealant will also be used as a binder or tackifier to hold seed during revegetation, mulch, and fertilizers in-place until grasses become established and stabilize on the landfill surface.

With the implementation of the above-referenced mitigation measures for the proposed City/County Landfill, significant impacts from fugitive dust emissions would be substantially reduced.

In addition, refer to Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality and Appendix D4, Revisions to Draft SEIR, Appendix B8, Air Quality Modeling and Wind Speed and Direction Summary, in this document.

Topical Issue 4: Landfill Gas Generation and Odor Control

Concerns have been raised that the proposed City/County Landfill would generate substantial volumes of LFG, resulting in the potential for odor migration onto sensitive land uses.

Response

Odors can occur when the landfill surface, due to differential waste settlement, subsidence, or cracks, allows the LFG to escape into the atmosphere. At the existing inactive City Landfill, cracks found on the landfill surface are filled as part of a continuous maintenance program. A similar procedure would be performed at the proposed landfill footprint area.

The proposed LFG collection and flaring system would be installed to collect gases generated by the decomposition of refuse through a series of horizontal and vertical gas collector wells designed to minimize the potential of onsite and offsite gas emissions and odors. The proposed LFG collection and disposal system will consist of gas extraction wells and piping. This system will be constructed of polyethylene pipe, which will flex as differential settlement occurs at the landfill. Once LFG is generated, it will be drawn into the horizontal collectors or wells and subsequently to the collection piping system by the vacuum blowers. To avoid drawing air into the system, the gas is extracted at the same rate it is being produced by controlling the vacuum level in the piping system. Extraction wells will be spaced so that the volume of refuse influenced by the wells is sufficiently balanced to capture the maximum amount of gas being generated by the landfill. The wells will be located so that the area of well influence will slightly overlap that of the adjoining wells.

Furthermore, the collection system piping would be sized so that sufficient vacuum is available to all wells in the system (see Draft SEIR, Figure 2.7-7).

The horizontal gas collection system will be installed when preparing each new cell area and will be expanded as necessary to ensure compliance with SCAQMD Rule 1150.1 (Control of Gaseous Emissions from Active Landfills).

The monitoring of surface and ambient air quality is a continuous process required by the SCAQMD throughout the site life of the landfill and during its closure and postclosure maintenance period. Both the LFG collection and flaring system and sampling program for the proposed landfill will require approval by the SCAQMD. Surface sampling is used to identify areas of the landfill where gas may be escaping.

With respect to odors, the landfill must not be a source of odor nuisance per the requirements of CCR, Title 27, §20919. The project proponent would prepare and implement an odor abatement program, which would be approved by the designated City of Los Angeles Local Enforcement Agency (City LEA). The program would ensure that odor levels within the facility are kept within baseline odor standards and that odors emanating from the facility would not exceed any odor detection thresholds at the property boundaries. The best method for ensuring that there will be no odor generation is by proper compaction and coverage of all solid waste materials by the end of the working day. Refuse received at the proposed landfill would be property disposed within 1hour of receipt, compacted, and covered with a minimum layer of 6 inches (i.e., State standard) of compacted soil cover material or an approved alternative daily cover by the end of the working day; therefore, the potential for odors is substantially reduced. The odors that may be released directly from the refuse prior to being covered with cover material are usually at low levels and are dispersed in the atmosphere at levels of concentration below which they do not create a nuisance to local receptors. The proposed landfilling operations are located at sufficient distances from the potential receptors (residential) and separated by sufficient terrain so that no odor nuisance from refuse emplacement should occur.

The following mitigation measures would be implemented as part of a comprehensive odor control program:

- The natural biological processes that generate odors in a landfill through anaerobic decomposition cannot be prevented or avoided. However, the LFGs shall be prevented from escaping to the atmosphere through the use of control measures. These measures include using daily and intermediate cover material over deposited wastes, filling any surface cracks with clean dirt as necessary, and extracting LFG through the use of an LFG collection and recovery system and destroying collected gases by combustion.

- Operational techniques shall be used to control odor sources at the landfill. The size of the working face shall be limited so that the area of waste exposed to the atmosphere is kept to a minimum.

- Solid waste shall be compacted within 1 hour of its arrival at the working face.

- The LFG collection and recovery system shall be installed in phases as each portion of the landfill site is filled. The final system shall contain a network of gas extraction wells, collection system piping, and flaring facilities. Because the LFG generation begins at lower levels of volume and increases during the landfill site life, the gas will be flared initially until sufficient quantities are available for processing into electricity.

- If an odor problem should develop, appropriate control measures shall be implemented. These measures include applying daily cover material or more frequent application of the cover material to seal the landfill surface, or making adjustments to the wells, equipment, and operation of the LFG collection and recovery system.

- To ensure that odors are kept to a minimum, the following odor/LFG monitoring program shall be implemented for the proposed project. The monitoring program shall comply with the requirements of SCAQMD Rule 1150.1 and include:

  - Sample Probe Installation: At a minimum, one monitoring probe per 1,000 feet of landfill perimeter shall be installed to identify potential areas of subsurface LFG migration. These probes shall be monitored to ensure that large quantities of LFG do not vent offsite through subsurface soils.

  - Integrated Landfill Surface Sampling: The landfill surface shall be monitored to ensure that the average concentration of total organic compounds over the landfill surface does not exceed SCAQMD's standard of 50 parts per million (ppm).

  - Ambient Air Samples: Twenty-four-hour integrated gas samples and required meteorological data shall be taken to assess any impact the landfill is having on the ambient air quality at the landfill perimeter.

  - Instantaneous Landfill Surface Monitoring: Spot checks on the landfill surface shall be made to determine the maximum concentration of total organic compounds measured as methane at any one point on the surface of the landfill does not exceed the SCAQMD's standard of 500 ppm.

  - Regular Monitoring and Annual Testing: LFG concentrations at perimeter probes, gas collection system headers, the landfill surface, and in ambient air downwind of the landfill shall be monitored once per month or less frequently (but no less than quarterly) as required by the SCAQMD. The LFG collection system shall be adjusted and improved based on quarterly monitoring data and annual stack testing results.

- LFG flaring systems shall be sited as required by the SCAQMD and constructed using best available control technology (BACT). The flames shall be totally contained within the stack. Flame arresters shall be provided to the satisfaction of the City LEA. To the extent technically and economically feasible, gas recovered at the landfill site shall be converted to energy or developed for other beneficial uses rather than flared.

With the implementation of City Mitigation Measures in the Draft SEIR, Section 4.2.13, Odor Impacts, pp. 4-94 through 4-96, no significant impacts from odors would occur.

Topical Issue 5: Stormwater Runoff Control Measures

Questions have been raised regarding the project proponent's ability to control and contain stormwater runoff so that contact between stormwater and the landfill will be avoided.

Response

Implementation of the proposed project would result in a net change (or diversion) to existing drainage patterns, hydrologic conditions, and quantities through alterations to the site topography, including alterations to and discharges from the project site. Construction grading and the removal of surficial vegetation would remove existing barriers that currently act to dissipate (i.e., slow down and reduce) stormwater runoff from the site. As a result, if surface water control measures are not implemented, the proposed project has the potential to increase the stormwater runoff and peak discharge, increase erosion and sediment transport, and decrease surface water quality due to increased sediment loads. The recommended mitigation measures provided in the Draft SEIR, pp. 4-113 and 4-114, require the project proponent to make improvements consisting of surface water drainage channels, interceptor ditches, pipelines, and sedimentation basins. These proposed features will collect, direct, and safely convey stormwater runoff around the landfill site and route runoff into regulated sedimentation basins. Figure 4.3-2 of the Draft SEIR shows the proposed site drainage plan. Moreover, these features will be designed and constructed to minimize ponding, infiltration, inundation, erosion, slope failure, washout, and overtopping.

CCR, Title 27, §20260 requires that drainage and sediment control structures (e.g., sedimentation basins) for landfill sites be designed to handle, at a minimum, a 100-year-frequency, 24-hour storm event. The proposed City/County Landfill will be designed to accommodate a 100-year storm event. Specifically, the sedimentation basins will handle sediment and debris flow, settle out suspended soil particles, prevent silting of the downstream channel, and maintain the natural watercourse. Sedimentation basins will be located outside of proposed landfill filling areas.

Drainage from the project site (including the main canyon and four tributary canyons) converges at the mouth of Sunshine Canyon near the landfill entrance. Stormwater runoff flows from tributary channels, and erosion caused by these flows converges at the canyon's mouth. Currently, stormwater from within the upper reaches of Sunshine Canyon is collected in the County Landfill sedimentation basin. Water that collects in that basin is periodically monitored under the stormwater monitoring plan for the operational County Landfill. Drainage from this basin travels southerly into a wash before reaching the mouth of the canyon near the landfill entrance.

Offsite, stormwater from the project site flows underneath San Fernando Road into an 8-foot-wide box culvert that is maintained by the City Department of Public Works, Bureau of Engineering (City BOE). The culvert is approximately 120 feet long and releases stormwater into the Weldon Canyon Flood Control Channel, which is located directly east of the site entrance across San Fernando Road. This channel is part of the City's flood control system. Drainage in this channel flows south for approximately 2 miles and then passes through a debris basin located directly west of the Los Angeles Reservoir. After passing through this basin, stormwater enters the Bull Creek Flood Control Channel located approximately 3.5 miles south of the project site. This channel is owned, operated, and maintained by the County Department of Public Works (DPW), Hydrology and Water Conservation Division. Stormwater then enters the Sepulveda Dam approximately 11 miles south of the project site. This dam is owned, operated, and maintained by the U.S. Army Corps of Engineers (Corps).

The inactive City Landfill has numerous drainage control features, such as benches, interceptor ditches, and concrete drainage channels (see Draft SEIR, Figure 4.3-2), to divert stormwater runoff away from the landfill. These control improvements are maintained regularly and closely monitored during the rainy season so that

any necessary repairs or maintenance can be performed in an expeditious manner. Areas of ponding or erosion damage on the existing inactive landfill are repaired upon discovery and as weather permits.

To minimize potential stormwater quality impacts, the project proponent will request coverage under the General National Pollutant Discharge Elimination System (NPDES) permit from the LARWQCB for nonpoint-source stormwater runoff. The NPDES permit regulates general construction activities and industrial activities. In general, the NPDES permit application would describe the landfill, type and quantity of wastes expected, effluent and receiving water limitations, pretreatment requirements, and monitoring programs. This permit is intended to eliminate nonstormwater discharge to existing stormwater systems, implement a water pollution prevention plan and monitoring program, and require monitoring of discharges into the localized stormwater system.

The potential exists for nonstormwater discharges into the stormwater conveyance systems. Various control measures and features described in the Draft SEIR will be used to separate stormwater from wastes being disposed of in the proposed landfill and to control sediment load, debris, and erosion impacts caused by stormwater runoff. The long-term impacts associated with development and operation of the landfill could allow potential pollutant sources to be transported into local stormwater systems. These potential impacts will be minimized by properly storing all liquids (e.g., oil, antifreeze, lubricants, or diesel fuels) necessary for the operation and maintenance of landfill equipment and reducing the potential for spills. Any onsite spills will be contained in accordance with an approved spill response plan. In addition, any fertilizers or insecticides used for revegetation purposes will be stored within the plant materials center. To the greatest extent possible, the products used will be biodegradable and nontoxic.

With the implementation of City Mitigation Measures identified in the Draft SEIR, Section 4.3.1, Surface Water, pp. 4-113 and 4-114 for stormwater runoff, no significant impacts would occur.

Topical Issue 6: Hydrogeologic Relationship between Sunshine Canyon and the San Fernando Valley Groundwater Basin

> *Questions have been raised regarding the hydrogeologic connection between Sunshine Canyon and the San Fernando Valley Groundwater Basin.*

Response

Data pertaining to groundwater within the Sunshine Canyon area were obtained from several prior studies of the project site and supplemented by monitoring data gathered from the monitoring well network. Borings completed at the project site have ranged in depth from 2 to 62 feet, as shown in Table 4.1.1 of the Draft SEIR. Most exploration borings and accompanying packer tests were conducted within the proposed landfill footprint area. However, several borings were purposely located outside of the landfill footprint because surface geologic features warranted further subsurface documentation. Numerous borings (C-6, C-7, C-10, C-11, and C-12) were located within unique geologic features that are known to produce higher permeabilities, such as deep-seated landslides, axis of anticlines, and ridgelines. During site exploration activities, groundwater generally was encountered in the exploratory borings (CM-1, CM-3, CM-4, CM-8, and CM-9) drilled in the canyon bottom, with one exception. Boring C-2, which was drilled to the bottom of the canyon, did not intercept groundwater. Exploratory Borings CM-3 and CM-5 do not lie in a stream gully and did encounter groundwater at depths of 40 to 50 feet. Groundwater was not encountered in the remaining exploratory borings (C-6, C-7, C-10, C-11, and C-12), although indications of previous

groundwater existence were found in recovered drill core soil samples (i.e., iron and manganese staining in fractures). The borings that encountered groundwater were completed either in alluvium or colluvium where groundwater was encountered or in bedrock material, and the majority were sealed off from the near-surface alluvium and colluvium.

Groundwater at the project site generally flows in a south to southeast direction. Results of the drilling program and subsequent water level readings indicated that confined groundwater conditions may exist at numerous locations within the project site. Groundwater in the uppermost aquifer occurs under unconfined conditions in the alluvial sediments and generally under confined conditions in the top weathered zone of the Towsley Formation. The lower bedrock zone was found to occur under confined conditions. Available groundwater studies indicate that potentially limited groundwater resources lie beneath the project site.

The geologic structure works in conjunction with onsite topography to restrict groundwater movement within and down the canyon axis. With the relatively low hydraulic conductivity documented in the Towsley Formation and the hydraulic gradients at the site, groundwater velocities are low. The bedrock units are folded along the Oat Mountain syncline and the Pico anticline. To the south of the main canyon, the units generally dip to the north along the south flank of the syncline (into the main canyon), and this minimizes groundwater movement (against the dip) to the south and southeast. Northward, the bedding rolls over the Pico anticline and dips north. Along the northern side of the main canyon, the bedrock units dip to the north, and groundwater movement is not likely to be impeded by the structure.

Within Sunshine Canyon, groundwater follows the topography and moves down slopes, continuing toward the valley axis. The primary component of groundwater flow, based on the work performed onsite, is shown to be horizontal. The vertical component of flow is highly variable over the project site. In the upper portions of the canyon where recharge is likely, a downward component of flow is suspected. In the lower portion of the canyon, there is evidence of an upward component of groundwater flow direction. This upward component is also demonstrated further downstream and near the landfill entrance.

Movement of shallow groundwater follows the direction of surface drainage. Water stored in the alluvium and shallow bedrock generally flows below grade within the canyon. Based on estimates of hydraulic conductivity using soil descriptions from boring logs, the estimated groundwater discharge velocity in the alluvium ranges from approximately 0.005 to 1 foot/day. Groundwater in the bottom of the canyon flows slowly toward the mouth of Sunshine Canyon.

Due to the pervasively folded, faulted, and anisotropic nature of the bedrock (i.e., interbedded sandstone and shale), the flow rate of groundwater at the project site can vary significantly over short distances. However, the presence of nonactive faults in addition to interbeds of low-permeability shale and mudstone tends to restrict the flow of groundwater. Subsurface water in Sunshine Canyon is effectively hydraulically separated from the San Fernando Valley alluvium by the low-permeability bedrock. Groundwater flow in the bedrock is not continuous between the canyon and valley floor area.

After independently reviewing published hydrogeologic reports for the Sunshine Canyon area, the Watermaster (i.e., the Los Angeles County Superior Court appointed hydrologist who manages the withdrawal and replenishment of groundwater supplies in the adjudicated groundwater basin) for the Upper Los Angeles River Area (ULARA) concluded that, other than through the alluvium, there was no groundwater connection between Sunshine Canyon and the San Fernando Valley Groundwater Basin. The Watermaster also concluded that the natural bedrock material underlying the canyon is of low permeability and has low storage

capability. A report prepared for the City Bureau of Sanitation (BOS) on groundwater movement in Sunshine Canyon states:

> Whatever groundwater movement does occur is undoubtedly complicated and slow. Complications include the bedding, which, although generally dipping towards the east in the lower canyon, dips steeper than the hydraulic gradient making it necessary for the groundwater to move across the bedding. Interbeds of siltstone and shale act as subsurface dams with little or no permeability. Groundwater quality is poor.[11]

The alluvial soils within the canyon have generally been found to have a higher permeability and capability of transmitting fluids than the bedrock. In that regard and similar to the operational County Landfill, the foundation base-grade elevations for the proposed landfill would be prepared by excavating all alluvium, weathered rock, and other unsuitable foundation materials followed by the installation of several environmental protection and control systems, such as the gravel subdrain system, compacted soil foundation layer, liner system, LCRS, surface and water drainage controls, and other features. Therefore, no contact between deposited refuse and alluvial soils would occur as a result of proposed landfill development.

Additionally, any possibility for groundwater migration has been effectively cut off since the installation of the groundwater extraction trench across the bottom of Sunshine Canyon. The trench is approximately 200 feet long and is located across the access roadway near the southeast toe of the inactive landfill. This system is part of a comprehensive groundwater monitoring system (recognized by LARWQCB Board Order No. 87-158) implemented for the existing inactive landfill. This trench also serves to intercept drainage from the County Landfill. Subject to Waste Discharge Requirements (WDRs), liquids can be subsequently used onsite for landscape irrigation, dust control, or other nonemergency uses.

It is anticipated that the proposed City/County Landfill would not impact imported drinking water or domestically produced drinking water (e.g., from local area wells) since the nearest spreading ground is the Hansen Spreading Ground located approximately 5 miles southeast of the project site. No impacts on this spreading ground are anticipated as a result of project development. In addition, surface water runoff from the project site is safely conveyed into the City's flood control system, which connects with the County's flood control system. No significant impacts to beneficial uses of groundwater of the San Fernando Groundwater Basin would occur as a result of the development of the proposed City/County Landfill.

Topical Issue 7: Groundwater Protection

> *Questions have been raised regarding whether the monitoring systems required for the proposed City/County Landfill would be sufficient to ensure groundwater protection.*

Response

The LARWQCB reviews and revises WDRs for all Class III sites (including the inactive City Landfill) to ensure consistency with revised CCR, Title 23, Chapter 15, which requires upgrading of groundwater monitoring systems to identify water quality degradation. Article 5 of Chapter 15, adopted in 1991, specifies new guidelines for the siting of groundwater monitoring wells around all active landfills. In addition, the U.S.

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[11]/ *Hydrology of Sunshine Canyon North Valley Landfill Site*, Robert T. Bean, Consulting Geologist. Unpublished report, July 28, 1978.

Environmental Protection Agency (USEPA) issued 40 Code of Federal Regulations (CFR), Parts 257 and 258, "Subtitle D" (or Solid Waste Disposal Facility Criteria) in 1991, which uniformly applies additional requirements to landfill operators. The LARWQCB adopted Order No. 93-062 in September 1993, which requires all regional landfills to comply with these federal regulations.[12] In July 1997, the above regulations were incorporated into CCR, Title 27, Chapter 3, Subchapter 3, Article 1, SWRCB-Water Quality Monitoring and Response Programs for Solid Waste Management Units.

The LARWQCB also administers the Solid Waste Assessment Test (SWAT) Program pursuant to the California Water Code (CWC) §13273, which requires owners of active or inactive nonhazardous landfills to evaluate possible migration of hazardous wastes or leachate from each facility. In addition to requiring site evaluations, the SWAT Program provides deadlines for implementation of water quality monitoring systems at active solid waste disposal sites, requires water quality monitoring systems at many closed solid waste landfill sites that previously had none, and requires identification of leaking sites for verification monitoring or remedial actions under CCR, Title 27, §20385. Upon approval by the LARWQCB, landfill operators must collect groundwater monitoring data during four consecutive quarters and submit that data in a SWAT report. SWAT reports must include an analysis of both surface and groundwater on, under, and within a 1-mile radius of the landfill site.

Currently, 22 groundwater monitoring wells are installed at the project site to monitor groundwater conditions and water quality. Both shallow and deep groundwater monitoring wells have been installed. The shallow wells are screened exclusively within alluvial material and bedrock to properly evaluate and compare groundwater quality upgradient and downgradient in similar geologic formations. Upgradient wells were installed and designed to monitor natural groundwater conditions present within the water-bearing strata. These wells are intended to supplement monitoring of groundwater conditions around the perimeter of the existing landfill and to monitor for possible offsite pollution migration. Downgradient wells (i.e., deep monitoring wells) were installed to monitor potential impacts resulting from the existing inactive landfill. Of the 22 wells installed, 13 specifically monitor groundwater downgradient from the existing landfill. The County Landfill is hydrogeologically upgradient of the existing inactive landfill.

In addition to groundwater monitoring wells, the vadose zone is also monitored. This zone is defined as the area below the landfill and above groundwater where water may be present or suspended in the weathered bedrock or soil. The presence or absence of this water has historically been monitored at the City Landfill through the use of lysimeters, which are special monitoring points designed to permit the collection of water that may be in the pores of the soil or weathered bedrock above the groundwater zone. These wells are shown in the Draft SEIR, Figure 4.3-4.

Currently, vadose zone monitoring is accomplished by four lysimeters that have been installed in the vadose zone of the existing inactive City Landfill. Quarterly monitoring records (since lysimeter installation) have indicated that no liquid can generally be collected from the lysimeters. Monitoring of the vadose zone is also conducted using a series of gas sampling probes installed around the waste mass. These probes are monitored on a monthly basis for the presence of LFG as required by the SCAQMD. One groundwater sample is collected in one of the probes exhibiting the highest LFG concentration, as required by the SCAQMD. Monitoring at the County Landfill is accomplished by sampling the underdrain system outfall points instead

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[12]/ *Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties,* California Regional Water Quality Control Board, Los Angeles Region (4), p. 4-10. Adopted June 13, 1994.

of lysimeters. For both areas, sampling is performed quarterly and findings are reported to the LARWQCB. This would also occur for the City/County Landfill.

As indicated in Topical Issue 6, any possibility for groundwater migration has been effectively cut off since the installation of the groundwater extraction trench across the bottom of Sunshine Canyon. The trench is approximately 200 feet long and is located across the access roadway near the southeast toe of the inactive landfill. This system is part of a comprehensive groundwater monitoring system (recognized by LARWQCB Board Order No. 87-158) implemented for the existing inactive landfill. This trench also serves to intercept drainage from the County Landfill. Subject to WDRs, liquids can be subsequently used onsite for landscape irrigation, dust control, or other nonemergency uses.

With the implementation of City Mitigation Measures identified in the Draft SEIR, Section 4.3.2, Groundwater, pp. 4-135 and 4-136, and the design and installation of the comprehensive monitoring system (described above), no significant impacts to the beneficial groundwater uses of the San Fernando Valley Groundwater Basin would occur.

Topical Issue 8: Landfill Liner Design

> *Concerns have been raised that the proposed design for the landfill liner system would not provide sufficient protection against the degradation of existing groundwater resources.*

Response

As stated in City Mitigation Measures identified in the Draft SEIR, Section 4.3.2, Groundwater, p. 4-135, in compliance with the Resource Conservation and Recovery Act (RCRA), Subtitle D, 40 CFR, Part 258, Subpart D, §258.40 (Design Criteria), the proposed development of the City/County Landfill would include the installation of a composite liner system. This liner system would consist of two components: (1) the upper component shall consist of a minimum 30-mil-thick flexible membrane liner (FML), and (2) the lower component shall consist of a low-permeability soil layer equivalent to at least a 2-foot-thick layer of compacted low-permeability soil with a hydraulic conductivity of no more than 1×10^{-7} centimeters per second. If an FML component consisting of high-density polyethylene is used, it would be at least 60 mils thick. If a thinner soil barrier layer of lower permeability is used, it would have equal or superior containment capability. The FML component would be installed in direct and uniform contact with the underlying low-permeability soil component. In addition, the landfill would have an LCRS consisting of either a minimum 1-foot-thick granular layer or a geosynthetic alternative with an equivalent flow capacity and a minimum 2-foot-thick protective soil cover over which refuse will be placed. There would also be a protective toe berm at the landfill terminus.

In accordance with RCRA Subtitle D, 40 CFR, Part 258, the composite liner system will be placed under the entire landfill footprint, including the canyon bottom and side slopes. Design details of each site-specific liner system will be described in the project proponent's Report of Waste Discharge (ROWD) for the landfill facility. The liner systems will be constructed and field tested in accordance with strict QA/QC procedures submitted to and approved by the LARWQCB prior to construction.

Areas of natural groundwater seepage will be intercepted by the installation of a subgrade gravel drainage blanket. A series of underdrains will be placed in areas where seeps and springs have been identified and will

collect and convey any water from these sources to the sedimentation basin. The nature and source of the seep will be investigated including sampling and laboratory testing.

With the proper installation of the proposed liner system, no significant impacts on groundwater resources are anticipated with development of the proposed project.

Topical Issue 9: Leachate Generation, Collection, and Treatment

Concerns have been raised that the proposed City/County Landfill would result in substantial leachate generation, which could result in surface or groundwater contamination.

Response

The potential for leachate to form when water passes through deposited waste could occur if excess water use or water spreading for irrigation or dust control or rainfall results at the proposed landfill. Leachate generation rates are primarily dependent on the amount of liquid the waste originally contained and the quantity of precipitation that enters the landfill through the cover and falls directly into the waste. The chemical characteristics of the leachate will be affected by the biological decomposition of biodegradable organic materials, chemical oxidation processes, and dissolving organic and inorganic materials in the waste. The leachate's chemical composition will change as the proposed landfill goes through the various phases of decomposition, similar to the changes that occur in LFG production.

In order to determine the amount of leachate that the proposed City/County Landfill would generate, an engineering model called Hydrologic Evaluation of Landfill Performance (HELP) was used. HELP is a hydrologic model of water movement across, into, through, and out of the landfill. The HELP model predicted leachate quantities based on observations of empirical data and was used as the basis for a conservative design of the LCRS. That design also predicts the maximum estimates of leachate production after closure of the proposed project.[13] HELP facilitates the estimation of surface runoff, drainage, and leachate production that might develop as a result of landfilling operations using a wide variety of landfill designs. The model uses climatic soil and design data to simulate the effects of hydrologic processes, including precipitation, surface storage, runon, runoff, infiltration, percolation, evapotranspiration, soil moisture storage, and lateral drainage. A landfill system includes various combinations of vegetation, cover soils, waste cells, special drainage layers, impermeable barrier soils, synthetic membrane covers, and liners that can be modeled with HELP.

Based on local average precipitation data, combined with the assumptions of an operating landfill designed with interim covers in place, the HELP model indicated that approximately 5.2 to 9.2 inches of precipitation may percolate through the landfill in 1 year. It is anticipated that after closure, and with an engineered final cover placed on the landfill, only minimal amounts of precipitation would percolate through the landfill in 1 year.[14] The steeper slopes of the City/County Landfill would be built with surface drainage systems that would not be subject to significant percolation due to the rapid rate of surface water runoff. As such, the major contributor of percolation is expected to be the top deck surface area of the landfill, which is relatively

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[13]/ *Report of Disposal Site Information, Proposed Sunshine Canyon Landfill Extension Site*, Volume I, PRA Group, p. 70. August 16, 1991.

[14]/ Ibid., p. 72.

flat. Preliminary design of the project site indicated that infiltration would be lessened by reducing the area of percolation in the canyon.

With regard to the long-term contamination potential of a "typical" landfill permitted to accept municipal solid waste, an extensive review of published material conclusively demonstrated that landfill leachate possesses a trend of decreasing pollution loads over time.[15] Observed studies show that key leachate indicators (e.g., total organic carbon, chemical oxygen demand, biological oxygen demand, and leachate concentration) substantially decrease in concentration relative to an initial value and eventually, upon landfill closure, stabilize both chemically and biodegradably.

For the proposed project, the HELP model projected the amount of leachate generation expected to occur. Additional modeling for the proposed City/County Landfill is anticipated to be performed during preparation of its ROWD. It was estimated by using the HELP model that the County Landfill had an estimated leachate production rate of 120 gallons per minute (gpm). No leachate has been detected in the groundwater monitoring wells at the County Landfill, and all extracted, treated alluvial groundwater has been approved for onsite irrigation and dust control use by the LARWQCB.

To address potential environmental impacts resulting from leachate formation, the proposed City/County Landfill is mandated by State and federal laws to install an LCRS. The LCRS will be installed on top of the liner system in all areas of the proposed landfill footprint including side slope and waste-on-waste areas of the existing inactive City Landfill. This system will be constructed, maintained, and operated to collect and remove twice the maximum anticipated daily volume of leachate from the landfill. The LCRS will be designed of sufficient strength and thickness to withstand pressures exerted by overlying wastes, waste cover materials, and equipment used during landfilling activities. The LCRS will also be designed and constructed pursuant to 40 CFR, Part 258, and in accordance with CCR, Title 27, §20340.

The LCRS will be of the blanket type and overlay the FML, and it will collect and direct the intercepted leachate toward leachate sumps where it will be collected and removed from beneath the waste. The blanket system will be sloped toward the sumps to prevent ponding of leachate. The proposed LCRS drainage network will be designed and engineered to withstand the potential effects of seismic events. The HDPE pipe selected for the proposed LCRS drainage network will have the ability to deform (be flexible) without leakage during potentially strong earthquakes.

In addition to design features described above, operational practices will be performed by the landfill operator to minimize leachate generation. These include diverting stormwater runon around the landfill, diverting surface water runoff away from active landfilling areas, minimizing the size of the landfill working face area, compacting disposed waste to decrease its permeability and increase its ability to shed water, grading the landfill surface away from active landfill areas, and applying daily, intermediate, and final cover material to minimize moisture infiltration into the waste mass. Additionally, the proposed City/County Landfill will not accept liquid wastes or wastes with high-moisture content (i.e., wastes containing greater than 50 percent water by weight).

Leachate collected by the LCRS would be directed by gravity to sumps and then discharged to a leachate transmission pipeline for conveyance to a storage tank at the leachate treatment facility. The flow capacity

[15]/ M. Reinhard, Ph.D., Stanford University. Unpublished letter to Purcell, Rhoades & Associates, December 21, 1987.

of the pipeline would exceed anticipated leachate flow rates. The leachate volume and its characteristics would be monitored closely at the storage tank by periodic sampling and analysis.

A description of the components of the leachate treatment system is provided in the Draft SEIR, Section 2.7.4, Leachate Collection and Removal System, p. 2-61. This system includes air stripping and carbon-bed filtration treatment processes. Leachate treatment processes would be conducted in accordance with applicable permit conditions of the LARWQCB.

The leachate treatment system would be similar to the one currently in place at the operational County Landfill. Recovered leachate would be pumped to a condensate holding tank. From this tank, the leachate would be air stripped and carbon bed polished to remove chemical impurities. Air stripping removes the majority of VOCs from leachate by moving air through the collected liquid. Carbon is then added to "polish" the liquid and remove any remaining low-level VOCs. Treated liquids would then be stored in one of two treated handling tanks. Effluent from the leachate treatment facility would be sampled and tested for contaminants, and a bioassay test would be conducted. After completion of these tests, if it is acceptable, treated liquids would be used for irrigation or dust control. Approval for the reuse of treated liquids at the proposed City/County Landfill would be obtained from the LARWQCB.

The project site is also located in a relatively dry area (average annual rainfall is estimated at approximately 10 inches);[16] a typical rainstorm has a short duration and high intensity. Rainfall would tend to run off the landfill surface and not infiltrate the surface area, minimizing the potential for leachate formation.

It is anticipated that the design and operational characteristics of the proposed landfill, the installation of numerous environmental protection and control systems, and the continuous monitoring during landfilling operations and the closure and postclosure maintenance period will ensure the integrity of groundwater resources within Sunshine Canyon. It is not expected that this resource would be impacted by the proposed project development.

With the implementation of City Mitigation Measures identified in the Draft SEIR, Section 4.3.2, Groundwater, pp. 4-135 and 4-136, for leachate generation, no significant impacts would occur.

Topical Issue 10: Sensitive Biological Habitats

> *Statements have been made that the removal of Venturan coastal sage scrub at the site would result in unavoidable significant impacts on endangered and sensitive animal species.*

Response

The dominant natural plant community within the project site is Venturan coastal sage scrub. This community comprises 149.1 acres in the City and 10.9 acres in the County. Venturan coastal sage scrub occurs north, east, and south of the existing City Landfill on exposed slopes and is dominated by California sagebrush (*Artemisia californa)*, California buckwheat (*Eriogonum fasciculatum),* thick-leaved yerba santa (*Eriodicytyon crassifolium),* black sage *(Salvia mellifera),* and white sage *(Salvia apiana).* Other plant species

[16]/ Based on County Department of Public Works Oat Mountain Hydrologic Map (1969), closest 50-year isohyet (maximum 24-hour amount) located within project site boundary.

occurring in this community include Mexican elderberry (*Sambucus mexicana*), sudweed aster (*Lessingia filaginifolia),* pinebush *(Ericameria pinifolia),* and Our Lord's candle (*Yucca whipplei*).

This habitat is one of four sensitive habitats found within the project site. Venturan coastal sage scrub is ranked "highly threatened" by the California Natural Diversity Data Base (CNDDB) because of development pressures. The CNDDB ranks this community as S2.1, which means this community has between 21 to 100 viable occurrences or covers between 4,000 to 20,000 hectares (i.e., 9,884 to 49,420 acres) in California. In addition, high numbers of rare species are found within this community.

The development of the proposed City/County Landfill within the City portion of Sunshine Canyon would result in the direct loss of approximately 82.2 acres of Venturan coastal sage scrub habitat and resulting loss of small mammals, reptiles, amphibians, and other small animals of slow mobility. This impact is considered significant. More mobile wildlife species would be forced to move into remaining areas of open space or other habitats.

The California Department of Fish and Game (CDFG) has identified a list of Species of Special Concern (SSC). Several SSCs were located during field surveys or have the potential to occur onsite; refer to the Draft SEIR, Table 4.4-4, p. 4-159, for a status of sensitive wildlife species.

Suitable habitat exists within the Venturan coastal sage scrub habitat for the California gnatcatcher *(Polioptila californica californica)* that is federally listed as threatened and is an SSC. The California gnatcatcher has restricted habitat requirements, consisting of coastal sage scrub dominated by coastal sagebrush and generally occurring below 750 feet in elevation in coastal regions and below 1,500 feet in elevation in inland locations (Atwood and Boisinger, 1992). Although the species was not observed during numerous field surveys conducted onsite, the project site is located within this species' historic geographical range; consequently, the species could possibly move onsite prior to project implementation. Mitigation measures are proposed to reduce impacts on the California gnatcatcher to a less than significant level. Surveys for the California gnatcatcher will be conducted prior to obtaining grading permits to determine the status of the species within the proposed development areas. If grading activities occur during the nesting season, a federally permitted biologist will survey areas to determine whether the species is present. If gnatcatchers are present, grading activities will cease until proper officials are notified, and additional habitat restoration or purchase of suitable offsite habitat will be required.

The existing Venturan coastal sage scrub provides suitable habitat for reptiles. The San Diego horned lizard (*Phrynosoma coronatum blainvillei)* is located within this habitat and is considered threatened. Impacts on this species are considered significant. Restoration of the coastal sage scrub habitat is proposed to mitigate impacts to a level of less than significant. Although removal of habitat will create a temporal loss of the species, it is anticipated that populations should recover following restoration. Topsoil that is friable will be selected to suit lizard habitat requirements. In addition, the coastal western whiptail (*Cnemidophorus tigris multiscutatus)* was also observed onsite. Because this species is fairly common regionally, impacts on this species are considered adverse but not significant. (Although not considered sensitive by State or federal resource agencies, it is considered locally rare in southwestern California and was recently included as a Candidate 2 species for federal listing.) Suitable habitat is also present for the silvery legless lizard *(Aneilla pulchra pulchra),* considered an SSC, and the coastal rosy boa *(Lichanura trivirgata roseofusca).* Because suitable habitats are available in the vicinity of the project site, impacts on these species are considered adverse but not significant.

The removal of Venturan coastal sage scrub would also affect the following SSC bird species that were observed onsite and could potentially breed onsite: Southern California rufous-crowned sparrow (*Aimophilia ruficeps canescens)* and loggerhead shrike *(Lanius ludovicianus)*. Because suitable habitat exists for these species in the vicinity of the project site, impacts on these species are considered adverse but not significant. The Bell's sage sparrow (*Amphispiza belli belli)* and coastal cactus wren (*Campylorhynchus brunneicappillus)* were not present onsite during breeding bird surveys conducted in 1995. Although suitable habitat is present, the potential for these species to occur onsite is low. Potential impacts on these species as a result of project implementation are considered less than significant.

Coastal sage scrub habitat also provides winter foraging habitat for the northern harrier (*Circus cyaneus)* (SSC), which was observed on the adjacent site. The prairie falcon (*Falco mexicanus)* (SSC) was also observed onsite. The golden eagle (*Aquila chrysaetos)* is a California Fully Protected Species, an SSC, and protected by the federal Bald Eagle Act. A golden eagle was observed onsite during previous field surveys. Because of the large amount of foraging habitat available for this raptor species in the vicinity of the site, impacts on raptor foraging habitat are not significant. If habitat removal is proposed during the raptor breeding season (i.e., March to July), a survey will be conducted for active nesting areas. If active nests are found, no construction activities will occur within 500 feet of an active nest until the young have fledged. The 500-foot perimeter around each nest will be fenced. Trees containing nests will only be removed during the nonbreeding season.

Proposed project mitigation includes the restoration of Venturan coastal sage scrub onsite, and this will include a detailed conceptual mitigation plan containing information on planting, maintaining, and monitoring revegetated coastal sage scrub habitat. The implementation of this plan will provide greater than a 1:1 (replacement: removal) ratio to offset loss of habitat. Surface soils and seed sources of Venturan coastal sage scrub will be gathered from areas of the project site and spread within onsite mitigation areas.

After the incorporation of the City Mitigation Measures identified in the Draft SEIR, Section 4.4.1, Vegetation and Wildlife Habitat Assessment, pp. 4-179 through 4-181, no significant impacts on endangered and sensitive animal species due to the removal of Venturan coastal sage scrub would occur.

Topical Issue 11: Oak Trees and Douglas Fir Trees

> *Questions have been raised regarding why the project proponent would perform offsite rather than onsite big-cone Douglas fir and oak tree mitigation for those resources that would be disturbed within Sunshine Canyon.*

Response

Both onsite and offsite planting areas are being proposed for big-cone Douglas fir and oak tree mitigation by the project proponent. The proposed project (including closure activities) would result in the direct loss of 545 coast live oak trees *(Quercus agrifolia)*, 19 canyon live oak trees (*Quercus chrysolepis*), and 2.7 acres of small isolated patches of big-cone Douglas fir (*Pseudotsuga macrocarpa)* found within the proposed landfill footprint.

Direct project impacts on these resources will be mitigated to the greatest extent possible by implementing replanting programs and performing phased restoration on the landfill site. Mitigation tree planting will primarily occur within O'Melveny Park and the ±100 acre open-space area located south of the existing

landfill. The open-space area is to be maintained as open space as part of the original City approval of the inactive City Landfill. Walnut and oak trees will be planted in suitable barren portions of the open-space area between the existing City Landfill and Granada Hills, O'Melveny Park, in East Canyon, and on the canyon ridge areas above the clearing limits. Sycamores and willows will be planted along Bee Canyon and East Canyon Creek. Appropriate planting locations will be selected based on soil types, steepness of the slope, and aspect (i.e., location and or direction of the sun). Mitigation measures will comply with the City's Oak Tree Ordinance.

City Mitigation Measures for the loss of oak tree resources will comply with the Los Angeles City Oak Tree Ordinance and include replanting native trees at a 2:1 (replacement:removal) ratio, consisting of 15-gallon or a 5:1 ratio of 3-gallon container trees. Mitigation trees will be planted prior to removal of impacted trees, and all mitigation trees will need to be specimen size within 1 year after tree removal. A specimen tree is defined as a 15-gallon tree with a minimum trunk caliper of 1 inch measured 1 foot above the ground. A total of one hundred 24-inch box and twenty-five 36-inch box size coast live oak trees shall be planted in areas identified by the City. The trees planted will be required to be in natural form. The total mitigation tree count obtained using the 5:1 replacement ratio will be reduced by 125 trees to account for the inclusion of these larger trees. To assure successful establishment and survival of the mitigation trees, a 3-year monitoring and maintenance program will be implemented. Each year, the mitigation planting will be monitored for growth and survival.

Native tree seed stock will be obtained from the onsite plant materials center (i.e., nursery). The center will include a greenhouse and shade house that will be used for the germination of native tree seed stock (e.g., coast live oak, canyon live oak, big-cone Douglas fir, sycamore, maple, and black walnut) and native vegetation gathered in and around the Sunshine Canyon area. Once germinated, these species will be used as part of the revegetation programs within Sunshine Canyon.

The existing nursery (located in the City) is recognized as one of the largest growers of coast live oak trees in the Southern California region. The project proponent, in conjunction with its consulting forester, has advanced the growing techniques for both the coast live oak and the big-cone Douglas fir tree species. A cooperative research program is established at this nursery with Oregon State University, Department of Forest Sciences. Future onsite revegetation programs that are being proposed will be established in cooperation with the City's Chief Forester (Street Tree Division). The current tree planting and mitigation program at the existing City Landfill is achieving a near 90-percent average success rate, and trees planted in the open-space area are increasing in height by 6 inches or more per month.

After the incorporation of City Mitigation Measures for Douglas firs and oak trees identified in the Draft SEIR, Section 4.4.3, Native and Nonnative Tree Resources, pp. 4-197 and 4-198, no significant impacts on these resources would occur.

Topical Issue 12: Wetlands

Questions have been raised regarding why the project proponent would perform offsite rather than onsite wetlands mitigation for impacts on resources that would be disturbed within Sunshine Canyon.

Response

Onsite mitigation for the loss of wetlands is not practical due to unsuitable conditions for establishing both wetlands and riparian habitats. As a result of this determination, the project proponent will provide mitigation that will result in no net loss of wetland habitat.

Development of the City/County Landfill would remove both wetland and riparian habitats from the project site. It is expected that the streamzones and wetland areas located within the proposed landfill footprint and some areas external to those areas (i.e., used for ancillary facilities) would be graded, filled, or disturbed as a result of landfill development. Grading of the site would occur in phases as dictated by the need for additional landfill footprint area. Because the landfill would remain indefinitely (as a constructed fill area), wetland habitats would not be reestablished within these areas.

Potential candidate mitigation sites have been identified by the project proponent in conjunction with resource agencies to compensate for impacts on riparian and wetland resources. These sites include Bull Creek, Bee Canyon, and East Canyon, which are located either adjacent to or in proximity to the project site. If neither of these potential candidate sites are available, the project proponent will purchase wetland credit through an established mitigation bank (one that is already established by a developer, public, nonprofit, or private entity) in consultation with regulatory agencies as compensatory mitigation for impacts on wetland and riparian resources.

After the incorporation of City Mitigation Measures for wetlands identified within the Draft SEIR, Section 4.4.2, Wetlands and Riparian Habitat, pp. 4-189 through 4-191, no significant impacts on this resource would occur.

Topical Issue 13: Closure of Existing Inactive City Landfill

> *Questions have been raised regarding the required closure of the existing inactive City Landfill, and revegetation activities.*

Response

Pursuant to CCR, Title 27, §21090, as part of landfill closure, final cover is required to be placed on a landfill's top slopes, side slopes, and bench areas. For closure of the existing inactive City Landfill, the proposed final cover would be an engineered equivalent of the required final cover. The ability to utilize an engineered equivalent to the required final cover for landfill closure is discussed in CCR, Title 27, §21090, which states:

> The RWQCB can allow any alternative final cover design that it finds will continue to isolate the waste in the Unit from precipitation and irrigation waters at least as well as would a final cover built in accordance with applicable prescriptive standards. . .

The proposed engineered equivalent of the required final cover for closure of the existing inactive City Landfill, would consist of a monolithic soil layer relying on evapotranspiration and unsaturated permeability to control water infiltration. The vegetative layer would be placed on top of the final cover on those portions of the landfill's top slopes, side slopes, and bench areas that are not part of the proposed City/County Landfill

project design. Vegetative cover would be placed on an estimated ±125 acres of the ±205 acre existing inactive City Landfill.

The vegetative layer would provide long-term erosion control caused by potential surface water runoff. When revegetated, a permanent grass and legume cover will provide an effective means to control fugitive dust emissions. Selected plant species would be chosen for rapid establishment. Due to the existing terrain, the seed mix chosen would be comprised of shallow-rooted (less than 12 inches) drought- and pH-tolerant plants. Native and nonnative seed mix would be applied. It is anticipated that the vegetation cover soil would eventually evolve into a mosaic of shrubs interspersed with annual grasslands. Once established, selected plant species are intended to be self-propagating and not require excessive irrigation or long-term maintenance.

To ensure successful revegetation, a 3-year monitoring and maintenance program would be implemented. Periodically, revegetated areas would be monitored for growth and survival rates. A maintenance and monitoring program would be implemented during the 30-year postclosure maintenance period.

A ±100 acre open-space area is located southeast of the existing inactive landfill within the City jurisdiction. This area is maintained as open space and will be enhanced by the project proponent with additional natural vegetation to promote wildlife in this area. Appropriate planting locations will be selected within this area based on soils, slope steepness, and aspect. The external abutting slopes and peaks of the inactive landfill site will remain undisturbed. The upper portions of the ridgeline (i.e., 50 vertical feet below the ridgeline) will also be left undisturbed. The upper perimeter ridges of the inactive City Landfill will be planted with native trees (following the approval of the final closure and postclosure maintenance plan [FCPMP] by the City LEA) in order to minimize visibility of the inactive landfill and proposed City/County Landfill.

For the proposed project, the project proponent proposes that the City/County Landfill would be planted with a variety of trees, shrubs, and grasslands to provide wildlife habitats. As operating landfill areas are completed, it is proposed that the finished slope will be covered with both amended soil and recycled green waste material. These materials will be placed on the front surfaces of slopes after they have received an impermeable seal. As soils are added, amendments would be included to balance any unsuitable characteristics such as acidity (pH). Fertilizers would be added at the time of soil placement and continued as part of the project proponent's ongoing maintenance program. This soil cover will provide rooting material for the final vegetation. The project proponent also proposes that revegetation would take place concurrently with filling operations as the landfill progresses up the canyon; only the active filling areas and other operational areas of landfill would not be vegetated. The remainder of the inactive disturbed areas onsite would be planted with either temporary vegetation (on areas that remain inactive for a period longer than 180 days) or permanent vegetation.

Revegetation of slopes and fill areas with appropriate native flora will be accomplished to support local fauna. As part of the proposed revegetation plan, the reestablishment of vegetation will focus on using native species from local seed sources. Nonnative species may be used only if it is approved by the consulting biologists for areas where quick cover or a nurse crop is needed and would be removed later if appropriate. Replacement cover material will be obtained from within Sunshine Canyon to retain soil composition compatible with native flora and leave the surrounding topography undisturbed.

Topical Issue 14: Noise

Concerns have been raised that the proposed City/County Landfill operations would create significant noise impacts on sensitive receptors within the area.

Response

During construction, the nearest residential unit (located 1,700 feet southwest of the nearest point of the construction area onsite) would be exposed to a noise level of 54 decibels on an A-weighted scale (dBA). Because the existing ambient noise level near the closest receptor is 52.4 dBA, a construction noise increase to 54 dBA at that location would not be a perceptible audible increase and therefore is not significant. In 1995, noise readings were taken at five different locations in proximity to the landfill to determine existing ambient noise levels. The proposed City/County Landfill would not significantly impact existing ambient noise levels at any of the selected noise reading locations.

The noise generated from landfilling operations is expected to be similar to the noise produced during construction activities because construction and landfilling activities would use the same types of equipment. The noise emanating from the inactive City Landfill (associated with routine maintenance) is not audible to the residential developments located south of the project site unless the maintenance equipment is operating near the top deck area of this landfill. All operational activity related to the proposed project would take place within the boundaries of the project site and well below existing perimeter ridgelines. Therefore, any sound emanating from landfilling operations would be effectively blocked by the existing landfill, intervening terrain, and the existing landscaped berm near the ±100 acre open-space area. Any landfill operation noise that may be audible at the trailers located across from the landfill entrance would be attenuated by the extended distance and masked by existing noise from the I-5 Freeway, railroad, and wood- chopping business. Therefore, any potential new noise sources associated with landfill operations would be from increased truck traffic proximal to the trailers.

Any additional increases in traffic-generated noise would be largely masked by traffic traveling on the I-5 Freeway. Ambient noise increase due to the proposed project near the trailers located across San Fernando Road is only projected to increase by about 1 dBA. When additional ambient noises are considered (e.g., the railroad and existing firewood chopping operation), the community noise equivalent level (CNEL) increase would be further reduced. Based on the presented significance criteria (i.e., City Noise Ordinance), a noise impact is considered significant when it exceeds a 3-dBA CNEL increase; therefore, project-generated traffic would not result in a significant noise increase at this location.

With the incorporation of City Mitigation Measures for noise identified in the Draft SEIR, Section 4.5.2, Operational Noise Impacts, p. 4-220, no significant impacts would occur.

Topical Issue 15: Land Use

Comments have been made that the proposed City/County Landfill would not be consistent with the Granada Hills-Knollwood Community Plan.

Response

Development of the proposed City/County Landfill would require an amendment to the *Granada Hills-Knollwood Community Plan* from Open Space to Heavy Industrial and a zone change from A1-1-O to M3-1-O. A portion of the proposed City/County Landfill, comprising ±42 acres, is already authorized in the County portion of Sunshine Canyon under existing County General Plan and zoning designations. The majority of acreage within the City portion of Sunshine Canyon is substantially disturbed from previous landfilling operations that occurred from 1958 to 1991.

Development of the proposed City/County Landfill would have minimal impacts on adjacent land uses. The operational County Landfill is located northwest of the proposed landfill footprint area. Other surrounding uses include open space to the north and west, gas storage fields to the west, an oil field to the southwest, and several freeways to the north and east of the project site. The nearest residential dwelling in Granada Hills is located approximately 1,700 feet from the proposed landfill footprint area. An existing ridgeline and a ±100 acre open-space area separate these uses. The existing perimeter ridgeline separates O'Melveny Park to the southwest, effectively blocking views from ground-level, park-related uses. Trailers and industrial uses located across San Fernando Road to the east are 700 feet from the proposed landfill footprint area. These uses would not have views of proposed landfill operations.

In addition, landfill operations would be regularly monitored by City, State, regional, and federal agencies for compliance with conditions of approval. There is a caretaker onsite 24 hours a day, and the telephone numbers of the District Manager of the landfill and SCAQMD are posted to immediately resolve any concerns due to landfill operations.

Following the direction of City staff, the project proponent is pursuing a General Plan Amendment/Zone Change (GPA/ZC) to accommodate the operation of a landfill facility. Maintaining the current Open Space designation on the project site would be inconsistent with future heavy-construction activities that must occur as part of State-mandated closure and postclosure maintenance (and the implementation of the FCPMP) of the existing inactive City Landfill. In addition, maintaining the *Granada Hills-Knollwood Community Plan* Open Space designation for the site would not be compatible with the adjoining operational County Landfill. Implementation of a GPA/ZC would also remedy these existing inconsistencies.

Several of the *Granada Hills-Knollwood Community Plan* objectives would be achieved through designating a facility to provide disposal capacity to meet the needs of the City's population and by preserving the ridgelines that surround the landfill (e.g., objectives 1, 2, 7, 8, and 10). The *Citywide General Plan Framework* goals would be achieved by providing adequate disposal capacity, ensuring an environmentally sound and cost-effective solid waste management system, creating job opportunities, and preserving the existing perimeter ridgelines (e.g., goals 3A, 3F, 6A, 9F, 9G, and 9H). In addition, development of the proposed City/County Landfill would conform to the criteria stated in the *City-Collected Refuse Disposal Plan*.

The proposed landfill would also implement the solid waste management goals and policies of the City and County of Los Angeles by providing needed solid waste disposal capacity within the County. These solid waste management plans include *Solid Waste Management Status and Disposal Options in Los Angeles County, Los Angeles County Solid Waste Management Action Plan, City of Los Angeles Solid Waste Management Action Plan, City of Los Angeles Solid Waste Management Plan, City of Los Angeles Solid Waste Management Policy Plan, City of Los Angeles Source Reduction and Recycling Element, Integrated*

Solid Waste Management System for Los Angeles County, Los Angeles County Source Reduction and Recycling Element, Los Angeles County Countywide Integrated Waste Management Plan, and *Los Angeles County Countywide Siting Element.*

Topical Issue 16: Hazardous Materials

Comments have been raised that the proposed City/County Landfill would have the potential to accept hazardous waste materials, thereby resulting in risk-of-upset conditions.

Response

The proposed project will be designed as a Class III nonhazardous solid waste landfill facility. No hazardous, acutely hazardous, radioactive, infectious medical, or liquid wastes will be accepted at this facility. The project proponent will implement a hazardous waste load-checking program at the project site similar to the program that currently exists at the operational County Landfill. This program will include employees visually inspecting incoming waste-hauling loads at the scale house area and using remote television monitors to inspect incoming rolloff-type loads and open-top vehicles. Radiation-detecting devices and sensors capable of detecting VOCs will also be used at the scale house area to prevent the unauthorized disposal of hazardous waste materials.

Hazardous waste load checks at the proposed City/County Landfill will be 1.5 load checks per 1,000 tons of solid waste received at the landfill for the first year of operation. However, after the first year of operation, BFI may request that the City LEA decrease the required load checking frequency to one load check per 1,000 tons of waste received at the City/County Landfill. Solid waste would be unloaded in a segregated (isolated) area of the landfill site for visual inspection. For each load inspected, the following information will be recorded by the landfill employees: (1) date and time of load check, (2) name and telephone number of hauling firm, (3) license plate number of vehicle, (4) driver's name and license number, (5) source and type of waste, and (6) the type and amounts of any hazardous wastes found. Workers trained to identify hazardous waste materials will inspect the unloaded wastes to see if they contain any hazardous wastes.

During random load checks, unacceptable wastes that are safe to handle will be picked out of the waste stream and placed in a sealed holding bin that is currently located adjacent to the landfill access road south of the scale facilities. Material from this bin will be removed by a contracted hazardous waste hauler and replaced with an empty, sealed bin. If a hazardous waste that may pose a serious risk to facility workers or the public or if unidentifiable material (that may be hazardous) is discovered during random load checking by one of the spotters at the active working face, the area will be immediately cordoned off. The spotter will immediately notify a landfill supervisor via the use of a two-way radio, telephone, pager, or visual/verbal contact. A landfill supervisor will have the vehicle driver detained and inform the LEA inspector assigned to the landfill. In addition, the supervisor will call the California Environmental Protection Agency (Cal-EPA), Department of Toxic Substances Control (DTSC), to correctly identify the material and, if necessary, take preventive steps to guarantee the highest level of safety.

If the duty officer at the DTSC states that the material is safe to handle, the refuse will be removed and temporarily stored onsite. The project operator will obtain an identification number from Cal-EPA. All containers used for storage of hazardous waste material will be clearly marked to indicate the date of waste accumulation. A label will be placed on all nonstationary containers in which hazardous wastes are stored.

If the material has the potential to pose a serious threat to facility workers, waste haulers, or the public (e.g., radioactive or acutely hazardous material), the immediate project area will be evacuated, and a contracted hazardous waste hauler will be called to remove the material from the project site and transport it to a permitted Class I hazardous waste landfill. The landfill supervisor will then inform the City of Los Angeles Police Department (LAPD) and the County of Los Angeles Office of the District Attorney, Environmental Crimes Unit, so that proper criminal action can be taken. In addition, the City of Los Angeles Fire Department (LAFD), City of Los Angeles Department of Environmental Affairs, and the LARWQCB will be informed of the incident and all necessary reports completed.

The County Landfill operation currently has signs at the landfill entrance informing waste haulers that the facility is designated as a Class III nonhazardous landfill site. Signs inform waste haulers of the rules and regulations governing the disposal of hazardous waste.

It is expected that small amounts of household hazardous waste (HHW) would remain undetected and be disposed of at the proposed landfill. These wastes are generally inadvertently mixed in with residential solid wastes by residential customers. However, it should be noted that approximately 46 percent of all refuse entering the project site would be delivered via transfer trucks. These transfer trucks would haul residual (i.e., nonrecyclable) waste materials from transfer stations/material recovery facilities (MRFs). All transfer stations/MRFs have existing load-checking programs in place. At these facilities, HHW, if found, is manually sorted and picked out of the waste stream and disposed of properly. In some cases, this material can be recycled.

For those HHWs that are landfilled, environmental control systems (e.g., landfill liner, LCRS, and leachate treatment) will reduce this potential risk-of-upset conditions to a less than significant level. It is expected that any trace contaminants in the LCRS will be collected and removed through that system.

With the incorporation of City Mitigation Measures for hazardous materials identified in the Draft SEIR, Section 4.9.1, Hazardous Materials, pp. 4-296 and 4-297, no significant impacts would occur.

Topical Issue 17: Vector Prevention and Control

> *Comments have been raised that the proposed City/County Landfill would attract vectors and spread disease and litter offsite.*

Response

The proposed City/County Landfill has the potential to attract several different types of vectors to the project site. Certain types of vectors, such as rodents and insects, can be transported to the site via collection vehicles or self-haul trucks. Generally, the materials in curbside collection vehicles are continuously compacted prior to disposal at any facility, thus reducing live rodents. The residual solid waste materials from transfer stations/MRFs are also densely compacted into transfer trucks. These trucks are either enclosed or tarped prior to transport. General compaction densities would inhibit vector migration and destroy some existing vectors.

Effective operational procedures and quality assurance will be provided by the project proponent to ensure that the proper coverage of landfilled waste materials will be performed on a daily basis, similar to the existing County Landfill vector control practices. All waste materials brought to the site will be unloaded at

an active working face area, compacted, tarped, or covered with at least 9 inches of clean soil by the end of the working day. Refuse will be compacted within 1 hour of placement to approximately 1,400 pounds per cubic yard (cu. yd.). At this refuse density, potential food source or habitation for vectors will be significantly reduced.

Many items that would be stored and used at the landfill facilities (e.g., administrative and employee ancillary buildings) have the potential to attract vectors (e.g., food, seed, office supplies). These items will be stored in closed containers and within an enclosed structure. Containers will be inspected routinely and cleaned regularly to reduce vector attraction. In addition, insect breeding will be minimized by preventing the ponding of surface water at the project site.

By following such procedures, the project proponent will ensure that potential food sources for common scavenging birds, such as pigeons, crows, and sea gulls, will not result in potential impacts, such as food and other wastes being carried to nearby properties, as well as deposited feathers and excrement that could potentially support ticks, mites, lice, and fleas.

Additionally, flies will not create nuisances at the proposed green waste and wood waste recycling area. The Los Angeles County Sanitation Districts conducted a fly vector investigation using shredded green waste as daily cover during a short-term evaluation at the Scholl Canyon Landfill. This study was designed to evaluate whether green waste attracts or deters flies. Results of the study indicated that shredded green waste does not attract flies. With respect to the proposed project, all source-separated green and wood wastes proposed for acceptance at the project site will be processed within 24 hours by landfill personnel. This waste type (if approved) will be used as alternative daily cover material at the landfill working faces or tarped at the end of the day and subsequently used as soil amendment material for landfill revegetation, erosion prevention, and weed abatement programs.

All buildings, paved surfaces, landscaped areas, and perimeter areas will be inspected regularly for signs of vector activity. Any structural defects will be repaired following discovery or during routine maintenance inspections. This will help prevent the intrusion of any ground-dwelling rodents. Additionally, both landfill operations and onsite ancillary facilities will be inspected routinely by the LEA.

With the incorporation of City Mitigation Measures for vectors identified in the Draft SEIR, Section 4.9.2, Vectors, pp. 4-300 and 4-301, no significant impacts would occur.

Topical Issue 18: Litter Control

> *Comments have been made that the proposed City/County Landfill would result in substantial litter generation beyond the project site boundary and within the adjacent community.*

Response

Solid waste landfills have the potential to generate high volumes of litter. Litter generation can result in potential nuisance or aesthetic impacts. Sources of litter associated with operation of a landfill facility include waste materials blown from or dropped by refuse hauling vehicles, litter blown from the active working face by the wind or by the movement of landfill equipment, and unauthorized or illegal dumping. Generally, illegal dumping occurs throughout the City and County and primarily in rural or open space areas. In the past,

illegal dumping has occurred in proximity to the project site along Foothill Boulevard, within the community of Sylmar.

Because the project site is located in the eastern edge of the Santa Susana Mountains near the entrance of the Newhall Pass area, wind conditions could potentially transport litter offsite. The strongest winds generated within this area are during short-term episodes of Santa Ana wind conditions. During high wind conditions, the project site manager will designate confined and shielded portions of the landfill for disposal.

Currently, for the operational County Landfill, the project proponent uses an extensive litter control program with specific preventive and response measures to control windblown litter and debris onsite and, if necessary, within the vicinity of the landfill site. These measures include placing waste materials within confined working face areas, using proper compaction techniques and daily cover material, using portable litter fences adjacent to the daily operating area, and installing a 25-foot-high secondary litter fence along the southern boundary of the landfill's perimeter. In addition, the project proponent provides cleanup along San Fernando Road and its frontage road to the Roxford Street exit of the I-5 Freeway, Balboa Boulevard to Sesnon Boulevard, and within O'Melveny Park.

Once a week, or more frequently if required, the project proponent mobilizes cleanup crews to provide litter control pickup in areas surrounding the landfill site. These areas include O'Melveny Park, areas along Balboa Boulevard and San Fernando Road, and other areas in proximity to the landfill. In addition, and on a daily basis, landfill employees inspect the areas immediately adjacent to the landfill site to pick up litter, if necessary. Enforcement of litter control practices at the operational County Landfill is under the authority of the County of Los Angeles, Department of Health Services (County LEA).

Vehicles transporting waste loads to the project site that are not covered, as required by law, are also a contributor of onsite litter at the project site and within the general vicinity of the project area. Currently, haulers with uncovered waste loads are informed at the scale house area that all future waste loads must be tarped and covered. If a specific refuse hauler continues to bring solid waste to the project site in vehicles that are not fully covered, the project proponent has the option to refuse delivery of the load and will impose fines and/or surcharges upon the violating waste-hauling company.

Drivers of waste-hauling vehicles who violate the mandated tarping requirement are given a notice by the project proponent that states the following requirement:

> TARPING VEHICLE CODE REQUIREMENT: The following tarping vehicle code will be enforced at the Sunshine Canyon Landfill. First offenders will be warned a second time, and multiple offenders will be fined $100.00 per offense.

Additionally, in accordance with the California Vehicle Code (CVC), §23114(a), no vehicle shall be driven or moved on any highway unless the vehicle is constructed, covered, or loaded to prevent any of its contents from dropping, shifting, leaking, blowing, spilling, or otherwise escaping from the vehicle. In addition, CVC, §23115 states that no vehicle loaded with garbage, swill, cans, bottles, wastepapers, ashes, refuse, trash, or rubbish; or any noisome, nauseous, or offensive matter; or anything transported to a dump site for disposal shall be driven or moved upon any highway unless the load is totally covered in a manner that will prevent any part of the load from spilling from the vehicle.

Large-volume customers currently comply with these requirements at the operating County Landfill. If these large-volume customers do not comply, there is a mechanism (via their existing contract) to enforce a fine(s). Also, the project proponent is presently working with the County LEA to encourage small-volume haulers to use proper tarping.

The proposed City/County Landfill will incorporate litter control measures similar to those described above for the operational County Landfill. The potential for litter migration into O'Melveny Park or residential areas within Granada Hills is very unlikely due to existing topographic features and the separation distance from the working face areas to these areas. However, should fugitive litter reach these areas, the landfill's litter control crew will be dispatched immediately to clean up any migrating litter from the landfill project.

With the incorporation of City Mitigation Measures for litter identified in the Draft SEIR, Section 4.9.3, Litter, pp. 4-305 and 4-306, no significant impacts would occur.

Topical Issue 19: Traffic Conditions at Landfill Entrance

Comments have been made that the proposed City/County Landfill would result in unacceptable level of service (LOS) conditions on San Fernando Road during the morning and evening peak hours. In addition, it has been suggested that the proposed project would result in unsafe turning movements on San Fernando Road at the landfill entrance.

Response

The improvements recommended at the landfill entrance on San Fernando Road, listed in the Draft SEIR, Table 4.13-9, p. 4-372, will mitigate the impacts of the proposed project traffic at this location to a less than significant level. The San Fernando Road/Project Driveway intersection is expected to operate at LOS C during both the a.m. and p.m. peak hours with the implementation of the recommended mitigation measures.

In addition, intersection improvements have been made to the landfill entrance (adjacent to San Fernando Road) as a result of developing the County Landfill. These improvements were required pursuant to the adopted CUP for the County Landfill. Improvements were also authorized under a "B" permit granted by the City BOE. In addition, the project proponent recently sought an interim change authorization to the B permit; that authorization has been received from the City. It is anticipated that a signal at San Fernando Road and the landfill entrance will be installed by July 1998. The installation of a new signal at the landfill entrance on San Fernando Road will alleviate any potential safety concerns resulting from truck traffic entering or exiting the project site, as well as improve access.

Topical Issue 20: Planned Haul Routes

Comments have been made that waste-hauling vehicles traveling to and from the proposed project would adversely impact the local circulation system, including Balboa Boulevard.

Response

Regional access to the project site is provided via the following freeway systems: Antelope Valley (SR-14), Foothill (I-210), Simi Valley-San Fernando Valley (SR-118), Golden State (I-5), and San Diego (I-405) Freeways.

Immediate ingress to and egress from the project site are provided via San Fernando Road. Project-generated traffic is expected to use the following local area roadways in proximity to the site: Sepulveda Boulevard, Roxford Street, Balboa Boulevard (limited use only), Foothill Boulevard, and Yarnell Street. All traffic will enter the project site via San Fernando Road from one of the eight main access routes, including (1) north along the I-5 Freeway, (2) south along SR-14, (3) west along the I-210 Freeway, (4) southeast along the I-5 Freeway, (5) north along the I-405 Freeway, (6) east and west along the SR-118 Freeway, (7) north on San Fernando Road, and (8) north on Balboa Boulevard to San Fernando Road (this route is restricted to light vehicles only [weighing less than 6 tons], except for refuse collection vehicles that serve the local communities).[17]

The Draft SEIR, Section 4.13.1, Traffic, p. 4-348, identifies the general distribution pattern for the proposed City/County Landfill. The vast majority of daily traffic generated by the landfill would be truck traffic (approximately 94 percent truck traffic, 6 percent from employee-related vehicles). Project-generated traffic was distributed and assigned to the local area system based on expected origins and destinations of the refuse truck traffic. Because the project is envisioned to serve the local and regional area, the following distribution patterns are assumed for traffic distribution and generation:

- Twelve percent of the project-related traffic is expected to be distributed north of the project site on the I-5 Freeway (10 percent) and Sierra Highway (2 percent).

- Sixty-eight percent is expected to be oriented to the south on the I-5 Freeway (45 percent), San Fernando Road (21 percent), and Balboa Boulevard (2 percent).

- Twenty percent is expected to be distributed east of the site on the I-210 Freeway (5 percent), Foothill Boulevard (5 percent), and Roxford Street (10 percent).

Generally, three types of trucks would be used to transport refuse to the project site: transfer trucks that bring in materials from transfer stations, curbside collection trucks that obtain wastes from the local collection routes, and pickup and small stakebed trucks that are primarily used by private contractors to bring in refuse (such as gardening and landscaping green wastes). Each type of vehicle is described below.

Transfer Trucks: Generally, wastes transported in transfer trucks would comprise about 46 percent of the refuse brought to the project site. These trucks would be received from the BLT Enterprise Central Los Angeles, Santa Monica, Beverly Hills, Culver City, and Falcon (Wilmington) transfer stations. An average round trip is estimated at 54 miles.

Curbside Collection Trucks: The proposed project would also have collection vehicles transporting refuse to the project site. It is anticipated that curbside collection vehicles from the communities of Granada Hills, Chatsworth, West San Fernando, Encino, and numerous west Los Angeles cities (e.g., Santa Monica, Culver City, Beverly Hills, and Inglewood) would transport refuse to the site. These vehicles would transport about 52 percent of the waste brought to the project

[17]/ City Ordinance No. 161,201.

Local Deliveries: Local deliveries include the use of small pickups (0.75- to 1.5-ton load capacity) and stakebed trucks. Generally, these vehicles would collect and transport landscaping material, green wastes, and wood wastes. These deliveries comprise less than 2 percent of the total vehicle trips to the project site.

Mitigation measures that would reduce cumulative impacts resulting from development of the proposed project are identified in Table 4.13-9 (Revised) in this document. These measures are intended to offset the cumulative impacts due to project implementation. The Draft SEIR, Table 4.13-7, p. 4-369, Column 5, 1998 w/Mitigation, depicts the expected volume-to-capacity (V/C) and LOS values for the impacted intersections after implementation of mitigation measures. As shown in Columns 5 and 6, Project Impact Post Mitigation, therein, all cumulative project traffic is not expected to impact either local area streets or freeway systems within the region on either a project-specific or cumulative basis with the implementation of these mitigation measures. Therefore, no significant impacts are anticipated as a result of project implementation.

After the implementation of project-specific City Mitigation Measures for transportation and circulation listed in Table 4.13-9 (Revised) in this document, no significant impacts would occur.

Topical Issue 21: Fire Prevention and Control

Comments have been raised that the proposed project could create a major fire that could spread into the adjacent community.

Response

The project site where the proposed landfill footprint is planned is disturbed due to extensive landfilling operations that have taken place in one form or another for a period of nearly 40 years, and it would be adjacent to current County Landfill operations. However, much of the surrounding terrain is mountainous and in a natural state. The portion of the project site located within the City is designated as a Mountain Fire District. Areas adjacent to the site are covered with chaparral and coastal sage scrub that, in combination with high winds, have the potential to create an extreme fire hazard.

Brush fires have the potential to occur at or near the project site. Small onsite brush fires will be controlled by using landfill equipment such as tracked dozers, scrapers, and water trucks. In the event that a brush fire encroaches onto the project site, landfill operations would immediately cease until either the LAFD or Los Angeles County Fire Department (LACFD) is notified. However, tracked dozers could be mobilized immediately by landfill personnel to create firebreaks. All landfill personnel are trained to handle small fires and, if necessary, could provide assistance to fire personnel extinguishing small brush fires in and around the project site. The project proponent would provide heavy equipment to either the LAFD or LACFD to combat offsite brush fires near the project site. The threat of a fire igniting onsite and then spreading offsite would be considered rare because most areas around the landfill's footprint area would be graded and surficial vegetation removed, thereby eliminating combustible brush.

The primary fire concern at a landfill site is associated with a "hot load." A hot load is defined as a truck that brings ignited refuse to the landfill site. If a hot load is brought to the project site, landfill personnel will direct the load to an isolated area of the site where it would be properly extinguished with either tracked dozers, scrapers, or other fire-suppression measures, including water, dry chemical extinguishers, or smothering.

Another potential fire source is a subsurface refuse fire. This fire is triggered by the burial of a hot load igniting other refuse materials, the improper operation of the LFG collection system, or the inadvertent burial of chemical waste. Subsurface fires are dependent on waste composition, moisture content, available oxygen, ambient soil-air pressure, and the insulating characteristics of the surrounding fill-and-cover material. This type of fire is minimized by landfill design features, in-place control features used during the operation of the LFG collection and flaring system, and the proper application of cover material. The proposed design of the landfill and environmental control features will alleviate this hazard.

The potential for a subsurface fire ignited by a surface fire is also extremely remote because cover soils isolate surface fires, preventing them from igniting subsurface waste materials; the amount of waste materials above the surface is limited to the amount deposited on any given day; and landfill personnel can quickly extinguish surface fires with fire-suppression equipment. Open flames in a landfill as a result of a subsurface fire are highly unlikely. Impacts from a subsurface fire would result in accelerated local settlement in the vicinity of the fire or the venting of smoke or combustion of byproducts through the landfill cover material. Control of subsurface fires requires removing combustible material, eliminating the air supply, or cooling the fire zone below the ignition temperature. Because these fire control techniques are effective in extinguishing deep landfill fires, a long-term uncontrollable subsurface fire at the project site is considered very remote.

The inactive City Landfill, access road, and operational County Landfill serve as a partial firebreak from surrounding brush areas. Located near the western perimeter ridgeline of the site is a 100,000-gallon water tank that supplies water to the inactive City Landfill and provides necessary onsite fire flow capability. Existing water lines distribute water throughout the project site. In addition, within the County, another 265,000-gallon water tank and three fire hydrants are provided to meet fire flow demands for the County landfill.

A fire response plan has been prepared for all landfill personnel. This plan details procedures to follow in the event of a fire or explosion, designates an emergency coordinator, and establishes safe havens for employees. All landfill personnel are trained in where the nearest fire extinguishers are located, how to extinguish small fires, and who to contact in case of an emergency.

With the incorporation of City Mitigation Measures for fires identified in the Draft SEIR, Section 4.14.1, Fire Emergency Medical Services, pp. 4-398 through 4-400, no significant impacts would occur.

Topical Issue 22: Compatibility with Residential Uses

Comments have been raised regarding the proximity of the site to residential uses.

Response

The project site is topographically isolated and lies within a portion of the Santa Susana Mountains. The ±100 acre open-space area located along the southern perimeter of the project site has undergone extensive revegetation and has been planted with over 11,000 trees. Many of these trees are native and are over 15 feet high. This open-space area is elevated several hundred feet higher (i.e., ranging in height from 1,425 to 1,975 feet above mean sea level [MSL]) than existing residential areas located to the south (i.e., approximately 1,300 to 1,400 feet above MSL).

Six trailers are located immediately east of the landfill entrance, across San Fernando Road. At final fill, the proposed landfill footprint would be located ±700 feet from these uses. Additionally, the proposed landfill footprint would be located ±1,700 feet from the closest residential house located on Timber Ridge Drive in Granada Hills. The existing perimeter ridgeline, open-space area, and portions of the existing inactive landfill form an effective transition between residential use and proposed landfill operations and activities. The proposed project would not affect privacy nor would it hinder the interaction or movement of people, goods, or information. The proposed project would be physically compatible and consistent with its surrounding environs, including existing residential land uses located near the project site.

The proposed City/County Landfill footprint's maximum vertical height at buildout would result in a final fill elevation (at its top deck area) of 2,000 feet MSL. The top deck area at this height would consist of approximately 34 acres within City jurisdiction. This top deck area would be contoured to blend into the surrounding natural terrain. At this elevation located near the City/County boundary, the proposed project would descend westerly (1,885 feet MSL) to encompass land within the County portion of Sunshine Canyon and connect vertically and horizontally with the approved County Landfill footprint. The proposed landfill footprint would also descend (to 1,800 feet) southerly to abut with the existing inactive landfill. Due to its physical location within the interior of Sunshine Canyon, the top deck of the landfill footprint will be effectively shielded from public views within Granada Hills. However, the following landfill locations would be visible: a comparatively small portion of the landfill footprint near the mouth of the canyon (1,350 feet MSL), along the northern perimeter ridgeline (1,825 feet MSL), and adjacent to the mountainous areas near O'Melveny Park (where trails exist) that are higher in elevation than the landfill (e.g., Mission Point [2,771 feet MSL]).

The perimeter ridgeline along the southern boundary of the project site (near the City/County boundary) rises to a maximum elevation of about 2,150 feet MSL. The existing southern fill limits of the inactive landfill (i.e., larger fill area) range in elevation from 1,725 to 1,950 feet MSL. Elevations in this area would effectively block interior views of the final fill areas from the south and southwest, especially residential uses located in the community of Granada Hills.

Topical Issue 23: Immediate Combined City/County Landfill Operations Alternative

Comments have been raised regarding which of the alternatives considered in the Draft SEIR would be the environmentally superior alternative.

Response

Under the Immediate Combined City/County Landfill Operations Alternative, project development would immediately result in landfilling operations being commenced within one landfill footprint located in Sunshine Canyon. In comparison with the proposed project, this alternative would have the same landfill footprint configuration encompassing ±451 acres. Also, like the proposed project, this landfill footprint would connect with the operational ±215 acre County Landfill. Refer to **Figure 5.6-1** for the conceptual base grading plan for this alternative.

This alternative would provide a net disposal capacity of 90 million tons, and unlike the proposed project, landfilling operations would occur immediately at one single working face during the first 18 to 24 months rather than at two separate working faces, and there would be a single, joint intake area with a single set of scales and supporting administrative facilities. Approximately 11,000 tpd of waste would be received at one

landfill footprint. The site life would be approximately 26 years, assuming a constant intake rate of 11,000 tpd.[18]

Development sequencing for this alternative would result in three sequences similar to the proposed project, as shown on **Figure 2.5-5**. Under this alternative, development of the landfill footprint would initiate in the City jurisdiction, abut and overlay portions of the inactive landfill (Sequence A), proceed in a northerly direction across the City and County boundary, and connect to the operational County Landfill (Sequence B). Once interim fill elevations are reached, the landfill footprint would extend back into the City jurisdiction (Sequence C).

Similar to the proposed project, implementation of this alternative would require some form of agreement between the City and the County to authorize common power over the entire project site. This agreement would recognize existing discretionary approvals, contractual agreements, or other arrangements that were approved by the County Board of Supervisors and regulatory agencies in connection with the approved County Landfill. Therefore, existing permitting requirements and regulatory obligations in connection with that landfill would effectively be maintained and, if necessary, modified or amended to reflect the resulting provisions established under the subject agreement.

Under this alternative, less significant impacts would occur (for up to 2 years) because landfilling operations would be contained at a single working face area. In comparison to the proposed project, the following environmental impacts would be reduced:

- During the first 18 to 24 months, less daily fugitive dust emissions would be generated because landfilling operations would be contained at one working face area instead of two separate working faces. During high-wind episodes (i.e., Santa Ana wind conditions), landfilling operations would be performed at wind-protected areas of the site within either jurisdiction. Potential offsite fugitive dust emissions would be reduced due to the flexible location of landfilling operations.

- During the first 18 to 24 months, less daily fugitive dust and mobile emissions would be generated during landfilling operations because refuse disposal would be contained within one working face of the landfill rather than two separate areas.

- During the first 18 to 24 months, the landfilling operations would result in less significant risk-of-upset conditions from litter generation because landfilling would be confined to wind-protected areas of the project site during high wind conditions. Offsite windblown litter would be reduced due to the flexible location of the active working face area.

- During the first 18 to 24 months, less significant worker safety impacts would result due to the consolidation of heavy equipment and the increased ability to control the routing of waste-hauling vehicles ingressing to and egressing from the project site. This would result in less onsite vehicular congestion, facilitate safer turning movements, and increase driver visibility.

- This alternative would provide easier access to City and County Fire Departments and other emergency personnel due to reduced onsite vehicle congestion as a result of confining landfilling

[18]/ Based on 90,000,000 tons of disposal capacity ÷ 11,000 intake tonnage × 312 operating days = 26.22 years of anticipated site life.

operations to one working face. The use of a single working face area would result in the need for less water consumption for dust control purposes.

In comparison with the proposed project, this alternative would meet all development and solid waste objectives. Implementation of this alternative would facilitate the waste planning efforts of the City and County necessary to meet their short-, mid-, and long-term planning needs.

The Immediate Combined City/County Landfill Operations Alternative would have less significant impacts than the proposed project for the first 18 to 24 months. Specifically, this alternative would result in less significant impacts on air quality, create less potential risk-of-upset conditions (windblown litter and worker safety associated with onsite vehicle routing), improve public services response (fire and emergency service access), and generate less potential demand for onsite water consumption.

Implementation of this alternative would not result in any area-wide or regional impacts that would be greater than the proposed project. Overall, this alternative would be considered environmentally superior to the proposed City/County Landfill Project because environmental impacts would be less for up to a 2-year period.

3.3 STATE AGENCIES

Jeannie H. Blakeslee
Permitting and Enforcement Division
California Integrated Waste Management Board
8800 Cal Center Drive
Sacramento, CA 95826

Letter 3.3-1

Comment 1: The Overview of the document indicates that an average of 11,000 tons per day (tpd) of waste is to be disposed at the facility. It also states that 11,000 tpd would be the maximum amount of waste accepted at the facility. The Project Description indicates an average of 11,000 tpd. Section 2.6.2 indicates that 12,100 tpd is the maximum anticipated quantity of waste deposited per operating day. What is the maximum anticipated quantity of waste to be disposed and materials to be processed at the facility? It would be helpful if a proposed maximum permitted daily tonnage instead of an average daily tonnage were consistently incorporated into the document.

Response 1: The Draft SEIR states both the **average** and **maximum** [emphasis added] intake rates to maintain consistency with the County Landfill Extension, Conditional Use Permit (CUP) and Oak Tree Permit 86-312-(5). CUP Conditions 10(e) and (f) for that operating landfill state the following:

> The net tonnage placed in the landfill shall not exceed 36,000 tons per week (6,000 tons per day average based upon 6 working days per week).
>
> The net tonnage of waste placed in the landfill on any given day shall not exceed 6,600 tons.

Until the proposed landfill and current operational landfill are combined, the initial proposed landfill would provide an **average** [emphasis added] waste intake rate of 5,000 tpd in the City portion of Sunshine Canyon and 6,000 tpd at the County Landfill. The ultimate City/County landfill would combine landfilling operations and allow an **average** [emphasis added] waste intake rate of approximately 11,000 tpd.

The **maximum** [emphasis added] net tonnage that can be deposited per operating day is 12,100 tpd (based on a maximum intake rate of 5,500 tpd in the City and 6,600 tpd in the County) with a maximum weekly capacity of 72,600 tons of refuse (an average of 11,000 tpd based on 6 working days per week). This total also includes an average of 1,100 tpd of inert waste.

With respect to the Draft SEIR, the environmental analysis is based on the **maximum** [emphasis added] net tonnage amount of 12,100 tpd.

Comment 2: The Project Description includes a discussion of SubTitle D requirements, and mentions the use of 30-ml high density polyethylene (HDPE) as part of the liner system. Figure 2.7-2 indicates that 60 ml HDPE would be used at this facility. In order to avoid

confusion, it may be useful to state clearly which thickness of HDPE would be used as part of the liner system.

Response 2: Within the context of Subtitle D regulations, the 30-mil geomembrane reference is the **minimum** [emphasis added] geomembrane thickness allowed under Subtitle D. The proposed liner design, as presented in the Draft SEIR on Figures 2.7-1 and 2.7-2, will incorporate an HDPE geomembrane with a minimum thickness of 60 mils.

Comment 3: Section 4.1 Grading. Approximately 451 acres are to be graded, in three sequences. How much material is to be excavated?

Response 3: As stated in the Draft SEIR, Section 2.5.1, Proposed City/County Landfill Footprint, p. 2-25:

> The proposed combined City/County Landfill footprint would ultimately encompass ±451 acres within both City and County jurisdictions.

Of this total, the proposed project includes ±194 acres within the City, ±80 acres of which are part of the inactive landfill. Disturbances from previous landfill activities are shown in the Draft SEIR, Figure 2.4-5.

As stated in the Draft SEIR, Section 4.1.1, Grading Activities, p. 4-4, approximately 10 million cu. yd. of soil material will be excavated to develop the landfill's Sequences A, B, and C. This material will be moved over the life of the estimated 26-year project.

Comment 4: Is blasting part of the excavation? If so, there may be substantial noise, air and dust impacts associated with the activity.

Response 4: It is very unlikely that blasting would be used as part of the proposed City/County Landfill, although methods of excavating earthen materials can vary with encountered field conditions. However, if blasting is used (due to unforseen conditions), the City would need to approve its use prior to any blasting occurring. As stated in the Draft SEIR, Section 2.6.3, City/County Landfill Design, p. 2-50:

> Various excavation methods would be used to achieve foundation base-grade elevations. The specific methods would be a function of the soil type encountered or bedrock material expected to be excavated. Conventional construction equipment, such as an excavator, wheeled loaders, dozers, and scrapers, would be utilized. The project site would be excavated within the limit lines and base of excavation contours of the proposed City/County Landfill footprint to obtain the necessary cover material for proper landfill development and operation.

Comment 5: Where is the stockpiled material to be stored?

Response 5: Existing and Anticipated Soils Stockpile Areas are included in the Draft SEIR, Section 4.1-1 Grading Activities, Figure 4.1-1. This figure has now been changed. The project

proponent is now proposing two soils stockpile areas, since it has now been determined that these two areas will have sufficient area to accommodate soils stockpile. As shown on revised Figure 4.1-1, included in Section 2.0 Revision and Additions to Draft SEIR, within this document, the previously proposed soils stockpile areas, located on the top deck of the existing inactive City Landfill, has now been deleted. As shown on revised Figure 4.1-1, soils stockpile areas for the proposed City/County Landfill would include the existing north canyon stockpile area and the anticipated northwest canyon stockpile area.

Excavated soils would be stockpiled for future use as base material for the liner foundation layer, liner operations layer, daily, intermediate and final cover materials. Excavated soils would be stockpiled away from, but proximate to the immediate active working face area. Water trucks would also be utilized during excavation, soil stockpiling, and stockpile borrow to reduce fugitive dust emissions. Currently, the northern canyon within County jurisdiction is being used to stockpile soil for the operational County Landfill. When operational, it is anticipated that this same canyon area would be used as a stockpile area for the proposed City/County Landfill, until landfill footprint development occurs in this area. Once development occurs, the stockpiled area would be moved northwest to the anticipated northwest canyon stockpile area. For the existing north canyon stockpile area, an extensive dual line subgrade drainage system was installed. This system includes dual, perforated high-density polyethylene (i.e., plastic), drainage lines, surrounded by an aggregate drainage blanket and geotextile filter fabric. The subgrade drainage system was installed within a collector trench along the lowest point of the canyon area, prior to stockpile placement. A similar subgrade drainage system would be installed for the anticipated northwest canyon stockpile area, prior to stockpile placement.

Comment 6: Grading is to take place in the expansion area, which has a potential for landslides. Construction activities would commence at the top of slide areas to retain slope stability. The landfill is in close proximity of the Santa Suzana and Northridge faults, and is in an area where liquefaction may pose a threat to landfill liner and leachate collection system integrity.

Although slope stability does not fall under IWMB's regulatory authority, we ask that actual design of the landfill reflect measures to minimize indirect impacts associated with potential problems with slope stability.

Response 6: The potential environmental impacts associated with slope stability and the design of the proposed City/County Landfill are analyzed in the Draft SEIR. As stated in the Draft SEIR, Section 4.1.6, Geologic Hazards - Slope Stability, p. 4-44:

> With respect to engineered slopes, landfills have generally been found to be stable under static and seismic loading conditions. Waste faces as steep as 1.3H:1V with a height of 150 feet (45 m) are known to be stable under both static and moderate (0.25-g PGA) seismic loads. Waste faces with an inclination of 2H:1V have remained stable under severe seismic loading, as evidenced by the performance of landfills in the Loma Prieta, San Fernando, and Northridge

earthquakes. The advent of geosynthetic liner and cover systems with relatively low interface shear strengths adds a new element to landfill design that must be considered in assessing static and dynamic stability. However, performance of the geosynthetic-lined Lopez Canyon Landfill in the Northridge earthquake (Matasović et al., 1995) indicates that properly designed geosynthetic lined landfills can withstand strong ground motions from earthquakes without damage.

The following mitigation measures would be incorporated into the project design to lessen potential impacts associated with slope stability to a less than significant level:

- Final maximum refuse slope gradient at the site shall be no steeper than 2H:1V (horizontal to vertical) for the landfill.

- Final cut-and-fill slopes shall have an overall slope gradient no steeper than 1.5H:1V.

- Final slopes shall be engineered to have a static factor of safety of at least 1.5.

- Survey monuments shall be installed around the perimeters of the outer fill areas at points where they would not be subject to disturbance by landfill development. The exact spacing, location, and characteristics of the survey monuments shall be submitted to and approved by the City LEA.

In addition, all engineering design reports and permit drawings will be submitted to the appropriate regulatory agencies for their review and approval prior to project construction.

Antero A. Rivasplata, Chief
State Clearinghouse
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Letter 3.3-2

Comment 7: The State Clearinghouse has submitted the above named draft Environmental Impact Report (EIR) to selected state agencies for review. The review period is now closed and the comments from the responding agency(ies) is(are) enclosed.

Response 7: The comment is noted.

Comment 8: This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Response 8: The comment is noted.

3.4 REGIONAL AGENCIES

J. David Stein, Manager
Performance Assessment and Implementation
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Los Angeles, CA 90017-3435

Letter 3.4-1

Comment 9: This is a follow-up letter to one dated September 4, 1997. At that time I invited you to attend our next meeting of the SCAG Standing Committee on Implementation (SCI), held October 9. Since then the SCAG Regional Council has called for a General Assembly to be held on October 9 instead of the regular committee meetings.

The item on the Draft Subsequent Environmental Impact Report for the Sunshine Canyon Landfill Project will be heard at the November 6, 1997 SCI meeting to be held at the SCAG office in Los Angeles, starting at 11:15 a.m.

SCAG staff comments to the SCI differ somewhat from those we originally sent you. They reflect a new agency position on projects impacted by recent 208 Plan consistency and conformity discussions with the State California Water Resources Control Board. A copy of these comments is enclosed.

Response 9: The comment is noted.

Comment 10: The Growth Management Chapter (GMC) of the Regional Comprehensive Plan contains a number of policies that are particularly applicable to this Project.

Core Growth Management Policies

3.01 The population, housing, and jobs forecasts, which are adopted by SCAGs Regional Council and that reflect local plans and polices, shall be used by SCAG in all phases of implementation and review.

SCAG staff comments. As SCAG has designated subregions, the City of Los Angeles part of the Project is situated in the City of Los Angeles subregion, whereas, the part of the project located in unincorporated Los Angeles County is situated in the North Los Angeles County subregion. Implementation of the project would result in the creation of approximately 35 new jobs. This would be a relatively insignificant amount of new jobs and would be within the projected growth for the area. The Proposed project would help meet the need for facilities to handle existing and forecasted waste generated within the City of Los Angeles, and nearby cities and unincorporated areas in Los Angeles County. The proposed Los Angeles County Integrated Waste Management Plan and Siting Element, which includes facility needs that the Project is in part designed to meet, and is based on, adopted SCAG growth forecasts. The Draft SEIR contains a discussion of SCAG growth forecast consistency on pages 4-80 and 4-81. The Project is consistent with this core RCPG policy.

Response 10: The comment is noted.

Comment 11: *3.03 The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*

SCAG staff comments. Recent studies of solid waste management issues in Southern California, including various City and County of Los Angeles studies referenced in the Draft SEIR, and the recently completed SCAG Solid Waste Task Force Report, have concluded that landfill capacity in the Southern California area has and continues to be a critical issue for local governments. Recycling efforts and the economic downturn during the past five years have only extended the time to address increased landfill capacity or other waste management alternatives. Siting and expansion of landfills in the urban area has increasingly become more difficult, time consuming and costly. Consequently, the implementation of the Proposed project could be considered as an action that would help cities and counties with their long term materials recovery and waste disposal options. This would be consistent with the objectives of the GMC to guide growth in the region and to mitigate its negative impacts. The Draft EIR contains information on phasing and timing, as stated in the above Project Description and on pages 2.-44 and 2.-45. The Project is consistent with this core RCPG policy.

Response 11: The comment is noted.

Comment 12: *3.05 Encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities.*

SCAG staff comments. The Draft EIR, on page 4-80 and in other places throughout the document, acknowledges that Project site has available in-place infrastructure and ancillary facilities that can accommodate additional landfill development. These facilities are contained primarily in the existing active County Landfill site (entrance road, scales, administrative/training building, drainage, gas, waste treatment, and water infrastructure) but also portions of the shut down City landfill site (entrance road, nursery, drainage, landfill gas and water infrastructure). Maximizing the use of these facilities helps to reduce the ultimate cost of waste management. The Project is supportive of this ancillary RCPG policy.

Response 12: The comment is noted.

Comment 13: *3.08 Encourage subregions to define an economic strategy to maintain the economic vitality of the subregion, including the development and use of marketing programs, and other economic incentives, which support attainment of subregional goals and policies.*

SCAG staff comments. The Draft SEIR on page 4-259 acknowledges that the proposed Project is supportive of two economic development goals in the Los Angeles Citywide General Plan Framework Element (i.e., a physically balanced distribution of land uses that contributes toward and facilitates the City's long-term fiscal and economic viability, conserves natural resources, and provides adequate infrastructure and public resources; and, industrial growth that provides job opportunities for the City's residents and maintains the City's fiscal viability). It also notes that "project implementation would further minimize fuel consumption by developing a landfill in the City's jurisdiction close to wasteshed areas rather than transporting waste to other landfill locations located out-of-County: and, reduced transportation distance provides for lower tipping fees". The Project is supportive of this ancillary RCPG policy.

Response 13: The comment is noted.

Comment 14: *3.09* *Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.*

SCAG staff comments. See SCAG staff comment on RCPG policy 3.05. The Project also includes facilities to handle green and wood waste, and integrates the resultant mulch material into the landfill daily cover program, thus saving costs and helping to keep tipping fees lower. The Project is supportive of this ancillary RCPG policy.

Response 14: The comment is noted.

Comment 15: *3.10* *Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.*

SCAG staff comments. The Draft SEIR, in Section 2.0 (Project Description), acknowledges that the proposed Project builds upon an existing permitted County Landfill which has undergone extensive environmental review. The proposed City/County Landfill will benefit from this experience, and along with new and expanded environmental impact analysis, will help minimize red tape associated with the permitting of an expanded landfill. This in turn, will help to maintain the economic vitality and competitiveness of the combined City/County Landfill. The Project is supportive of this ancillary RCPG policy.

Response 15: The comment is noted.

Comment 16: *3.12* *Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.*

SCAG staff comments. The Draft SEIR acknowledges that the Project has a relatively insignificant number of employees and would not be subject to SCAQMD's Rule 2202. It also notes that the Project will result in 440 transfer truck trip ends daily (46% of refuse brought to site will be in transfer trucks) and 1,280 daily trip ends by curbside collection trucks. Mitigation measures are proposed to help encourage use of transfer trucks, direct truck traffic to non-peak hours and increase fees for trucks not carrying full loads. These actions will help reduce vehicle miles traveled by refuse vehicles. The Project is supportive of this ancillary RCPG policy.

Response 16: The comment is noted.

Comment 17: *3.18 Encourage planned development in locations least likely to cause adverse environmental impact.*

SCAG staff comments. The Project is designed in a manner which will minimize adverse environmental impacts. The following objectives identified in the Draft SEIR are designed in a manner which will minimize adverse environmental impacts: ensure corporate commitment to meet environmental, health and safety goals, and exceed regulatory standards and requirements during landfill construction, operation and closure; minimize impacts on air quality within the South Coast Air Basin by providing additional disposal capacity within the Los Angeles region, thereby reducing emissions from transporting refuse longer distances; and, minimize significant impacts on environmental resources associated with the development of new landfill sites (i.e., proposed sites located within undisturbed canyon areas or remote desert locations) by using areas of the existing inactive landfill and other areas within Sunshine Canyon that are primarily disturbed and that have infrastructure in place to readily accommodate future development.

The mitigation measures included in the Draft EIR have been developed to address any identified adverse environmental impacts. The adequacy of project specific mitigation of impacts should be carefully considered by the City of Los Angeles and the County of Los Angeles. The Project is supportive of this ancillary RCPG policy, as it pertains to the above noted areas.

Response 17: The comment is noted.

Comment 18: *3.19 Support policies and actions that preserve open space areas identified in local, state, and federal plans.*

SCAG staff comments. The Draft SEIR acknowledges in Section 4.14 (Public Services) that implementation of the proposed Project will result in the preservation of 987 [acres] of open space which will become part of the 8,000 acre Santa Clarita Woodlands State Park. This acreage includes 426 acres in the East Canyon dedication area for open space and recreational purposes, 81 acres dedicated for trail and road purposes, and over 480 acres of land located along

the northerly and westerly boundaries of Upper Bee Canyon for wildlife preservation and recreational use. The Draft SEIR notes on page 2-85 that an existing 100 acre open space buffer area is located directly south of the inactive landfill. Within the buffer area, a voluntary tree planting program was initiated by the project proponent and over 11,000 trees have been planted, including over 1,300 coast live oak trees. The Draft SEIR also states on page 4-421 that the developer will fund one community service project within the City per year for 15 years, for such uses as construction of community swimming pools, community parks restoration or development, and community center rehabilitation or development. The Project is supportive of this ancillary RCPG policy.

Response 18: The comment is noted.

Comment 19: *3.20* *Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.*

SCAG staff comments. The Draft EIR, in Section 4.4 (Biological Resources), acknowledges that the Project will have major impacts to biota, including: temporary and permanent impacts on biological resources (loss of over 80 acres of Venturan Coastal Sage Scrub, over 31 acres of Coast Live Oak Woodland, two populations of Slender Mariposa Lily and minimal amounts of other sensitive wildlife habitat (i.e., Southern Willow Scrub and Arroyo Willow Scrub). Development of the City/County Landfill will result in the removal of approximately 3 acres of jurisdictional waters, wetlands and riparian habitat. Impacts will also occur to the following sensitive animal species: San Diego Horned Lizard, California Gnatcatcher, Least Bell's Vireo and Western Burrowing Owl. The site does not function as a wildlife corridor, because of previous landfill disturbance. Mitigation measures are proposed for wildlife habitat, wetlands and sensitive animal species. Additional procedures are proposed to protect migratory bird and raptor breeding sites (nests). Of special note, the existing County Landfill and shut-down City Landfill have maintained a plant materials center or nursery and revegetation program that is of major importance. The Draft SEIR notes that the existing nursery is recognized as one of the largest growers of coast live oak trees in the Southern California region and has initiated a program with Oregon State University and others to study advanced growing techniques for the coast live oaks and big-cone Douglas fir tree species. The adequacy of project specific mitigation of impacts should be carefully considered by the City of Los Angeles and the County of Los Angeles. Assuming the aforementioned mitigation actions are taken and prove effective, the Project would be supportive of this ancillary RCPG policy.

Response 19: The comment is noted.

Comment 20: *3.21 Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*

SCAG staff comments. The Draft SEIR acknowledges that no sensitive cultural resources were found to be present on the surface of the site, and that only one non-significant known deposits of prehistoric or historic significance was identified during the records search. Based on this, the Draft SEIR concludes that the proposed Project will have no immediate or direct or indirect impact on cultural resources, and that if cultural resources are identified during the development process, additional studies will be undertaken and corrective actions taken. The project is supportive of this ancillary RCPG policy.

Response 20: The comment is noted.

Comment 21: *3.22 Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*

SCAG staff comments. The Draft SEIR acknowledges that onsite grading activities associated with landfill cut-and-cover operations will directly impact development of approximately 451 acres and will result in the excavation of over 10 million cubic yards of material. Grading within the site would balance out over the life of the Project. Excavated soils would be used onsite as the liner foundation layer, liner operations layer, daily cover, intermediate cover, and for the vegetative or erosion control layer of the final cover. Extensive seismic investigation of the site is documented in the Draft SEIR and it states that the Northridge Earthquake produced no significant adverse impacts within the Project area. It concludes that no cumulative impacts for seismic exposure are anticipated. The Draft EIR states on page 4-40 that the landfill will be designed "to withstand the maximum probable earthquake without damage to the foundations or to the structures which control leachate, surface drainage, erosion or gas". It also notes some potential for liquefaction and slope stability (landslides) which can be easily mitigated. Mitigation measures are proposed for all significant earth resource impacts.

Response 21: The comment is noted.

Comment 22: The Draft SEIR documents extensive investigations of the potential risk of upset resulting from disposal of hazardous materials, vectors, litter, employee safety, and site security, human health explosion, airport safety (bird strikes) and electric and magnetic fields (two transmission lines traverse the site). Design features and mitigation measures are proposed to address any potential adverse impacts.

Response 22: The comment is noted.

Comment 23: The Draft SEIS also acknowledges some potential exists for "hot load" refuse fire, brush fires on-or off site, and subsurface refuse fire. Mitigation measures are proposed to address any adverse impacts.

Response 23: The comment is noted.

Comment 24: The Draft SEIR states that a small portion of the project site (i.e., near the bottom of the canyon where the creek flows offsite) is designated within the 100 year floodplain. Sedimentation basins exist or are proposed to hold both predicted sediment load and provide storage capacity necessary to accommodate stormwater flow from the operational County landfill, the upper reaches of Sunshine Canyon and the proposed City/County Landfill.

The adequacy of project specific mitigation of impacts should be carefully considered by the City of Los Angeles and the County of Los Angeles. Assuming the aforementioned actions are taken and prove effective, the Project would be supportive of this ancillary RCPG policy.

Response 24: The comment is noted.

Comment 25: *3.23 Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.*

SCAG staff comments. Discussion of mitigation measures for most of these environmental factors is addressed under SCAG policies 3.20 and 3.22. Additionally mitigation measures are proposed to reduce noise below a level of significance. The Project is supportive of this ancillary RCPG policy.

Response 25: The comment is noted.

Comment 26: The Regional Mobility Chapter (RMC) also has policies, all of which are core, that pertain to the proposed project. This chapter links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. Among the relevant policies in this chapter are the following:

Regional Streets and Highways Program Policies

4.10 Potential down-stream congestion impacts from capacity enhancing projects will be studied.

SCAG staff comments. The Draft SEIR in Chapter 4.13 (Transportation/ Circulation) acknowledges on page 4-374 that the Project will add a maximum

of 73 peak hour trips in either direction on Interstate 5. Although this volume of trips does not meet the significant impact criteria (150 or more peak hour trips) of the Los Angeles County Congestion Management Program, the trips will add to a regionally significant AM and PM peak hour congestion problem on Interstate 5. The Draft SEIR on pages 4-346 and 347 notes that 220 transfer trucks and 640 curbside collection vehicles (daily/two-way) would use the facility. The transfer trucks are typically 60 feet long semis (23.5 ton capacity) and the curbside collection vehicles are typically 40 feet long (9 ton capacity). Project traffic distribution data on page 4-348 indicates that of the total 2,260 (daily/two-way) passenger car equivalent (PCE) trips, 10 percent (226 trips) are expected to be distributed north of the project site on I-5 and 45 percent (1,017 trips) are expected to be distributed east on I-5. The total of these I-5 trips (1,243 trips) adds to the continuing congestion problem on I-5. This is particularly significant, given the heavy-duty vehicle contribution that transfer trucks and curbside collection vehicles would add to the I-5 traffic. Although the proposed Project does not address the continuing increased congestion of I-5, it does however acknowledge responsibility to provide turn lane improvements at the I-5/Rockford [sic] Street intersection.

Response 26: Consulting traffic engineers completed mainline freeway analyses for the Congestion Management Program (CMP) monitoring stations referenced below. The general procedures for completing the CMP Mainline (Freeway) Analysis are contained in the *1995 Congestion Management Program for Los Angeles County*. The objective of this mainline freeway analysis is to identify the potential traffic impacts of the proposed project on the CMP network (I-5 or I-405 Freeways) within the immediate vicinity of the project site.

Per CMP Traffic Impact Analysis (TIA) criteria, mainline freeway monitoring stations where the project will add 150 or more trips in either direction, during the a.m. or p.m. peak hours, will require evaluation. The four freeway monitoring stations closest to the project site that could potentially be impacted by project traffic consist of the following:

1. CMP Station 1006: Post Mile 29.97 - I-5 Freeway at Burbank Boulevard
2. CMP Station 1007: Post Mile 36.90 - I-5 Freeway at Osborne Street
3. CMP Station 1008: Post Mile R46.55 - I-5 Freeway north of State Route 14
4. CMP Station 1070: Post Mile 44.27 - I-405 Freeway north of Roscoe Boulevard

Appendix D1 in this document provides a summary of the freeway segment analysis for each of the key monitoring stations during the a.m. and p.m. peak hour, respectively. Per the Los Angeles County CMP, a significant project impact occurs when the proposed project traffic increases traffic demand on a CMP facility by 2 percent of demand-to-capacity ratio (D/C $\geq$ 0.02), causing or worsening LOS F (D/C > 1.00).

Based on the above CMP criteria and results of the mainline freeway analysis, the proposed project will not significantly impact any of the four CMP monitoring stations during either the a.m. or p.m. peak hours.

Because forecasted a.m. and p.m. peak hour-generated trips on the I-5 and I-405 Freeways were well below the threshold of 150 trips required for the freeway segment analysis, no analysis was initially performed as part of the traffic study report for the proposed project. However, a summary of this information was provided in the Draft SEIR, Section 4.13.2, Los Angeles County Congestion Management Program, p. 4-374.

Comment 27: SCAG's comments on the recently proposed Newhall Ranch project included the following:

> *The Draft EIR indicates that capacity enhancements will be required on major highways (Interstate 5 and State Route 126), in part, to serve transportation demand generated from the Newhall Ranch Specific Plan. SCAG Regional Travel Forecast Model analysis and input on the regional transportation system from the County Transportation Commissions for the June 1997 SCAG Regional Transportation Plan indicate that for year 2020, most of Interstate 5 south of State Route 126 to State Route 14 is expected to experience delays as a percentage of travel time up to 50 to 70 percent of 1990 conditions. Furthermore, congested speeds on this segment of I-5 will be from 23 to 16 miles per hour in most areas. Greater delays and lower congested speeds south of the I-5/SR 14 intersection to 1-405 are anticipated. No provisions for funding the additional improvements, including interchange enhancement, on I-5 have been identified. Funding of I-5 improvements needs to be addressed in the Final EIR, including the Newhall Ranch contribution, if any, to these improvements.* These comments are also applicable to the proposed Sunshine Canyon Landfill Project. Until the funding of congestion mitigation improvements to I-5 and impacted interchanges are resolved to the satisfaction of Caltrans, and LAMTA, the Project can not be found consistent with this core RCPG policy.

Response 27: The methodology used to prepare the traffic study report for the proposed project is consistent with the traffic impact guidelines for the City of Los Angeles and the requirements outlined in the *1995 Congestion Management Program for Los Angeles County*. The study evaluated the existing and future traffic conditions at 13 key intersections in the surrounding vicinity. Implementation of recommended mitigation measures at the five intersections significantly impacted by the project will offset the impact of project traffic (inclusive of 33 related projects) and mitigate unsatisfactory operation conditions to acceptable levels. As shown in the CMP Mainline (Freeway) Analysis, the proposed project will not have a significant impact on either the I-5 or I-405 Freeways. For additional discussion of the CMP analysis, refer to Response 26.

Comment 28: *4.20 Expanded transportation system management by local jurisdictions will be encouraged.*

4.23 TSM activities throughout the region shall be coordinated among jurisdictions.

SCAG staff comments. The Draft SEIR acknowledges in Section 4.13 (Transportation/Circulation) that the project design and congestion mitigation measures for arterials, impacted intersections and the access roadway into the Sunshine Canyon Landfill site reflect a sensitivity to TSM actions. The

recommended automatic traffic surveillance and control (ATSC) signal improvements on San Fernando Road at the Project entrance driveway and at the intersection of San Fernando Road and Balboa Boulevard should be mitigation measures and the landfill developer should contribute their appropriate share to these TSM improvements. The Project is conditionally consistent with these two core RCPG policies, assuming the aforementioned ATSC actions are taken.

Response 28: This comment is noted.

Comment 29: Regional Non-Motorized Transportation Program Policies

4.25 The development of the regional transportation system should include a non-motorized transportation system that provides an effective alternative to auto travel for appropriate trips. The planning and development of transportation projects and system should incorporate the following, as appropriate:

a Provision of safe, convenient, and continuous bicycle and pedestrian infrastructure to and throughout areas with existing and potential demand such as activity areas, schools, recreational areas (including those areas served by trails), which will ultimately offer the same or better accessibility provided to the motorized vehicle.

b Accessibility to and on transit (bus terminals, rail stations, Park-and-Ride lots), where there is demand and where transit boarding time will not be significantly delayed.

c Maintenance of safe, convenient, and continuous non-motorized travel during and after the construction of transportation and general development projects. Existing bikeways and pedestrian walkway should not be removed without mitigation that is as effective as the original facility.

SCAG staff comments. Draft SEIR acknowledges on pages 4-385 through 387, that the City of Los Angeles proposes to develop a Class II bikeway along San Fernando Road and that this facility could conflict with truck access to the project. Should this exist, a mitigation measure is proposed to address this conflict.

The Draft SEIR acknowledges in Section 4.14 (Public Services) an extensive existing and proposed hiking and equestrian trail system in open space areas surrounding the Project. Consideration should be given in the long range future development of the site for open space purposes, to the inclusion of trail facilities to connect up with adjacent existing or proposed trails. The Project is supportive of this ancillary RCPG policy.

Response 29: The comment is noted.

Comment 30: The Air Quality Chapter (AQC) core actions that are generally applicable to the Sunshine Canyon Landfill Project are as follows:

5.11 Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.

SCAG staff comments. The Draft SEIR does not acknowledge that the Project incorporates most recently regional growth forecasts into the transportation and air quality modeling for the Project. We are unable to determine whether regional transportation/air quality impacts would be mitigated. Therefore, based on the information provided in the Draft SEIR, we are unable to find the Project consistent with this core RCPG policy.

Response 30: Consistency with regional growth forecasts for the San Fernando Valley subarea and Los Angeles City subregion (within the City) and Santa Clarita subarea and North Los Angeles subregion (within the County) is described under the Regional Comprehensive Plan and Guide Growth Management Chapter (see Draft SEIR, Section 4.2.10, Project Consistency with Applicable Plans, pp. 4-80 and 4-81). The 35 jobs anticipated to occur from the proposed project would not significantly affect regional growth projections. Air quality modeling was based on methodology contained in the *SCAQMD CEQA Air Quality Handbook.* Traffic modeling for this project was based on methodology established by the Institute of Transportation Engineers as modified by the City of Los Angeles, Department of Transportation (LADOT) to consider, among other factors, regional growth projections and related projects (see Draft SEIR, Section 4.13.1, Traffic, p. 4-334). Project-generated and cumulative air quality emissions would be significant (see Draft SEIR, Section 4.2.12, Operations, p. 4-91). Both project-generated and cumulative traffic impacts would be less than significant with the implementation of mitigation measures identified in the Draft SEIR, Table 4.13-9.

In addition, air quality impacts were analyzed for consistency with the Air Quality Management Plan based on the *Guidelines for Implementation of 1989 AQMP Conformity Procedures* (SCAG, March 1990). These guidelines provide consistency requirements for jobs/housing balance, vehicle trip reduction, and air quality analysis to minimize land use, transportation, and air quality impacts (see Draft SEIR, Section 4.2.10, Project Consistency with Applicable Plans, p. 4-78). These guidelines assure conformance with the same issues referenced in the core action stated above. Development of the proposed project would preclude the development of more distant sites and associated increases in vehicle miles traveled and vehicle emissions.

Comment 31: The Water Quality Chapter (WQC) core recommendations and policy options relate to the two water quality goals.

- *To restore and maintain the chemical, physical and biological integrity of the nation's water (Federal Clean Water Act).*

SCAG staff comments. The Draft SEIR appropriately acknowledges in Section 4.3 (Surface and Groundwater), the manner in which the Project addresses this federal water quality goal.

Response 31: The comment is noted.

Comment 32: • *To achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters (State Porter-Cologne Water Quality Act).*

SCAG staff comments. The Draft SEIR appropriately acknowledges in Section 4.3 (Surface and Groundwater), the manner in which the Project addresses the achievement of State water quality goal.

Response 32: The comment is noted.

Comment 33: The Water Quality Chapter's core recommendations and policy options that are particularly applicable to the Sunshine Canyon Landfill Project include the following:

11.02 Encourage "watershed management" program and strategies, recognizing the primary role of local governments in such efforts.

SCAG staff comments. The Draft EIR references a number of "watershed management" strategies in Section 4.3 (Surface and Groundwater). The adequacy of project mitigation measures should be carefully considered by the City of Los Angeles, Los Angeles County Department of Public Works (Flood Control Division), Los Angeles Regional Water Quality Control Board and U.S. Army Corps of Engineers. The Project is consistent with this core RCPG policy.

Response 33: The comment is noted.

Comment 34: *11.05 Support regional efforts to identify and cooperatively plan for wetlands to facilitate both sustaining the amount and quality of wetlands in the region and expediting the process for obtaining wetland permits.*

SCAG staff comments. The Draft SEIR in Section 4.4 (Biological Resources) appropriately addresses the preservation and restoration of wetlands. See also previous SCAG staff comments relative to wetlands preservation and restoration under policies 3.18 and 3.20. A variety of project design features and mitigation measures are proposed relative to the preservation and restoration of riparian ecosystem, including wetlands. The Army Corps of Engineers Section 404 permit, and ancillary wetlands restoration planning requirements will also govern the successful response to this policy. The adequacy of project mitigation measures should be carefully considered by the City of Los Angeles, Los Angeles County Department of Public Works (Flood Control Division), Los Angeles Regional Water Quality Control Board and U.S. Army Corps of Engineers. The Project is consistent with this core RCPG policy.

Response 34: The comment is noted.

Comment 35: *11.07 Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.*

SCAG staff comments. The Draft EIR addresses the possible use of reclaimed groundwater and leachate, both of which are part of a comprehensive ground water management system. This water would be used onsite for landscape, irrigation, dust control, or other non-emergency need. The Project is consistent with this core RCPG policy.

Response 35: The comment is noted.

Comment 36: The Integrated Solid Waste Management Chapter (ISWM) is non mandated; it is provided for information and advisory purposes. The recommendations in the chapter fulfill the chapter's objectives and do not create new legal mandates for local governments or other regional governments organizations, like sanitation or waste management districts. The chapter includes the following appropriate policy recommendations:

Response 36: The comment is noted.

Comment 37: *14.1 Developing recycling industries and self sustaining markets for recycled materials.*

SCAG staff comments. The Draft SEIR on page 2-3 acknowledges as a solid waste objective: recover, recycle, and/or reuse waste materials that would be otherwise disposed of at the City/County Landfill by providing public "drop-off", "buyback". And greenwaste/wood waste recycling areas for local residents. The document also acknowledges on page 4-346 that at least 46 percent of the waste will be transported to the site from transfer stations or MRFS. No provision is referenced in the Draft SEIR which would support the development of recycling industries, except for green/wood waste recycling facilities, that would be developed on a 3 acre site within the Project. Consideration should be given to the development of other recycling industries at the landfill site, either as a part of the on-going landfilling activities or after the landfill is closed. The Project is supportive of this ancillary RCPC policy, as it relates to green/wood waste and the "drop-off" and "buyback" center.

Response 37: The comment is noted. With respect to future development of the project site, development after the postclosure period at the site would be in accordance with the requirements of California Code of Regulations (CCR), Title 27, §21190. Any future development of the project site would be consistent with City and County General Plan elements and zoning requirements as conditioned by the City and County in providing

entitlements for the project. (See Draft SEIR, Section 2.15.1, End Use of the Site, p. 2-95.)

Comment 38: *14.3 Economic impacts of increased waste management costs.*

SCAG staff comments. The Draft SEIR on page 2-3 acknowledges two key solid waste objectives that pertain this policy: 1) provide cost-effective disposal options for the City, County, and private haulers at a landfill facility located within the region to minimize transportation costs; and 2) facilitate local and regional efforts directed toward attaining solid waste disposal capacity objectives for the City and County of Los Angeles contained in the California Integrated Waste Management Act of 1989 (AB 939) [and various listed City and County planning documents], and formally executed agreements between the County and the City that identify the need for maximum technically and environmentally feasible expansion of landfill sites. These objectives begin to address the critical issue of increased waste management costs. The Final SEIR should be updated to include policy reference to Chapter 14 (Integrated Solid Waste Management) of the Regional Comprehensive Plan and Guide and consideration of the various recommendations, especially those pertaining to landfills, in the April 1997, SCAG Solid Waste Task Force Report. The City/County Landfill should also consider the inclusion in the Final EIR of a mitigation measure that would include as an important goal to "accept waste only from jurisdictions in compliance with the waste diversion mandates of AB 939." The Project is supportive of this ancillary RCPG policy.

Response 38: SCAG's Integrated Solid Waste Management Chapter 14 supports the objectives of A.B. 939. This chapter does not institute mandates but instead describes existing law and assists local governments in integrating waste issues with other regional issues. Solid waste management planning is generally performed at the local level by every jurisdiction in the State. The goals of A.B. 939 generally promote waste prevention, recycling, composting, safe disposal, and transformation, and are intended to minimize the unnecessary duplication of efforts by local governments. The objectives of State law are to divert at least 25 percent of all waste from landfills by 1995 and at least 50 percent by the year 2000, and ensure that there is adequate, safe disposal capacity for remaining wastes.[19]

The regional strategies adopted in the *Regional Comprehensive Plan and Guide* (RCPG) support local government activities and the private sector in developing recycling industries and markets, coordinating waste prevention awareness programs, making cost comparisons of waste management alternatives to reduce costs to business and the economy, and providing data and dialogue regarding intercounty disposal projects. The RCPG has identified Los Angeles County as having a critical shortfall of landfill

[19]/ *Regional Comprehensive Plan and Guide*, SCAG, p. 14-3. March 1996.

capacity and that growth in the region will increase pressure on existing landfill space.[20] As indicated within the Draft EIR prepared for the RCPG and Regional Mobility Element (RME) solid waste section, the following is stated: "Disposal capacities for some jurisdictions within Los Angeles are extremely low. Within Los Angeles County, approximately ten landfills will be closing before 2010, three landfills in 2010 and three landfills after 2010."[21]

The Solid Waste Task Force was formed in the fall of 1995 and consists primarily of members of SCAG's Energy and Environment Committee. The Task Force investigates current and future solid waste management needs and capacities in Southern California, future waste management options, and recommendations on public policy guidance and cooperative efforts. Recommendations are organized for the short-term (1996-2000), medium-term (2000-2010), and long-term (2010-2040) waste management options.[22]

The Solid Waste Task Force Report states the following regarding solid waste disposal capacity in the region:

> Landfills currently are the most economic way to handle trash in Southern California and this is expected to continue for the foreseeable future. Siting new landfills or expanding existing ones will continue to be a major challenge. The efficient use of existing landfills could avoid increased waste disposal costs, and a depletion of existing natural resources. Costs of disposing of waste could likely double or triple over the next decade in some parts of the SCAG region. Concerns about access to landfills are highly localized and will continue to be a strong focus in parts of Los Angeles County.[23]

This report also recommends the following short- and medium-term actions:

> Encourage and support the siting of new landfills necessary to meet residual disposal needs.[24]

The project proponent would accept waste from jurisdictions in compliance with A.B. 939 (e.g., jurisdictions that have completed a Source Reduction and Recycling Element [SRRE], have received California Integrated Waste Management Board (CIWMB) certification of that jurisdiction's SRRE, and are working toward stated mandated diversion goals).

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[20]/ Ibid., pp. 14-14, 14-16, and 14-24.

[21]/ *Draft Environmental Impact Report for the Regional Comprehensive Plan and the Regional Mobility Element*, SCAG, p. 13.17. December 1993.

[22]/ *Solid Waste Task Force Report*, SCAG, p. 1. April 1997.

[23]/ Ibid, p. 2.

[24]/ Ibid, p. 26.

Comment 39: *14.4 Promote new technologies.*

SCAG staff comments. The Draft SEIR acknowledges that the Project will incorporate some new technology features in the design and operation of the City/County Landfill. These include the state-of-the-art Plant Materials Center, bottom composite and side-slope liner systems (including a more superior alternative side-slope liner) and an automatic tracking system to monitor and account for all incoming waste. In the evaluation of project alternatives, the Draft SEIR considered and rejected various waste management technologies and strategies, including: source reduction, recycling, composting, waste-to-energy, and the use of alternative daily cover materials. This analysis is included in Section 5.9 (Waste Management Technologies and Strategies). The Draft SEIR on page 1-14 concludes that "solid waste transformation technologies such as co-composting, pyrolysis, landfill mining, and high-volume shredding are considered speculative, and these technologies are not feasible alternatives to the proposed Project". Although the Draft SEIR acknowledges alternative waste management technologies, it does not address technologies in a comprehensive manner. The Project is partially supportive of this ancillary RCPG policy as it relates to the stated new technology project features, but not supportive of the policy as it relates to alternative waste management technologies.

Response 39: Consideration of alternative waste management technologies and strategies is provided in the Draft SEIR. Specifically, Section 1.9, Alternatives Summary, p. 1-14, states the following:

> Even with the implementation of advanced and aggressive waste management alternatives, solid waste landfills would still be needed to adequately provide for the amount of waste being generated within the City. Therefore, alternative waste management strategies and technologies are not considered viable alternatives to the proposed project because they would not attain most of the basic objectives or avoid or substantially lessen any of the significant effects of the project.

Alternative solid waste management technologies and strategies, by themselves, would not eliminate the need for high intake and capacity solid waste landfills in Los Angeles County due to the existing and projected disposal capacity shortfall. Over 36,000 tpd of solid waste currently requires disposal within Los Angeles County after source reduction, recycling, and composting programs have diverted as much of the recyclables as possible. Alternative waste management strategies and technologies would not be able to accommodate, by themselves, the volume of solid waste generated on a daily basis within Los Angeles County.

Comment 40: *14.5 Facilitating regional dialogue on intercounty waste disposal projects.*

SCAG staff comments. The Draft SEIR presents a clear discussion of various alternative waste disposal facilities in Section 5.0 (Alternatives). The information presented is helpful in facilitating the regional dialogue on

intercounty waste disposal projects. Furthermore, the Draft SEIR presents a case to support the selection of the proposed Project over the various alternatives noted in the Project Description. The Project is supportive of this ancillary RCPG policy.

Response 40: The comment is noted.

Comment 41: Consistency with the 208 Plan for the South Coast Planning Area

As the designated Areawide Waste Treatment Management Agency for Southern California, SCAG is mandated under Section 208 of the Federal Clean Water Act [33 U.S.C. § 1288] to engage in a comprehensive waste treatment planning process the primary product of which is the Areawide Waste Treatment Plan for the South Coast Planning Area (or "208 Plan"). Section 208(e) of the Clean Water Act provides that no NPDES permit may be issued for any point source which conflicts with the 208 Plan.

The current 208 Plan was prepared by SCAG in 1979. Due to a lack of federal or state funds, SCAG has been unable to update the Plan. Given the great demographic and environmental changes which have taken place in Southern California over the last two decades, the Regional Council has recognized that it is not feasible to determine whether a given project is consistent with the Plan.

While the statutes and regulations designate SCAG to make the conformity and consistency findings, the legal responsibility for these findings rest with the Regional and State Water Boards.

SCAG staff comments. As previously noted, the Project is consistent with SCAG's adopted population forecasts. These forecasts, however, have not been incorporated into the 208 Plan for the South Coast Planning Area. Furthermore, the various Residual Waste Management (especially Sanitary Landfill) policies and actions in the 208 Plan are dated. SCAG is unable to make a finding that the Project is consistent with the 208 Plan for the South Coast Planning Area. SCAG and the State Water Resources Control Board are precluded from carrying out their mandated review responsibilities and the Project is currently inconsistent with the 208 Plan for the South Coast Planning Area and any NPDES permit issued for any point source associated with the Project would conflict with the 208 Plan.

Response 41: The project proponent will comply with all applicable requirements of the LARWQCB for controlling, monitoring, and testing stormwater discharge at the project site. With respect to the 208 Plan, the project proponent will comply with any future updates to the 208 Plan that are approved by both SCAG and the LARWQCB.

Comment 42: Conclusions and Recommendations:

As noted in the staff comments, the proposed Draft Supplemental Environmental Impact Report for the Sunshine Canyon Landfill is consistent with or supports many of the core and ancillary policies in the Regional Comprehensive Plan and Guide. Until the funding

of congestion mitigation improvements to Interstate 5 and impacted interchanges are resolved to the satisfaction of Caltrans and LAMTA, the Project can not be found consistent with core policy 4.10.

Response 42: The comment is noted. Refer to Responses 26 and 27.

Comment 43: The Project is conditionally consistent with core policies 4.20 and 4.23.

Response 43: The comment is noted.

Comment 44: The Project is partially supportive of ancillary policy 14.4, but not supportive of the manner in which it addresses alternative waste management technologies.

Response 44: Refer to Response 39.

Comment 45: Furthermore, based on insufficient information in the Draft Supplemental Environmental Impact Report, we are unable to determine consistency with core policy 5.11.

Response 45: Refer to Response 30.

Comment 46: For the reasons stated herein, SCAG is unable to make a finding that the Project is consistent with the 208 Plan for the South Coast Planning Area.

Response 46: Refer to Response 41.

Comment 47: All mitigation measures associated with the project should be monitored in accordance with AB 3180 requirements and reported to SCAG through the Annual Reasonable Further Progress Reports.

Response 47: As referenced in the Draft SEIR, Section 7.0, Mitigation and Monitoring Program, p. 7-1, A.B. 3180 requires that the public agency adopt a reporting or monitoring program to ensure compliance with mitigation measures and conditions of project approval that were adopted to lessen or avoid significant effects on the environment.

In addition, any changes required or incorporated at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project shall prepare and submit a proposed reporting and monitoring program. Therefore, requirements of the Annual Reasonable Further Progress Reports will be complied with as applicable to the proposed project and in a manner specified by the Responsible Agency. (Refer to Table 7.4-1 [Revised] in this document.)

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Performance Assessment and Implementation
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017-3435
[Supplemental Comments]

Letter 3.4-2

Comment 48: SCAG's Standing Committee on Implementation on November 6,1997 approved staff comments included in the September 4, 1997 letter on the Draft Subsequent Environmental Impact Report for the Sunshine Canyon Landfill Expansion Project.

Response 48: The comment is noted.

Comment 49: They also directed that we include the following supplemental comments on the above referenced project.

1. The Final EIR should address the manner in which the proposed project deals with the potential problems (litter, dirt, debris and odors) associated with high wind events in the Newhall Pass area. The Committee chair was especially concerned about this problem because of the close proximity of the landfill expansion over portions of the previous City of Los Angeles site to adjacent residential areas.

Response 49: Refer to Topical Issue 3 for discussions of potential high wind conditions at the project site, potential fugitive dust migration beyond the project boundary, SCAQMD Rules 402 and 403, how soil sealant will be used at the project site, and its effectiveness at limiting fugitive dust. Also, refer to Topical Issues 4 and 18 for discussions of potential odor and litter impacts and recommended mitigation measures.

Comment 50:

2. The Final EIR should address the manner in which the proposed project addresses the relationship of potential surface and groundwater related problems associated with the Van Orman Reservoir and the Metropolitan Water District water treatment facility. The Committee chair and other committee members expressed concern about the potential damage to the regions water supply that could result from surface or groundwater contamination.

Response 50: Refer to Topical Issue 6 for a discussion of groundwater movement within Sunshine Canyon and the potential for leachate migration. Refer to Topical Issue 3 for a discussion of the potential for fugitive dust migration beyond the project site boundary.

Comment 51:

3. The Final EIR should address the manner in which the design of the liner system for the proposed landfill expansion can accommodate seismic events of the magnitude of the Northridge Earthquake. The Committee chair expressed concern that given the past experience of earthquakes (Sylmar and Northridge) in the vicinity of the Santa Susana Mountains, the design of the landfill liner system should be such that any rupture resulting from ground shaking activity can be detected rapidly and mitigated.

Response 51: Refer to Topical Issues 1, 2, and 8 regarding seismicity, the landfill's performance during the Northridge earthquake, and a summary of the proposed landfill's liner and environmental control systems that will be designed to withstand major earthquake events.

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Letter 3.4-3

Comment 52: **Regulations**

Regulations for municipal solid waste landfills are no longer found in Chapter 15, Title 23, California Code of Regulations. They are now contained in Title 27 of the California Code of Regulations which became effective July 18, 1997. In the future please reference the appropriate sections of Title 27.

Response 52: The Draft SEIR was in review prior to Title 27 taking effect. All references to Title 23 have been changed accordingly in this Final SEIR.

Comment 53: **Section 5.2.2 Material Parameters for Static and Pseudo-Static Analyses**

The material parameters utilized for the solid waste materials must be consistent with the parameters used for the Stage II development of the Sunshine Canyon County Landfill (presently unapproved by this Regional Board).

Response 53: The comment is noted. Phase II of the operational County Landfill was recently approved by the LARWQCB.

Comment 54: **Surface Water**

Alteration of a streambed requires the approval of a Corps of Engineers 404 permit and a Regional Water Quality Control Board 401 Certification permit.

Response 54: The Draft SEIR identifies these discretionary permits (see Table 2.16-1, Summary of Regulatory Permits and Discretionary Actions Required for the Proposed City/County Landfill Project, p. 2-98) and the status of obtaining these permits from the regulatory agencies.

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Letter 3.4-4

Comment 55: **Section 1.7.1 - Unavoidable Significant Adverse Impacts**

This section identifies significant adverse air quality impacts for various criteria pollutants [i.e., nitrogen oxides (NO_x), reactive organic gases (ROG), and particulate matter (PM_{10})] due to project implementation. This section further states that "Regional emissions of all criteria pollutants [i.e., carbon monoxide, NO_x, sulfur oxides (SO_x) and PM_{10}] will decrease by reduced mileage traveled within the South Coast Air Basin." The SCAQMD is unclear about why vehicle miles traveled (VMT) would be reduced, how they were derived, the specific amount of reductions being calculated, whether or not this reduction in VMT is included in the analysis of air quality impacts, etc. The SCAQMD does not see this information given in any greater detail in the Air Quality Impacts chapter. Therefore, please clarify these VMT reductions, in light of the additional trips being generated at this site, and provide all assumptions and calculations used.

Response 55: The SCAQMD does not provide a methodology to calculate the differences described above and typically operates under the policy that vehicle trips and their attendant emissions are project related. Therefore, all emissions related to vehicles visiting the site are included in the analysis, and no reductions are assumed.

However, solid waste hauling companies generally use solid waste landfills that are the closest to their area of service and/or have the lowest tipping fee. If the City/County Landfill was not developed, waste haulers would be forced to transport solid wastes to landfills located farther away from the City of Los Angeles than the proposed project. This would result in greater air quality emissions due to the increased travel distance. The proposed City/County Landfill is located approximately 27 miles from the downtown area of the City of Los Angeles.

Alternatives to the proposed project were analyzed in the Draft SEIR, Section 5.0, Alternatives. Of the alternatives considered, the El Sobrante Landfill is located approximately 65 miles from the downtown area of the City of Los Angeles and the proposed Eagle Mountain, Bolo Station, and Mesquite Landfill remote landfill sites are located approximately 200 to 250 miles from downtown Los Angeles. The Eagle Mountain, Bolo Station, and Mesquite waste-by-rail remote landfill projects would also require the construction and operation of several high-volume transfer/MRFs with rail-loading capabilities to provide the transport of solid wastes to remote desert locations. These transfer stations/MRFs would result in additional air quality emissions. As described, implementation of these alternative landfill projects would result in greater regional air quality emissions than the proposed City/County Landfill.

Comment 56: **Section 3.1.3 - Air Quality**

Please note that the boundaries of the South Coast Air Basin do not include all of Los Angeles County, as of July 1, 1997, but rather, the non-desert portion of Los Angeles County. The SCAQMD's area of jurisdiction is different from the Basin and is as follows: the four-county South Coast Air Basin (Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties) and the Riverside County portions of the Salton Sea Air Basin (SSAB) (formerly part of the SEDAB).

Response 56: The stated text from the Draft SEIR has been corrected. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, in this document.

Comment 57: This section states that the Basin is currently in nonattainment for lead. This statement is incorrect and should be corrected in the Final SEIR.

Response 57: The stated text from the Draft SEIR has been corrected. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, in this document.

Comment 58: **Sections 4.2.5 and 4.2.10**

These sections refer to the 1994 Air Quality Management Plan (AQMP). Please note that the most currently adopted AQMP is the 1997 AQMP. The 1997 AQMP has also been approved by the California Air Resources Board and forwarded to U.S. EPA as part of the State Implementation Plan revision. However, U.S. EPA has not taken any approval action on the 1997 AQMP. This document should be referred to in the Final SEIR. Copies are available through the SCAQMD's Public Information Center at (909) 396-3600.

Response 58: The Draft SEIR was prepared prior to the adoption of the 1997 AQMP. However, this information has been added into this Final SEIR. Refer to Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, in this document.

Comment 59: **Section 4.2.7- Site Preparation/Construction Sequencing**

The Draft SEIR does not include an estimate of the anticipated duration of construction activities.

In addition, it is unclear whether or not any operation activities will overlap any construction activities. Any overlap between construction and operational emissions should be discussed and analyzed to determine overall site-specific impacts. If cell filling activities are occurring at the same time construction is occurring, the entire process should be treated as operational, analyzed together, and compared to the operational significance thresholds to determine project significance.

Response 59: The Draft SEIR, Section 4.2.7, Site Preparation/Construction Sequencing, pp. 4-60 through 4-64, analyzes the short-term air quality impacts associated with the initial construction phase of the proposed City/County Landfill. This initial construction phase

would occur over a 6- to 9-month period. To avoid confusion, Section 4.2.7 has been revised to "Site Preparation/Construction Phase (Short-Term)." Refer to Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, in this document.

All construction-related emissions associated with future sequences of the proposed City/County Landfill were included in the Draft SEIR, Section 4.2.8, Air Quality Operational Phase (Long-Term), Table 4.2-8, and construction activities for these future landfill sequences would occur over a long duration.

As stated in the Draft SEIR, Section 4.2.6, Proposed Project Overview, p. 4-60:

> . . . The installation of the liner system and access road realignment, will be performed in sequences as landfill development occurs. Thus, these improvements are considered operational components of the proposed project. Also during the operational phase, portable structures now located at the County Landfill will be relocated onto the City portion of Sunshine Canyon.

As landfilling sequencing occurs, landfill construction and operations would occur concurrently; however, during these periods, the project proponent would schedule construction and operational activities so that heavy equipment could be used for both activities and would not create the need for additional heavy equipment or cause any disruption in the daily operation of the landfill. The resulting air quality emissions that are generated would not exceed the "worst-case" emissions projected in Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, in this document.

Comment 60: Table 4.2-5 contains construction emissions for initial site preparation. This table includes emissions of particulate matter (PM_{10}) with an estimate of 60.8 pounds per day. Table 4.2-6 shows fugitive dust PM_{10} emissions from initial site preparation to be 399.8 pounds per day before mitigation. The SCAQMD recommends that unmitigated PM_{10} emissions from Table 4.2-6 be included in Table 4.2-5 for ease in identifying unmitigated project emissions.

Response 60: The Draft SEIR, Table 4.2-5, p. 4-61, identifies daily heavy equipment emissions that would occur during the construction phase (short-term) of the proposed project. This table is entitled, "Construction Emissions for Initial Site Preparation." To avoid confusion, Table 4.2-5 is herein revised to "Construction Exhaust Emissions for Initial Site Preparation." Table 4.2-6 includes the total daily emissions occurring during the construction phase (short term) of the proposed project as a result of site grading, site erosion, and the emissions from heavy equipment listed in Table 4.2-5. Refer to Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, in this document.

Comment 61: Based upon the materials received regarding the proposed project, SCAQMD staff was unable to locate any calculations conducted that support the emissions estimates listed in Table 4.2-5. In attempting to verify the results in Table 4.2-5, SCAQMD staff re-calculated some of the emissions in Table 4.2-5 and found that some of the emission factors used in the Draft SEIR were based on an 8-hour day, 7-hour day, etc. Since it is stated in the Draft SEIR that the normal workday is 10 hours, the Lead Agency should

adjust the calculations to reflect a 10-hour work day in the Final SEIR. Re-calculating emissions based on a 10-hour workday may show that the construction phase of the project creates significant emissions for pollutants other than NO_x and PM_{10}.

Response 61: Construction equipment emissions are based on 10-hours of operation per day. Emission calculations, including appropriate reference sources, are now included in Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, in this document.

Comment 62: This section indicates that the Lead Agency used EMFAC-7EP to model mobile source emissions. Please note that the California Air Resources Board (ARB) has a more recently approved and updated version of these emission factors, EMFAC-7G. The SCAQMD recommends that the Lead Agency revise for the Final SEIR its mobile source emissions results using EMFAC-7G emission factors to reflect the most accurate data currently available.

Response 62: The EMFAC7EP values used in the analysis were taken from the *SCAQMD CEQA Air Quality Handbook*, which the District uses in its review of air quality assessments. However, mobile source emissions have now been recalculated using the most current EMFAC7G model, and these results are included in Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, in this document.

Comment 63: **Section 4.2.7- Fugitive Dust**

The SCAQMD's strongly recommends that air quality impacts be calculated using approved emission factors such as AP-42 which are more conservative. Other emissions factors should not be used unless documentation is provided supporting the use other emissions factors.

Response 63: With the exception of silt content obtained at a representative site 10 miles to the north, dust emissions were previously calculated using AP-42 (1985) as a reference source, which was the most recent version when the Draft SEIR was prepared. In response to comments made by the LAUSD on the Draft SEIR (refer to letter 3.8-1, Comments 250 through 252), all PM_{10} emissions associated with the generation of fugitive dust have now been recalculated using the standard or recognized default values as presented in AP-42 (1995). AP-42 is prepared by USEPA and is updated periodically to reflect current research regarding emission sources and control technologies/measures. The reevaluation using the updated AP-42 emission factors and methodologies for calculating emissions, as well as more specific operational related emission factors, increased the estimated unmitigated PM_{10} emissions associated with heavy equipment operations and travel on unpaved surfaces. However, the revised AP-42 emission factor for calculating PM_{10} emissions for travel over paved surfaces, resulted in a decrease in unmitigated PM_{10} emissions associated with fugitive dust. The revised calculations are included in Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, in this document.

Comment 64: In the case of using fugitive dust factors from the Transit Mixed Concrete (TMC) site, there is no supporting documentation justifying its use for the proposed landfill expansion project. Further, the TMC site is located approximately 10 miles away from

the proposed expansion site and may have completely different soil characteristics. The SCAQMD therefore recommends using the more conservative AP-42 emission factors to ensure that the analysis captures the maximum potential adverse impact from this source.

Response 64: Refer to Response 63.

Comment 65: **Section 4.2.8 - Air Quality Operational Phase**

As indicated in the comments for Section 4.2.7 above, equations supporting the results in Table 4.2-7 were not included in the materials received by the SCAQMD. Project specific calculations should be provided (in an appendix, for example) to facilitate corroboration of the results by the public. Similarly, many of the results provided do not reflect a 10-hour work day. The SCAQMD recommends that the Lead Agency revise in the Final SEIR the applicable factors from the CEQA Handbook to reflect the 10-hour work day. If adjustments have not be made, Table 4.2-7 should be re-calculated.

Response 65: Refer to Response 61.

Comment 66: Tables 4.2-14 and 4.2-15

These tables display emissions, control efficiencies and remaining emissions in an effort to quantify the effectiveness of applicable mitigation measures. By the way the table is set up, however, it is unclear which specific mitigation measures are associated with the control efficiencies listed. For example, the SCAQMD has no way of knowing what mitigation measure is being described under CO - Heavy Equipment Operation, and how a control efficiency of 40 percent was determined. The SCAQMD recommends that the Lead Agency revise these two tables to include the mitigation measures specified in the text and associate the appropriate control efficiency for that mitigation measures for each emissions source.

Response 66: As noted from past conversations with both SCAQMD and California Air Resources Board (CARB) staff, the exact control efficiency of mitigation measures for heavy equipment operations is difficult to quantify because all measures have a degree of uncertainty and not all measures are cumulative in nature. The values assigned to the mitigation for heavy equipment operations were determined in accordance with a report issued by the CARB based on a 2-day conference conducted on January 9 and 10, 1992. The report includes the effects of various emission-reduction measures to be used for heavy equipment diesel engines. Many of the mitigation measures proposed for the Sunshine Canyon Landfill operation are addressed in this report. Specifically, those mitigation measures presented in the Draft SEIR for heavy equipment and addressed in the CARB report include:

- fuel injection timing retardation resulting in NO_x reduction of 15 to 30 percent (>20 to >40 percent in AP-42),

- use of high-pressure fuel injectors resulting in PM_{10} reduction in excess of 80 percent with reduction in hydrocarbons, and
- low-emission fuels resulting in unquantified reductions in all emissions.

The referenced reductions in equipment emissions for these mitigation measures are considered to be both reasonable and conservative.

Comment 67: **Truck Travel and Fugitive Dust Emissions**

Please specify the length of paved roads and unpaved roads being referred to in Tables 4.2-15 and 4.2-16. As stated previously, there are no specific calculations provided to show how these emissions were calculated, therefore, it is difficult to assess the validity of the control efficiency.

Response 67: As discussed in the Draft SEIR, Section 4.2.8, Air Quality Operational Phase (Long-Term), p. 4-71, onsite travel on paved surfaces is estimated at 2 miles per vehicle per day. The Draft SEIR, Section 4.2.8, Air Quality Operational Phase (Long-Term), p. 4-72, shows that travel over unpaved surfaces is estimated at 800 feet per vehicle per day. Calculations are included in Appendix D2, Revisions to Draft SEIR, Section 4.2 Air Quality, in this document.

Comment 68: The text does not clearly state which criteria pollutants exceed both construction and operational thresholds. SCAQMD is unclear about the overall findings of significance for air quality. The SCAQMD assumes, based on Table 4.2-15, that emissions will remain significant for CO, NO_x, ROG, and PM_{10} on an operational basis. Construction emissions should also be re-assessed, noting that potential re-calculations may be in order. The SCAQMD recommends that the Lead Agency include a table or discussion that aggregates all unmitigated emissions (both construction and operation) for clarity.

Response 68: The Draft SEIR, Section 4.2.11, Construction, p. 4-84 through 4-86, specifically notes that construction emissions for NO_x and PM_{10} would result in an exceedance of the SCAQMD significance thresholds after the incorporation of mitigation measures. The Draft SEIR, Section 4.2.12, Operations, pp. 4-86 through 4-91, notes that operations would result in exceedances of the CO, NO_x, ROG, and PM_{10} criteria and would remain significant after the incorporation of mitigation measures. Both Tables 4.2-14 and 4.2-15 reiterate these findings and include unmitigated and mitigated emissions. Revised calculations for air quality emissions associated with the proposed project are included in Appendix D2, Revisions to Draft SEIR, Section 4.2 Air Quality, in this document. The revised calculations do not change any conclusions for the proposed project regarding impact significance except that SO_x emissions are now over the SCAQMD significance threshold during project operations and would remain significant after the incorporation of mitigation measures.

The Draft SEIR explains that the estimate of construction emissions includes initial site preparation, and operational emissions include construction associated with future sequences of landfill development. Refer to Response 59 for a discussion of proposed

project construction duration and a discussion of construction and operational activities occurring concurrently at different portions of the project site.

Comment 69: **Section 7.0 - Mitigation Reporting**

The SCAQMD has evaluated the Mitigation Reporting and Monitoring Program, Section 7.0, and concluded that several mitigation measures have inappropriately been assigned to the SCAQMD to monitor. Please refer to Attachment 2 for a list of mitigation measures over which the SCAQMD has no jurisdictional or enforcement authority.

Attachment 2 Mitigation Measures Not Under the Jurisdiction of the SCAQMD

Construction and Operation

- The project proponent will maintain equipment in tune per manufacturer's specification.
- The project proponent will use catalytic converters on gasoline-powered equipment.
- The project proponent will retard diesel engine injection timing by 2 degrees.
- High-pressure fuel injectors will be installed.
- Heavy equipment will use reformulated, low-emission diesel fuel.
- The project proponent will substitute electric and gasoline-powered equipment for diesel-powered equipment where feasible.
- Where applicable, equipment will not be left idling for prolonged periods.
- Public streets shall be swept at the conclusion of construction work.
- Refuse trucks shall be maintained in proper tune.
- High-pressure fuel injector nozzles shall be used, and diesel engine timing shall be retarded by 2 degrees.
- Using a progressive fee schedule, the project proponent shall encourage trucks to carry full loads.
- The project proponent shall encourage trucking to be performed during off-peak hours.
- When operating onsite, trucks shall not be left idling for periods in excess of 5 minutes.
- Private owner-operators shall be warned that, if their trucks emit excessive amounts of smoke as determined by scale house workers, they will not be allowed future access to the landfill facility.
- Filling in each active area shall be prolonged through the utilization of a 20-foot maximum cell height.
- Solid waste shall be compacted within 1 hour of its arrival at the working face.

Response 69: The stated text from the Draft SEIR has been changed to incorporate this information. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, in this document.

Comment 70: **Health Risk Analysis Air Quality Modeling**

According to the Draft SEIR, the Lead Agency used the SCREEN2 model to estimate the ground level concentration for zero plume rise, flat terrain, and hybrid configuration scenarios. The SCAQMD recommends that the Lead Agency utilize the ISCST3 model.

If the Lead Agency continues to rely on the SCREEN2 model, however, a clarification of what assumptions were used, how data were derived, etc., needs to be included.

Response 70: The use of SCREEN2 as a screening level assessment for CEQA purposes was established in a modeling protocol received and reviewed by SCAQMD staff. The protocol specified use of SCREEN2 for the initial assessment. If the results did not establish a less than significant impact with an adequate margin of safety, then BEEST-X, a hybrid combination of ISCST2 and COMPLEX 1, was to be used. This protocol was followed in the Draft SEIR. SCREEN2 model input/output assumptions and derivations were presented in detail in the Draft SEIR, Appendix B6, Low-Level Health Risk Assessment, and include the computer output sheets with all specified input parameters. The SCREEN2 analysis shows that toxic emissions are below the SCAQMD significance threshold of one in 1 million for cumulative maximum individual cancer risk, as discussed in the Draft SEIR, Section 4.2.9, Health Risk Analysis, p. 4-76.

However, in response to this comment by the SCAQMD, landfill emissions have now been modeled using the ISCST3 model. Revised modeling is based on updated gas production rates (from five flares) and revised gas composition data based on the most recent flare source test and includes emissions of gas from the landfill surface. The ISCST3 analysis shows that toxic emissions are below the SCAQMD significance threshold of one in 1 million for cumulative maximum individual cancer risk. These results are presented in Appendix D3, Revisions to Draft SEIR, Appendix B6, Low-Level Health Risk Assessment, of this document. In addition, refer to Response 97 for a discussion of data that have been changed in the Draft SEIR air quality assessment to reflect the maximum permitted emissions from five flares.

Comment 71: Currently, the SCAQMD is unable to replicate the results contained in the Health Risk Analysis.

Response 71: Refer to Response 70.

Comment 72: The SCAQMD also noted discrepancies between emission rates for criteria pollutants (Table 6, Appendix B6 and Table 4.2-8, Volume 1).

Response 72: Refer to Response 97 within this document.

Comment 73: **Section 4.2.13 - Odor Impacts**

The odor discussion in the text (page 4-94, third full paragraph) implies that the SCAQMD has determined that the Sunshine Canyon Landfill is not a source of odors. Although it is true that in some instances odor complaints in the area have been traced to other sources or the sources could not be verified, the landfill has been cited a number of times for verified nuisance odor complaints by the SCAQMD, particularly when it was in full operation. This paragraph needs to be revised in the Final SEIR to more accurately reflect the past history of nuisance odor complaints.

Response 73: No "Notices of Violation" (pertaining to odor) were ever issued by the SCAQMD (the agency that regulates landfill odors) at either the inactive City Landfill or currently operating County Landfill. This information is confirmed by a Notice of Violation/Notice to Comply (NOV/NC) Report issued by the SCAQMD on December 19, 1997, to the environmental consultant.

By way of clarification, the SCAQMD indicated at a public hearing (in January 1987) that, after numerous inspections, the City Landfill was not the source of previous Granada Hills resident odor complaints. (Refer to testimony of Terry Wilkinson, SCAQMD Inspector, before the SCAQMD Hearing Board on January 27, 1987.) It should be noted that the primary odor source that had been detected in the general area of the project site is from naturally occurring sulfur and existing oil well and gas injection storage operations at Aliso and Cascade Oil Fields. Existing odor control procedures used onsite are effective in controlling refuse odors.

In accordance with CCR, Title 27, §20919 through 20923, the project proponent will ensure that LFG generated at a disposal site is properly controlled to protect public health and safety, and the environment. The project proponent will prepare and implement an odor abatement program as approved by the designated City LEA. The program will ensure that odor levels within the facility are kept within baseline odor standards and that odors originating from the facility will not exceed any odor detection thresholds at the property boundaries.

The best method for reducing the possibility for odor generation is by properly compacting and covering the deposited waste by the end of the working day. Odors emanating from the generation of LFG inside the landfill will be controlled through the installation and operation of an LFG collection and flaring system in full compliance with SCAQMD permitting conditions and the requirements of CCR, Title 27, §20937. All incoming or outgoing truck traffic (i.e., collection and/or transfer vehicles) will be completely enclosed or equipped with an impermeable, tight-fitting cover to suppress odors and prevent spillage of materials. The Draft SEIR, Section 2.6.3, City/County Landfill Design, describes the methods that would be used at the project site with respect to compacting and using daily cover material.

For an additional discussion of this issue, refer to Topical Issue 4 and the Draft SEIR, Section 4.2.13, Odor Impacts, pp. 4-94 through 4-96, which identify specific mitigation measures for potential odor impacts.

Comment 74: In the next paragraph on the page, the text implies that the SCAQMD has approved as adequate the existing odor control procedures. This information is not accurate. Although it may be true that the existing odor control procedures are effective under certain conditions, they may not necessarily be effective under all conditions. There are a number of parameters that could reduce the effectiveness of the odor control procedures including meteorology, maintaining the equipment in good condition, etc.

Response 74: The SCAQMD has not "approved" odor control procedures that are presented in the Draft SEIR. Meteorological conditions would not reduce the efficiency of the proposed

odor control techniques are because they are based on reasonable worst-case conditions designed so that odors are not detected beyond the project boundaries. All equipment will be maintained in an acceptable, operable condition. Refer also to Response 73.

Comment 75: Further, there is no evidence in the Draft SEIR that the existing odor control procedures will be effective once the landfill has expanded. The extent of the expansion could render as inadequate any odor control procedures similar to those currently in place. Therefore, the text needs to be modified to reflect the fact that the SCAQMD does not necessarily consider the existing odor control procedures are effective under all conditions.

Response 75: Proposed odor control measures will comply with SCAQMD Rule 1150.1 so that odor is not detectable beyond the project boundaries. Refer to Response 73 for a discussion of odor control measures to be implemented for the proposed project and the historical effectiveness of odor control measures at the project site.

Comment 76: Further, the Lead Agency should provide additional information to support the assertion that the proposed odor control procedures will be adequate for the expanded landfill.

Response 76: Refer to Response 73.

Laura J. Simonek
Principal Environmental Specialist
Metropolitan Water District of Southern California
350 South Grand Avenue
Los Angeles, CA 90071

Letter 3.4-5

Comment 77: **Existing Metropolitan Facilities**

The proposed project may adversely affect both the Metropolitan's Balboa Inlet Tunnel and the Joseph Jensen Filtration Plant located approximately ½-mile southeast of the landfill entrance. This plant delivers up to 750 million gallons of water per day to portions of the San Fernando Valley, Ventura County, and west Los Angeles County areas. It will be necessary for the City of Los Angeles Planning Department to consider these facilities in its project planning.

Response 77: No impacts on either facility would occur with the implementation of the proposed project.

The Balboa Inlet Tunnel is located approximately 1,400 feet (due southeast) from the landfill entrance. Moreover, at its closest distance to the nearest property boundary, the tunnel is approximately 1,000 feet. This pipeline (14 feet in diameter) is located underground and is fully **encased** [emphasis added]; it passes beneath the I-5 Freeway before connecting into the Jensen Plant. Information pertaining to the Balboa Inlet Tunnel is presented in the Draft SEIR, Section 4.3.2, Groundwater, p. 4-127.

The Los Angeles Aqueduct Filtration Plant is located approximately 2 miles southwest of the project site. In addition to distance, this plant is protected from any potential impacts because subsurface water in Sunshine Canyon is effectively hydraulically separated from the San Fernando Valley by the low-permeability bedrock. Groundwater flow in the bedrock is not continuous between the canyon and valley floor area.

After independently reviewing published hydrogeologic reports for the Sunshine Canyon area, the Watermaster (i.e., Mr. Melvin Belvins) for the Upper Los Angeles Basin Area concluded that, other than through the alluvium, there was no groundwater connection between Sunshine Canyon and the San Fernando Basin. The Watermaster also concluded that the natural bedrock material underlying the canyon is of low permeability and has low storage capability. (See Topical Issue 6.)

Additionally, any possibility for groundwater migration has been effectively cut off since the installation of the groundwater extraction trench across the bottom of Sunshine Canyon. The trench is approximately 200 feet long and is located across the access roadway near the southeast toe of the inactive landfill. This system is part of a comprehensive groundwater monitoring system (recognized by LARWQCB Board Order No. 87-158) implemented for the existing inactive landfill.

Comment 78: In order to avoid potential conflicts with Metropolitan's facilities, we request that preliminary engineering design drawings or improvement plans for any activity in the area of Metropolitan's pipelines and rights-of-way be submitted for our review and written approval.

You may obtain detailed prints of drawings of Metropolitan's pipelines and rights-of-way by calling Metropolitan's Substructures Information Line at (213) 217-6564.

Response 78: This request is acknowledged and will be complied with by the project proponent. It should be noted that the design and operation of the proposed City/County Landfill would all occur on BFI-owned property located within Sunshine Canyon. No impacts on MWD's pipelines or rights-of-ways would occur as a result of project development.

Comment 79: **Groundwater and Water Quality Concerns**

The potential leakage of leachate into the groundwater basin, as well as contamination of surface water, is a major concern for this region. Metropolitan is primarily concerned that the Balboa Inlet Tunnel and subsequent water supply could be at significant risk from the potential leakage of leachate. The Balboa Inlet is a concrete lined tunnel located immediately southeast of the proposed leachate treatment facility. The tunnel lining could be subject to decomposition and corrosion by leachate. Should leachate come in contact with the tunnel, water quality could be severely compromised. The Final SEIR should elaborate upon the proposed mitigation measures for groundwater quality impacts. The measures mentioned in the Draft SEIR include the recovery and treatment of leachate onsite and the sampling of the treated leachate on a regular basis to affirm suitability for reuse. It is Metropolitan's understanding that treatment of leachate-contaminated water is not possible through the normal water filtration process. Only a sewerage treatment plant would be able to treat such water, and then it would be unusable for public consumption. The loss of valuable water resources and subsequent treatment would be at great expense to the public.

Response 79: With respect to the Balboa Inlet Tunnel, refer to Response 77. Also, as mentioned in that response, the project site has no hydrogeologic connection to the San Fernando Valley Groundwater Basin other than through the surface alluvium; therefore, there is no reasonable possibility of the proposed project having an impact on MWD facilities (including the Balboa Inlet Tunnel).

With respect to leachate generated from the proposed City/County Landfill, any leachate generated would be captured and treated onsite (see Topical Issue 9). As indicated in Topical Issue 9, the proposed LCRS would be installed directly on top of the liner system in all areas of the proposed landfill footprint including the side-slope and waste-on-waste areas of the existing inactive landfill. This system would be constructed, maintained, and operated to collect and remove twice the maximum anticipated daily volume of leachate from the landfill. The LCRS would be designed of sufficient strength and thickness to withstand pressures exerted by overlying wastes, waste cover materials, and equipment used during landfilling activities. The LCRS would also be designed and constructed to maintain less than a 12-inch depth of leachate over the liner.

Comment 80: In addition, the Draft SEIR discusses using treated leachate water for dust control onsite. Though such use of treated water may conserve other important water resources, the Final SEIR should distinguish the parameters that assure leachate is nonhazardous and discuss the tests that will be used to verify its safety.

Response 80: Refer to Topical Issue 9 for a discussion of leachate treatment and requirements for reuse.

Comment 81: Metropolitan is concerned that leachate sprayed upon surface roads may contaminate both underground and surface water sources.

Response 81: Refer to Topical Issue 9 for a discussion of leachate treatment and requirements for reuse.

Comment 82: In addition, such treated water will also come into contact with Metropolitan's Balboa Inlet Tunnel. The project as proposed would not comply with the State of California Water Resources Control Board Chapter 15 requirements to protect underground water quality for as long as the wastes represent a threat to groundwater resources.

Response 82: As stated in Responses 77 through 79, there is no reasonable possibility of the proposed project having an impact on MWD facilities (including the Balboa Inlet Tunnel). The proposed City/County Landfill will be designed and operated in compliance with CCR, Titles 14, 23, and 27, to ensure that no significant impacts on MWD facilities will occur.

Comment 83: **Surface Water Runoff**

The Draft SEIR discusses proposed modifications to the existing drainage patterns. These improvements consists of surface water drainage channels, interceptor ditches, and pipelines that would collect, direct and convey surface water runoff around the landfill site and route runoff into regulated sedimentation basins. The drainage pattern indicated in Figure 4.3-1 of the Draft SEIR appears to be directing the surface runoff into the same channel that flows by Metropolitan's Joseph Jensen Plant. Metropolitan is concerned about the possible impact on its facility and requests that the downstream surface water discharge facilities or stream beds be analyzed for potential redirected storm flow impacts.

Response 83: Stormwater runoff from the project site currently flows into the Weldon Canyon Flood Control Channel that runs parallel to San Fernando Road. This channel is owned, operated, and maintained by the City BOE. With implementation of the proposed project, stormwater flows from the project site would continue to flow into this flood control channel.

The three proposed sedimentation basins would collect surface water flow, reduce the surface water sediment load, and reduce the rate of surface water flow leaving the project site to predevelopment surface water flow before entering the Weldon Canyon Flood Control Channel, thereby mitigating potential physical (e.g., erosion, obstructions, etc.) downstream impacts of high surface water flows. Quality of surface water leaving the

sedimentation basins at Sunshine Canyon will be monitored in accordance with the NPDES permit requirements developed by the LARWQCB for the site, thereby mitigating downstream water quality impacts. No offsite redirection of stormwater flows would occur.

Comment 84: **Pest Control and Management**

Various bird species, in addition to ravens, may be attracted to the landfill. The proposed landfill will provide a readily available food source for these pest species. Subsequent migration of birds to our Jensen Plant filtration basins and reservoirs would increase the potential for contamination of the water supply. The Final SEIR should detail the provisions for minimizing bird and pest contact with the proposed landfill, for example, the amount of hours allowed before refuse is covered with soil, the potential for having exposed refuse over night or weekends, etc.

Response 84: Refer to Topical Issue 17 for a discussion of vector prevention and control. Also refer to the Draft SEIR, Section 4.9.2, Vectors, pp. 4-300 and 4-301, which details the proposed mitigation measures that would be used for vector control.

In addition, the project proponent will implement operational techniques to limit vector activity, including placing refuse within 1 hour of receipt, compacting waste at the active working face, properly applying cover material, keeping the active working face as small as safely possible (given the type and number of landfill equipment and personnel), ensuring proper grading of interim fill surfaces, and eliminating ponding areas on the project site. Additionally, the onsite LEA will monitor the site daily for vector activity, and all potential food source materials (e.g., seed mixes, office supplies, etc.) will be stored in closed containers and/or within an enclosed structures.

Per the requirements of CCR, Title 27, §20680, the project proponent shall cover disposed solid waste with a minimum of 6 inches of compacted daily cover material at the end of each operating day. In accordance with the requirements of CCR, Title 27, §20690, alternative materials of alternative thickness for daily cover (other than at least 6 inches of earthen material) for municipal solid waste landfill units may be approved by the LEA with concurrence by the CIWMB if the landfill operator demonstrates that the alternative material and thickness control vectors, fires, odors, blowing litter, and scavenging without presenting a threat to human health and the environment. This requirement is incorporated into this Final SEIR. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR.

It should be noted that the County Landfill, which became operational in August 1996, has never been cited or received any violations from regulatory agencies with respect to onsite vector activity.

Comment 85: In addition, Metropolitan requests that the Final SEIR discusses the bird and pest control measures to be implemented in the green waste/wood waste, recycling and public drop off area.

Response 85: Refer to Response 84 for a discussion of vector prevention and control measures for the proposed project.

3.5 COUNTY AGENCIES

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Solid Waste Management Program
County of Los Angeles
Department of Health Services
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Letter 3.5-1

Comment 86: **Section 2.0 - Project Description.**

Paragraph 2.5.7. Proposed Landfill Ancillary Facilities

This section states (page 2-42) that as a component of the "green waste/wood waste recycling area" a dropoff and buyback recycling center would be established for use by the local community. Figure 2.4-5 locates this area on the opposite side of the site from the entrance gate. Will this location require users to travel along the same roads used by heavy trucks and other equipment to get there? Possibly the dropoff center could be located nearer the entrance gate.

Response 86: Refer to Response 190 for a discussion of the reason why the public buyback center is no longer being consider as part of the proposed project. The safest and closest location for the green waste/wood waste recycling area is on the top deck area of the inactive landfill and outside of the proposed landfill footprint boundary. With respect to small-volume haulers, these users will travel on the same access road as the larger waste hauling vehicles. However, the distance to the green waste/wood waste recycling area will be shorter than the distance to the active working face.

The access roadway within Sunshine Canyon was improved prior to the start of landfill operations at the County Landfill. Improvements were implemented in the summer of 1996 in response to the City's approval of a grading permit. Those improvements included the installation of drainage improvements, grinding and removing the existing asphalt road, importing aggregate subbase material, and importing asphalt for resurfacing of the access roadway consistent with project specifications.

Comment 87: Paragraph 2.10.3. Unloading Waste Materials at the Landfill Working Face.

This section is vague regarding self-haul loads.

a. Are these the same as those described later on as "local delivery?"

Response 87: Self-haul trips are local deliveries and include transport from local landscapers and noncommercial loads. Local deliveries (e.g., landscapers, gardeners) would generate approximately 100 tpd (or 2 percent of the maximum daily intake) of the total daily intake into the landfill facility. The traffic study identified approximately 125 half-ton and three-quarter-ton trucks (or self-haul trucks) that would transport refuse to the project site.

The Draft SEIR, Section 2.0, Project Description, is intended to provide an overview of the project and anticipated forms of truck trips into the proposed landfill facility. The Draft SEIR, Section 4.13, Transportation and Circulation, provides a detailed assessment of project and cumulative traffic generation.

Comment 88: b. Will all self-haul loads go to the green waste/wood waste drop-off area? If so, how will waste materials get from this area to the actual working face?

Response 88: No. However, it is anticipated that the majority of self-haul vehicles will include waste loads from local landscapers or gardeners. After checking in at the scale house area, these vehicles would be directed to the green waste/wood waste recycling area. Green waste/wood waste would be removed and deposited in 40-cu.-yd. drop boxes. This material would be ground with a transportable tub-grinding machine and then used onsite for landfill daily cover material, soil amendment for City/County Landfill revegetation programs, erosion prevention, fire prevention, and weed abatement. All segregated loads of green waste/wood waste received would be ground and reused onsite within 24 hours.

A small portion of self-haul vehicles (those not having green waste/wood waste loads) will proceed to the active working face area using the same route as larger refuse vehicles. As mentioned in Response 86, the access roadway through Sunshine Canyon has been improved and provides a ROW of 160 feet (for two lanes of traffic), with easements for berming and drainage.

Comment 89: c. The separation of public self-haulers from commercial delivery trucks (collection and transfer trailers) is a fundamental part of landfill design, primarily due to safety issues. This should be discussed further. One feature that might be incorporated into the overall site design is a self-haul "transfer station" near the scale-house. In this regard, small loads would be dropped off near the scale house and from there transported to the working face in operator owned transfer trucks. This would altogether eliminate the necessity for public self-haulers to commingle with heavy trucks.

Response 89: It is not anticipated that self-haul vehicles transporting green waste/wood waste would commingle with heavy trucks at the project site. As mentioned in Response 86, small-volume haulers will travel on the same access road as larger trucks. However, the distance to the green waste/wood waste recycling area will be shorter than the distance to the active working face area. After checking in at the scale house area, self-haul vehicles would be directed to the green waste/wood waste material area. However, for safety purposes, self-haul and larger waste hauling vehicles would be separated at the scale house area.

Comment 90: **Section 4.2 - Air Quality**

a. The document identifies three means of transporting waste to the site: Transfer trucks, curbside collection trucks, and local deliveries. The document makes the following assumptions:

Type of vehicle	% of vehicular traffic	% of waste delivered
Transfer trucks	20	46
Collection truck	58	52
Local delivery	22	2*

* The sentence in the last paragraph on page 4-66 should be corrected to read "These vehicles would account for less than 2 percent of the total *amount of waste* that would be delivered to the site."

Response 90: The commenter is correct and the text has been changed to include the revised language. Refer to Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, in this document.

Comment 91: Whereas transfer trucks are predicted to account for only 20% of the vehicular traffic, they will deliver 46% of the waste. A practical mitigation measure would be to allow delivery to the site only in transfer trucks. This would potentially eliminate up to 400 vehicle trips per day. Curbside collection vehicles should be allowed to deliver waste to the site only if traveling less than ten miles from the point of collection. The SEIR (page 4-65) states that curbside collection trucks may travel to the site from jurisdictions as far away as Santa Monica, Culver City, Beverly Hills, and Inglewood. Each of these jurisdictions has a transfer station within its city limits, or there are transfer stations located nearby. This particular requirement is standard at many landfills throughout the state (for example, Orange County landfills, see EIR page 1-16, and the Keller Canyon Landfill in Contra Costa County.)

Response 91: This comment is noted.

Comment 92: b. The proposed mitigation measures relating to delivery vehicles (page 4-87) are weak and will be ineffectual. These consist, in the first two instances of "encouraging" haulers to do something, i.e., to carry full loads, and to use the site during off-peak hours. On page 2-74 it is stated that the frequent hauling of partial loads would result in a surcharge notice being assessed. Why not encourage utilization of the site during off-peak hours through a lower tipping fee?

Response 92: This comment is noted. The use of the site during off-peak hours through a lower tipping fee is not being considered as part of the proposed project at this time by the project proponent.

Comment 93: c. It would be helpful to have further information regarding the data presented in Table 4.2-7. Are these emissions based on the amount of pollutants emitted from equipment in good, fair, or poor operating condition?

Response 93: As stated in the Draft SEIR, Section 4.2.8, Air Quality Operational Phase (Long-Term), p. 4-65, the data presented in Table 4.2-7 are as presented by the *SCAQMD CEQA Air Quality Handbook* and ultimately based on *AP-42, Compilation of Air Pollution*

Emission Factors (USEPA, 1985) and, in accordance with AP-42, are based on a report prepared by the CARB in July 1983. Because these data are now outdated, more modern equipment would be expected to produce fewer emissions. This table has been revised based on 1998 EMFAC7G emission factors. (See Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, in this document.)

Comment 94: If these figures are for vehicles in good or very good condition, it should be explained how a 40% efficiency reduction can be obtained (Table 4.2-15) by retarding diesel engine injection timing 2 degrees, or installing high-pressure fuel injectors as stated on page 4-87.

Response 94: The 40-percent reduction is not applied to vehicles but to heavy equipment. The reduction is provided by CARB based on a 2-day conference conducted on January 9 and 10, 1992. Refer to Response 66 for an additional discussion of this report and related mitigation measures.

Comment 95: It is also hard to see why these are considered "mitigation measures" since a prudent operator would do these things as standard operating practices anyway.

Response 95: Diesel fuel retardation and the installation of high-pressure fuel injector nozzles exceed both BFI's standard operating procedures and standard mitigation measures provided in the *SCAQMD CEQA Air Quality Handbook.*

Comment 96: Page 4-68. Combustion of Landfill Gas Emissions

a. The document states that "while the FEIR Sunshine Canyon Landfill Extension proposed a total of eight flaring stations within Sunshine Canyon, revisions in LFG generation calculations as well as experience gained in the generation rates associated with the existing inactive landfill have shown that two additional flare stations will be required for the project." This will actually be a reduction in the number of flares from the previously proposed eight to five. The document states that LFG generation calculations form the basis for the determination that only five flares will (eventually) be required, but these calculations are not included in the SEIR.

Response 96: Refer to Response 97.

Comment 97: b. It is difficult to decipher Table 4.2-9. This table is labeled "Permitted Daily Emissions From Flaring Activities." Do the figures portray actual emissions? What are "permitted" emissions? There are apparently two permitted flare stations in the county and an "existing" flare station within the City. Text associated with Table 4.2-9 states that for CEQA purposes, the volume of emissions associated with the 'permitted' activities has been doubled to include both existing emissions, and the proposed project at buildout. Table 4.2-9 should clearly show the total amount of emissions associated with a specific number of flares, i.e., two or five or eight, or however many will eventually be constructed.

Response 97: In response to this comment, the data in the Draft SEIR air quality assessment have been changed to reflect the maximum permitted emissions from a total of five flares. This includes the two existing flares at the City and County Landfills, which are already in operation. In 1997, the emission limits for two permitted flares were revised to reflect changes in gas composition. The emission limits in the original permits were based on the best estimate of gas composition available at the time the permits were issued. Since gas composition changes over time, SCAQMD practice is to periodically revise emission limits to reflect actual conditions. These data have subsequently resulted in changes to the Draft SEIR and are included in Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, in this document. The new modeling does not change any conclusions regarding impact significance except that SO_x emissions are now over the SCAQMD significance threshold for project operations after the incorporation of mitigation measures. In addition, refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk analysis due to the use of the ISCST3 model and revised flare emission estimates.

Comment 98: Page 4-88. Fugitive Dust

Emissions of fugitive dust or particulate matter are created primarily at the working face of most landfills rather than by vehicular travel over hard-packed roads, yet the SEIR proposes mitigation measures devoted almost exclusively to road dust and ignores the working face. The majority of PM_{10} emissions are created when refuse is dumped at the working face. These emissions are, admittedly, the most difficult to control: Delivery trucks may contain highly dispersive material, some of which may be toxic or unhealthful. At the same time, until the material is actually dumped there is no way of knowing what will come out of the truck. The SEIR, however, does not address this at all. It is suggested that as a mitigation measure a water truck, capable of discharging a high pressure spray, be permanently stationed at the working face to knock down any load containing dust or particulates.

Response 98: The greatest contributor of PM_{10} emissions is not at the working face of the landfill but along the onsite haul roads. Appendix D2, Revisions to Draft SEIR, Table 4.2-11 (which is based on AP-42, 1995 emission factors), estimates that over 83 percent of the fugitive dust is generated along the onsite haul roads. These emissions would be mitigated by applying water to the onsite haul roads. In addition, site personnel would direct a water truck to the working face when high-dust loads are observed. Refer to Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, in this document. A comprehensive load check program would be implemented for the proposed project to ensure that hazardous wastes are not deposited at the landfill (see Topical Issue 16).

Comment 99: Page 4-47

a. The discussion of wind conditions focusses mainly on general conditions throughout the Los Angeles basin and provides little information regarding site specific conditions.

Response 99: Refer to Topical Issue 3 for a discussion of wind conditions at the project site.

Comment 100: b. Figure 4.2-2 purports to be a windrose for the Sunshine Canyon Landfill, yet the related text (page 4-47) is set in the context of general conditions within the SCAB.

Response 100: Refer to Topical Issue 3 for a discussion of wind conditions at the project site.

Comment 101: Page 4-92

The statement dismissing the significance of odor from refuse is unsubstantiated in the real world. The terrain of this site will provide a conduit to carry odors directly toward the residential community to the southeast at least 10% of the time as shown on Figure 4.2-2.

Response 101: The proposed landfilling operations are located at sufficient distances from the potential receptors (residential) and separated by sufficient terrain so that no odor nuisance from refuse emplacement should occur. With respect to odors, the landfill must not be a source of odor nuisance per the requirements of CCR, Title 27, §20919. The project proponent would prepare and implement an odor abatement program, which would be approved by the designated City LEA. The program would ensure that odor levels within the facility are kept within baseline odor standards and that odors emanating from the facility would not exceed any odor detection thresholds at the property boundaries. The best method for ensuring that there will be no odor generation is by proper compaction and coverage of all solid waste materials by the end of the working day. Odors emanating from the generation of LFG inside the landfill will be controlled through the installation and operation of an LFG collection and flaring system in full compliance with SCAQMD permitting conditions.

Refuse received at the proposed landfill would be disposed of within 1 hour of receipt, compacted, and covered daily with a minimum layer of 6 inches (i.e., State standard) of cover material; therefore, the potential for odors is substantially reduced. The odors that may be released directly from the refuse prior to being covered with cover material are usually at low levels and dispersed into the atmosphere at levels of concentration below which they do not create a nuisance to local receptors.

Mitigation measures that would be implemented by the project proponent as part of a comprehensive odor control program are listed in Topical Issue 4.

Comment 102: Page 4-94

The "mitigation measures" proposed to minimize odors from refuse are either already required by law (i.e., the use of daily cover), are vague ("operational techniques" shall be utilized to control odor sources at the landfill.), or will be ineffectual (solid waste shall be compacted within 1 hour or [sic] its arrival at the working face.) It is suggested that as mitigation measures the operators commit to covering highly odorous loads immediately, or maintain a source of odor suppressant chemicals on hand for use when necessary.

Response 102: This suggestion will be considered by the City. However, recommended odor control mitigation measures for the proposed project will be similar to those already being implemented for the operational County Landfill. These measures have proven effective in eliminating odors beyond the project site boundaries. Also refer to Responses 73 and 101 for a discussion of required odor control measures to be implemented for the proposed City/County Landfill.

Comment 103: **Section 4.3 Surface and Groundwater**

Page 4-103

The document should explain the difference between an individual point source NPDES permit and the statewide general NPDES permit program viz-a-viz monitoring and reporting requirements, and why the statewide general program was selected.

Response 103: Refer to Response 549 for a discussion of NPDES regulatory history and permitting requirements.

Comment 104: **Section 4.5 - Noise**

Paragraph 4.5.2. Operational Noise Impacts

a. This agency does not necessarily agree that just because "the noise emanating from the existing, inactive landfill . . . is not audible to the residential developments located south of the project site . . ." the conclusion can be drawn that sound from proposed landfilling operations would also be inaudible. It is stated in the SEIR that noise is audible if maintenance "equipment" is operating "near" the top deck area. The SEIR does not make it clear if this "equipment" would be consistent with the noise that could be expected from the type of equipment used in landfilling operations, nor does it make clear what is meant by "near" the top deck.

Response 104: The "top-deck" areas of the existing inactive City Landfill (nearest to residential uses in Granada Hills) refer to the highest-elevation areas where landfill operations previously occurred. Noise would be audible from heavy equipment used periodically on the top-deck areas and would be similar to noise produced from construction activities. However, this noise would not be audible at residential areas in the community of Granada Hills. Due to the infrequent use of this equipment on top-deck areas, no significant noise impacts on sensitive receptors are anticipated to occur. For additional information, refer to Topical Issue 14 in this document.

Comment 105: b. The SEIR does not address the noise that could be expected from the tub grinder which would be placed in the proposed green waste/wood waste processing area. This area is located at the closest point on the site to the residences to the south.

Response 105: Construction noise levels were measured from the landfill footprint (where construction activities would be heavily concentrated) to the nearest residential receptor located 1,700 feet from the landfill footprint. The construction equipment anticipated for the

proposed City/County Landfill project is included in the Draft SEIR, Table 2.14-2. Noise impacts from construction equipment to the nearest residential unit would be an increase of 1.6 decibels above existing ambient noise levels. This increase would not be perceptible at this residential location. (Refer to the Draft SEIR, Section 4.5.1, Construction Noise Impacts, p. 4-215.) The unloading, movement, or tub grinding of green wastes/wood wastes would not result in a perceptible noise increase to existing noise levels at residential uses in Granada Hills (south of the project site). Tub grinding would also not be audible at the trailers located across from the landfill entrance due to existing background noise from the I-5 Freeway and wood chopping operations. Therefore, noise impacts would remain less than significant.

Refer to Response 88 for a discussion of green waste/wood waste processing activities. Segregated loads of green waste/wood wastes would be unloaded at the green waste/wood waste recycling area, deposited in disposal containers, and then screened by an employee waste checker. The green waste/wood waste material would then be loaded and transported by heavy equipment to an area near the landfill working face. Once at this location, green waste/wood waste would be stockpiled, tub grinded, and used for alternative daily cover or other onsite uses. Green waste/wood waste would be tub grinded and reused onsite within 24 hours of its arrival at the City/County Landfill.

Comment 106: Page 4-219/4-220

It is stated in the SEIR that vehicles in excess of 6,000 pounds (gross) are prohibited from Balboa Boulevard. However, it cannot be concluded that "... landfill-bound truck traffic would not influence noise levels . . . since these vehicles are prohibited from traveling along Balboa Boulevard." The SEIR estimates that up to 22 percent of the project related traffic may be due to local deliveries, i.e., vehicles less than 6,000 pounds. The proposed mitigation measures only address this issue by stating that "citizens, small commercial, and private users" shall be "encouraged" to use alternate routes. This may not be effective, however, in that Balboa Boulevard is the only practical route to the site from the communities of Granada Hills, Chatsworth, Canoga Park, and Reseda.

Response 106: City Ordinance No. 161,201 currently prohibits vehicles over 6,000 pounds from using Balboa Boulevard, south of San Fernando Road. Some heavy-duty trucks serving the local community use Balboa Boulevard as allowed by the ordinance; however, no through traffic of heavy-duty vehicles is allowed. Waste-hauling vehicles traveling to and from the County Landfill, servicing communities located to the south and the southwest, will continue to use the regional freeway system including the Golden State (I-5) Freeway, the San Diego (I-405) Freeway, Foothill (I-210) Freeway, and the Ronald Reagan (SR-118) Freeway. This would also occur for the proposed City/County Landfill operation. Refer to Topical Issue 20 for a discussion of planned haul routes.

Comment 107: **General**

This SEIR (Table 3.2-1) defines the continuing operations of the county landfill as a 'related' project. In reality, the county and city portions of the site are each part of a single landfill. This document, therefore, describes only one half of the proposed landfill project - rarely are the cumulative impacts clearly addressed. In some respects this may be acceptable, e.g., the traffic analysis does factor traffic due to continuing operations into the background levels. In other cases, e.g., air impacts, it ignores the existing, and therefore cumulative, impacts from ongoing operations.

Response 107: Regarding the cumulative impact analysis and as stated in the Draft SEIR, Section 3.2.1, CEQA Requirements, p. 3-18, in reference to the County Landfill (noted as "related project No. 28"), the existing operational County Landfill was initially approved by the County Board of Supervisors in February 1991 and reapproved in November 1993. (Refer to the Draft SEIR, Appendix C2, County/City Landfill Project History, for additional information on this matter.) Since 1992, this landfill has been treated as a "related project" at the request of City Planning staff and LADOT because of then-outstanding litigation and the fact that this landfill project was then proposed and not yet developed. Therefore, the Draft SEIR has cumulatively analyzed the development of that project, other related projects (including two other proposed landfill projects within the region), and the potential development of the City/County Landfill. It should be noted that on June 24, 1997, one of the proposed landfill projects (i.e., Towsley Canyon or "related project No. 32") was dropped from further consideration as a potential landfill site by the County Board of Supervisors. That project is still cumulatively analyzed within the Draft SEIR because it was considered a feasible project at the time of the related projects list compilation.

Comment 108: For example, the SEIR states that "Because the emissions associated with construction and operation of the cumulative projects cannot be determined without a full analysis of each project ... the cumulative analysis for the project's air quality must be generic by nature." This may be true in the case of some of the 33 projects identified as contributing to cumulative impacts, but it is not the case as far as the county landfill is concerned since that project was the subject of an in-depth study. The document is deficient in not providing at least some information in the cumulative impact section of each impact area.

Response 108: Refer to Response 107. As stated in the Draft SEIR, Section 4.2.10, Project with Applicable Plans, p. 4-84, the *SCAQMD CEQA Air Quality Handbook* provides methodology to determine whether a project is cumulatively significant. In accordance with the *SCAQMD CEQA Air Quality Handbook* (p. 9-12), if a project can reduce emissions by 1 percent per year to the year 2010, it is not considered cumulatively significant. This analysis is performed through a comparison of unmitigated and mitigated emissions and by dividing the projected reduction (in percent) over the period from project operations to the year 2010. This would require that mitigation attain a control efficiency of 14 percent for operations beginning in 1996. The proposed project would not achieve this level and is therefore considered cumulatively significant. Refer to Response 68.

David Yamahara
Assistant Deputy Director
Planning Division
County of Los Angeles
Department of Public Works
900 South Fremont Avenue
Alhambra, CA 91803-1331

Letter 3.5-2

Comment 109: **Traffic and Lighting**

The proposed project is estimated to generate approximately 2,260 passenger car equivalent (PCE) trips per day, 245 and 285 PCE trips during the a.m. and p.m. peak hours, respectively.

We agree with the traffic study that the traffic generated by the project will not have any significant impact on County intersections or roadways.

Response 109: This comment is noted.

Comment 110: Traffic volumes indicated in Figure 4.13-14 (1998 A.M. Peak-Hour Background Traffic Volumes) of the SEIR are identical to those in Figure 4.13-15 (1998 P.M. Peak-Hour Background Traffic Volumes). This discrepancy should be corrected.

Response 110: Figure 4.13-14 has been revised and is included in Section 2.0, Revisions and/or Additions to Draft SEIR. Figure 4.13-15 is correct as presented in the Draft SEIR.

Comment 111: We recommend the State of California Department of Transportation also review this project for impacts/mitigations within its jurisdiction.

Response 111: The California Department of Transportation (Caltrans) has been provided copies of the traffic impact study and the conceptual improvements plans for impacted intersections for review and comment. In addition, Caltrans staff, along with LADOT staff, have been involved with the proposed project since its inception.

M. Michael Mohajer
Assistant Division Engineer
Environmental Programs Division
County of Los Angeles
Department of Public Works
900 South Fremont Avenue
Alhambra, CA 91803-1331

Letter 3.5-3

Comment 112: GENERAL COMMENTS

1. The California Integrated Waste Management Act of 1989 (AB 939), as amended, mandates the County to prepare a countywide siting element which must address the 15-year solid waste disposal capacity needs (1995-2010) of the unincorporated areas of the County, the City of Los Angeles, and other cities in Los Angeles County.

   The Department, under the auspices of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force, prepared the Los Angeles County Countywide Siting Element dated June 1997 (June 1997 CSE). The June 1997 CSE was approved by a majority of the cities in Los Angeles County containing a majority of the cities' population in November 1997. The Sunshine Canyon Landfill Expansion, City of Los Angeles, has been identified in the June 1997 CSE. The proposed expansion will provide for a portion of the 15-year disposal capacity need identified in the June 1997 CSE.

Response 112: This comment is noted.

Comment 113:

2. Please revise all references to the "Los Angeles County Department of Public Works, Solid Waste Management Division" to read "Los Angeles County Department of Public Works, Environmental Programs Division" throughout the document.

Response 113: The Draft SEIR has been changed to incorporate this information. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR.

Comment 114: SPECIFIC COMMENTS

1. Executive Summary, Section 2.2.1, Statistical Information in Connection with Solid Waste Generation and Permitted Capacity within the City of Los Angeles, page ES-11.

   As mandated by State law, the Department is responsible for collecting statistical data by jurisdiction of origin on the quantity of solid waste disposed at permitted solid waste disposal facilities in Los Angeles County. The Department is then required to consolidate this information and report the data to all appropriate cities and counties in the State of California.

As discussed below and based on the data collected by the Department and reported to the City of Los Angeles and the California Integrated Waste Management Board, the information provided in Section 2.2.1 needs to be expanded/revised.

Response 114: This comment is noted. Refer to Comment 115 for additional information pertaining to this issue.

Comment 115: The following identifies the quantities and distribution of that portion of the solid waste that was generated in the City of Los Angeles in 1995 and disposed of at permitted disposal facilities within and outside Los Angeles County:

- Permitted disposal facilities in Los Angeles County:

- Class III landfills	3,627,037 tons
- Unclassified landfills	145,239 tons
- Transformation facilities	56,525 tons

- Permitted disposal facilities outside Los Angeles County:

- Exports to Riverside County	4,623 tons
- Exports to Ventura County	8,630 tons
Total disposed	3,842,054 tons

Response 115: Refer to Section 2.0, Revisions and/or Additions to Draft SEIR.

Comment 116: Based on the 1995 estimated diversion rate of 40.6 percent listed in the above-mentioned Section and the above disposal quantities, the estimated solid waste generation rate for the City of Los Angeles in 1995 is 6,468,104 tons. Based on the estimated City population of 3,593,729, this translates into a per-capita waste generation rate of 1.80 tons of solid waste per person per year in the City of Los Angeles rather than 1.58 as listed in the document.

All appropriate sections of the SEIR should be revised to reflect the above information.

Response 116: The Draft SEIR has been changed to incorporate this information. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, in this document.

Comment 117: 2. Executive Summary, Table ES-1, page ES-13 (also shown on page 2-5 of Volume I).

Table ES-1 indicates that the information provided is based on the Preliminary Draft Los Angeles County Countywide Siting Element dated January 1996. However, the discussion fails to define the term "permitted disposal capacity." Please refer to Section 3.3.4 of the June 1997 CSE, page 3-4, and include the definition provided.

Response 117: As stated in the *Los Angeles County Countywide Siting Element, Volume I - The Element* (June 1997), p. 3-4, "permitted disposal capacity is defined as the total quantity of solid waste (in cubic yards and/or tons) which a permitted landfill or permitted transformation facility is allowed to receive in accordance with, the terms, conditions, and limitations of the facility's current Solid Waste Facility Permit, Land Use/Conditional Use Permit, Waste Discharge Requirements Permit, and the Permit to Operate, whichever is less."

Comment 118: The disposal quantities, remaining disposal capacity, and footnotes listed in Table ES-1 should be consistent with those provided in the June 1997 CSE.

Response 118: The Draft SEIR has been changed to include this information. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR Table 2.3-1 (Revised). In addition, Table 4-3, Remaining Permitted Combined Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County, included in *The Los Angeles County Countywide Siting Element, Volume I - The Element* (June 1997), does not provide an analysis indicating how the recent closures of the Azusa, BKK, and Lopez Canyon Landfills have substantially reduced the total remaining solid waste disposal capacity with the Los Angeles County landfill system.

Comment 119: Additionally, footnote (d) of Table ES-1 should be revised to indicate that "The Chiquita Canyon Landfill has recently obtained a land use permit which provides for an anticipated disposal capacity of 23 million tons."

Response 119: The Draft SEIR has been changed to include this information. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, Table 2.3-1 (Revised).

Comment 120: All appropriate Sections of the SEIR should be revised to conform with the comments listed above.

Response 120: Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, in this document.

Comment 121: Additionally, it should be noted that the remaining combined permitted disposal capacity of all Class III landfills in Los Angeles County is estimated at approximately 86 million tons as of July 1, 1997.

Response 121: The Draft SEIR has been changed to include this information. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, Table 2.3-1 (Revised).

Comment 122: 3. Summary, Volume I, Section 1.9.1, Alternatives Not Evaluated, Mission/Rustic-Sullivan Landfill, page 1-12.

Revise this Section and other appropriate Sections of the SEIR to incorporate updated information on the status of the Mission/Rustic-Sullivan Canyons site, as identified in the June 1997 CSE. Specifically, the Mission/Rustic-Sullivan site is not identified as a possible landfill site in the June 1997 CSE.

Response 122: The Draft SEIR has been changed to include this information. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, in this document.

Comment 123: 4. Summary, Volume I, Section 1.9.1, Alternatives Not Evaluated, page 1-14, third bullet.

We agree that California's standards and requirements for the operation of disposal facilities are more stringent compared to other states. Additionally, disposal facilities located in Los Angeles County must operate under even more stringent conditions as mandated by local/regional agencies, as in the case of the Sunshine Canyon Landfill in the County unincorporated area.

Response 123: This comment is noted.

Comment 124: 5. Summary, Volume I, page 1-25, Status of Elsmere Solid Waste Management Facility, and Section 5.7.1, page 5-27.

Revise these Sections and all other appropriate Sections of the SEIR to incorporate updated information on the status of the Elsmere Solid Waste Management Facility, as identified in the June 1997 CSE. Specifically, they should reflect a proposed landfill capacity of 80 million tons exclusive of any Angeles National Forest lands.

Response 124: The proposed Elsmere Canyon Landfill site is owned by BFI. BFI indicates that this project remains viable and is currently undergoing an extensive corporate and economic review.

Comment 125: 6. Volume II, Appendices, page C13-2, Countywide Integrated Waste Management Plan.

Revise the definition of the Countywide Integrated Waste Management Plan to reflect the following:

- The Countywide Integrated Waste Management Plan also includes the Countywide Integrated Waste Management Summary Plan prepared by the County.

- The Countywide Integrated Waste Management Plan includes all Non-Disposal Facility Elements prepared for the County unincorporated area and each of the 88 cities located within Los Angeles County.

Response 125: The Draft SEIR has been changed to include this information. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, in this document

Comment 126: Subsequent detailed discussions of the various components of the Countywide Integrated Waste Management Plan should include a detailed description of the Countywide Integrated Waste Management Summary Plan, dated June 1997, which was prepared by the Department and approved by a majority of the cities in Los Angeles

County containing a majority of the cities' population in November 1997. This document was prepared pursuant to the California Integrated Waste Management Act of 1989, as amended.

Response 126: The Draft SEIR, Appendix C13, pp. C13-5 and C13-11, provides a generalized summary of the Countywide Integrated Waste Management Plan (January 1996), which is still applicable to the current plan. Any subsequent detailed discussions would reference the most recently approved plan.

Comment 127: 7. Volume II, Countywide Siting Element, page C13-3.

Revise the discussion to indicate that under current State law, the County of Los Angeles is mandated to prepare the Countywide Siting Element to specifically address the disposal capacity needs of the 88 cities in Los Angeles County and the County unincorporated communities for a 15-year planning period.

Response 127: The Draft SEIR has been changed to incorporate this information. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, in this document.

3.6 CITY DEPARTMENTS

Richard E. Olsen, Assistant Fire Marshall
Bureau of Fire Prevention and Public Safety
City of Los Angeles Fire Department
200 North Main Street, 9th Floor
Los Angeles, CA 90012

Letter 3.6-1

Comment 128: All items of concern to this Department appear to have been addressed adequately at earlier levels of review.

Response 128: This comment is noted.

Homer M. Morimoto, Division Engineer
Development Services Division
City of Los Angeles
Bureau of Engineering
600 South Spring Street
Los Angeles, CA 90012

Letter 3.6-2

Comment 129: STREETS:

San Fernando Road north of the project driveway should be improved by constructing concrete curb, gutter, and a minimum 40-foot half roadway with appropriate transition near the northerly property line to join the freeway offramp improvements to the satisfaction of the City Engineer. San Fernando Road south of the driveway has been improved per Plan No. P-34901. Additional widening and/or dedication may be needed subject to the LADOT review of the traffic study.

Response 129: This request by the City BOE will be forwarded to the City decisionmakers for their review and consideration. Improvements to San Fernando Road, as required, will be coordinated with the City BOE. Refer to Table 4.13-9 (Revised) and Appendix D1 in this document.

Comment 130: HYDROLOGY:

Grading Plan should be submitted to the Valley Engineering office of the Bureau of Engineering, should the drainage construction become necessary.

Response 130: Surface water management system improvements planned for the sedimentation basin located near the landfill entrance and the controlled release of runoff to the Weldon Canyon Flood Control Channel as described in the Draft SEIR, Section 4.3.1, Surface Water, p. 4-102, will be submitted to the City's Valley Engineering Office for review, comment, and approval prior to the construction of surface water conveyance structures, which are governed by the CIWMB and the LARWQCB.

Comment 131: GEOTECHNICAL REVIEW:

The report is generally geotechnically acceptable. However, Section 4.1 indicates that secondary displacement due to faulting could cause 8 inches of displacement beneath the landfill. The impact of this displacement on the proposed liner should be evaluated.

Response 131: There will be no impact from 8 inches of secondary displacement (due to faulting) at the proposed project. The landfill facility will be designed, permitted, and constructed in compliance with seismic design standards contained in CCR, Title 27, Division 2, Subdivision 1, Chapter 3, Subchapter 2, Article 4, §20370. This seismic design section establishes design criteria or considerations for the landfill "to withstand the maximum probable earthquake without damage to the foundations or to the structures which control leachate, surface drainage, erosion, or gas." Design considerations will include strong ground shaking and secondary ground rupture. The landfill design and seismic

analysis, including the liner design, will be reviewed and approved by the LARWQCB prior to construction. As such, 8 inches of displacement will not affect the liner system.

Charles C. Holloway
Supervisor of Environmental Assessment and EMF
City of Los Angeles
Department of Water and Power
111 North Hope Street
Los Angeles, CA 90051-0100

Letter 3.6-3

Comment 132: The area lies within the LADWP's 1805 Acreage Supply Charge (ASC) district and upon successful completion of the EIR process and the procurement of the necessary permits for the facility, the landfill project may be subject to the required ASC upon the owner's application for water service.

Response 132: This comment is noted.

Comment 133: The subject area, consisting of approximately 194 acres within the City of Los Angeles, is to be utilized for landfill operations for the next 26 to 28 years. Upon closure of the landfill, this acreage could be extended to long-term nonuse. If ASC charges for this project are exempt because it is a City of Los Angeles facility, due consideration and review by the LADWP's Water Services Organization of the 1805 ASC rate may be required.

Response 133: Currently, BFI receives water from the DWP, and the ASC charge has already been paid for the entire project site.

Comment 134: If there is any intended use of subsurface water (groundwater) or surface water (from precipitation or storm runoff) for irrigation or other consumptive use, approval must be obtained from the Upper Los Angeles River Area (ULARA) Watermaster. This landfill falls within the boundaries of the ULARA watershed, and by adjudication all surface and subsurface water rights belong to the City of Los Angeles of which the Watermaster is the caretaker (enforcer) of those rights.

Response 134: This comment is noted.

Comment 135: Appropriate dust control measures must be provided.

Response 135: Feasible dust control mitigation measures are included in City Mitigation Measures in the Draft SEIR, Section 4.2.11, Construction, and Section 4.2.12, Operations, pp. 4-86 through 4-91. For an additional discussion, refer to Topical Issue 3 in this document.

Comment 136: Electrical service will be provided in accordance with the LADWP's rules and regulations. Electrical facility construction may cause limited temporary impact on the surrounding communities in the form of unavoidable noise, air pollution and traffic congestion during construction.

Response 136: Currently, both the DWP and SCE provide electrical service to the project site. As stated in Section 2.5.3, Proposed Project Use of Existing County Landfill Ancillary Facilities and Environmental Protection and Control Systems, p. 2-37 of the Draft SEIR,

the use of County Landfill ancillary facilities and systems (including existing power and water lines) would occur for the proposed City/County Landfill until landfill development requires onsite utility line relocation. The associated impacts of ancillary facilities and systems relocation are analyzed under construction impacts for each environmental topical issue in Section 4.0 of the Draft SEIR. No offsite utility line relocations would be required.

Robert T. Takasaki, Senior Transportation Engineer
City of Los Angeles
Department of Transportation
221 North Figueroa Street, Suite 600
Los Angeles, CA 90012

Letter 3.6-4

Comment 137: The Department of Transportation (DOT) has reviewed the July 1997 Subsequent Environmental Impact Report (SEIR) for the Sunshine Canyon City Landfill Extension Project. The proposed project consists of the development and operation of a Class III nonhazardous solid waste landfill facility and an on-site green waste/wood waste recycling area on a 205 acre site. The project is contiguous with the previously approved Sunshine Canyon County Landfill Extension project located in the unincorporated County area of Sunshine Canyon and utilizing a common access driveway on San Fernando Road south of the I-5 southbound offramp and south of Sierra Highway. The proposed City Landfill project would have an estimated net airspace volume of approximately 31 million tons and with an average solid waste disposal intake of approximately 5,000 tons per day. The maximum daily intake for the proposed City landfill is 5,500 tons per day. The City landfill operation will be open for refuse disposal from 6:00 AM to 6:00 PM, Monday through Saturday, excluding Sundays and holidays. Except as noted, the content of DOT's comments and recommendations to offset the traffic related impacts of the project on the surrounding streets and intersections as outlined in our letter of March 12, 1996 have been included in the July 1997 SEIR.

Response 137: LADOT's understanding of the project (description and location) and its operations is consistent with that evaluated by the traffic consultants in the Draft SEIR, Section 4.13, Traffic and Circulation. The hours of operation for refuse disposal on Saturday, however, are from 7:00 a.m. to 2:00 p.m. as stated in the Draft SEIR, Table 2.12-1.

Comment 138: The Conceptual Mitigation Plans contained in Appendix F for the intersection of San Fernando Road at the project driveway show three schemes in which two are Interim Improvement Plans and the third is an Ultimate Improvement Plan for that intersection. Only the Ultimate Improvement Plan was discussed with DOT in our prior review of the traffic study. DOT prefers the Ultimate Improvement Plan (dual northbound left turn lanes) to the Interim Improvement Plans (single northbound left turn lane). Therefore, DOT recommends that the Ultimate Improvement Plan be required as the mitigation measure for this location.

Response 138: This comment by the LADOT has been superceded. The LADOT has submitted a revised letter on the Draft SEIR from Robert Takasaki, Senior Transportation Engineer, LADOT, to Hadar Plafkin, City Planner, dated February 26, 1998. This letter is included in Appendix D1 of this document. In this revised letter, Mr. Takasaki states the following:

> Reference is made to our November 25, 1997 memo to your Department in which the Department of Transportation (DOT) submitted comments on the July 1997 Subsequent Environmental Impact Report (SEIR) for the Sunshine

Canyon City Landfill Extension Project. Upon further consideration and based on a recent meeting between DOT, Department of City Planning and representatives for the Sunshine Canyon Landfill Extension Project and Browning-Ferris Industries (BFI), DOT would like to change our previous comments regarding the improvement plans for the intersection of San Fernando Road and the project driveway. Previously our Department recommended that a new traffic signal and the Ultimate Improvement Plan (dual northbound left turn lanes) be required as the mitigation measure for this location. BFI is now processing a B-Permit to install a new traffic signal at this location to improve the safety of trucks currently using the project driveway to access the County landfill portion of the site.

DOT now recommends that either of the two Interim Improvement Plans (single northbound left turn lane on San Fernando Road at the project driveway depicted in the Conceptual Mitigation Plans contained in Appendix F) may be installed initially at this location. However, if found warranted by DOT within 5 years after the City portion of the landfill begins operations, the developer shall install the Ultimate Improvement Plan (dual northbound left turn lanes) at this location. The developer shall guarantee by a surety bond or other suitable financial instrument acceptable to the Bureau of Engineering, all costs associated with the design and installation of the Ultimate Improvement Plan (dual northbound left turn lanes including the widening of the San Fernando Road and project driveway).

The developer shall also commence processing a B-Permit with the Bureau of Engineering for the Ultimate Improvement Plan within 60 days after the City portion of the landfill begins operation to insure that the Ultimate Improvement Plan can be installed immediately after DOT determines that such improvements are needed. Prior to setting the bond amount the Bureau of Engineering shall require that the developer's engineer or contractor contact DOT's B-Permit Coordinator, telephone (213) 580-5336, to arrange a pre-design meeting to finalize the proposed design needed for the project.

The referenced mitigation measure has been modified, per the new LADOT comment. This change has been incorporated into this Final SEIR. Refer to Section 2.0 Revisions and/or Additions to Draft SEIR, in this document. In addition, refer to Appendix D1, LADOT Comments (February 26, 1998), Revised Mitigation Concept Plan and Summary of Freeway Segment Analysis, within this document.

Comment 139: On Pages 1-76, 1-77 and 1-78, Table 1.10-1, Summary Matrix of Potential Environmental Impacts, Mitigation Measures, Net Unmitigated Adverse Impacts, Mitigation Compliance Responsibility and Monitoring Phasing and Enforcement Program, please make corrections as follows:

<u>On page 1-76 under Section 4.13.1 and Mitigation Measures Column</u>

Roxford Street at the 1-5 Freeway, (SB ramp)

- Restripe westbound ~~southbound~~ approach on Roxford Street to provide dual left-turn lanes and one through lane.

Response 139: This change has been incorporated into this Final SEIR. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR in this document.

Comment 140: Roxford Street at the Encinitas/I-5 Freeway (NB ramp)

- Restripe northbound approach ~~westbound through lane~~ on Encinitas Avenue to provide left-turn lane, shared through/left-turn lane and shared through/right-turn lane ~~left/through option lane~~.

Response 140: This change has been incorporated into this Final SEIR. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR in this document.

Comment 141: On Page 1-77, under Section 4.13.1 Traffic and Mitigation Measures Column
San Fernando Road at Balboa Boulevard

- Replace second paragraph to state:
  Contribute to the design, construction and operation of the Northeast Valley Automated Traffic Surveillance and Control (ATSAC) system for this intersection. The current cost of ATSAC for the Northeast Valley System is $79,000 per intersection. The contribution to ATSAC should be made prior to the start of construction for this ATSAC System which is scheduled for the year 2003.

Response 141: This change has been incorporated into this Final SEIR. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR in this document.

Comment 142: San Fernando Road at Sierra Highway

- Restripe northbound approach ~~through lane~~ on San Fernando Road to provide a shared through/right-turn lane and exclusive right-turn lane ~~through/right option lane~~ and restripe the westbound approach of Sierra Highway for a 12-foot wide curb lane.

Response 142: This change has been incorporated into this Final SEIR. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR in this document.

Comment 143: San Fernando Road at project driveway

- Replace paragraph to state:
  Install a new traffic signal and widen and restripe the northbound approach of San Fernando Road to provide dual left-turn lanes and two through lanes. Also contribute to the design, construction and operation of the Northeast Valley ATSAC system for this intersection. The current cost of ATSAC for the Northeast Valley System is $79,000 per intersection. The contribution to ATSAC should be made prior to the start of construction for this ATSAC System which is scheduled for the year 2003.

Response 143: This comment has been modified by LADOT. Refer to Response 138. The referenced mitigation measure has been modified, per the new LADOT comment. This change has been incorporated into this Final SEIR. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR in this document.

Comment 144: On Page 1-77, Table 1.10-1 immediately after the paragraph on San Fernando Road at project driveway

- Please add the following paragraph:
  The required street improvements and signal modifications shall be guaranteed before the issuance of any building permit for this project though the B-Permit process of the Bureau of Engineering, Department of Public Works and the Encroachment Permit process of Caltrans (where applicable). Construction of the improvements to the satisfaction of DOT, the Bureau of Engineering and Caltrans (where applicable) must be completed before issuance of any certificate of occupancy. Prior to setting the bond amount the Bureau of Engineering shall require that the developer's engineer or contractor contact DOT's B-Permit Coordinator, telephone (213) 580-5336, to arrange a pre-design meeting to finalize the proposed geometric and traffic signal designs needed for the project.

Response 144: This change has been incorporated into this Final SEIR. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR in this document.

Comment 145: On Page 1-78, under Section 4.13.4 Parking and Safety Concerns and Mitigation Measures Column
Replace paragraph to state that a new traffic signal at the project landfill entrance should be installed immediately prior to issuance of any certificate of occupancy for the project.

Response 145: This change has been incorporated into this Final SEIR. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR in this document.

Comment 146: On Page 4-372, Table 4.13-9, Project-specific Mitigation Measures, should be revised to reflect the above comments described for Table 1.10-1.

Response 146: This change has been incorporated into this Final SEIR. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR in this document.

Comment 147: On Page 4-379 under City Mitigation Measure, replace the first bullet to state:
Prior to issuance of any certificate of occupancy for the project, install a new traffic signal at the project landfill entrance and widen and restripe the northbound approach of San Fernando Road at the project driveway to provide dual left-turn lanes and two through lanes. Also contribute to the design, construction and operation of the Northeast Valley ATSAC system for this intersection. The current cost of ATSAC for the Northeast Valley System is $79,000 per intersection. The contribution to ATSAC should be made prior to the start of construction for this ATSAC System which is scheduled for the year 2003.

Response 147: This comment has been modified by LADOT. Refer to Response 138. The referenced mitigation measure has been modified, per the new LADOT comment. This change has been incorporated into this Final SEIR. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR in this document.

Comment 148: This memorandum does not constitute approval of the driveways and parking scheme for the project. Those require separate review and approval and should be coordinated with the Citywide Planning Coordination Section (Room 4460, Counter "O") as soon as possible to avoid delays in the building permit approval process.

Response 148: This comment is noted.

Hal Bernson, Councilman 12 District
City Council of the City of Los Angeles
200 North Spring Street, Room 237
Los Angeles, CA 90012-4878

Letter 3.6-5

Comment 149: I am pleased to have the opportunity to comment on the Draft Subsequent Environmental Impact Report (Draft SEIR) for the Sunshine Canyon Landfill Expansion Project. As the Chairman of the City Councils Planning and Land Use Management (PLUM) Committee, I see many projects that have significant impacts on the City of Los Angeles and various neighborhoods. Rarely, do I see a project of this magnitude and negative impact.

Response 149: This comment is noted.

Comment 150: As the elected representative of the 12th Council District, I have the honor of speaking for the residents of Granada Hills who bear the impact of this project. We have reviewed the above referenced document and request consideration of the following comments:

Response 150: This comment is noted.

Comment 151: TRAFFIC

Issue #1. A current and reliable traffic study is needed for the SEIR and should include the following from a worst case scenario viewpoint:

- Existing and future average daily traffic (ADT) volumes
- Traffic generation (including peak hour)
- Traffic distribution
- Analysis of peak hour demand and capacity using volume-to-capacity (V/C) and level of service (LOS) methodologies for intersections along with current and projected capacities of local roads, state highways, and freeways that might be impacted.

Response 151: The traffic study for the proposed project analyzed the reasonable "worst-case" project and cumulative project traffic impacts. This study was prepared according to the procedures outlined in the LADOT *Traffic Study Policies and Procedures*. The methodology for analyzing traffic impacts was deemed adequate by the LADOT and is included in LADOT's memorandums dated March 12, 1996. Those memorandums are included in the Draft SEIR, Appendix B1, LADOT/City Planning Staff Correspondence and Traffic Impact Study Report.

The traffic study, included in its entirety in the Draft SEIR, provides existing and forecasted average daily traffic volumes, traffic generation for the proposed project (within the City) inclusive of the County Landfill, and 32 other related projects. The traffic study adequately evaluates the traffic impacts of the proposed project at the 13 key intersections.

Comment 152: Special attention needs to be given to the following intersections:

- San Fernando Road at Project Driveway;
- San Fernando Road at I-5 Freeway (southbound off ramp);
- San Fernando Road at Sierra Highway;
- San Fernando Road at Balboa Blvd.

Response 152: The intersections of San Fernando Road/Project Driveway, San Fernando Road/I-5 SB offramp, San Fernando Road/Sierra Highway, and San Fernando Road/Balboa Boulevard have been evaluated according to LADOT criteria. Mitigation measures required to offset the project traffic impacts, as well as cumulative project traffic, are listed in Table 4.13-9 (Revised) and Table 1.10-1 (Revised) in this document. These mitigation measures are acceptable to the LADOT.

Comment 153: Issue #2. This project will be "truck intensive". This study should address the current amount of truck traffic and other vehicular traffic, and the amount by which vehicular/truck traffic will increase both during construction, operation, and upon project completion.

Response 153: The Draft SEIR, Table 4.13-4, Project Traffic Generation Forecast within the City, p. 4-347, and Appendix B1, Traffic Impact Study Report, Table 5, Project Traffic Generation Forecast, p. 17, summarizes the trip generation forecast for the proposed project in the City and provides information on the number of "truck trips" and "vehicular trips" that the proposed project would generate on both daily and peak hour (a.m./p.m.) basis. The amount of truck and vehicular traffic that would be generated during the construction phase is detailed in the Traffic Impact Study Report, p. 39.

Using a PCE equivalent of 3:1 for transfer trucks and 2:1 for curbside collection trucks, the project would generate a total PCE of 2,260 trip ends, with 245 PCE trip ends produced during the a.m. peak hour and 285 PCE trips generated during the p.m. peak hour.

Comment 154: Data provided by the proponent is outdated and taken at times when the city side of the landfill was closed and is therefore inaccurate. A new study should include current data with truck types noted and actual truck routes.

Response 154: The traffic study is based on "existing" 1992/1993 traffic count data. At the time the traffic study was prepared (1995), traffic volumes adjacent to the site were much lower than the prior 1992/1993 count data. Given the decrease in volume from 1992 to 1995, the LADOT had no objection to using prior 1992/1993 volumes as the database for the traffic analysis. All information that was provided to LADOT and City Planning staff during preparation of the Traffic Impact Study Report was verified by both departments.

Comment 155: Issue #3. The SEIR uses outdated and incorrect information with projections to the year 1998. Since that time period is only a month away, the entire traffic element must be redone with projections through the year 2003 or more.

Response 155: All LADOT requirements pertaining to preparation of the traffic study were met, and LADOT's review of the Draft SEIR did not result in further requests for analysis. At this time, the LADOT has not required that the traffic analysis be revised to evaluate Year 2003 traffic conditions. Refer to Response 154.

Comment 156: Issue #4. The truck analysis is incremental and does not take into account the cumulative impacts of the County and City landfill operations open at the same time. The analysis also does not include the inert truck traffic.

Response 156: The project (including vehicles transporting inert loads) and cumulative traffic impacts of the proposed project were evaluated in the Traffic Impact Study Report. The County Landfill Extension project was considered as a "cumulative" project and is referenced as Zone VIII, Map No. 28 on Table 6, Trip Generation for Related Projects. As indicated, the County Landfill Extension, assuming an average daily intake of 6,000 tpd, is expected to generate 3,820 daily passenger car equivalent (PCE) trips, with 405 PCE trips occurring during the a.m. peak hour and 480 PCE trips during the p.m. peak hour.

It should be noted that the trip generation potential of the County Landfill Extension was forecast based on daily and peak-hour trip generation rates developed from actual count data taken at the landfill, when the majority of the materials were delivered to the site by curbside collection trucks using a PCE factor of 2:1.

Hence, the County Landfill Extension project's trip generation potential and associated impact can be considered conservative and over estimated. In fact, using the same factors and methodology to forecast the trip generation potential for the proposed project, the County Landfill Extension would only generate 2,360 daily PCE trips, with 253 PCE trips occurring during the a.m. peak hour, and 298 PCE trips occurring during the p.m. peak hour. The traffic generated and impacts associated with the County Landfill Extension are equivalent to that of a landfill that has an average daily intake of 10,200 tpd (not 6,000 tpd). The proposed project is anticipated to generate 2,260 daily PCE trips, with 245 PCE trips occurring during the a.m. peak hour and 285 PCE trips occurring during the p.m. peak hour.

With reference to the County Landfill being treated as a related project, the Draft SEIR, Section 3.2. Related Projects, p. 3-18, indicates the following:

> In reference to the County Landfill (noted as "related project No. 28"), this project was initially approved by the County Board of Supervisors in February 1991 and reapproved in November 1993. (Refer to Appendix C2, of this Draft SEIR for additional information on this matter.) Since 1992, this specific project has been treated as a "related project" at the request of City Planning staff and LADOT because of outstanding litigation and the fact that this project was proposed and not yet developed. Therefore, this Draft SEIR has cumulatively analyzed the development of that project, other related projects (including two other proposed landfill projects within the region), and the potential development of the City/County Landfill project. It should be noted that on June 24, 1997, one of those proposed landfill projects (i.e., Towsley

Canyon or "related project No. 32") was dropped from further consideration as a potential landfill site by the County Board of Supervisors. That project is still cumulative analyzed herein within this document, since it was considered a feasible project at the time of the related projects list compilation.

The Traffic Impact Study Report cumulatively analyzes both the City and County Landfills and 33 related projects, including two additional landfills (i.e., Towsley Canyon and Elsmere Landfills). Mitigation was recommended based on impacts resulting from **all** [emphasis added] related projects being developed. Moreover, the traffic impact study report was accepted by the LADOT. Since that period, the Towsley Canyon Landfill was dropped from consideration as a potential landfill site by the County. In addition, several of the 33 related projects were either dropped from development consideration or downsized. Additionally, the Traffic Impact Study Report analyzed the County Landfill (which was previously analyzed, approved for development, and mitigated for by the County) because at the time the study was being prepared, this landfill **was not** [emphasis added] operational; however, it was a "reasonably foreseeable future project." This landfill was previously mitigated for (as part of a 17,500-tpd operation) and, at the discretion of the City, continues to be cumulatively analyzed along with the City portion of the proposed project. The project proponent has voluntarily accepted any additional mitigation measures (though not required by CEQA) for cumulative traffic generated from projects that have been dropped or already developed (and mitigated for as part of project approval). Therefore, the traffic impacts predicted in the Draft SEIR presents a reasonable "worst-case" scenario by over-predicting potential development conditions and associated traffic.

It should be noted that until the proposed landfill and current operational landfill are combined, the initial proposed landfill would provide a waste intake rate of 5,000 tpd in the City portion of Sunshine Canyon and 6,000 tpd at the County Landfill. The ultimate City/County Landfill would combine landfilling operations and would allow an average waste intake rate of approximately 11,000 tpd. The maximum net tonnage that can be deposited per operating day is 12,100 (based on a maximum intake rate of 5,500 tpd in the City and 6,600 tpd in the County) with a **maximum** [emphasis added] weekly intake rate of 72,600 tons (a maximum of 12,100 tpd based on 6 working days per week).

The Draft SEIR analyzes 5,500 as the **maximum** [emphasis added] daily intake rate for the City portion of the proposed project and includes cumulative traffic generated from the operating County Landfill and other related projects.

Comment 157: AIR QUALITY

There are numerous issues of air quality that must be addressed and mitigated.

Issue #1. One of the problems which led to the Zone Revocation hearings of 1988 was that significant amounts of trash and dust which were blowing in the wind and landing in the neighborhoods homes below the landfill, and the City and Counties water supply. Pictures of large plumes of dirt and trash billowing upwards of 500 feet in the air were

submitted to the ZA for proof. Additionally, credit records, doctors records and other sensitive material was retrieved by local residents from locations in Beverly Hills, Culver City and Santa Monica, all cities utilizing the landfill at the time. We were never able to quantify the amount of trash and possibly contaminated particulates that may have entered the water systems which supply 80% of the City and large areas of Los Angeles County. This evidence led ZA John Parker to conclude "**in the context of the strong winds which blow from the north, this landfill is probably in a POOR location**". (emphasis added)

Response 157: The previous City Landfill operation **never** [emphasis added] resulted in contaminated particulates entering the Los Angeles Reservoir or any other water treatment or storage systems. On March 14, 1988, the Office of Zoning Administrator conducted a public hearing to solicit testimony and gather information to consider the revocation or modification of the Sunshine Canyon Landfill zone variance. The revocation action was requested by Councilman Hal Bernson, citing allegations of various violations of the variance grant and additional nuisances. The Chief Zoning Administrator instructed that proceedings be initiated under §12.27-B, 5 of the Los Angeles Municipal Code and Condition 13 of the extant grant to determine the validity for cause to revoke or modify the operation.

It was further determined (in 1988) by Mr. Parker, Associate Zoning Administrator, with respect to specific allegations concerning dust, health aspects, and water contamination that:

> Dust, as well as rubbish blowing from the landfill, constitute violations of Condition No. 13. BFI is presently making good efforts to control dust, but additional measures are needed. . . . Fugitive dust appears to relate to the condition of the surface of the site than to active filling operations. This action attempts to address that aspect.
>
> Allegations of health impacts, allergies, skin conditions, respiratory conditions, etc., are unproven. Materials in the file contain no scientific or expert documentation relating to this.
>
> Allegations regarding water contamination and failure to examine for toxic materials were unproven. Further, the latter allegation does not relate to any extant condition of the variance or requirements under the Minimum Regulations.
>
> The following allegations were not satisfactorily proven: confinement of gases (Minimum Regulations III.O), monthly reports of perimeter gases (Minimum Regulations III.O(1)), fences (Minimum Regulations VI.A), pest control reports (Minimum Regulations VI.G), bench marks (Minimum Regulations VII.F), deposit of toxic materials into the landfill, and adverse effects upon real estate values.

With respect to these zone variance findings (1988), the Zoning Administrator placed eight additional conditions on the operation of the landfill.

It should be noted that Mr. Parker, Associate Zoning Administrator, stated the following information with respect to specific allegations:

> Dust, as well as rubbish blowing from the landfill, constitute violations of Condition No. 13. BFI is presently making good efforts to control dust, but additional measures are needed. In the context of the strong winds which blow from the north, this landfill is probably in a poor location. **However, this is a hindsight observation, after residential development has crept northerly to the edge of the landfill property** [emphasis added]. Under the present circumstances, further efforts to control dust and trash must be made. Fugitive dust appears to relate more to the condition of the surface of the site than to active filling operations. This action attempts to address that aspect.[25]
>
> BFI must be granted the opportunity to cure the violations and problems relating to the landfill. Although several of the violations go well beyond being inadvertent infractions, **the landfill is an enormously complex and extensive operation involving inevitably some infractions** [emphasis added]. This action constitutes the first time that the Office of Zoning Administration has officially found the landfill to be in violation of conditions; as would occur in a revocation action under a conditional use, the operator must be given an opportunity to prove up and, only in the event of future violations and failures to comply, would actual revocation be considered under a further public hearing and action.[26]

Issues raised by the commenter are currently being addressed by existing zone variance conditions for the inactive City Landfill and by existing CUP Conditions and mitigation measures imposed for the now operational County Landfill.

Neither the MWD nor DWP has ever asserted that the operational County Landfill or the landfill in the City has resulted in any contamination due to fugitive dust emissions. Both of these agencies analyzed the Draft SEIR during its review and submitted correspondence (Letters 3.4-5 and 3.6-3, respectively) that are included in Appendix C, Original Comments Received on the Draft SEIR, in this document. As indicated in their letters, neither the MWD nor DWP believes that fugitive dust emissions from the project site will affect their respective facilities.

Potential contamination of the water supply at either the Joseph Jensen Filtration Plant or the Los Angeles Reservoir as a result of high wind conditions is extremely remote because these facilities are respectively located approximately ½ mile and 2 miles

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[25]/ Case No. ZA 17804 (RV) Sunshine Canyon Landfill Consideration of Revocation - Zone Variance, September 1, 1988, Summary of Conclusions and Findings, No. 7.

[26]/ Ibid., No. 6.

southwest and downgradient of the project site and are separated from the project site by an elevated perimeter ridgeline, a landscaped ±100 acre open-space area, several residential developments, existing roadways, and other industrial development.

Comment 158: The history of the area shows that this pass is in a very high wind tunnel. High pressure zones from the upper deserts are compressed in the venturi of the pass and create extremely strong winds from the north.

Response 158: Refer to Topical Issue 3 for a discussion of wind conditions at the project site.

Comment 159: In 1989, a major fire erupted on the landfill property. The Los Angeles City Fire Department estimated winds of in excess of 75 MPH which whipped the flames along the foothills and destroyed 18 homes in Porter Ranch.

Response 159: The December 1988 fire did not start within the boundaries of Sunshine Canyon, and the cause of the fire remains undetermined. Onsite landfill personnel and equipment prevented the fire from encroaching upon the southern berm of the existing inactive City Landfill.

As stated in the Draft SEIR, Section 4.14.1, Fire and Emergency Medical Services, p. 4-398:

> The threat of a fire igniting onsite and then spreading offsite would be considered rare because most areas around the landfill, especially the landfill footprint area, have combustible vegetation removed and are graded. The landfill footprint area would create a firebreak since existing surficial vegetation is removed. Unless authorized, onsite areas such as the ±100 acre buffer area and other natural areas in Sunshine Canyon are considered off limits to landfill personnel.

It is proposed for the project site that small onsite brush fires would be controlled by using landfill equipment such as dozers, scrapers, and water trucks. Fire flow to the project site (including water tanks, fire hydrants, and water lines) would meet the requirements of the Los Angeles Fire Department (LAFD). Control of offsite brush fires would be the responsibility of either the LAFD or Los Angeles County Fire Department (LACFD). However, landfill equipment would be made available to these departments during offsite brush fires.

Comment 160: The AQMD regulations prohibit dust and other air contaminants being blown into the air. Sunshine Canyon has been closed on a number of occasions for this reason. Amazingly the AQMD rule excludes wind in excess of 25 MPH as an act of nature. Since there are frequent high winds that blow in this area then dissipate on the valley floor, AQMD rules rarely apply. A wind circulation and frequency study must be done prior to any approvals.

Response 160: Refer to Topical Issue 3 for a discussion of SCAQMD Rules 402 and 403. A surface wind circulation and frequency study is included in the Draft SEIR, Appendix B8.

Comment 161: Issue #2. The applicant admits to unavoidable significant adverse impacts to air quality relating to operational aspects of the project in its Draft SEIR. Air quality impacts are expected to remain above significant levels for criteria pollutants nitrogen oxides (NO_x), reactive organic gases (ROG), and suspended particulate matter (PM_{10}) due to project implementation. These impacts cannot be mitigated to levels below significance.

Response 161: Refer to Response 68 for a discussion of the environmental determination within the Draft SEIR, stating that the proposed project would create an unavoidably significant adverse impact on air quality due to construction and operational emissions.

Comment 162: Issue #3. Odor impacts. There is no evidence in the Draft SEIR that the existing odor control procedures will be effective once the landfill has expanded. The extent of the expansion could render as inadequate any odor control procedures similar to those currently in place.

Response 162: Refer to Topical Issue 4 for a discussion of the odor control program for the proposed City/County Landfill. Refer to Responses 73 and 101 for a discussion of the historical effectiveness of odor control measures at the project site. Regarding the County Landfill, since operations began in August 1996, there have been no Notices of Violation or Notices to Comply issued by the SCAQMD, which is the monitoring agency for odor complaints.

Comment 163: This landfill has been cited a number of times for verified nuisance odor complaints by the South Coast Air Quality Management District (AQMD). Perhaps the applicant should use a high percentage of dirt as cover, rather than Alternative Daily Cover (ADC), to mitigate odor impacts of operations.

Response 163: The project proponent has never received any issued notices by the SCAQMD with respect to odor generation for the previous City Landfill operation or at the operating County Landfill. Refer to Responses 73 and 101 for a discussion of the historical effectiveness of odor control measures at the project site. The proposed City/County Landfill must not be a source of odor nuisance per the requirements of CCR, Title 27, §20919 - 20923. Refer to Topical Issue 4 for a discussion of the odor control program and mitigation measures for the proposed City/County Landfill.

Comment 164: Issue #4. Traffic errors and the impact on air quality is greatly underestimated. Without corrected traffic impact studies and truck counts, the SEIR is naturally deficient in any evaluation of air impacts. The traffic projections produced by a new study will cause all air quality projections to be re-evaluated and calculated.

Response 164: Refer to Response 151 for a discussion of the methodology used in preparation of the Draft SEIR traffic study.

Comment 165: ALTERNATIVES

Issue #1. The No Project alternative is not really a no project alternative. BFI states clearly that if the No Project alternative is chosen, they will seek expansion in the

County. The premise of the landfill is to "alleviate disposal capacity shortfalls in Los Angeles County". It must be pointed out that there are no current shortfalls, even though predicted for the year 1993, it never happened, and the surplus of landfill space today remains significant. Likewise, if the No Project alternative is chosen, then the county permit expansion of up to 70 million tons would adequately protect against any possible future landfill shortage.

Response 165: The No Project Alternative assumes that the proposed project would not be implemented, thereby precluding development of the combined City/County Landfill within Sunshine Canyon with a net disposal capacity of 90 million tons.

The project site in the City would retain its existing land use designation of Open Space and its zoning designation of A1-1-O in conformance with the recently approved Granada Hills-Knollwood Community Plan. The existing County Landfill, with a disposal capacity of 17 million tons, would continue to operate, accepting an average of 6,000 tpd of waste. However, it is anticipated that the County Landfill capacity will be exhausted by approximately 2006, based on its allowable daily intake rate.

If the No Project Alternative were to be approved, the project proponent would pursue future project entitlements pursuant to existing County Landfill CUP Conditions to expand landfill development in the upper reaches of the County portion of Sunshine Canyon. However, even though this could result in the expansion of the County Landfill, up to a disposal capacity of 70 million tons, it cannot be simply assumed that such a request would be approved by the County.

In order to avoid the greater environmental impacts that would result from the extension of landfilling farther into Sunshine Canyon, the Board of Supervisors, in the Sunshine Canyon Landfill Extension CUP, Conditions of Project Approval, Condition (10)(b), directed the project proponent to file applications with the City to commence the environmental processing and permitting of a landfill within the City's jurisdiction as part of a combined County/City facility.[27] (The project proponent filed those project applications with the City on June 25, 1991.) In this regard, the Board further stated in CUP Condition 10(a) that it "wished to conserve and if possible avert the destruction of oak trees and other significant ecological resources in its jurisdiction and encouraged the City to permit additional landfill capacity within its jurisdiction for its landfill capacity needs." The purposes of the CUP Conditions (by the Board) were to minimize the removal of approximately 3,200 oak trees, big-cone Douglas fir trees, and other significant biological resources in the upper reaches of Sunshine Canyon by

[27]/ Refer to Sunshine Canyon Landfill Extension CUP and Oak Tree Permit 86-312-(5), Conditions of Project Approval, initially approved on February 19, 1991, by the County of Los Angeles Board of Supervisors. Specifically, CUP Condition 10(b) stated in part, "therefore, as soon as possible, but not later than July 1, 1991, the permittee shall apply to the City of Los Angeles to expand the landfill within the City . . . " At the time of the Board of Supervisors' final approval of the project in November 1993, CUP Condition 10(b) was changed and stated in part, "therefore, the permittee shall diligently pursue its application to the City of Los Angeles to expand the landfill within the City . . . " These conditions are incorporated in the Draft SEIR, Volume II, Appendices, Appendix C6, Sunshine Canyon Landfill Extension, Findings of Fact and Statement of Overriding Considerations, and Conditions of Project Approval.

encouraging the City to provide additional landfill disposal capacity within the portion of Sunshine Canyon that is already substantially disturbed (refer to Section 2.0 Revisions and/or Additions to Draft SEIR).

The Board also stated (under the County Landfill CUP, Finding No. 5) that:

> The approved project will begin within unincorporated County territory with a fill having an estimated waste capacity of approximately 16.9 million tons and covering a landfill footprint of approximately 215 acres exclusive of support facility sites (County Only Fill Design). If permitted by the City of Los Angeles, the filling would, after development of the initial increment of the 215 acre landfill in unincorporated territory, begin concurrent operations in the City's jurisdiction. The landfill would then increase progressively in height in the City and in the County area until the final elevation of the City-County landfill design (having approximately 100 million tons of waste disposal capacity) has been reached (City-County Fill Design). The canyons would then be filled and the landfill would close subject to a detailed closure plan unless further permits to expand the landfill were subsequently granted. If the City denies the applicant's request to extend into the City or grants a permit for a fill which does not overlay the project area associated with the County Only Fill Design, then, under the approved project, no portion of the landfill extension within the County may extend beyond the surface area associated with the County Only Fill Design.[28]

Comment 166: Issue #2. The SEIR addresses operational and near operational out of county and state rail haul sites and states that they "would result in disturbances on desert environments, the need for secondary transfer stations facilities, and the use of waste-by-rail systems, which would result in greater environmental impacts". This concept is hard to understand in light of the impacts that BFI causes on human beings. In their view the impacts to a vacant mine or open desert is more important than the health of 15,000 citizens who will live in the debris "drop zone" caused by wind blown trash.

Response 166: Refer to the Draft SEIR, Section 5.10, Remote Landfill Facilities In-State/Out-of-State, pp. 5-43 through 5-66, and Table 5.3-1, pp. 5-72 through 5-94, for an environmental comparison of topical issues between the proposed City/County Landfill and alternative waste-by-rail landfill projects. Mitigation measures to minimize windblown litter are presented in the Draft SEIR, Section 4.9.3, Litter, pp. 4-305 and 4-306. Refer to Response 183 for a discussion of human health surveys.

With respect to the alternatives addressed in the Draft SEIR, and in accordance with the State CEQA Guidelines, §15126(d), an EIR must:

> . . . describe a range of reasonable alternatives to the project, or to the location of the project, which would feasiblely attain most of the basic objectives of the

[28]/ Sunshine Canyon Landfill Extension, Findings and Order of the County of Los Angeles Board of Supervisors, Conditional Use and Oak Tree Permit 86-312(5). November 1993.

project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.

In regard to feasibility, State CEQA Guidelines, §15126(d)(5)(A), states that:

> . . . among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent).

Comment 167: Likewise the potential of water contamination to the two major fresh water storage reservoirs for over 15,000,000 people in the greater Los Angeles/Ventura County areas.

Response 167: Refer to Response 157 for a discussion of allegations that the previous City Landfill operation caused contaminated particulates to enter the Los Angeles Reservoir and other water treatment and storage systems.

Comment 168: A more serious effort must be shown toward consideration of alternative sites.

Response 168: With respect to the alternatives selected, City Planning staff chose these alternatives pursuant to State CEQA Guidelines, §15126, subd.(d). The Draft SEIR, Section 1.9, Alternatives Summary, pp. 1-12 through 1-30, describes both the alternatives not evaluated and the alternatives selected for analysis.

The Draft SEIR, Section 5.0, Alternatives, provides an in-depth analysis of the following alternatives to the proposed project: the No Project, Reduced Volume, Immediate Combined City/County Landfill Operations, Potential/Proposed Landfill Sites in Los Angeles County (i.e., Blind Canyon and Elsmere Solid Waste Management Facility), Out-of-County Landfill Site (i.e., El Sobrante Landfill), Waste Management Technologies and Strategies (i.e., source reduction, recycling, composting, waste-to-energy, and alternative daily cover materials), and Remote Landfill Facilities In-State/Out-of-State (i.e., Eagle Mountain, Railcycle-Bolo Station, Mesquite Regional, and La Paz Landfills).

Comment 169: Issue #3. The SEIR does not address the fact that the City of Los Angeles currently has issued an RFP to look at new technologies or alternatives to land filling. The SEIR does not look at new technologies. The County currently operates the SERF project, and a private contractor operates another facility in Commerce-- both are waste-to-energy facilities. These facilities are similar to the ones used around the world, and in areas such as Japan, where they eliminate nearly 100% of all waste without landfills. In Hemet, a new facility is being experimented with using polymer's to inject into sorted trash. The end product is a usable brick. No mention of any of these new technologies is found in the SEIR and they need to be explored; particularly, in light of the City of Los Angeles' RFP.

Response 169: The referenced RFQ/RFP solicited by the City BOS for alternative waste management technologies would eventually fund a pilot program for an undetermined advanced solid waste transformation technology. If fully approved and permitted, it is anticipated that a facility would be constructed and operated in the City and would transform approximately 50 to 100 tpd of City-generated waste. As stated above, this type of facility will not accommodate the volume of waste (i.e., estimated at 12,000 tpd) now being generated in the City nor would it provide the City with short-, medium-, and long-term disposal capacity required by A.B. 939.

An analysis of alternative waste management technologies and strategies was provided in the Draft SEIR, Section 5.9, Waste Management Technologies and Strategies, pp. 5-36 through 5-43. It should be noted that the *Los Angeles County Countywide Siting Element*, prepared by the Los Angeles County Department of Public Works, Environmental Programs Division, estimates that less than 2,000 tpd of solid waste is disposed of at the two permitted transformation/waste-to-energy facilities in Los Angeles County (e.g., Commerce Refuse-to-Energy Facility and the Southeast Resource Recovery Facility).[29] In comparison, over 36,000 tpd of solid waste is disposed of in Los Angeles County landfills. As stated in the Draft SEIR, Section 5.9, Waste Management Technologies and Strategies, p. 5-43:

> It was concluded by the City that even with the implementation of advanced and aggressive waste management alternatives and ADCMs [Alternative Daily Cover Materials], landfills would be needed to adequately provide for the amount of waste being generated. Therefore, these waste management strategies and technologies are not considered viable as stand-alone alternatives to the proposed project. Although these options are vital parts of an integrated waste management solution, and necessary for reducing and diverting the amount of waste disposed in landfills, these technologies and strategies alone cannot resolve the need for necessary disposal capacity in-County and effectively ensure adequate public health and safety.

Comment 170: Issue # 4. The lack of serious consideration of the Orange County landfills who are willing to accept some LA County waste. This option is a good short term solution to any disruptions that "Could" happen until a full rail haul system, or new technology system could be built.

Response 170: Currently, a limited amount of Los Angeles County-generated solid waste is imported into Orange County landfills (e.g., less than 2,000 tpd), and existing restrictions (e.g., permit limitations, existing franchise agreements, maintaining CEQA-exempt status) prohibit additional increases into these landfills. The Draft SEIR, Section 1.9.1, Alternatives Not Evaluated, pp. 1-14 through 1-17, discusses these limitations and the reasons why Orange County waste importation is not considered a feasible alternative to the proposed project.

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[29] *Los Angeles County Countywide Siting Element, Volume I - The Element*, Los Angeles County, Department of Public Works, Environmental Programs Division, Table ES-2. June 1997.

Comment 171: Suggested consideration should be made of utilization of existing landfills in the following manner:

Until the year 2006:

A. Olinda and Olinda Alpha landfill, Orange County.
B. Bowerman Landfill, Orange County.
C. El Sobrante, Riverside County.

After the Year 2006:

A. Mesquite Regional Landfill, Imperial County.
B. Eagle Mountain Landfill, Riverside County.
C. Bolo Station Landfill, San Bernardino County.
D. New technology in basin.

Response 171: This comment is noted. Refer to Responses 168, 169, and 170.

Comment 172: REGIONAL DEVELOPMENT

Issue #1. Since there have been over 64,000 proposed and/or permitted housing units for the areas to the north which lie in the Chiquita Landfill area, this growth does not place any additional need for Sunshine Canyon since Chaquita is scheduled to take their trash.

Response 172: The Chiquita Canyon Landfill was approved in February 1997 for an approximate 23-million-ton landfill expansion. However, the maximum permitted disposal capacity for this facility will remain at 5,000 tpd. This landfill's recent approval was challenged in court, and the trial court determined that additional environmental study was required for the building and maintenance of proposed onsite sedimentation basins. This issue was not analyzed in the Draft EIR for that project. In addition, one sedimentation basin would be constructed in a blue-line streambed, and as a result of that construction, a streambed alteration permit would be required from regulatory agencies. Therefore, in accordance with the requirements of CEQA, a discussion of the potential impacts resulting from the development and maintenance of sedimentation basins will be required. It is anticipated that additional environmental documentation would be prepared to address this issue.

Comment 173: However, the traffic patterns that this growth will create along the I-14 and I-5 corridors, which run next to Sunshine Canyon, is enormous. These cumulative impacts are not included in this SEIR. The Southern California Association of Governments (SCAG) will take this issue up and the SEIR needs to properly analyze these impacts.

Response 173: Based on the determination of LADOT and City Planning staff, the Chiquita Canyon Landfill or proposed developments located near this landfill were not cumulatively analyzed as part of the traffic study prepared for the proposed project due to their distance from the project site. However, as shown by the results of the CMP Mainline

(Freeway) Analysis, which is provided in the Draft SEIR, 4.13.2, Los Angeles County Congestion Management Program, p. 4-374, the proposed project will not have a significant traffic impact on either the I-5 or I-405 Freeways. In addition, both Caltrans (the State transportation agency) and MTA (the regional agency that administers the CMP Program) did not indicate any disagreement with the CMP analysis provided in the Draft SEIR.

For additional information regarding cumulative traffic analysis, refer to Responses 26 and 27.

Comment 174: WATER QUALITY

Issue #1. The landfill lies within one mile upwind of the MWD Jensen Filtration Plant and the DWP Los Angeles Reservoir. These two facilities supply most of the water for Los Angeles City, County and parts of Ventura County. The City Zoning Administrator has documented that the landfill is in a bad location due to the frequent winds in the area. The possibility of wind blown contamination is of such great significance that extensive wind modeling must be done to guarantee that there is no wind blown contamination.

Response 174: Refer to Response 157 for a discussion of allegations that the previous City Landfill operation caused contaminated particulates to enter the Los Angeles Reservoir and other water treatment and storage systems.

Comment 175: Issue #2. The Inlet Tunnel of the MWD Jensen Filtration Plant is within ½ mile of the landfill leachate collection system. The BFI system is a concrete system which is subject to breakage in severe earthquakes or erosion. A better system must be designed to protect the MWD Jensen Plant.

Response 175: Refer to Responses 77 through 79 for a discussion of the potential for the proposed City/County Landfill to impact the Balboa Inlet Tunnel or the MWD Joseph Jensen Filtration Plant. The proposed project would not result in any significant impacts to these facilities.

The "leachate collection system," or LCRS, will be composed of HDPE pipe, not "concrete." This pipe has the ability to flex without leakage during potentially strong earthquake events such as those described in the Draft SEIR, Section 2.7.4. HDPE pipe is also resistant to erosional effects.

It should be noted that the proposed sedimentation basin near the landfill entrance will be concrete-lined. Refer to Response 678 for a discussion of surface water quality monitoring and testing requirements at the project site.

Comment 176: Issue #3. Surface runoff from the landfill will empty into a channel that flows directly in front of the MWD Jensen Filtration Plant. Any breakage or overflow of this channel could cause significant contamination. BFI needs to find a better run off control system.

Response 176: As stated in Section 4.3.1, Surface Water, p. 4-102, of the Draft SEIR:

> Drainage from the project site (including the main canyon and four tributary canyons) converges at the mouth of Sunshine Canyon near the landfill entrance. Surface water runoff from precipitation, flow from tributary channels, and erosion caused by these flows converge at the canyon's mouth. Currently, surface water from within the upper reaches of Sunshine Canyon is collected in the County Landfill sedimentation basin. Water that collects in that basin is periodically monitored under the stormwater monitoring plan for the operational County Landfill. Drainage from this basin travels southerly into a wash before reaching the mouth of the canyon near the landfill entrance.
>
> Offsite, surface water from the project site flows underneath San Fernando Road into an 8-foot-wide box culvert that is maintained by the City BOE. The culvert is approximately 120 feet long and releases surface water into the Weldon Canyon Flood Control Channel, which is located directly east of the site entrance across San Fernando Road. This channel is part of the City's flood control system. Drainage in this channel flows south for approximately 2 miles and then passes through a debris basin located directly west of the Los Angeles Reservoir. After passing through this basin, surface water enters the Bull Creek Flood Control Channel located approximately 3.5 miles south of the project site. This channel is owned, operated, and maintained by the County DPW, Flood Control Division. Surface water then enters the Sepulveda Dam approximately 11 miles south of the project site. This dam is owned, operated, and maintained by the Corps.
>
> The existing inactive landfill has numerous drainage control improvement features, such as benches, interceptor ditches, and concrete drainage channels, to divert surface water runoff away from the landfill. These control improvements are maintained regularly and closely monitored during the rainy season so that any necessary repairs or maintenance can be performed in an expeditious manner. Any areas of ponding or erosion damage on the existing inactive landfill are repaired upon discovery and as weather permits by the project proponent.
>
> As part of the required closure for the existing inactive landfill, sedimentation basin A will be constructed within Zone A (on approximately ±2.5 acres), near the mouth of Sunshine Canyon to control and capture anticipated surface runoff from peak storm events and to ensure that no significant impacts would occur offsite.

The Weldon Canyon Flood Control Channel, referenced by the commenter, is owned, operated, and maintained by the City BOE. Any future improvements to this channel would be under the responsibility of the City BOE. The proposed project would create an enhancement to existing conditions by providing for three new sedimentation basins that would slow and temporarily collect stormwater and remove sediment before releasing this stormwater in a controlled manner into the flood control channel.

The project proponent would comply with all NPDES requirements to ensure that the quality of surface water leaving the project site would not result in significant environmental impacts on downstream land uses or facilities.

"Significant contamination" as stated by the commenter would not occur.

Comment 177: Issue #4. BFI rests all of its protection from ground water contamination on the fact that the landfill is lined. However, the liner is merely 60 mil thick and will not withstand movements of over 12 inches. The 1994 Northridge earthquake moved the peak above the landfill 15-18 inches. The active earthquake faults in the area raise this issue to a level of significance and the EIR does not show how BFI can satisfy EPA standards for municipal landfills if the liner was to be damaged by another 1971 or 1994 size earthquakes.

Response 177: The amount of seismic displacement that the liner system can sustain depends not only on the magnitude of displacement but also on the pattern of displacement. The 12-inch limit on liner displacement referred to in this comment is a relative displacement between material on different sides of the liner. The 15- to 18-inch displacement of the peak above the landfill referred to in this comment was a rigid body displacement of the entire crustal block on which the landfill is located and would have no impact on liner integrity should it happen again. Furthermore, beneath the 60-mil plastic liner is a 2-foot-thick clay liner that provides a redundant barrier to waste constituent transport in the unlikely event that the plastic liner is damaged.

Refer to Topical Issue 2, Landfill Stability During Northridge Earthquake, in this document.

Comment 178: Issue #5. The liner warranty is valid for only 20 years. Degradation of the liner would continue each year making it less likely to withstand earth movements. This raises questions as to whether the liner, after 5 or 10 years could withstand even a modest earth movement. The EIR needs to show a scale of strength for each year of operation, and how BFI can guarantee the protection of the water table in later years, or after closure.

Response 178: Refer to Response 974 for a discussion of the long-term viability of HDPE as a containment material. Refer to Responses 976 and 977 for a discussion of warranties for landfill liners. The proposed liner system shall serve as an effective waste containment groundwater protection system for as long as wastes could pose a threat to groundwater resources, in accordance with State regulations.

Comment 179: Issue #6. Bird contamination. During the previous operations of the City Sunshine Landfill, large flocks of birds would land in the open faces of the landfill then travel the 1 mile to the Jensen Filtration Plant and Los Angeles Reservoir. Analysis must be done to show the potential aerial contamination of water supplies from these birds-- both from carried mater and droppings.

Response 179: Operational measures currently used at the County Landfill have proven effective in preventing and controlling vectors. Similar measures would be used for the proposed project. For an additional discussion of this issue (i.e., vector control), refer to Topical Issue 17 and Response 84.

Comment 180: MISCELLANEOUS

Issue #I. Property values. As the Councilman for the Granada Hills area I have had reports of home sales falling out of escrow due to the disclosure of the existence of a landfill near the home. I have also heard from many people that their property values have suffered. BFI must guarantee the value of all future sales. A real estate analysis must be done to protect home owners from negative value impacts and BFI must be forced to underwrite any losses.

Response 180: In 1988, findings of the City's Associate Zoning Administrator (John Parker) indicated that the allegation that the Sunshine Canyon Landfill would adversely affect real estate values was not satisfactorily proven.

Implementation of the proposed project is not anticipated to impact the property values of existing residential homes proximate to the project site. In addition to the project-specific study prepared in 1988, several other economic valuation studies have been prepared on landfills in the Southern California market area that address this issue.

Specifically, a residential valuation study was prepared by Dr. Chapman Finley of JurEcon, Inc., for the Sunshine Canyon Landfill County Expansion. That study, entitled *An Evaluation of the Sunshine Canyon Landfill's Impact on the Value of Homes in Adjacent Residential Neighborhoods*, was prepared in November 1988 and was provided in the *FEIR, Responses to Comments*, Volume A, Appendix 7. Based on that study, which compared neighborhoods adjacent to the project site with four similar residential areas located at specified distances from the site, it was determined that the existing inactive landfill (when operational) had no discernible economic impact on property values.

This study evaluated the potential landfill extension's effect on the sale price of homes or rate of price appreciation of these homes in a defined area. Data were compiled on over 2,000 home sale transactions in the Granada Hills area and spanned over a 10-year period. A model was constructed by the consultants to delineate transaction prices in terms of year of sale, housing variables (for example, size and year built), and neighborhood variables.

The study concluded that the proposed landfill extension would not affect housing values. As noted in the study, a home with given characteristics adjacent to the landfill would, on average, sell for the same price as a similar home in a comparable neighborhood at some distance from the landfill. Furthermore, once adjustments for prestigious neighborhood differences were made, a home adjacent to the landfill could even be expected to sell for the same price as a similar home in a noncomparable neighborhood. The lack of a statistically significant difference between the target

neighborhoods adjacent to the landfill and comparable neighborhoods indicated that the Sunshine Canyon Landfill did not impact local housing prices.

A similar study was conducted for the Puente Hills Landfill (i.e., a 12,000 tpd landfill facility) during its environmental review. That study, conducted in 1989 by Parkcenter Realty Advisors, assessed the impacts on residential property values near the proposed Puente Hills Landfill. Sales data were compared between two study areas near the landfill and two control groups with similar housing located at a distance from the landfill. The two study areas consisted of single-family residential homes located in Western Hacienda Heights and Avocado Heights. The two control groups chosen were located in south-central Hacienda Heights and Rowland Heights.

Sales data were analyzed using overall price levels, price per square foot, and appreciation rates over a 5-year period as indicated by resales. The average prices per square foot in the study areas closely mirrored those of the control areas with nearly identical patterns of price trends. A review of resale information indicated a consistent range of annual average appreciation rates for each of these four areas. The highest rates of appreciation for individual resales were experienced in the study areas. Median home prices for the study areas were within the range of those of the control areas with the exception of a dissimilar portion of Avocado Heights. Also, all areas experienced lower annual increases during 1984 to 1986 because of a sluggish real estate market. A regression analysis was used to incorporate all data collected. The results of this analysis supported an earlier study on values to property (adjacent to the Puente Hills Landfill) that was conducted in 1983.

Based on the results of the two studies conducted in 1983 and 1989, single-family residential property values near the Puente Hills Landfill are not adversely affected by their proximity to the landfill.

If required as a condition of project approval, BFI will complete a property valuation study, to determine the potential for economic effects that the proposed project might have on the value of homes in the community of Granada Hills.

Comment 181: Issue #2. Buffer Zone. The SEIR does not address the fact that the proposed 100 +/-acre buffer zone has a number of active uses in it. A buffer zone must be free of any active uses which BFI has planned in their so called buffer zone. BFI must either eliminate proposed and current flare stations, sedimentation basins, oil wells, office uses, and other landfill activities, or extend the proposed buffer zone.

Response 181: The Draft SEIR, Section 2.11.7, Visual/Landscaping Buffer Area, p. 2-85, states the following:

> Located directly to the south of the existing inactive landfill is a ±100 acre open-space area, which was established by the project proponent as a buffer zone to separate that landfill from residential areas in Granada Hills. This buffer area was permanently set aside in the early 1980s and serves as an onsite mitigation area. This buffer zone also supports various uses (i.e., **leased oil**

wells or associated facilities [emphasis added]). Within the area, a voluntary tree-planting program was established by the project proponent, and a diverse variety of native and nonnative trees were planted. Currently, over 11,000 trees have been planted, including 1,367 coast live oak trees.

Even with rezoning of the subject property, the buffer zone will never be developed into an industrial use. Moreover, this area is proposed for further mitigation planting if development of the proposed project occurs.

A "buffer zone" is not defined in the Los Angeles Municipal Code (LAMC); however, in the context of the proposed project, the primary purpose of such an open-space area is to provide an adequate separation distance between uses (i.e., residential versus industrial).

There are **no** [emphasis added] planned uses (for the proposed project) that would be located within the existing ±100 acre open-space area. Existing uses in that area are under lease agreements with the project proponent. Many of these activities began prior to the BFI purchase of the subject site. Planned ancillary facilities, such as the sedimentation basin, flare station, water tank, environmental learning center, leachate plant and storage area, scale house, and general administrative offices, are all located outside of the ±100 acre open-space area.

Comment 182: Issue #3. Previous history. The abuses of BFI are well known to the City of Los Angeles Planning Department, Board of Zoning Appeals and City Council. During the previous operation of the city side of Sunshine Canyon, prior to 1991, BFI was cited for many violations of Zoning codes and Building and Safety codes.

Response 182: The history of BFI's zoning violations and variance revocation proceedings is discussed in the Additional CEQA Document (April 1993), Section 2.4.2, City of Los Angeles Proceedings, pp. 2-6 and 2-7. The zoning proceedings are referenced in Appendix C of that document.

In March 1988, the Office of Zoning Administrator conducted a public hearing to solicit testimony and gather information to consider the revocation or modification of the Sunshine Canyon Landfill zone variance. The revocation action was requested by Councilman Hal Bernson, who cited allegations of various violations of the variance grant and additional nuisances. The Chief Zoning Administrator instructed that proceedings be initiated under §12.27-B, 5 of the LAMC and Condition 13 of the extant grant to determine the validity for cause to revoke or modify the operation.

Based on decisions reached by John Parker, City Zoning Administrator, in September 1988; the City Board of Zoning Appeals in December 1988; and the City Council in July 1989, the City determined that certain conditions of the zoning variance previously approved by the City had been violated by BFI, imposed certain conditions regarding the continued operations of the landfill in the City, and ordered that BFI take certain curative actions such as filing an application for a modification to the zoning variance.

Mr. Parker, the Board of Zoning Appeals, and the City Council also determined that a number of complaints raised in these proceedings were not factually supported. (See below for greater detail.) For example, these agencies determined that allegations regarding adverse health impacts, water contamination, and improper acceptance of toxic waste were factually unproven. (Refer to Appendix C of the September 1988 Decision, pp. 61 and 62). Also, the zoning violations found by the City did not cause the City to revoke BFI's zoning variance. Copies of Mr. Parker's, the Board of Appeals', and the City Council's respective decisions, which include lengthy recitations of the participants' respective positions, were attached as Appendix C of the September 1988 Decision by the Zoning Administrator.

With respect to the conditions of the zoning variance, the City did conclude (in 1988) that there were violations specific to litter and dust control and landfilling activities beyond certain boundary and height limitations of the perimeter ridgeline. Also, the Zoning Administrator stated that high winds sometimes prevail in this area of Sunshine Canyon and that rubbish blowing from the landfill was related to those conditions but that this was not a "major problem" (this statement is referenced in Appendix C of the September 1988 Zoning Administrator's Decision, p. 60). The Zoning Administrator also concluded that street litter was an issue that had been satisfactorily resolved by the project proponent (see Decision, p. 62).

As more fully discussed in Section 2.4.3.3, p. 2-9, of the FEIR, Additional CEQA Document, representatives of various regulatory agencies testified that BFI implemented control measures (after 1988) that adequately addressed these past problems. Similarly, with respect to the issue relating to dust, the project proponent took immediate curative actions after the City determination in 1988, which included the adoption of a refined surface soil treatment and transport abatement plan. Representatives of various regulatory agencies testified that these control measures proved successful. It should be noted that these measures are currently being used at the now operational County Landfill in addition to other mitigation measures related to dust control.

With respect to landfilling activity beyond certain height and boundary limitations, a number of persons from the City analyzed this issue and expressed their belief that the proper assessment of those limitations was difficult. For example, Mr. Robert Packard, the Engineer of Survey for the City BOS, expressed such an opinion as to the boundary limitations. However, because the Zoning Administrator found violations with respect to this zone variance condition, the project proponent took action and applied for a grading permit to resolve the issue of boundary limitations. That curative action was approved by the City in October 1989.

The Zoning Administrator determined in September 1991 that certain conditions of ZA-17804(ZV) and ZA-89-1129(ZV) would remain in effect after September 21, 1991, which was the zone variance expiration date for the Sunshine Canyon Landfill (within the City jurisdiction) and for BFI to cease landfilling operations at this landfill. As determined by the Zoning Administrator, there are six conditions that remain in effect and must be complied with by the project proponent. These conditions are:

1. ZA-17804 - Condition No. 14:

   That at the expiration of this grant or the completion of the land reclamation operations, the premises shall be left in a neat and orderly manner with no uncovered material, debris, or waste products left on the premises. Further, upon the completion of the project, the applicant or owners shall advise the City and County Recreation and Parks Department that the property is available for recreational purposes.

   While laws subsequent to 1966 may affect the use of the site for recreational purposes, the condition can be fulfilled by the action required.

   Status: The project proponent submitted correspondence to both City and County recreation departments informing these departments that this condition would be complied with by the project proponent after closure of the inactive City Landfill is deemed completed by the CIWMB.

2. ZA-89-1129 - Condition No. 1:

   a. The applicant shall prepare a survey of the boundaries and elevations of the approved variance in conformance with Condition Nos. 2 and 3 herein. Said survey shall be conducted by an independent surveyor mutually acceptable to the applicant and the Office of Zoning Administration, which latter shall act on consultation with the Office of Council District 12, the Bureau of Sanitation, and the Bureau of Engineering. Until such survey is completed and certified to the satisfaction of the aforementioned parties, the Bureau of Sanitation shall continue to enforce the boundaries and elevations that have been so utilized since the City Council action of July, 1989.

   b. Said independent surveyor shall be selected by the applicant within 2 weeks of the effective date of the subject variance action.

   c. Said survey shall be provided to the aforementioned City parties for review within 10 weeks following the effective date of the subject variance action.

      This condition became effective on August 31, 1991. The 10-week deadline for providing the survey (paragraph C) will obviously expire after September 21, 1991. The survey was needed to resolve the longstanding disputes over the proper location of the variance boundaries and to clarify boundaries for any future entitlements sought within the Sunshine Canyon property.

   Status: This condition was satisfied by the project proponent with the submittal of closure and postclosure maintenance plans (FCPMP) to the City LEA, CIWMB, and LARWQCB. Included within those documents is the engineered survey of the existing inactive landfill and ancillary facilities.

3. ZA-89-1129 - Condition No. 7:

Should the applicant proceed with construction of the sedimentation basin, said basin shall be constructed at a size that is adequate to the needs of the existing site, but which is not larger than necessary for the purpose of closure of the existing landfill. The construction shall be designed to meet minimum regulations and the determination of the final need and size shall be made by the Zoning Administrator in consultation with the appropriate regulatory agencies.

This condition will apply should the Bureau of Sanitation require the construction of a sedimentation basin within the variance area as a condition of closure.

Status: This condition will be satisfied once the development of the sedimentation basin occurs for the City Landfill. Plans and specifications for this basin (located near the landfill entrance) were submitted to the City, CIWMB, and LARWQCB as part of the FCPMP.

4. ZA-89-1129 - Condition No. 8:

a. Within 6 months after the landfill is full or after September 21, 1991, which ever occurs first, all landfill buildings, scales, checking stations, recycling center and facilities to accept trash shall be dismantled and removed from the site, except for offices and facilities necessary to monitor the closure plans.

b. Prior to establishment or continuance of said facilities after September 21, 1991, a plan(s) shall be submitted to the Zoning Administrator along with evidence that said facilities are strictly for the purpose of monitoring the closure plans for the City landfill portion of the site. The Zoning Administrator shall consult with the various regulatory agencies to verify that the facilities are for said purpose before authorizing the continuance or establishment of said facilities. Further, the Zoning Administrator may condition the authorization of said facilities.

It is noted that, during the life of ZA-17804, the variance area was not subject to the Oak Tree Ordinance (Ordinance No. 153,748) due to the express exemption under LAMC 46.02(a)2. However, after the expiration of the variance on September 21, 1991, future activities within the same area will be subject to the ordinance.

Status: The FCPMP confirmed which facilities would remain onsite during closure and postclosure activities. Any existing facilities that currently remain onsite have been authorized by the City.

5. BZA Case No. 4484 (12/19/91 Determination) - Condition No. 1:

   If the applicant cannot comply with the provisions of a condition of the variances due to a determination, requirement, etc. of a governmental agency, the applicant shall secure a written statement from the head of said agency explaining why the condition or provisions of the condition cannot be met and whether there is an alternative for meeting the condition or how the condition could be modified to enable the compliance intended.

Status: The project proponent has not needed any such statement.

6. BZA Case No. 4484 (12/19/91 Determination) - Condition No. 2:

   The applicant shall pay for an inspector to be assigned by the City to monitor compliance with all the conditions of the variance that were not complied with prior to the expiration of the subject variance for the filling phase of the landfill project.

Status: The project proponent continues to pay a yearly sum to the City LEA to monitor the existing inactive City Landfill, even through this facility ceased accepting waste. The City LEA agreed that as a result of the fee being paid and the City's ability to monitor compliance at this facility, the project proponent has satisfied this condition.

Comment 183: Zoning Administrator John Parker ordered BFI to conduct a health survey in the area to determine health impacts of the dump, in 1988. BFI has never complied. BFI promised to conduct the survey, then used legal trickery to get out of it.

Response 183: John Parker, the City's Associate Zoning Administrator, imposed Condition 7 in his order of the Sunshine Canyon Landfill Consideration of Revocation-Zone Variance (September 1, 1988), which included:

> That within 60 days of the effective data of this determination, the operator shall initiate the following to evaluate the impacts, if any, upon health by the landfill operation: A systematic sampling and analysis of air and soils in the area west of the Golden State/San Diego Freeways, north of Rinaldi Street, east of Reseda Boulevard and to the City limits on the north.
>
> The study design of such survey shall be submitted to the Los Angeles County Health Department for review and approval prior to implementation, in consultation with the Office of Zoning Administration and the Office of Council District 12. The results of the sampling and analysis shall be submitted to the same agencies and offices.

It should also be noted that the project proponent submitted a proposal to the City Zoning Administrator for the purpose of conducting a health study. Lengthy

discussions with the City ensued regarding revisions to the proposal, and modifications to the proposal were submitted. However, the City did not act on that proposal.

The City Associate Zoning Administrator also determined in September 1988 (in consideration of the possible revocation action of the zoning variance of the landfill) that the reason why a health study was required by the City was because information in the record pertaining to this issue was not adequate to prove or disprove adverse health affects. Specifically the City Zoning Administrator stated:

> Allegations of health impacts, allergies, skin conditions, respiratory conditions, etc., are unproven. Materials in the file contained no scientific or expert documentation relating to this.

With respect to the "informal health survey" sent to area residents by Councilman Hal Bernson (in 1988), the City's Associate Zoning Administrator stated in his findings (September 1988) regarding Case No. ZA 17804 (RV) Sunshine Canyon Landfill Consideration of Revocation-Zone Variance, p. 61:

> Health Impacts - This major allegation remains unproven. The health survey mailed to 5,000 residents was not scientific in its consideration. It would have been virtually impossible to answer it, absent perfect health, without appearing to indict the landfill for problems of allergies, respiratory ailments, skin diseases, etc. The questions and answers are not statistically valid, due to their construction. It would also have been helpful to have had expert (medical) input. A major question which the Administrator has is: Are the rates of allergy, respiratory illness, etc., abnormal for this area, in consideration of the frequently high winds blowing from the north and the proximity of a northerly hinderland with substantial natural vegetation? Under those conditions, a prevalence of allergies (particularly in the Spring) would not be surprising.

Prior to preparation of the Draft SEIR, comments were received from individuals during the NOP process that pertained to potential human health impacts (e.g., incidence of cancer, respiratory ailments and diseases, allergies, skin disorders, and airborne toxins). Most of the concerns were raised by individuals who resided in the Granada Hills area.

In response to these concerns, City Planning staff initiated investigations and had several meetings with leading medical authorities, such as Paul J. Papanek, M.D., M.P.H. (Chief, Toxics Epidemiology Program, Disease Control Programs of the County of Los Angeles, Department of Health Services) and Thomas M. Mack, M.D., M.P.H. (Professor of Preventive Medicine, University of Southern California, School of Medicine). Based on the review of existing information and the advice of these experts, City Planning staff concluded that an epidemiological study or a human health survey was not warranted for the proposed project.

It should be noted that Dr. Papanek indicated the potential for significant human health risk impacts to be statistically attributable to a Class III landfill is generally low. His comments were based on his extensive review of published scientific studies of landfill

sites located throughout California. Dr. Mack, who has designed, researched, and prepared a number of epidemiological studies for hazardous Class I waste landfills, indicated it would be unlikely that an epidemiological study for the proposed project would produce a definitive finding linking health problems of area residents to the landfill site. In summary, based on the results of this information and analysis, the proposed project will not have a significant effect on human health in the area of the project.

Comment 184: A health survey, although somewhat outdated now, needs to still be conducted to determine any impacts or diminution of the quality of health in the area south of the landfill since its re-opening.

Response 184: Health surveys for landfills were conducted in August 1995 for TACs as part of A.B. 3339 (codified in California Health and Safety Code, §41805.5) in a process called the Air Solid Waste Assessment Test (Air-SWAT). The results of the Air-SWAT for the existing inactive landfill were filed with both the SCAQMD and CIWMB. This landfill's Air-SWAT testing found no unacceptable levels of TACs at the project site's perimeter that can be attributable to onsite emissions.

For an additional discussion of this matter, refer to Response 183.

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Letter 3.6-6

Comment 185: This review of the draft of the Sunshine Canyon Landfill SEIR was conducted by the Environmental Affairs Department Local Enforcement Agency (LEA). The LEA, in partnership with other state and regional regulatory agencies, has the responsibility for ensuring the proper permitting, operation and closure of solid waste facilities within the City of Los Angeles. As a responsible agency under CEQA, our comments are focused on the environmental, technical and operational impacts related to the solid waste facility permit, which is required and issued by the LEA only after local land use entitlements are granted.

Response 185: This comment is noted.

Comment 186: **Section 1.0 Summary**

Section 1.2 Overview

The term "Average daily capacity" for the City portion is stated as 5,000 tons per day. The daily capacity should be listed as a maximum daily capacity and not an "average." In section 2.6.2 it states a maximum daily intake would be 5,500 tons per day which is in conflict with the earlier stated figure of 5,000 tons per day. This is repeated throughout the document and is inconsistent with future permitting that may occur. One maximum daily tonnage figure should be used, and it should not be an "average" but a maximum figure.

Response 186: Refer to Response 1 in this document. As indicated in that response, the Draft SEIR states both the **average** and **maximum** [emphasis added] intake rates to maintain consistency with the existing County Landfill Extension CUP and Oak Tree Permit 86-312-(5), and this information is required for the future Solid Waste Facilities Permit (SWFP) for the proposed project.

Specific to the adopted County Landfill CUP conditions 10(e) and (f):

> The net tonnage placed in the landfill shall not exceed 36,000 tons per week (6,000 tons per day average based upon 6 working days per week).
>
> The net tonnage of waste placed in the landfill on any given day shall not exceed 6,600 tons.

Until the proposed landfill and current operational landfill are combined, the initial proposed landfill would provide an **average** [emphasis added] waste intake rate of 5,000 tpd in the City portion of Sunshine Canyon and 6,000 tpd at the County Landfill. The

ultimate City/County Landfill would combine landfilling operations and allow an average waste intake rate of approximately 11,000 tpd.

The **maximum** [emphasis added] net tonnage that can be deposited per operating day is 12,100 tpd (based on a maximum intake rate of 5,500 tpd in the City and 6,600 tpd in the County) with a maximum weekly capacity of 72,600 tons (a maximum of 12,100 tpd based on 6 working days per week). This maximum total includes an **average** [emphasis added] of 1,100 tpd of inert waste.

Comment 187: **Section 2.0 Project Description**
Figure 2.4.5 Aerial Map

Provide an aerial map indicating where the location of the reduced volume alternative would be located in relation to the other alternatives.

Response 187: The Final SEIR will incorporate this information. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, in this document. This new graphic is included as Figure 5.5-3, Reduced Volume Alternative, and it depicts the proposed uses within the project site and operational County Landfill. Figure 5.5-3 is an addition to Section 5.0, Alternatives of the Draft SEIR.

Comment 188: *Section 2.5.4 Working Arrangement*

Although the project proponent may wish to pursue an agreement between the City of Los Angeles and County of Los Angeles LEAs on enforcement at the site, the possibility has not been discussed. The likelihood of a joint enforcement agreement is uncertain and is not an accurate reflection of the project's operational future. The Project Description should accurately reflect anticipated conditions.

Response 188: As entitlements for the project progress, both the City and County LEAs would be consulted to formalize the terms of this agreement.

The potential for this type of requirement for some form of agreement between the City and County to authorize common power over the entire project site was initially discussed between City Planning staff, the environmental consultant, and project proponent as documented in meeting minutes. Additionally, discussions between City Planning staff and Program Manager of the Environmental Affairs Department were held.

Concepts of this type of arrangement have been presented to the County DPW and Department of Health Services (DHS). All of these discussions took place during preparation of the Draft SEIR.

As stated in the Draft SEIR, Section 2.5.4, Working Arrangement, p. 2-38:

> It is anticipated that prior to or concurrent with City/County Landfill Project approval by the City, both jurisdictions will execute a working arrangement, regarding the joint operation of the City/County Landfill. This arrangement would recognize existing discretionary approvals, contractual agreements, or

other arrangements that were approved by the County Board of Supervisors and regulatory agencies in connection with the approved County Landfill.

That agreement would state the purposes and powers to be exercised by both jurisdictions, including, but not limited to, the following:

- authorize cooperating but separate LEA jurisdiction over the respective City and County landfilling activities in Sunshine Canyon during the first 18 to 24 months (average daily capacity would be 5,000 tpd in the City and 6,000 tpd in the County Landfill);
- combine City/County LEA monitoring and enforcement activities at the proposed City/County Landfill into a single authority (after 18 to 24 months);
- allow the mutual use of the access road, ancillary facilities and areas, and environmental protection and control systems;
- set reimbursement obligations;
- establish tipping fee structures; and
- establish revenue sharing by the City and County.

Through the implementation of a working arrangement, both jurisdictions would authorize combined landfilling operations to occur at one landfill footprint in Sunshine Canyon. Additional discretionary approvals by the County will be necessary for this combined City/County landfilling operation.

It is not "unreasonable" or "speculative" for City Planning to assume that some instrument (such as a working agreement or joint powers authority) must be established by both jurisdictions so that both jurisdictions can mutually share in the monitoring and enforcement activities once landfilling operations are combined at the County and City. It should be noted that the terms of such an agreement will be jointly negotiated between the City LEA, County LEA, and project proponent.

Comment 189: *Section 2.5.6 General Design Features of the City/County Landfill Facility*

Portions of California Code of Regulations Titles 14 and 23 have been merged into a new Title 27. Title 27 will apply to the majority of landfill activities. However, other proposed on-site operations may continue to be regulated by Title 14 or 23. Reference to all applicable CCR Titles should be included.

Response 189: Revisions will be incorporated into the Final SEIR with respect to Title 27. It should be noted that Title 27 became effective after the Draft SEIR was published and disseminated for public review and comment. However, many pertinent sections of CCR, Title 27, have been referenced within this document as part of responses to comments.

Comment 190: *Section 2.5.7 Proposed Landfill Ancillary Facilities*

Page 2-42 Green Waste/Wood Waste Recycling Area discusses placement of this activity near the existing inactive landfill. A drop-off and buyback recycling center for the local community is also described. In order to reduce safety hazards to the

public, these unloading areas should be separate from the working face utilized by commercial vehicles.

Response 190: The public buyback/recycling center is no longer being considered as part of the proposed project due to the operational necessity of providing the safest possible access for waste-hauling vehicles utilizing the proposed City/County Landfill. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, within this document. In addition, refer to Response 88 for a discussion of green waste/wood waste unloading, length of storage, and onsite uses for tub-grinded materials.

Comment 191: *Section 2.5.7 Scale House and Check-In Facility*

Pages 2-39 and 2-43 discuss moving the scale house operations into the City of Los Angeles portion of the site, closer to the landfill entrance. Any impacts associated with a reduction in the on-site queue space for vehicles or other equipment should be evaluated.

Response 191: Impacts associated with relocating ancillary facilities from the County into the City and shortening the access roadway in Sunshine Canyon are discussed and analyzed in the Draft SEIR.

The Draft SEIR, Section 4.13.5, Access Roadway in Sunshine Canyon, pp. 4-380 and 4-381, states the following:

> The improved roadway through Sunshine Canyon to the City/County jurisdictional boundary is approximately 1 mile long, provides a ROW of 160 feet and easements for berming and drainage. These improvements have provided additional queuing space for incoming truck traffic.
>
> As part of implementation of the proposed City/County Landfill Project, the existing access roadway will be used until realignment of the roadway is necessitated to accommodate the development of landfilling areas within the project site. During this development, the access road would be progressively shortened and realigned toward the mouth of Sunshine Canyon. Realignment would also result in the landfill entrance being relocated approximately 50 feet southward of its present location. The final realignment of the access roadway would parallel the I-5 Freeway as depicted on Figure 2.5-1. Final realignment will occur near the projected 26-year operational site life. Specific grading and construction-related impacts on earth resources, air quality, and noise are discussed within the context of the cumulative project buildout of each of those topical sections in the Draft SEIR.
>
> No specific cumulative impacts are anticipated as a result of access road realignment throughout the proposed City Landfill's site life. This roadway would continue to accommodate traffic to the existing inactive landfill for closure and postclosure maintenance purposes and waste-hauling vehicles to the County Landfill until its closure.

Comment 192: *Section 2.6.2 City/County Landfill Disposal Capacity and Operational Site Life*
This section discusses average waste intake and weekly averages. The project proponent may have reached an agreement with the County that was incorporated into the County issued solid waste facility permit conditions to limit incoming tonnage on a weekly average. However, this is a condition with no precedent in City-issued solid waste facility permits. The Project Description should accurately reflect anticipated conditions.

Response 192: Refer to Response 188 for a discussion of the proposed requirement for some form of agreement between the City and County to authorize common power over the entire project site. Also, refer to Response 186 for a discussion of proposed project peak and average daily waste intake rates.

With respect to the adopted County Landfill CUP and its SWFP, both the average and maximum daily and weekly tonnage intake rates are included in those permits. The information provided in the Draft SEIR (i.e., both average and maximum daily and weekly tonnage intake rates for the County Landfill) is consistent with the previously certified FEIR.

Comment 193: If the project proponent wishes to seek a similar arrangement, this should be noted as speculative and would be an option to be considered beyond a daily tonnage limit.

Response 193: Refer to Response 192.

Comment 194: *Emergency Drainage Pipe*
Update applicable drawings to show location of the proposed 500' section drainage pipe that the project proponent is planning to implement as an emergency drainage control measure. Also show the parts of the pipe which will be underground. Add a description of how this drainage pipe will be integrated into the drainage control system in the proposed expansion of the landfill into the City portion of the site.

Response 194: A copy of the design drawings will be provided to the City LEA. The above-referenced drain pipe will not be integrated into the ultimate surface water management system because it is located in a proposed fill area. This 500-foot section of drain pipe will be removed as part of project development. It will be installed as a safety measure to correct localized unstable material adjacent to the streambed area.

Comment 195: *Section 2.6.3 Waste Cell Development*
This paragraph discusses the use of 9 inches of clean daily cover material. Page 242 of the SEIR also discussed the use of alternative daily covers such as green/wood waste alternative daily cover material. If alternative daily covers, other than clean soil are anticipated to be used, the associated impacts should also be evaluated in this document.

Response 195: The project proponent would utilize ADCMs at the proposed City/County Landfill, if approved by the LEA. Per the requirements of CCR, Title 27, §20680, the project proponent will cover disposed solid waste with a minimum of 6 inches of compacted

daily cover material on a daily basis. In accordance with the requirements of CCR, Title 27, §20690, alternative materials of alternative thickness for daily cover (other than at least 6 inches of earthen material) for municipal solid waste landfill units may be approved by the LEA with concurrence by the CIWMB if the landfill operator demonstrates that the alternative material and thickness control vectors, fires, odors, blowing litter, and scavenging without presenting a threat to human health and the environment. Anticipated ADCMs to be utilized would include tub-grinded green waste/wood waste and geosynthetic blankets.

Green waste/wood waste would be tub grinded and then used onsite as ADCMs or for other approved uses (e.g., landscaping or mulch material). Transporting the tub-grinded materials to the active working face or other areas of the site would result in fugitive dust emissions from onsite heavy equipment traveling on unpaved haul roads. These emissions have been analyzed in Section 4.2.12, Operations, Fugitive Dust, pp. 4-88 through 4-90, of the Draft SEIR. The fugitive dust created by onsite heavy equipment carrying green waste/wood waste materials traveling on unpaved haul roads would represent a very small percentage of the fugitive dust emissions created by all onsite heavy equipment traveling on unpaved haul roads during landfill operations. In addition, the temporary storage of green waste/wood waste materials has the potential to result in odor impacts. Odor impacts would be mitigated by ensuring that all green waste/wood waste materials are tub grinded and spread on the working face of the landfill, or used on approved areas of the site as landscape or mulch material, within 24 hours after the green waste/wood waste is received at the site.

Currently geosynthetic blankets are being used as ADCMs at the County Landfill operation. The County LEA approved the use of geosynthetic blankets as an ADCM at the County Landfill. Onsite observations by landfill personnel indicate that the use of geosynthetic blankets results in fewer dust emissions than the use of soil daily cover. In addition, because onsite heavy equipment is not needed to apply soil cover material on top of deposited refuse, fewer vehicular emissions are produced. Onsite observations at the County Landfill also indicate that the geosynthetic blankets provide excellent odor control. No significant impacts are anticipated as a result of using ADCMs.

Comment 196: *Section 2.7.7 Monitoring and Controlling Landfill Gas*

The SEIR states that "One probe per 1,000 sq. ft. of landfill perimeter is proposed to be installed in locations of greatest concern." Be advised that the City of Los Angeles "Minimum Regulations for Sanitary Landfills in the City of Los Angeles" September 22, 1971, Amended December 7, 1973 III Dump (Operations and Maintenance) O.1. requires that gas probes be placed at 300-foot intervals. We have enclosed a copy for your information. The project description should be amended to incorporate the required City of Los Angeles probe spacing.

Response 196: The referenced regulation has been superseded by regulations contained in SCAQMD Rule 1150.1 and CCR, Title 27, §20925. These regulations establish that the LFG probe spacing interval should not exceed 1,000 feet. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, in this document. Any inconsistencies between regulatory agency permitting requirements (i.e., City LEA, SCAQMD, LARWQCB, and CIWMB)

shall be resolved through monitoring plans to be developed by the project proponent that will be approved by all of these agencies.

Comment 197: *Section 2.8, Designated Local Enforcement Agency*

The SEIR states that the City and County will enter an agreement where a joint authority will exercise common power over the entire project site. No discussions have taken place between the City of Los Angeles LEA, County of Los Angeles LEA or the project proponent on the development of such an agreement. The likelihood of such an agreement is speculative. The project description should discuss operation of the site with two separate LEAs. Any discussion of a joint enforcement should only be a secondary description.

Response 197: Refer to Response 188 for a discussion of the requirement for some form of agreement between the City and County to authorize common power over the entire project site.

Comment 198: *Section 2.7.3, Waste-on-Waste Liner System and Figure 2.7-3*

Page 2-57, The Figure 2.7-3 is inconsistent with the text. The text on page 2-57 states that the waste-on-waste liner is over engineered final cover on the side slopes of the inactive landfill. The drawing shows only a existing intermediate cover of two (2') feet under the waste-on-waste liner system.

Response 198: The *1997 Addendum to the Final Closure and Post-Closure Maintenance Plan for the Sunshine Canyon City Landfill* calls for a monolithic final cover for the existing inactive City Landfill. The proposed 6-foot-thick final cover consists of 5 feet of final cover placed over the existing waste overlain by a 1 foot of vegetative soil layer. This information is depicted on Figure 2.7-3a in the 1997 Addendum.

Figure 2.7-3 has been revised and includes the proposed monolithic final cover for proposed project development. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, Figures 2.7-3a and 2.7-3b, in this document.

Comment 199: The existing proposed closure design for the inactive City landfill portion has a six (6') foot monolithic final cover over waste. Revise the drawing to show that the waste-on-waste liner system is on the final cover and the thickness of the final cover is a minimum of six feet.

Response 199: Figure 2.7-3 has been revised and includes the proposed monolithic final cover for proposed project development. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, Figures 2.7-3a and 2.7-3b, in this document.

Comment 200: The Local Enforcement Agency considers the "low permeability soil liner" as part of the "liner system" and not part of the foundation layer. The text is unclear on whether or not the low-permeability soil liner is part of the "foundation layer."

Response 200: The low-permeability soil liner is part of the liner system and not the foundation layer.

Comment 201: The text in Section 2.7.3 states that the waste-on-waste liner system has a compacted soil foundation layer (from the drawing, we assume it to be the buffer soil and subbase layers) next to the low-permeability soil liner layer of the waste-on-waste liner system.

Please clarify in the text that the subbase and buffer soil is the foundation layer that is referred to in the text and that the foundation layer sits on top of the final cover of the inactive City landfill. Add a label on the drawing showing what constitutes the "foundation layer."

Response 201: Figure 2.7-3 has been revised and includes the proposed monolithic final cover for proposed project development. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, Figures 2.7-3a and 2.7-3b, in this document.

Comment 202: *Section 2.10.3 Unloading Waste Materials at the Landfill Working Face*

Refer to comments on section 2.5.7 regarding unloading areas for green/wood waste materials.

Response 202: Refer to Response 190 for a description of the green waste/wood waste haul routes and unloading area.

Comment 203: The SEIR should clearly state that a load check program will be a requirement of the City of Los Angeles solid waste facility permit. Landfill personnel, not LEA inspectors, will be required to randomly select loads and inspect them for hazardous waste. The LEA will monitor implementation of this load check program by landfill personnel.

Response 203: The Final SEIR has incorporated this information. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, in this document.

Comment 204: *Section 2.13.1 Personnel Training*

Facility personnel should also receive training in recognition of subsurface fires and procedures to respond to such an emergency.

Response 204: The Final SEIR has incorporated this information. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, in this document.

Comment 205: *Section 2.15.1 End Use of the Site*

Insert a description of what happens with the proposed end use of the site under the existing closure plan. The following text summarizes the Local Enforcement Agency's position. The inactive city portion of the Sunshine Canyon Landfill is currently undergoing Final Closure Plan approval. Should the proposed landfill expansion project be approved, the proposed end use of the site and the closure conditions (under the existing closure plan for the inactive City portion which in affect at the time) will need to be revised and incorporated into the new closure plan which is to be submitted as part of the permit application to the Local Enforcement Agency. In any case, final cover will be installed on the currently inactive City portion landfill of the site.

Response 205: This comment is noted. As stated in the Draft SEIR, Section 2.15.1, End Use of the Site, p. 2-95:

> A definitive postclosure use of the site has not yet been identified due to the estimated 26-year operational life span and the mandated 30 years of postclosure maintenance. Postclosure uses at the site would be developed in accordance with the requirements of CCR, Title 14, §17796. Any future development of the project site would be consistent with City and County General Plan elements and zoning requirements.

It should be noted that even if the proposed extension back into the City were not approved, the existing inactive City Landfill area would be required to undergo a mandatory 30-year postclosure maintenance period prior to any consideration of postclosure uses, and the existing County Landfill area, which would continue its operation until at least 2006, and possibly far beyond if an extension into the upper reaches of Sunshine Canyon is approved, would affect the postclosure decisions regarding the existing inactive City Landfill.

CCR, Title 14, §17796, has now been superseded by CCR Title 27, §21190. Postclosure uses would be developed at the end of the mandated 30 years of postclosure maintenance in compliance with this section.

Comment 206: **Section 3.0 Environmental Setting**

Section 3.1.7 Light, Local Setting

The description of existing light sources should also include a discussion of light sources used by the existing landfill to illuminate the various working face locations after dark.

Response 206: The existing inactive City Landfill does not have working face locations that require illumination. The existing County Landfill currently has four transportable light "plants" that are positioned at the active working face, when necessary. Each light plant has four 1,000-watt bulbs to provide localized illumination. These lights are used during the application of daily cover, in the evening hours (approaching sunset until approximately 8:00 p.m.), and during the fall and winter season. Nighttime operational lighting provides localized illumination only, allowing for increased worker visibility and safety, and does not result in any offsite light spillage onto existing residential uses.

Similar light plants (with the same wattage) would be used for the proposed City/County Landfill. No significant impacts would occur because artificial light spillage would be confined to Sunshine Canyon and no sensitive land uses would be affected.

As stated in the Draft SEIR, Section 4.6, Light and Glare, p. 4-225:

> Onsite security lighting and security operations would reintroduce both limited night-lighting (stationary) and other associated lighting (vehicle headlights) during nightly security patrols. Because the landfill would only be operational

during daytime and early evening hours (for example 5:00 a.m., gates open and at 6:00 p.m., scales close during Monday through Friday), very low levels of artificial light will be introduced. Onsite nighttime illumination is anticipated to be of very limited duration and confined to specific maintenance areas at the project site located near the proposed landfill's administrative offices.

Comment 207: *Section 3.1.11 Transportation and Circulation, Local Setting*

It is strongly suggested that an analysis be included in the SEIR on whether a traffic signal should or should not be installed on San Fernando Road at the entrance to the landfill due to the high volume of two-way traffic on San Fernando Road.

Response 207: Refer to Topical Issue 19, Traffic Conditions at Landfill Entrance, in this document. Based on the analysis provided in the Draft SEIR, Appendix B1, Traffic Impact Study Report, a traffic signal is warranted at the landfill entrance on San Fernando Road. This new traffic signal at the landfill entrance on San Fernando Road will alleviate any potential safety concerns resulting from truck traffic entering/exiting the site, as well as improve access.

Recently, the project proponent sought an interim change authorization to the approved B permit for landfill entrance improvements. This authorization was approved by the City BOE and allows for the installation of a traffic signal at San Fernando Road and the landfill entrance. It is anticipated that this signal will be installed and fully operational by the end of July 1998.

Comment 208: **Section 4.0 Environmental Impact Analysis**

Throughout the impact analysis section, mitigation measures include performing activities in accordance with various rules or regulations. These actions should not be considered as mitigation measures, but as operating minimums. Specifically, designs, construction, and operations conducted in accordance with the California Code of Regulations Titles 14 and 27 are expected minimums. If these regulatory minimums are carried out consistently, impacts should be minimized. However, measures taken beyond these regulatory minimums would and should be considered as mitigation measures.

Response 208: Actions to comply with regulatory requirements are considered mitigation because they minimize impacts by limiting the degree or magnitude of the action and its implementation. This is consistent with the definition of mitigation provided in the State CEQA Guidelines, §15370, which states:

> (a) Avoiding the impact altogether by not taking a certain action or parts of an action. (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation. (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment. (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action. (e) Compensating for the impact by replacing or providing substitute resources or environments.

In addition, the Department of City Planning (EIR Preparation Manual, p.54) defines mitigation measures as:

> . . . measures may be voluntary, required by Code, recommendations of City, County, State or Federal agencies, or any other reasonable measures available for decisionmaker consideration.

Comment 209: *Figure 4.1-1 Existing and Anticipated Soils Stockpile Areas*
This figure shows that soil will be stockpiled on the top deck of the existing inactive City landfill. Impacts resulting from stockpiling of soil in this area need to be evaluated.

Response 209: Refer to Response 5 for a discussion of existing and anticipated soils stockpile areas.

Comment 210: Areas covered by the soil stockpile will not be able to achieve permanent vegetative cover until the soil is removed. Settlement of the surface by the surcharge of a soil stockpile should also be evaluated along with any other potential impacts.

Response 210: Pursuant to CCR, Title 27, §21090, as part of landfill closure, final cover is required to be placed on a landfill's top slopes, side slopes, and bench areas. For closure of the existing inactive City Landfill, the proposed final cover would be an engineered equivalent of the required final cover. The ability to utilize an engineered equivalent to the required final cover for landfill closure is discussed in CCR, Title 27, §21090, which states:

> The RWQCB can allow any alternative final cover design that it finds will continue to isolate the waste in the Unit from precipitation and irrigation waters at least as well as would a final cover built in accordance with applicable prescriptive standards. . .

The proposed engineered equivalent of the required final cover for closure of the existing inactive City Landfill would consist of a monolithic soil layer relying on evapotranspiration and unsaturated permeability to control water infiltration. The vegetative layer would be placed on top of the final cover on those portions of the landfill's top slopes, side slopes, and bench areas that are not part of the proposed City/County Landfill project design. Vegetative cover would be placed on an estimated ±125 acres of the ±205 acre existing inactive City Landfill.

The vegetative layer would provide long-term erosion control caused by potential surface water runoff. When revegetated, a permanent grass and legume cover will provide an effective means to control fugitive dust emissions. Selected plant species would be chosen for rapid establishment. Due to the existing terrain, the seed mix chosen would be comprised of shallow-rooted (less than 12 inches) drought- and pH-tolerant plants. Native and nonnative seed mix would be applied. It is anticipated that the vegetation cover soil would eventually evolve into a mosaic of shrubs interspersed with annual grasslands. Once established, selected plant species are intended to be self-propagating and not require excessive irrigation or long-term maintenance.

To ensure successful revegetation, a 3-year monitoring and maintenance program would be implemented. Periodically, revegetated areas would be monitored for growth and survival rates. A maintenance and monitoring program would be implemented during the 30-year postclosure maintenance period.

Comment 211: *Section 4.1.4 Geologic Hazards -Seismicity*

Page 4-40 City Mitigation Measures. It is recommended that provisions be made for a back-up generator to supply power to the gas flare system in the event of any extended power outage.

Response 211: The existing LFG flare station within the City does not have a backup generator because the project site is currently served by two independent electrical service purveyors (i.e., DWP and SCE). The proposed project would be serviced by both purveyors that would provide all onsite power needs. In the event that one of the service purveyors' onsite power lines are damaged during a major earthquake, the other purveyor would provide service until necessary repairs can be performed. After the January 1994 Northridge earthquake, the project site was without power for approximately 48 hours. At that time, DWP was the only electrical service purveyor to the site. SCE began providing electrical service to the project site in August 1996.

Comment 212: *Section 4.2.8 Air Quality Operational Phase (Long-Term)*

Page 4-70 Active Working Face Area. The SEIR states that unloading of refuse would not create substantial quantities of dust emissions. Have there been any measurements of dust generation during refuse unloading? Depending on the method, manual vs. automated, and the type of wastes, demolition inert vs. food waste, varying amounts of dust could be generated. Include a discussion on how the determination of insignificance was reached.

Response 212: The document equates dust generated from the working face to that used in active grading. The expected value of dust produced from deposition of refuse would certainly be less than that associated with unloading soil. Table 11.9-4 of AP-42 (1995) provides a value of 0.002 pound of total suspended particulates (TSP) per ton of soil unloaded. The PM_{10} value would be roughly 45 percent of this value or less than 0.001 pound per ton unloaded. Note that these values are representative of soil being dropped on soil. Since refuse contains considerably less dust and PM_{10} than soil, the realized dust generation would be even further reduced. Based on this conservative analysis, dust generated by unloading refuse is inconsequential.

Comment 213: *Combustion of Landfill Gas Emissions*

What is the basis for doubling the current emissions limit under the existing SCAQMD permit (3 stations) for flaring LFG to account for both existing (1 station) and future buildout (5 stations) conditions?

Response 213: Refer to Response 97 for a discussion of data that has been changed in the Draft SEIR air quality assessment, to reflect the maximum permitted emissions from five flares.

Comment 214: *Section 4.2.13 Odor Impacts*

Potential odors associated with the storage and processing of green/wood waste materials could result in negative impacts. These impacts should be evaluated along with possible mitigation measures.

Response 214: With respect to the discussion of green waste as a potential odor source, the Draft SEIR, Section 4.2.13, Odor Impacts, p. 4-92, states:

> Additionally, certain types of household wastes, including cooked and uncooked foodstuff and meats, **green waste** [emphasis added], and wet wood shavings, may begin decomposition before being delivered to the landfill. These types of wastes release low levels of distinct scents that can contribute to odor levels.
>
> By receiving the refuse, compacting it, and covering it with a minimum layer of 6 inches (i.e., State standard) of cover material at the end of each working day, the potential for these odors is substantially reduced. The odors that may be released directly from the refuse prior to being covered with cover material are usually at low levels and are dispersed in the atmosphere at levels of concentration below which they do not create a nuisance to local receptors. The proposed landfilling operations are located at sufficient distances from the potential receptors (residential) and separated by sufficient terrain (1,700 feet to the nearest residence) so that no odor nuisance from refuse emplacement should occur. Additionally, between the proposed City/County Landfill footprint and the residential areas in Granada Hills, formidable barriers to odor migration include the inactive landfill, which is approximately 300 feet in height, and a ±100 acre open-space area. These two features pose sufficient screening and distance to inhibit the transmission of odors beyond the project site boundaries.

It is not anticipated that odor impacts would be generated at the proposed green waste/wood waste area. This area would be used for recycling both green waste and wood shavings into small static piles for immediate use onsite. Segregated loads of green waste and wood shavings would be recycled and reused onsite within 24 hours of receipt at the project site in order to prevent any odor impacts associated with the onsite storage of these materials. Larger wood wastes that are not a high odor source or attraction for vectors (e.g., wood pallets and crates, large tree limbs, and tree stumps) would be tub grinded weekly or biweekly, depending on seasonal waste load volumes. Green wastes/wood wastes would be recycled using a transportable tub-grinding machine (approximately 500 horsepower). Material of varying particle size would be produced. This type of recycling product is intended to be used onsite for landfill daily cover material, soil amendment for City/County Landfill revegetation programs, erosion prevention, fire prevention, and weed abatement.

Comment 215: Refer to comment on section 2.7.7 Monitoring and Controlling Landfill Gas for sample probe installation.

Response 215: Refer to Response 196.

Comment 216: Installment of an odor neutralizing or deodorant misting system should be considered as a mitigation measure in areas of potential odor sources.

Response 216: The installation of an odor neutralizing or deodorant misting system for a Class III solid waste landfill is not required under CCR, Titles 14, 23, or 27. After the incorporation of recommended mitigation measures (listed in the Draft SEIR), no significant odor impacts would occur with development of the proposed City/County Landfill. Refer to Response 101 for a discussion of the odor control program for the proposed project.

Comment 217: The SEIR indicates LFG may be used to produce electricity (Pages 4-83 and 4-95). What are the environmental impacts associated with this activity? In what environmental document are these impacts evaluated? If there has not been an analysis, there should be an explanation that when project information is known, there would be a separate environmental review.

Response 217: Although the project proponent may consider developing a gas-to-energy system (e.g., to convert LFG into electricity) during the latter stages of City/County Landfill development, this is not considered a part of the proposed project currently under consideration. BFI would only consider the long-term possibility of permitting and installing a gas-to-energy system at the project site if in the future commercial quantities of LFG become available and market conditions are favorable (e.g., currently market conditions are not favorable). The potential long-term development of a gas-to-energy system at the project site would require the preparation of additional environmental documentation pursuant to CEQA to evaluate the potential impacts associated with the construction and operation of a gas-to-energy system and provide for project-specific mitigation measures.

Comment 218: *Section 4.5, City Noise Standards*

Page 4-205, Paragraph 4, Plans, and Policies. The section states that " . . . continue to regulate construction or excavation noise between the hours of 9:00 p.m. and 7:00 a.m. of the following day . . ." This statement conflicts with the second bullet item "Construction Noise" on the same page. This bullet item states that the limits are between 7:00 A.M. and 6:00 P.M. Verify the correct limiting hours of the City noise ordinance.

Response 218: The proposed project will comply with all applicable City and County noise requirements for onsite construction. The Draft SEIR is correct in the stated hours for the Noise Ordinance and Noise Element. The General Plan Noise Element does limit construction noise between 9:00 p.m. and 7:00 a.m. Landfill operations will be limited to the hours of 6:00 a.m. to 6:00 p.m., Monday through Friday, and from 7:00 a.m. to 2:00 p.m. on Saturday. The landfill entrance gate will open 5:00 a.m., Monday through Friday and 7:00 a.m. on Saturday to provide for truck and vehicle queuing.

The Draft SEIR, Section 4.5, Noise, p. 4-206, further describes the following City of Los Angeles Municipal Code noise regulations:

- Noise Ordinance No. 144,331 specifies that, in lieu of actual onsite measurement, ambient noise levels for residential and agricultural zones are 50 dBA during the day (7:00 a.m. to 10:00 p.m.) and 40 dBA during the night (10:00 p.m. to 7:00 a.m.).

- Construction Noise Ordinance No. 161,574 limits construction noise to 75 dBA as measured at a distance of 50 feet for construction machinery (including crawler tractors, dozers, and scrapers) and power equipment (including chain saws and log chippers) within 500 feet of a residential zone between the hours of 7:00 a.m. and 10:00 p.m.

- Construction Noise Ordinance No. 161,574 limits equipment use where such use will raise ambient noise levels by more than 5 dBA at any residential land use.

The Draft SEIR, p. 4-216, concluded that construction noise would not result in a significant increase to existing ambient noise levels. The apparent conflict is between the General Plan Noise Element and the City Municipal Code Noise Ordinance, both of which are addressed in the Draft SEIR.

Comment 219: *Sections 4.6 Light and Glare*

The environmental impact discussion states that the landfill would be operational during the hours of 5:00 AM to 6:00 PM. While this may be the hours that waste is accepted, the project description states that operational activities such as maintenance would be conducted until 9:00 PM. The potential for light and glare impacts and other environmental impacts from maintenance operations should also be evaluated.

Response 219: The Draft SEIR, Section 4.6, Light and Glare, pp. 4-225 and 4-226, states the following:

> In addition, the relocation and/or the development of new environmental control features, such as the flaring stations and leachate treatment plant, will require lighting for security and **maintenance purposes** [emphasis added]. Therefore, **several new light sources would be created** [emphasis added] within the City portion of Sunshine Canyon.
>
> . . . Onsite nighttime illumination is anticipated to be of very limited duration and confined to **specific maintenance areas** [emphasis added] at the project site located near the proposed landfill's administrative offices.
>
> Because of the distance of the onsite light sources from adjoining uses and the low intensity of the light sources, both light and glare created on the project site (within both City and County jurisdictions) would not be visible to surrounding areas. Project lighting would not be visible offsite to area residents during nighttime hours because of the intervening topography and existing ±100 buffer area that separates the project site from near-site receptors. Over 11,000 trees have been planted in the buffer zone and most are over 15 feet tall. None of the

existing or anticipated improvements would be a potential source of light or glare impact.

Any lighting system installed around proposed improvements would use direct distribution lighting aimed at the area of illumination. Each luminary fixture would include glare control devices installed to minimize the glare and spillage effect of the luminaire. Moreover, any installation of lighting fixtures would follow prescribed Uniform Building Code requirements for foundation design, backfilling and excavation, trenching for electrical wiring, and pole installation.

Comment 220: *Section 4.9.1 Hazardous Materials*

Page 4-293, Paragraph 2. If during a load check, or during regular operations hazardous materials are found, the supervisor must contact, in addition to Cal-EPA and DTSC, the Los Angeles County Fire Department Health Hazardous Materials unit.

Response 220: The Final SEIR has incorporated this information. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, in this document.

Comment 221: *Section 4.9.1 Cumulative Impact*

Page 4-296, Paragraph 3. The section states "Buildout of residential projects would increase the amount of HHW inadvertently disposed of in the solid waste stream." Note; Buildout of residential projects will not increase amount of HHW (not HWW), what may increase the amount would be an increase in permitted tonnage which in turn would result in a cumulative increase in HHW.

Response 221: The Final SEIR has incorporated this information. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, in this document.

Comment 222: *Section 4.9.1 City Mitigation Measures*

Page 4-297, Bullet 5. We recommend the mitigation measure for load checks be increased from 1 in 1,000 tons, to 1.5 in 1,000 tons to be more protective.

Response 222: The Final SEIR has incorporated this information. Refer to Section 2.0, Revisions and/or Additions to the Draft SEIR. Hazardous waste load checks at the proposed City/County Landfill will be increased to 1.5 load checks per 1,000 tons of solid waste received at the landfill for the first year of operation. However, after the first year of operation, BFI may request that the City LEA decrease the required load checking frequency to one load check per 1,000 tons of waste received at the City/County Landfill.

Comment 223: Page 4-297, Bullet 6. DTSC will not provide a hazardous waste identification, that would be provided by the operator or Los Angeles County Health Hazardous Materials unit.

Response 223: The Final SEIR has incorporated this information. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, in this document.

Comment 224: Page 4-297, Section 4.9.1, Bullet 9. The City will not "deem an inspector to be qualified through training and experience..." The inspector referred to must be identified clearly. If the inspector is an employee of BFI who will conduct hazardous waste load checks, then it is BFI's responsibility to deem the inspector qualified. The City currently assures that all LEA inspectors are qualified.

Response 224: Refer to Response 188 in this document for a discussion of the requirement for some form of agreement between the City and County to authorize common power over the entire project site. Refer also to Response 230 for additional discussion of the onsite LEA inspectors.

Comment 225: *Section 4.9.2 - Vectors*

Environmental Impact (paragraph 1, page 4-300). Oversized tires are often used at landfill sites for road demarcation and securing tarps, etc. Standing water tends to accumulate in these tires, especially after heavy rainfall. This document should include control measures outlining how the operator intends to prevent tires from attracting and propagating vectors on site (especially mosquitoes). If the operator is not going to use tires on site, then inclusion of these control measures is not necessary.

Response 225: Operational and disposal practices for waste tires at the proposed City/County Landfill would be same as those used at the operational County Landfill. Currently, automobile waste tires are used daily for securing the geosynthetic blankets that serve as alternative daily cover. These waste tires are moved daily so that they will not become an attraction to vectors. Oversized tires are occasionally used onsite to block unused or restricted dirt roads. When used, oversized tires are completely filled with soil so that they cannot harbor vectors.

Regarding the disposal of waste tires, waste haulers with loads of waste tires attempting to enter the landfill are stopped by landfill personnel at the scale house and check-in area, and are directed to the Azusa Landfill. Waste tires found within refuse are retrieved and placed into self-contained storage bins. Collected waste tires are then transported to the Azusa Landfill for end disposal.

Comment 226: *Section 4.9.3 - Litter*

City Mitigation Measures (paragraph 2, page 4-305). Clarification is needed regarding the phrase, "*. . . periodic application of cover material during the day and at the end of the working day . . .*"

Is the operator going to apply cover material periodically throughout the day at the working face? Is this in addition to applying a full daily cover at the end of each operational day? If so, then these two different activities must be distinguished and clarified.

Response 226: The Final SEIR has incorporated this information. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, in this document.

Comment 227: *Section 4.13.5 Access Roadway in Sunshine Canyon*

Realignment of the haul road and relocation of the scale house has the potential to effect the number of vehicles that are able to queue on-site. Approximately how many vehicles will be able to queue on-site after relocation of the scale house?

Response 227: Approximately 65 packer trucks or 40 transfer vehicles will be able to queue onsite after the relocation of the scale house.

With respect to the length of the access roadway, and as stated in the Draft SEIR, Section 2.10.1, Internal Access Roadway and Haul Road, pp. 2-72 and 2-73, the following information was provided:

> To provide for adequate truck queuing and vehicular stacking at final buildout, the access roadway would be approximately 1,200 feet long and 65 feet wide from the landfill entrance to the proposed scale house area. Approximately 100 feet east of the scale house area, the width of the roadway would increase to 100 feet to allow for additional truck and vehicle queuing.

The amount of project traffic is projected (by vehicle type) in the Draft SEIR, Table 4.13-4. There is sufficient queuing length and storage capacity to accommodate project traffic onto the site access roadway and scale house area during both the a.m. and p.m. peak hour periods.

Comment 228: *Section 4.14.1 Fire an Emergency Medical Services*

The storage of green and wood waste should be discussed as a source of potential combustion. Measures to control any such fires should be explored.

Response 228: Segregated green waste loads delivered to the project site would be transported to the green waste unloading area and placed in nonflammable 40-cu.-yd. storage bins. Any fire that could occur would be contained within these storage bins and readily extinguished by onsite personnel. The deposited green waste would be removed within 24 hours, ground, and used onsite as soil amendment for revegetation, erosion prevention, fire prevention, weed abatement, or as ADCMs for the City/County Landfill. Segregated loads of larger wood wastes not possessing the potential for high odors would be ground and utilized weekly or biweekly, depending on segregated wood waste load intake volumes.

Additionally, the Draft SEIR, Section 4.14.1, Fire and Emergency Medical Services, pp. 4-398 and 4-399, included mitigation measures for the proposed project that would ensure adequate water supply, fire hydrant placement, fire extinguisher placement, personnel training, brush clearance, and fire department access to extinguish onsite fires.

Comment 229: **Section 7.0 Mitigation Reporting**

Table 7.4-1 - Mitigation Reporting and Monitoring Program (MRMP)

4.2.12 - Operations: Construction Equipment (page 7-10). Remove City LEA as an Enforcement Agency.

Response 229: The Final SEIR has incorporated this information. Refer to Section 2.0, Revisions and/or Additions to the Draft SEIR.

Comment 230: Page 7-26. The following mitigation measure requires further explanation: "Full-time inspectors shall be employed onsite for inspection of waste materials. Full-time inspectors shall be deemed by the City to be qualified through training and experience to perform assigned duties."

State who would employ these inspectors. (City of Los Angeles, BFI, or another party?)

Response 230: Refer to Response 188 in this document for a discussion of the requirement for some form of agreement between the City and County to authorize common power over the entire project site. These full-time inspectors (similar to the County Landfill Extension) would be LEA inspectors who are trained and employed by the City of Los Angeles or as designated by the working arrangement between the County and City. As stated in the Draft SEIR, Section 2.8, Designated Local Enforcement Agency, p. 70:

> . . . The City, through its LEA, would maintain an onsite inspector at the project site at all times when waste is being received and processed, Monday through Saturday, during normal operational hours.

Comment 231: If full-time inspectors are deemed necessary, which City department is responsible for ensuring inspector qualification and training.

Response 231: Refer to Response 188 and 230. The City Environmental Affairs Department's LEA would be the designated LEA on behalf of the CIWMB for landfilling activities in the City's jurisdiction. The LEA inspector would monitor compliance with and enforcement of all federal, State, regional, and local agency regulations.

Comment 232: If the City LEA is responsible then it should be so stated.

Response 232: Refer to Response 188.

Comment 233: *Section 7.7 Public Access to Records*

State where a public records file will be maintained, such as at a local library. Indicate if regulatory agencies inspection reports will also be included in this file.

Response 233: The responsible City department for maintaining this file is the Department of City Planning, Environmental Review Section, 221 N. Figueroa Street, 15th Floor, Los Angeles, California.

Comment 234: *Section 7.4 Designated LEA*

The City of Los Angeles LEA is the designated LEA for the City. BFI cannot designate another LEA. This needs to be made clear in the document.

Response 234: Refer to Response 188 in this document for a discussion of the requirement for some form of agreement between the City and County to authorize common power over the

entire project site. The City of Los Angeles is the designated LEA for the City portion of Sunshine Canyon. The project proponent has not designated another LEA; rather, it is acknowledged by the project proponent that some form of cooperation between the two jurisdictions (i.e., County and City of Los Angeles) must be formalized prior to project development to successfully accomplish respective monitoring and enforcement activities. Both jurisdictions would actively participate in this process.

Comment 235: In the Summary Matrix of the environmental impacts under the category Operations 4.2.12, Refuse Trucks page 12, the LEA should be deleted as the monitoring agency for truck operations activity such as truck idling, truck arrival times, and truck loads as these are not LEA requirements.

Response 235: The Final SEIR has incorporated this information. As a result of comments received on the Draft SEIR, changes have been made to Table 1.10-1 (Summary Matrix) and Table 7.4-1 (Mitigation Reporting and Monitoring Program). Refer to Section 2.0, Revisions and/or Additions to Draft SEIR.

3.7 LOCAL AGENCIES

David A. Bobardt, Planner
City of Glendale
633 East Broadway, Room 103
Glendale, CA 91206-4386

Letter 3.7-1

Comment 236: After review of the document it has been found that the project will have no impact on the City of Glendale or its operation.

Response 236: This comment is noted.

Donald M. Williams, Senior Planner
City of Santa Clarita
Public Works
25663 West Avenue Stanford
Santa Clarita, CA 91355-1103

Letter 3.7.-2

Comment 237: Over the past eight years the City of Santa Clarita has stayed actively involved in the regional solid waste planning process. Initially, our focus was primarily that of opposition to the placement of new landfills at multiple locations adjacent to the City limits. For the past several years, however, a considerable effort has been made to focus on the broader issues of solid waste management. The GBB Report, the UCLA Policy Summit, and other current efforts to focus the concerns of the cities throughout the County have all been undertaken with the goal of providing constructive input into the planning process. We have undertaken our comments on the SEIR document with this, as well as the Guidelines, in mind.

Response 237: This comment is noted.

Comment 238: Based on our review and understanding of the Draft SEIR prepared for the Sunshine Canyon Landfill expansion project, we offer the following comments and observations for your consideration in the Final SEIR.

Response 238: This comment is noted.

Comment 239: The SEIR contains numerous references to the proposed Elsmere Canyon Landfill as a 190-million ton facility, located in the Angeles National Forest, having a footprint of 700+ acres and an operational life of from 50 to 100 years. As you may be aware, this iteration of the proposed Elsmere Canyon landfill has been dropped from consideration by the United States Forest Service (USFS), and the County of Los Angeles Regional Planning Department, the regulatory agencies involved in processing the request.

Response 239: Refer to Response 124 within this document for a discussion of the status of the proposed Elsmere Solid Waste Management Facility. The Elsmere Canyon property is owned by the project proponent, BFI. BFI indicates that this potential landfill project remains viable and is currently undergoing an extensive corporate and economic review.

Comment 240: Specifically, the Omnibus Parks and Public Lands Management Act of 1996 prohibits the use or trade of land within the Angeles National Forest for use as a landfill facility. The Act was signed into law by President Clinton on November 12, 1997, effectively ending consideration of the 190-million ton proposal by the USFS. The USFS subsequently requested of the property owner, Browning-Ferris Industries (BFI) that the case be withdrawn and BFI has complied. County Regional Planning has also requested in writing that the project be withdrawn from consideration, and though BFI has not complied with this request, County Regional Planning staff is no longer actively processing the proposal. Additionally, County senior management staff have publicly stated that Elsmere Canyon will not be developed as a landfill.

Response 240: Refer to Responses 124 and 239. BFI's current review of the Elsmere Canyon Landfill project does not include the use of Forest Service land because the Omnibus Parks and Public Lands Management Act of 1996 was signed into law.

Comment 241: In light of the above, we would recommend that all references to the development of Elsmere Canyon as a landfill be deleted from the SEIR.

Response 241: Refer to Response 124.

Comment 242: Failing that, we request that language be added to the SEIR that the Elsmere Canyon landfill proposal identified in therein is no longer actively under consideration, nor is it at this time a viable or legal landfill development option.

Response 242: Refer to Response 124.

Comment 243: The proposed expansion project does not include the development of an associated on-site Materials Recovery Facility (MRF) to complement existing recycling and composting activities at the landfill site. Reconsideration should be given to the provision of a MRF at this location insofar as it would assist the City of Los Angeles, and the region, to meet AB 939's mandated diversion goal of 50%, and the City's own adopted goal of 70% diversion. To not implement a MRF at this location appears to be a sorely missed opportunity for both the public and the applicant.

Response 243: A materials recovery facility (MRF) has never been planned for the project site by the project proponent for several reasons. First, the County portion of the site is currently used for landfilling operations, and areas within the City have been used for landfilling activities for nearly 40 years. The proposed project is acknowledged as part of an "ultimate City/County Landfill Project" within the Sunshine Canyon area since initial project applications were filed with the County in 1984. Second, based on approved CUP conditions imposed on the project proponent by the County for the County Landfill Extension, this proposed project is required to be processed within City jurisdiction. Third, BFI currently owns and operates numerous transfer stations/MRFs in the Southern California area. These transfer station/MRF sites are located closer to major urban centers, where refuse is collected and transported to these facilities by smaller collection vehicles, and refuse is subsequently transported via larger transfer trucks to landfill facilities such as Sunshine Canyon. Therefore, it has never been BFI's intention, either short or long term, to propose the siting of an MRF facility in Sunshine Canyon.

It should be noted that BFI is one the world's largest recyclers of refuse and agrees that MRFs are an integral part of a region's (such as Los Angeles County) overall integrated waste management system.

It is further anticipated (and discussed in the Draft SEIR) that the majority of waste being transported and disposed of at this proposed landfill would be "residual waste." Residual municipal solid waste is nonrecoverable waste after processing and inspection

at an MRF or transfer station. This waste would be transported via transfer trucks for end-disposal at the project site.

Comment 244: Our review of the air quality section indicates that the section is difficult to read and is unclear. Impacts are addressed in a number of different ways, rely on studies done at different times and under varying conditions, and generally do not clearly convey information to the lay reader.

Response 244: The air quality section is consistent with the City's guidelines for preparation of topical sections within a Draft EIR, air modeling protocol, and the *SCAQMD CEQA Air Quality Handbook.*

Comment 245: The air quality impacts of this project exceed components of both state and federal statutes, and this should be clearly stated.

Response 245: This comment is vague because it does not specify the "components" of State and federal statutes the commenter believes are violated. The analysis in the Draft SEIR does not identify any requirements of State or federal law that are violated. It is true that the existing air quality in the SCAB exceeds the State and national ambient air quality standards. It is assumed that the State and federal statutes referenced by the commenter are the California Ambient Air Quality Standards (CAAQS) and the National Ambient Air Quality Standards (NAAQS). These health-based standards were established for six criteria air pollutants including ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, suspended PM_{10}, and lead. In addition, the State has set standards for sulfates and visibility-reducing particles. (These State and federal ambient air quality standards are presented in the Draft SEIR, Table 4.2-1.) These standards are intended to protect the health and welfare of the general population. Currently, in some portions of the local air basin, concentrations of ozone, carbon monoxide, and PM_{10} particulate matter are being exceeded per the CAAQS and NAAQS standards.

However, both State and federal air quality standards are based on pollutant concentrations in the ambient air and not on the amount of pollutant discharged from a single source. Pollutant concentrations are highly dependant on the amount of pollutant emitted, the area over which it is emitted, and the height of the source. Pollutant concentrations vary with ambient temperature, wind speed, direction, vertical atmospheric stability, source to receiver distance, and intervening topography.

Moreover, ozone (a criteria pollutant of major concern) is not emitted directly but is the byproduct of a reaction of nitrogen oxides and ROGs in the presence of direct sunlight. This chemical reaction may take hours to complete, and the resultant ozone then manifests itself several miles downwind from the project site. Because of the distances involved, emissions from many sources contribute to this reaction. This is why the presents daily emission thresholds for criteria pollutants to determine the significance of a project. It is also true that project emissions exceed the significance levels identified by the for several pollutants. The significance levels were adopted for CEQA purposes only, and a project with emissions in excess of a significance level has not violated State or federal law. Rules of the SCAQMD prohibit issuance of permits

for any equipment that violates SCAQMD or federal regulations. Impacts of pollutants that manifest themselves closer to the source, such as CO, can readily be modeled and are listed in the Draft SEIR, p. 4-73. The Draft SEIR states that the proposed project will create significant and unavoidable air quality impacts because the daily levels of criteria pollutants exceed the daily thresholds suggested by the SCAQMD, and these pollutants cannot feasibly be mitigated to below these threshold levels. Refer to Response 68.

Comment 246: Ultimately, the air quality impacts of this project are adverse and unavoidable even after mitigation measures are applied.

Response 246: This comment is noted. Air quality impacts are significant and unavoidable for NO_X, PM_{10}, and ROG.

Comment 247: Additionally, the Health Risk Analysis (Section 4.2.9) set forth on page 4-64 discusses SCAQMD guidelines. Care should be taken to identify whether the Health Risk Analysis undertaken pursuant to SCAQMD standards will also meet those required under the federal Clean Air Act; it is our understanding that the requirements vary between the acceptable levels, parts per million, between the state and federal, with the federal being the less permissive of the two.

Response 247: While the primary NAAQS are designed to protect the health and welfare of the general population, there are no federal Clean Air Act requirements that relate specifically to excess cancer risk. Applicable SCAQMD requirements are generally equal to, or more stringent than, federal clean air standards. By meeting the SCAQMD guidelines, federal requirements are automatically met.

"Health Risk Analysis" (HRA) is a term reserved for exposure to toxic or hazardous air contaminants. There are many pollutants associated with State or federal clean air standards that have adverse health risks at elevated exposures but do not undergo an HRA. Because criteria pollutants such as CO are identified in State or federal clean air standards as having a zero effect (or healthful) exposure levels, the impact analysis for that particular criteria pollutant is conducted relative to not exceeding the acceptable threshold ambient concentration. State and federal clean air standards differ somewhat; however, the SCAQMD requirements are as stringent as, or more stringent than, the federal Clean Air Act criteria.

The HRA for the proposed project was conducted using State guidelines for calculating excess cancer risk. These State guidelines use EPA information on toxic air contaminants (TAC) exposure. There is, therefore, no ambiguity in compliance with State or federal TAC exposure that was addressed in the proposed project's HRA.

3.8 OTHER INTERESTED PARTIES/ORGANIZATIONS

Patricia Dean, Real Estate and Asset Management Branch
Bill Piazza, Environmental Health and Safety Branch
Los Angeles Unified School District
355 South Grand Avenue, Suite 500
Los Angeles, CA 90071

Letter 3.8-1

Comment 248: Thank you for giving the Los Angeles Unified School District the opportunity to comment on the SEIR for the Sunshine Canyon Landfill project.

The air quality at three local schools - Van Gogh Street and El Oro Way Elementary Schools, and Robert Frost Middle School - could be affected by the project. Therefore, adequate and feasible mitigation measures must be incorporated into this project to address potential impacts on these schools and reduce those impacts to a level of insignificance.

Response 248: All feasible mitigation measures will be incorporated into the mitigation monitoring and reporting program for the proposed project. For a discussion of emission levels modeled at the nearest school site (Van Gogh Street Elementary School), refer to Response 257.

Comment 249: The attached comments from the District's Environmental Health and Safety Branch discuss the air quality impacts and propose mitigation measures to address such impacts.

Response 249: Responses to these comments are provided below.

Comment 250: In response to your request to provide comments on the air quality element for above referenced project, the following is provided.

Upon review of the available documentation presented in the Subsequent Environmental Impact Report (SEIR) staff notes that the applicant readily proclaims particulate (PM_{10}) and nitrogen oxide (NO_x) emissions associated with construction of the proposed project would produce "adverse" and "significant" air quality impacts. Operational impacts were also reported to be "adverse" for PM_{10}, NO_x and carbon monoxide (CO). However, staff believes that even with the applicant's admission of the project's significant impacts, their analysis is erroneous in its approach to quantify contaminant values with the use of outdated predictive emission equations and assumptions that favor under prediction.

Response 250: Refer to Responses 62, 63, and 64 in this document for a discussion of these issues.

Comment 251: For example, the applicant utilizes soil testing data collected from a site located approximately 10 miles from the proposed project to develop a fractional profile of total suspended particulates (TSP) to particulates ≤10 microns (PM_{10}). As such, the value utilized by the applicant was 28.6 percent. Based on this value, a daily PM_{10} generation

rate, assuming a water spray application to suppress dust, was estimated to be 158 pounds per day. Nevertheless, the California Air Resources Board (CARB) and South Coast Air Quality Management District (SCAQMD) recommend higher fractional values of 55 and 50 percent, respectively. In addition, the U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards (OAQPS) "strongly recommends" that "site-specific data" be utilized when generating emission estimates with approved predictive emission equations. In the absence of such data, a standard or recognized default value must be used. Therefore, to exemplify the applicant's attempt to under predict particulate generation, use of the 50 percent fractional value will yield a daily emission rate of 303 pounds. As such, the applicant underestimates the daily emission rate by 145 pounds.

Response 251: Refer to Response 63 for a discussion of using 1995 AP-42 emission factors to calculate fugitive dust emissions.

Comment 252: In addition, the applicant predicts particulate emissions associated with vehicular travel on paved surfaces within the boundary of the landfill will emit approximately 3,333 pounds per day. Assuming a control efficiency of 95 percent for a twice daily application, the daily generation rate is approximately 167 pounds. Notwithstanding the applicant's approach to quantify particulate generation, they base this estimate on a predictive equation that is no longer valid. If one utilizes the current OAQPS emission factor equation and applies the applicant's control efficiency of 95 percent, the emissions generated from truck travel on paved roads within the landfill are predicted to be 275 pounds per day. As a result, the applicant underestimates the daily PM_{10} generation rate by 108 pounds.

Response 252: The revised analysis uses the updated emission factors and calculation methodology presented in Section 13.2.1 of AP-42 (1995). It should be noted that the new AP-42 calculations have been substantially revised form those presented in the older version (see Section 11.2.5 of AP-42 [1985]). Refer to Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, in this document.

Comment 253: However, even with the significant discrepancy in particulate source strength noted above and their admission of the project's adverse affect on local air quality, implementation of proposed mitigation measures will not limit the degradation of air quality and project related impacts remain significant and unavoidable.

Response 253: Refer to Response 63 for a discussion of using 1995 AP-42 emission factors to calculate fugitive dust emissions. In addition, refer to Response 68 for a discussion of the environmental determination within the Draft SEIR, stating that the proposed project would create an unavoidably significant adverse impact on air quality for construction and operational emissions.

Comment 254: As result of the project's potential to degrade local air quality, staff is concerned for the health of the students and staff attending schools in proximity of the proposed landfill. To underscore our concern, the South Coast Air Quality Management District reports "inhalation of particulates may cause coughing, wheezing, and physical discomfort in

breathing, and may alter the immune system. Elevation in the level of ambient particulates has been linked to increased mortality, respiratory infections, asthma attacks, and aggravation of pre-existing respiratory and cardiovascular diseases. The results of these conditions include increased hospitalizations, and school and work absences (SCAQMD 1997)."

Response 254: The various health effects noted require either a very substantial increase in ambient particulate level or particulates that have a high degree of chemical irritability. ISCST3 modeling has demonstrated that school children attending Van Gogh Street Elementary School (approximately 0.7 mile from the nearest property boundary of the Sunshine Canyon Landfill) as well as the more distant Robert Frost Middle School and El Oro Way Elementary School will not be exposed to any significant increase in particulates above existing levels as defined by the SCAQMD. Particulate matter from soil disturbance characteristic of landfill operations is typically of a large diameter and is readily filtered by human breathing passages. Such material is also chemically and/or biologically benign. Its irritability is much less than the sulfates, nitrates, ammonia, carbon, and condensed hydrocarbons that comprise the bulk of small-diameter urban atmospheric particulates from other sources.

Since 1994, the SCAQMD has been monitoring the relative fraction of various types of compounds comprising "coarse" particulate matter absorbed mainly in the nose and pharynx versus fine particulate matter capable of deep lung absorption. The following table presents relative mass fraction of various chemical species in downtown Los Angeles in 1995:

Material	Coarse	Fine
Sulfates	10%	15%
Nitrates	23%	30%
Ammonium	9%	16%
Elemental Carbon	8%	14%
Sodium and Chlorine	4%	2%
Crustal Components	26%	<1%
Organic Carbon	20%	26%

Source: SCAQMD 1997 AQMP, Appendix V, Chapter 2.

Very little crustal material is thus contained in the fine particle fraction in the SCAB. Even if small amounts of crustal material did reach the alveoli (air cells of lungs formed by the dilation of tiny air passageways), the chemical and biological reactivity is much less than the various chemicals comprising the bulk of the airborne particulate fraction.

Comment 255: NO_x refers to a mixture of nitric oxide (NO) and nitrogen dioxide (NO_x) compounds. However, it is reported that NO reacts rapidly to form NO_2 in and around areas with high NO_x generation rates. Exposure to NO_2 will elicit or alter sensory responses.

Impaired pulmonary function, increased incidence of acute respiratory disease and difficulty in breathing for individuals afflicted with bronchitis especially young children have also been documented (SCAQMD 1994).

Response 255: The NO to NO_2 conversion rate within the exhaust plume from an LFG flare is comparatively slow once available ozone is scavenged from the air. Any subsequent conversion from NO to NO_2 relies on photodissociation, which is a much slower process. Due to the distance from the flare stations and other onsite sources, elevated exposure of NO_2 to young children in the landfill proximity will generally be less than that experienced while traveling in a car on local roadways.

Comment 256: Adverse health effects associated with CO exposure result primarily from its ability to displace oxygen and bind with the hemoglobin in the blood, reducing the capacity of the blood to carry oxygen. Exposure to CO may elicit mild headaches and breathlessness with moderate exercise. Continued exposure may lead to severe headaches, irritability, impaired judgment and memory, and rapid onset of fatigue (Cal/EPA, 1995).

Response 256: Ambient air quality standards for CO are established at the threshold where an older person with angina pectoris (pain below the sternum caused by the constriction of the heart muscle, usually due to coronary artery disease) would first experience any observable adverse effects. CO emissions associated with landfill operations are not predicted to cause such thresholds to be reached. The CO effects listed in this comment are those associated with the onset of CO poisoning. Project-related emissions will not cause even the most stringent CO clean air threshold levels to be exceeded, much less the array of life-threatening health effects listed in this comment.

Ambient CO concentrations from trucks outside the landfill boundary are predicted to be well below the State of California's 1-hour standard of 20 ppm. The spectrum of CO exposure and associated health effects is as follows:

Concentration	Health Effect
<20 ppm	None - Offsite landfill exposure
20 ppm	None - State standard
35 ppm	None - Federal standard
70 ppm	Impairment of time interval discrimination
75 ppm	Onset of angina pectoris pain or pain duration lengthened
80 ppm	Changes in perception of brightness
120 ppm	Increased reaction time to visual stimuli
270 ppm	Changes in driving performance
500 ppm	Headache, fatigue, dizziness, loss of coordination

Source: Godish, T., *Air Quality*. 1991.
Note: Assuming 35-ppm exposure = 1.3% carboxyhemoglobin saturation with a linear dose-response relationship with increasing exposure.

The effects noted in the referenced Cal-EPA 1995 document by the commenter relate to confined space exposures or to the effects experienced by a very heavy smoker and not to any ambient concentration.

Comment 257: As a result, contaminant emissions generated from construction and operational activities, as presented in the SEIR, are considered unacceptable and necessitate appropriate mitigation for students and staff who work and/or attend class at the neighboring Van Gogh Street, El Oro Way and Robert Frost Middle school sites.

Response 257: The dispersion of PM_{10} emissions due to onsite operations have now been modeled using the EPA ISCST3 model. Sources of PM_{10} were modeled as either area sources or, in the case of landfill gas flares, as point sources. Sources were placed in their anticipated location within the landfill, or if anticipated location is not known, sources were placed nearest to potential receptors. Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, Attachment Tables 257-1 and 257-2 in this document provide area source and point source modeling parameters, respectively. Meteorological data used in the model were from the Newhall meteorological station and were provided by the SCAQMD. Meteorological deposition parameters were estimated considering site topography according to *User Instructions for PMERGE and DEPMET* (U.S. EPA, December 1994). Source specific deposition parameters were estimated according to AP-42. Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, Attachment 257 is the ISCST3 model output file. As can be seen on page 31 of Attachment 257, the maximum average 24-hour PM_{10} concentration at the Van Gogh Street Elementary School (the nearest of the three schools) is less than 2.3 $\mu g/m^3$, which is below the 2.5 $\mu g/m^3$ level of significance for localized impacts, as specified by the SCAQMD. Lower PM_{10} concentrations would be seen at the more distant El Oro Way Elementary School and the Robert Frost Middle School. Therefore, the proposed project would not have a significant localized impact, and additional mitigation is not required.

Comment 258: Unless the applicant can quantify through the application of revised emission estimates and associated dispersion modeling that project related emissions will not contribute to an existing air quality violation or expose sensitive individuals to substantial pollutant concentrations, the applicant must provide effective offsite controls to minimize contaminant infiltration within occupied building structures.

Response 258: Refer to Response 257.

Comment 259: Offsite controls shall mean the installation of local air purification systems which exhibit a control efficiency of not less than 95 percent for particulates ($\leq$10 microns) gases and vapors.

Response 259: Refer to Response 257.

Comment 260: Additionally, outdoor ancillary structures used by students and staff during lunch and recess (i.e., tables and benches) shall receive periodic cleaning to minimize particulate deposition and subsequent retainment.

Response 260: Large-particle deposition capable of soiling lunch tables and benches occurs within only a few hundred feet of the source. The USEPA suggests that this distance is often even less than 100 feet. As stated in the Draft SEIR, Section 4.13.3, Schools, p. 4-404, the nearest school (Van Gogh Street Elementary) is located approximately 1.75 mile from the landfill entrance and approximately 0.7 mile from the nearest site boundary. There would be inadequate linkage between project-related dust emissions and periodic cleaning at any Los Angeles Unified School District (LAUSD) school sites to require such a mitigation measure.

Comment 261: Please advise as to the disposition of this memorandum and subsequent response by the applicant.

Response 261: All comments contained in the LAUSD interoffice correspondence from Bill Piazza to Joan Friedman, dated December 1, 1997, have been responded to and are provided in Responses 250 through 260.

Sharon McGowan
13327 Golden Valley
Granada Hills, CA 91344

Letter 3.8-2

Comment 262: Do not wish the Sunshine Canyon Dump to expand at any time!!! Find a new location! Why here all the time? Enough is enough!

Response 262: This comment is noted.

Joycelyn and Davidson Turner
17512 Tuscan Drive
Granada Hills, CA 91344

Letter 3.8-3

Comment 263: When the Santa Ana winds occur, we have been inundated with debris and leavings blown from the dump.

Response 263: Refer to Topical Issue 18 for a discussion of potential litter impacts and mitigation measures for the proposed City/County Landfill. In addition, potential litter impacts and mitigation measures were analyzed in the Draft SEIR, Section 4.9.3, Litter, pp. 4-302 through 4-306. As indicated in the Draft SEIR, no significant impacts from litter migration are anticipated to occur after the implementation of mitigation measures. Onsite litter control practices currently used at the operational County Landfill have been highly successful in limiting offsite litter migration. In addition, a litter control crew is regularly dispatched by BFI to areas along San Fernando Road, Balboa Boulevard, O'Melveny Park, Bee Canyon Park, or other areas near the landfill where litter has accumulated or illegal dumping has occurred. Similar mitigation measures designed to minimize any offsite litter impacts would be used for the proposed City/ County Landfill.

Comment 264: The most disastrous event was a firestorm in this area, which occurred a few years ago. Although blame was never publicly placed, the fire started from the area of the dump.

Therefore, in the most rigorous way, we vehemently oppose this proposed landfill project.

Which beckons a much broader issue: Why is it that citizens, such as ourselves, and not appointed and elected officials bear the brunt of defense against such unsafe environmental proposals?

Response 264: Refer to Response 159 for a discussion of a fire alleged to have started at the previous City Landfill operation

Blair Norris, Environmental Engineer
Anheuser-Busch Companies, Inc.
Executive Offices
One Busch Place (202-4)
St. Louis, MO 63118-1852

Letter 3.8-4

Comment 265: Anheuser-Busch Sales and Services of Sylmar recently received a letter from your office notifying us of a proposed landfill site within two miles of our facility. The letter further indicated that a copy of the Environmental Impact Report (EIR) would be available for review at a variety of public library locations in the Los Angeles area. In a telephone conversation with you today you indicated that the EIR contains multiple volumes but that a summary document of this EIR may become available. I would like to request a copy of this summary document should it become available.

Response 265: City Planning Staff have responded to this request.

Commenter and address unknown **Letter 3.8-5**

Comment 266: I have lived on Daryl Avenue, Granada Hills, CA for 29 years.

There is not enough space or energy to express my feelings regarding this project which has been a source of great concern for those of us who live here. This project would not be remotely considered as a landfill if the powers that be would honestly come out and look at the facts and research the environmental impacts such a mega-dump will have on so many people for such a long, long period of time as well as quite possibly contaminate the water supply of the City of Los Angeles.

Response 266: These comments are noted. Refer to Response 157 for a discussion of allegations that the previous City Landfill operation caused contaminated particulates to enter the Los Angeles Reservoir and other water treatment and storage systems.

Comment 267: I hope this situation is give the most grave consideration as it is truly overwhelming -- the consequences.

Now, we in Granada Hills have been able to re-construct our homes and business' after the earthquate three + years ago, we are able to cope with the recession of the past few years,

Response 267: The City decisionmakers will review and consider the entire environmental record for the proposed project.

Comment 268: . . . the fires which have plauged us here in the hills in the past, but this mega-dump is something over which we have no control -- such a project is ad infinitum.

Response 268: This comment is noted. Refer to Response 159 for a discussion of a fire alleged to have started at the previous City Landfill operation.

Comment 269: The destruction of the mountains to create it -- can't reconstruct a mountain . . .

Response 269: The proposed project will be located within the interior portions of Sunshine Canyon. The land area being proposed for landfill development is primarily disturbed due to extensive landfilling activities that have taken place over a 40-year period. For a discussion of aesthetic impacts and mitigation measures associated with the proposed project, refer to the Draft SEIR, Section 4.18, Aesthetics/Views, pp. 4-457 through 4-463. As stated in the Draft SEIR, no adverse impacts on aesthetics/views are anticipated.

Additionally, refer to Topical Issue 22 in this document for a discussion of the proposed project's comparability with residential uses.

Comment 270: . . . can't control waste liquification below the ground from the garbage and filth, can't control the stench and the trash deposited . . .

Response 270: No adverse impacts from seismic liquefaction are anticipated to occur as a result of project development. For a discussion of potential environmental impacts from seismic liquefaction and proposed mitigation measures, refer to the Draft SEIR, Section 4.1.5, Geologic Hazards - Liquefaction, pp. 4-41 through 4-43.

Additionally, refer to the Draft SEIR, Section 4.2.13, Odor Impacts, pp. 4-91 through 4-96, for an analysis of potential environmental impacts and proposed mitigation measures for odor control. As stated in the Draft SEIR, no adverse odor impacts associated with development of the proposed project are expected to occur after the implementation of recommended mitigation measures.

Also, refer to Topical Issues 1, 2, and 4 in this document with respect to the issues of seismicity, landfill stability, LFG generation, and odor control.

Comment 271: . . . into a beautiful neighborhood which has long been established here.

Response 271: The comment is noted. The Sunshine Canyon Landfill began operation in 1958 in the City, prior to the development of most residential areas in Granada Hills.

Comment 272: When President Clinton gave his inaugural address, and I am quoting him, he said at one point in his speech, "Our children should not have to play at the edge of garbage dumps in our cities but in parks. It is my desire to accomplish this for our American children during my administration."

This Sunshine Canyon Dump is "0" feet from O'Melveny Park, the largest park in Los Angeles, second only to Griffith Park. It is also adjacent to Bee Canyon Park where only recently playground equipment has been installed for preschool children. We have zero graffiti up here, almost never hear a police siren, have pride of ownership and take care of our neighborhoods and each other.

Response 272: The source of this quote is unknown. It is not contained in either of President Clinton's inaugural addresses (Wednesday, January 21, 1993, or Monday, January 20, 1997).

The southern perimeter property boundaries of the project site include an existing perimeter ridgeline and a ±100 acre open-space area. The perimeter ridgeline coupled with the open-space area provide ample separation distance between the proposed uses and the residential areas in Granada Hills.

With respect to O'Melveny Park, this area is separated from the project site by the existing perimeter ridgeline located along the southwestern boundary of the City portion of the project site. That ridgeline rises to a maximum elevation of about 2,150 MSL. Existing southern fill limits of the inactive landfill range in elevation from 1,950 to 1,725 feet MSL. The perimeter ridgeline would effectively block interior views of the proposed landfill footprint to the south and southwest, respectively, especially from residential uses in Granada Hills. For a complete discussion of potential impacts on O'Melveny Park, refer to the Draft SEIR, Section 4.14.4, Parks and Recreational Resources, pp. 4-405 through 4-423. The Draft SEIR indicates that after the

implementation of mitigation measures, no adverse impacts on O'Melveny or other park facilities are anticipated to occur.

Comment 273: The Van Gogh Street Elementary School, which was totally demolished in the earthquake has just been rebuilt and will open for the Fall session the cost of which is unknown to me. It is approximately 8 to 10 blocks from the edge of the landfill property.

Response 273: The Van Gogh Elementary School was closed for seismic retrofitting and reconstruction following the 1994 Northridge earthquake. School buildings were damaged but not demolished by the earthquake. Van Gogh Street Elementary School is the nearest elementary school to the project site (approximately 1¾ miles from the landfill entrance or 0.7 mile from the nearest project boundary [southern]). With respect to the school's direct line-of-sight and the proposed project's landfill footprint, it is separated by existing residential uses, a ±100 acre open-space area, and existing perimeter ridgeline of the project site. For a discussion of how the proposed project would affect schools, including Van Gogh Street Elementary School, refer to the Draft SEIR, Section 4.14.3, Schools, pp. 4-401 through 4-405. As stated in the Draft SEIR, no adverse impacts on school facilities are anticipated to occur as a result of project development.

Comment 274: Tonight on the 5:00 p.m. Channel 4 news with Paul Moyer, it was reported a geological survey has determined that Granada Hills, Santa Clarita, and other Northern areas of the San Fernando Valley are prone to earthquakes previously not considered because of a condition known as liquification of the soil. Hal Fischman on Channel 5 at 10:25 gave a similar report, however more extensive and maps were shown on the TV which I am sure are available to the City of Los Angeles Environmental people. We also know that waste and garbage is prone to liquification after a period of time after it is under ground.

Response 274: The comments are noted. Refer to Response 270 with respect to this issue.

Comment 275: We all know our lives, as they are controlled by this imminent project, are held in the hands of a few men - the County Board of Supervisors and the Los Angeles City Council. It is time again for us here in this lovely area (this 2-mile radius of the Sunshine Canyon Landfill) to stand up and be counted.

Write to your City Council, The Board of Supervisors and to this Department of City Planning.

Response 275: These comments are noted.

George R. Monte, Principal
Richmont Investment Property Services, Inc.
107 West Lemon Avenue
Monrovia, CA 91016

Letter 3.8-6

Comment 276: We would appreciate receiving from you as soon as possible a copy of your executive summary or summary report of the draft subsequent environmental impact report (EIR) No. 91-0377-2C/GPA pertaining to the above referenced property.

Please forward this information to us as soon as it may be available from your office. If possible, two copies would be greatly appreciated. If there is a charge for this information please contact us as soon as possible so payment may be arranged.

Thank you for your assistance in this matter.

Response 276: City Planning staff have responded to this request.

Sharon E. Yackey
12715 Goethe Place
Granada Hills, CA 91344

Letter 3.8-7

Comment 277: Please, please do no allow the site at 14747 San Fernando Road, Sylmar, CA 91342 to be used as a landfill. The Sunshine Canyon landfill is already polluting our community and we need less, not more, dumping of debris, etc. in our community.

Response 277: The request is noted and will be forwarded to the decisionmakers for their review and consideration.

Violations that occurred with respect to the existing inactive landfill (when operational) were short term, did not pose a threat to the environment, and were immediately resolved by BFI. In this regard, the operational County Landfill has very strict and enforceable CUP Conditions and mitigation monitoring programs, which ensure daily compliance by the County LEA and various regulatory agencies. Also, when the County Landfill receives and processes waste, a County LEA inspector is onsite for inspection and enforcement activities. The LEA has the authorization to immediately cease landfilling activities at any time if it determines that the health, safety, or welfare of the general public is being endangered. To date, the LEA has never authorized the shutdown of this facility.

With respect to litter control, refer to Topical Issue 18 in this document. For a list of mitigation measures for litter control, refer to the Draft SEIR, Section 4.9.3, Litter, pp. 4-302 through 4-306. As stated in the Draft SEIR, no significant impacts are anticipated to occur either onsite or offsite after the implementation of these measures.

Comment 278: My husband and I moved out here with our children about 20 years ago. Prior to moving here none of us had any allergies. After a year, we were all getting allergies. At first we did not know why, but speculated it was the Sunshine dump. Now we are positive it was caused by the dump because after it closed, our allergies seemed to clear-up. (Not right away, but a year or two later.)

Response 278: A variety of sources may cause allergies; however, the project site has never been a documented source by regulatory agencies for causing allergens. Similar allegations were made by members of the Granada Hills community (in 1988) when the City's Zoning Administrator held meetings with respect to the zone variance revocation proceedings on the existing inactive landfill (when it was operational). Regarding those meetings, the Zoning Administrator stated the following:

> Allegations of health impacts, allergies, skin conditions, respiratory conditions, etc., are unproven. Materials in the file contained no scientific or expert documentation relating to this.

Regarding "allergies," an allergy is an abnormal reaction to an ordinarily harmless substance or substances. These sensitizing substances, called allergens, may be inhaled, swallowed, or come into contact with the skin. When an allergen is absorbed into the

body, it triggers white blood cells to produce IgE antibodies (e.g., a protein that orchestrates the reactions that cause allergies and many cases of asthma). These antibodies attach themselves to mast cells, causing release of potent chemical mediators, such as histamine, and thereby causing typical allergic symptoms. Some common allergens are pollens, mold spores, dust mites, animal dander, feathers, foods, medications, and insect stings.

Common symptoms of allergies include stuffiness, sneezing (sometimes 10 to 20 times in rapid succession), and an itchy, runny nose. More serious symptoms can include weakness, fatigue, insomnia, irritability, mood swings, lack of concentration, poor performance, loss of smell and taste, anorexia, sinusitis (e.g., sinus infection), and ear infections.

Some people with allergies may also develop asthma. Asthma is a reaction, usually allergic, characterized by attacks of wheezing and difficult breathing, particularly exhaling. Asthma attacks are brought on by a muscular spasm of the passages conveying air to and within the lungs (bronchi). The mucus membranes that line the respiratory passageways may become irritated and secrete massive amounts of mucus, which narrows the airways and worsens the asthma attack. There are many different types of factors that can trigger an asthma attack. Allergens, viral infections, sinusitis, irritants (e.g., strong odors, chalk dust, and tobacco smoke), temperature changes, exercise, chemical irritants, certain medications, and emotional anxiety all can contribute to the frequency and severity of asthma attacks. It is estimated that up to 90 percent of people with asthma have nasal allergies. Exposure to indoor allergens, particularly to dust mites, can play an important role in both primary sensitization and the later development of asthma.

The American Lung Association recommends the following steps to manage allergies: monitor air quality through radio, television, and newspaper pollen count reports. Allergy symptoms often develop when pollen counts are moderate to high but can continue even when the count lowers. Rainy, cloudy, or windless days usually have lower pollen counts, but mold spores may be higher right after a rain. Taking note of which allergens are at the highest levels may help in determining those that may be the most bothersome.[30]

The Draft SEIR adequately addresses the issue of human health risks and lists mitigation measures developed to remedy any potential impacts associated with human health risks. Regarding mitigation measures, refer to the Draft SEIR, pp. 4-314 through 4-317. As stated in the Draft SEIR, no significant human health impacts associated with the proposed project are anticipated to result after the incorporation of these mitigation measures.

Comment 279: Also, there is a continuous amount of debris and dust in the air. Again, when the dump was in operation, the inside of our home, our garage, and even our cars were always dusty, even shortly after cleaning. When the dump closed, there was a very noticeable

[30]/ http://www.pslgroup.com/dg/909e.htm; INTERNET.

difference. The inside of our home did not get as dusty and the cars stayed cleaner longer. Likewise when the dump went back into operation, everything got dusty again.

Response 279: The community of Granada Hills is surrounded on its western boundary and eastern edge by natural mountainous terrain that can contribute to fugitive dust emissions. In addition, fine dirt is likely generated by ongoing construction activities occurring in the immediate vicinity of the landfill. Industrial developments include Sunset Farms located east of the project site and the MWD water treatment plant located south of the project site, nearest to residential areas in Granada Hills. Another potential source of fugitive dust may be the Caltrans cut-slope areas, which parallel the northbound/ southbound lanes of I-5 Freeway. These slopes have been left in a denuded state since freeway construction was completed.

Refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Comment 280: Of course there are other environmental factors of concern to us. There is always the problem of leakage and contamination of the soil and underground water, which can cause chronic diseases if undetected. It sometimes takes years before one of these diseases develop, and then it is too late.

Response 280: Refer to Response 602 for a discussion of the potential for VOCs to pass through an HDPE geomembrane liner. Refer to this same response for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources.

Comment 281: Of course, there's the known pollution from dump trucks coming into the dump area, too.

Response 281: It is unclear to City staff what "pollution from dump trucks" is referenced by the commenter. However, the State of California Vehicle Code, §23115, requires that all vehicles transporting refuse or recyclables be covered to prevent spillage from vehicles. It should be noted that there have been no violations filed against the landfill operator, BFI, by any of the regulatory agencies that continuously monitor the project site, the California Highway Patrol (monitors freeways), or the Los Angeles Police Department (LAPD) (monitors local roadways).

Comment 282: Finally, it is just not fair that the "Valley" (*Our location in the valley has been singled out to receive trash for a period of time way in excess of that initially agreed to when dumping first began*) has to be the receptacle for all of Los Angeles' trash. Los Angeles is a large county and there are other areas which should be used for dumping. In fact, each supervisorial district should be responsible for its own trash.

Therefore, I respectfully ask that you deny the project as described on your notice 91-0377-ZC/GPA.

Response 282: These comments are noted. The current operational County Landfill is acknowledged as a landfill site in adopted County solid waste management plans. The proposed landfill is acknowledged in both City and County solid waste management plans and is intended to facilitate local and regional efforts to attain disposal capacity. Objectives in both the City and County waste management plans identify the need for the "maximum technically and environmentally feasible expansion of landfill sites" such as the proposed project.

For a discussion of other potential alternative landfill projects in Los Angeles County that are analyzed in the Draft SEIR, refer to Section 5.7, Potential/Proposed Landfill Sites in Los Angeles County, pp. 5-21 through 5-31.

Louie Carnevale
Carnevale & Lohr, Inc.
6521 Clara Street
Bell Gardens, CA 90201

Letter 3.8-8

Comment 283: In reference to the development project that has been proposed to be situated within the City portion of Sunshine Canyon. I am vehemently opposed to the idea of developing, operating and maintaining, and monitoring a Class III, nonhazardous solid waste landfill within or near the confines of populated domains. The anticipated effects on the environment are not in my personal best interest, my family's or my neighbors'. The negative effects are far more numerous than the positive impact that it could have for public use. I would suggest that a project with such anticipated effects on the environment and society be relocated to an area far removed from any areas where people will be residing; even if relocation means increased fees to transport the nonhazardous solid waste.

Response 283: These comments are noted. With respect to anticipated environmental effects, the commenter is referred to the Draft SEIR, Sections 4.1 through 4.19, for a comprehensive discussion of topical issues, their potential effect on the environment, recommended mitigation measures for environmental impacts deemed to be significant, and the level of significance following implementation of the mitigation measures. It should be noted that environmental effects of the proposed project on the City of Bell Gardens inhabitants are considered insignificant.

With reference to remote landfill locations analyzed in the Draft SEIR, refer to Section 5.10, Remote Landfill Facilities In-State/Out-of-State, pp. 5-43 through 5-66. This section includes an environmental comparison of the proposed project and remote waste-by-rail landfill projects.

Lynne A. Plambeck, Chairperson
Landfill Alternatives Save Environmental Resources (LASER)
23942 Lyons Avenue, Suite 103-353
Newhall, CA 91321-2423

Letter 3.8-9

Comment 284: We are a California non-profit organization made up of civic groups homeowners associations and environmental organizations throughout Los Angeles County. We have been active participants in solid waste issues in Los Angeles County since 1990.

Our organization commented extensively on the Sunshine Landfill Expansion during the County process. We were therefore surprised not to receive a copy of the DEIR for the City expansion. We have several members who are interested in different aspects of the project and therefore request a copy of the DEIR so that we may photocopy and divide it between our members.

We hope you will send us this document at the as soon as possible.

Response 284: City Planning staff have responded to this request.

The Department of City Planning distributed copies of the Draft SEIR to over 62 homeowner associations, improvement associations, and local cities. In addition, 14 libraries received copies of the Draft SEIR, and three of those libraries are located within the immediate area of the project site. These libraries include the City of Los Angeles Public Library, Granada Hills Branch; City of Los Angeles Public Library, Sylmar Branch; and the County of Los Angeles San Fernando Public Library.

Currently, LASER is not a recognized homeowner or improvement association in the City; therefore, this entity is not included on the City's mailing list for **environmental document** [emphasis added] distribution. However, individual members of LASER are on the City's mailing list and have received public notices for the proposed project.

Donald T. Kasper
12356 Jolette Avenue
Granada Hills, CA 91344

Letter 3.8-10

Comment 285: I am writing in response to section 4.2 (Air Quality) which describes the weather patterns and predicted airborne contaminant dispersion as a result of the landfill operation in Sunshine Canyon.

The EIR describing the windflow patterns is pathetically poor science. Its tries to state that mild winds from the South occur year-round, blowing any possible air contamination into the Northern canyons and away from the Los Angeles basin. This is patently untrue.

Response 285: The description of local wind patterns in the Draft SEIR is addressed in accordance with data provided in *A Climatological Air Quality Profile, California South Coast Air Basin* (SCAQMD, January 1980), as well as data and methodology provided in the *SCAQMD CEQA Air Quality Handbook* (April 1993). In addition, refer to Topical Issue 3 within this document for a discussion of wind conditions at the project site.

Comment 286: I attached an article I published in the Journal of Applied Meteorology which describes Winter wind conditions in the San Fernando Valley (SFV) as those winds blow through the Newhall Pass (and over Sunshine Canyon). This report, like all the others describing winds in the SFV, were not mentioned in the EIR.

Response 286: Refer to Response 285. The report published by the commenter (*Santa Ana Windflow in the Newhall Pass as Determined by an Analysis of Tree Deformation*, Donald T. Kasper, March 1980) is incorporated in its entirety in Appendix C, Original Comments Received on the Draft SEIR, in this document.

It should also be noted that the sufficiency of wind information is determined by the SCAQMD. In that regard, the SCAQMD did not comment on this issue with respect to the Draft SEIR.

In addition, refer to Topical Issue 3 within this document for a discussion of wind conditions at the project site.

Comment 287: The basis of my complaint is the following:

The Santa Ana winds flow through three mountain passes from the High Desert into the Los Angeles Basin. They are the: Newhall Pass, Santa Ana Canyon, and Cajon Pass. The duration and extent of these winds is so great within the Newhall Pass, I conducted a tree study sponsored by California State University, Northridge showing the amount of tree deformation due to the winds, and correlated that with spot windvane anemometer observations throughout the pass and the mountains on either side of the pass. A reprint of that article is enclosed.

Winds on the West side of the pass are much stronger that the East side. I have clocked winds to 65 mph with sustained winds of 40 mph on the East face of Oat Mountain (just West of the dump) on many occasions. The winds occur prevalently from October through May. Taking the 6 event number quoted in the EIR and multiplying by 10 for a total of 60 events per year is the most probable number reflecting what actually occurs there.

Response 287: The information concerning wind speed differential between various locations within local mountain/canyon geometries is well documented in many studies. That speed differential, however, does not affect the number of times per year that global pressure patterns create strong Santa Ana wind conditions. There are 5 to 10 strong Santa Ana wind events per year as stated in the Draft SEIR, each lasting as long as several days. Within these events, there are locational differences as noted in the comment. Such microscale effects do not alter global weather patterns or increase the storm event frequency tenfold as suggested.

With respect to wind speeds, the Draft SEIR, Section 4.2, Air Quality, p. 4-47, states the following:

> . . . [d]uring the winter months, the project area also experiences a frequent flow from the north and northwest through the Newhall Pass into the western San Fernando Valley. These winds predominate between 11:00 a.m. and 5:00 p.m. The speeds (16.5 mph average) reflect the influence of Santa Ana winds, which are strongest during those hours of the day and blow in a similar direction.
>
> Onsite measurement has shown the overall average wind speed to be 9.9 mph with a maximum 1-hour measurement of 45 mph. It should be noted that the overall average wind speed and maximum 1-hour wind speed do not preclude the presence of very low or high wind speeds, especially during Santa Ana conditions. These Santa Ana conditions, which are prevalent in Southern California from the fall through spring, with an average of 5 to 10 occurrences per year, can create strong southern-flowing winds.

In addition, refer to Topical Issue 3 within this document for a discussion of wind conditions at the project site.

Comment 288: The wind blows from NW to NE. Strong Santa Ana events dominate from the NE covering the Central and Western SFV. Some of that wind blows down the canyons of Oat Mountain. Most of these canyons are oriented along a NW-SE axis, blowing a large component of winds from the NW and down the foothills of Oat Mountain in the Central SFV. Unfortunately for Sunshine Canyon whose top dumping zone will be at 2,100 feet, this wind sheer occur along the canyons of Oat Mountain at an elevation of 1,500 feet.

Response 288: Refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of

SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used at the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

The Draft SEIR, Section 4.2.12, Operations, p. 4-88, states the following for project operations in the upper elevations of the canyon:

> Fugitive dust emissions in combination with PM_{10} emissions generated from vehicular exhaust are anticipated to create a significant impact. This would be especially true during above-average and occasionally high wind conditions (i.e., Santa Ana). Past operations have shown that the higher-elevation upper plateau and southern berm areas of the existing inactive landfill have experienced greater wind-generated fugitive dust occurrences than the lower elevations within the canyon. The lack of revegetation on the active face of the landfill surface has exacerbated difficulties in adequately controlling fugitive dust emissions during periods of high wind conditions. However, the project proponent has successfully established ground cover and other revegetation on portions of the existing inactive landfill site. Additionally, the project proponent has implemented enhanced soil treatment measures to stabilize soil conditions and further enhance onsite revegetation.

Comment 289: What occurs during the Winter half of the year is a fan dispersion of enormous force that focuses at the Northern apex of the SFV, and disperses into the entire valley.

Unless of course, the winds are mild, and there is a strong inversion. In that case, the winds skip over the inversion much like tossing a pebble onto a lake, where the winds extend as far as Catalina, kicking up large ocean swells there.

Response 289: This comment is noted. Refer to Topical Issue 3 for a discussion of wind conditions at the project site.

Comment 290: One of the largest canyons in the Oat Mountain area is Bee Canyon. This canyon diverts a significant component of the Santa Ana's, and funnels them into Granada Hills and the Van Norman Lakes. These lakes provide a significant part of the water for Los Angeles, and have the unique distinction of being post-processing reservoirs. That is, the water from the California Aqueduct is treated then poured into the lakes. From there is goes directly into the drinking water supply.

Response 290: Refer to Response 157 for a discussion of allegations that the previous City Landfill operation caused contaminated particulates to enter the Los Angeles Reservoir and other water treatment and storage systems.

Comment 291: These observations occurred over a decade before the Sunshine EIR. It is attached for your edification. The wind rose presented in figure 4.2-2 should either be labeled "Summer Wind rose for the SFV", or be thrown out altogether as a complete misrepresentation of the annual winds of the SFV.

Response 291: Refer to Appendix B8, Air Quality Modeling and Wind Speed and Direction Summary, within the Draft SEIR, which provides information pertaining to wind speed and direction frequency distribution for the Sunshine Canyon Landfill. The wind rose figure and data represent onsite measurements performed at the project site during the months of January through December 1994.

Comment 292: One interesting item was not mentioned in the EIR. The Santa Clarita area, including the Newhall Pass has a large accumulation of oil wells and oil processing facilities. Many sites have gas flaring towers to burn off the natural gas collected with the oil pumping. It is surprising that the EIR never considered what will happen in Santa Ana events when Northerly breezes from these fields and their NO_x and SO_x contaminants mix with dump gases.

Response 292: Santa Ana wind events are characterized by strong turbulence that rapidly dilutes point-source pollution emissions. Any Santa Clarita area oilfield activity emissions will be diluted to immeasurably small levels not far from their source.

Comment 293: In my review of the literature, there was an interesting report about SFV sea breezes. Your report shows only breezes coming up from Burbank which occur during Catalina eddy conditions. But what about other times? One of the most common sea breezes in the SFV is a Westerly breeze that originates in the Oxnard plain, blowing West over the Simi Hills, and into the SFV. This creates a sea breeze front with mixing and strong vertical currents in its path. The vertical rise is large enough that a line of clouds oriented North to South periodically demarcates the front. The sea breeze moves East, stagnating against the San Gabriel mountains of the Eastern SFV.

This produces a stagnation effect that serves to trap pollution in the SFV. Unlike the "it will dump out of the valley at Burbank and go away" conclusion of the EIR, repeated strong onshore flows in Summer will serve to accumulate pollution in the Central and Eastern SFV. Combined the Summer diurnal land breeze ejecting dump gases down the Canyons of Oat Mountain and the Newhall Pass, there is much less circulation and cleansing of SFV air than the report would indicate.

Response 293: As noted in the Draft SEIR, Figure 4.2-1 illustrates the dominant wind patterns in the SCAB and is not intended to be site specific. The graphic and accompanying text are presented in the *CEQA Air Quality Handbook* and, ultimately, *A Climatological/Air Quality Profile California South Coast Air Basin*, which are both prepared by the SCAQMD. The text does include area-specific language that discusses the local wind patterns.

While the Draft SEIR never states that pollution "will dump out of the valley and go away," it does discuss the transport of pollution as well as the potential for stagnation (which is not referenced by the commenter). The discussion included in the Draft SEIR on wind patterns and pollutant transport is from the SCAQMD information. The SCAQMD is the regional authority on air pollution and its dispersion. (See pp. A8-1 and A8-2 of the *CEQA Air Quality Handbook.*)

Comment 294: Mitigation:

Santa Ana winds are prevalent and strong in the Western Newhall Pass during Winter. The only mitigation feasible (short of closing the dump) is to monitor the winds along the ridge defining the Western part of the dump. When winds exceed some threshold (say, sustained for some interval over 25 mph), dumping should occur for the next 24 hours at lower elevations.

Response 294: Refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used at the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Nancy & Phil Bogna
16924 Knollwood Drive
Granada Hills, CA 91344

Letter 3.8-11

Comment 295: I have been to a library branch to view the available documents on the Sunshine Canyon Landfill. I counted 39 volumes. The last two seemed to be in regard to the current review - each of those approximately 3"-4" in depth. Very "daunting" to Ms J.Q. Public! However, this letter is very "simple" in its views and requests.

Response 295: It should be noted that an Executive Summary has been prepared for the Draft SEIR. This summary was distributed to each of the libraries on the City's distribution list. It briefly introduces the proposed project, provides project objectives, summarizes alternatives, states the environmentally superior alternative, discusses impacts resulting from project implementation, and states what unavoidably significant impacts the proposed project would have on the environment.

In addition, a Summary Matrix was also prepared and distributed to each library on the City's distribution list. This matrix lists the potential environmental impacts associated with the proposed project, lists recommended mitigation measures, provides the net unmitigated adverse impacts, states the mitigation compliance responsibility, and provides a monitoring and enforcement program for the proposed project.

Copies of both documents (i.e., Executive Summary and Summary Matrix) were distributed to 14 public libraries, including the libraries located proximate to the project site.

Comment 296: We are very much opposed to any expansion of the Sunshine Canyon Landfill. Our main concern has been, and continues to be, the close proximity to the water source at the Jensen Filtration plant (as well as area ground water).

Response 296: Refer to Response 157 for a discussion of allegations that the previous City Landfill operation caused contaminated particulates to enter the Los Angeles Reservoir and other water treatment and storage systems. In addition, refer to Response 602 for a discussion of the potential for VOCs to pass through an HDPE geomembrane liner. Refer to this same response for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources.

Comment 297: That is not to say other concerns such as odor, dust, debris,. . .

Response 297: For a discussion of these issues, refer to Topical Issues 3, 4, and 18 with respect to odor, debris, and litter.

Comment 298: . . . traffic and roadway . . .

Response 298: The Draft SEIR adequately addresses the issue of traffic and circulation within the context of project- and cumulative-project effects. An analysis of traffic and circulation is included in the Draft SEIR, Section 4.13, pp. 4-333 through 4-388.

Comment 299: . . . erosion. . .

Response 299: For a discussion of potential impacts related to erosion, refer to Topical Issue 5 in this document.

Comment 300: . . . ecology. . .

Response 300: Ecology is defined as a science that studies the interrelationships, distribution, abundance, and contexts of all organisms and their interconnections with their living (biotic) and nonliving (abiotic) environment, in addition to the function, changes over time, and response to disturbances. The City has assumed that the commenter is referring to the topic of biota. With respect to the topic of biological resources, refer to the Draft SEIR, Section 4.4, Biological Resources, pp. 4-139 through 4-202.

For an additional discussion of biological resources, refer to Topical Issues 10, 11, and 12, which discuss sensitive wildlife species, oak trees and big-cone Douglas fir trees, and wetlands, respectively.

Comment 301: . . . and environmental/health related problems are not also significantly troublesome.

Response 301: It is unknown what the commenter is referring to with respect to "environmental problems." However, for a discussion of potential human health risks, refer to Response 316 in this document.

Comment 302: Our feeling is that this is "on out of the ordinary/unique" situation-in respect to the extremely close proximity to the water plant.

Response 302: Refer to Response 157 for a discussion of allegations that the previous City Landfill operation caused contaminated particulates to enter the Los Angeles Reservoir and other water treatment and storage systems.

Comment 303: As mentioned in the information letter, the Sunshine Landfill is a designated non hazardous landfill. Certainly- that would be the ideal premise. However, it would surely be a certainty that hazardous waste would find its way into the landfill.

Response 303: Refer to Topical Issue 16 for a discussion of hazardous materials.

Comment 304: Also, it's a certainty that the area is earthquake prone.

Response 304: With reference to seismicity and landfill stability during the 1994 Northridge earthquake, refer to Topical Issues 1 and 2 in this document.

For a comprehensive discussion of this matter, refer to the Draft SEIR, Section 4.1.4, Geologic Hazards-Seismicity, pp. 4-24 through 4-41. The Draft SEIR presents the existing tectonic environment, figures displaying the regional earthquake faults, seismic regulatory requirements for landfill development, seismic hazard assessment for the Sunshine Canyon area, expected magnitudes, recent seismic events (including the

Northridge earthquake), the performance of landfills in the Southern California area, and proposed mitigation for the project site in regard to potential seismic events.

Comment 305: It is our understanding that BFI, the landfill operator, has been sited for numerous contamination violations, at other landfill operations.

Response 305: As stated in the Draft SEIR, Appendix C11, Browning-Ferris Industries Corporate History and Environmental Health and Safety Report, BFI's corporate environmental health and safety policy (Policy) includes the following: comply with all applicable environmental, health and safety laws and regulations, minimize adverse environmental health or safety effects from the company's business activities and take positive action toward achieving a cleaner global environment; adopt administrative and operational standards where protective laws do not exist or where the company believes existing laws or regulations may not be fully protective of health and the environment; cease to operate a facility or process, temporarily or permanently, if necessary, to conform to this policy in a manner consistent with the highest industry standards or otherwise to control environmental, health, or safety risks; and work constructively with host communities and appropriate regulatory agencies in the implementation of this Policy.

In order to carry out this Policy, BFI has implemented the following actions and programs: conduct appropriate training and audit programs to ensure that all employees are equipped with necessary information relevant to their duties within the company to implement this full Policy; proactive ly identify and control hazards to health, safety, and the environment resulting from its operations; conduct appropriate information sharing programs to communicate the significant operating aspects of the company's facilities with employees, the surrounding communities and appropriate regulatory agencies; utilize cross-company quality committees to identify and develop, where appropriate, additional company environmental, health and safety policies which are more protective than existing laws and regulations; encourage those affiliations where the company would not be the majority owner to adopt policies comparable to this Policy; require each business segment to develop specific plans, programs and procedures appropriate to that segment to ensure effective implementation of this policy; work constructively with trade associations, elected officials, governmental agencies and others to develop equitable and effective laws and regulations to protect human health and the environment; and conduct reviews of new facility designs and construction specifications to assure that appropriate environmental, health, and safety controls are in place. Refer to Appendix D5, BFI Award Information, within this document for a listing of awards given to BFI for environmental, engineering, public health and safety and community service excellence.

The City will carefully consider BFI's prior operational history and performance record at the existing inactive City Landfill and at the operational County Landfill to determine the nature of those past operational problems and shall develop strict operating control measures that would successfully prevent potential environmental problems from occurring. Based on the record before the City, BFI has taken adequate actions to correct prior problems that were brought to its attention, and according to various

regulatory agencies, control measures that were implemented by BFI have been proven effective.

With respect to the operational County Landfill CUP, 51 conditions of project approval and 9 monitoring programs were adopted by the County Board to ensure that the public's health and safety would not be compromised. In addition, there are nine separate regulatory and local agencies (County LEA, County DPW, etc.) that continuously monitor permit compliance at this facility. With respect to the issuance of permits, each regulatory agency has imposed it own conditions, which the project proponent is required by law to adhere to.

At the current County operation, a full-time County LEA inspector is onsite during the receiving and disposal of any waste. The LEA has the authority to order the immediate cessation of landfilling or other activities at the site if it is determined that the health, safety, and/or welfare of inhabitants of the County so require. Any cessation would continue until such time as the County LEA determines that the conditions leading to the cessation have been eliminated or reduced to an acceptable level. Similar to the operational County Landfill, the proposed project will be monitored by the City LEA or designated representative. The proposed project (similar to the operational County Landfill) will be continuously monitored for regulatory compliance. All of these regulatory agencies maintain a hotline number to assist the public with issues they may have regarding the landfill's operation or maintenance. The project proponent has successfully operated the County Landfill in compliance with extensive County CUP Conditions as well as State, regional and local environmental regulatory agency permit requirements.

Additionally, BFI provides management personnel with intensive training, designed to give them the knowledge and tools necessary to manage their facilities and operation in the most environmentally sound manner. With respect to management training, careful attention to the health and safety of workers and the public is required. This training has been successfully completed by the onsite mangers presently employed at the Sunshine Canyon Landfill site.

Federal, State, and local laws require landfill operators to immediately cure or rectify any violation. With respect to the existing inactive landfill, no contamination violations were ever issued by regulatory agencies that have jurisdiction over the project site. Any past violations (not associated with contamination) were resolved immediately by BFI through appropriate City procedures.

Comprehensive and enforceable mitigation measures, operating conditions, and monitoring activities by numerous regulatory agencies are to be undertaken to ensure that the proposed project is operated in a safe manner by the project proponent to alleviate impacts on public health and the environment.

Comment 306: Who is going to really listen to what "the people" have to say? Who is going to stand up for "the people"? Who is going to say "money doesn't talk"? We certainly hope we don't live so long as to see a situation of Citywide water contamination. Given the

other associated problems we probably won't! Please, please, please - someone - truly stand for the environment.

Response 306: Refer to Response 157 for a discussion of allegations that the previous City Landfill operation caused contaminated particulates to enter the Los Angeles Reservoir and other water treatment and storage systems.

Albert Knight, Vice President
Santa Susana Mountains Park Association
P.O. Box 4831
Chatsworth, CA 91313-4831

Letter 3.8-12

Comment 307: As Vice-President of the Santa Susana Mountains Park Association I have been given the SAD task of replying to the Draft Subsequent EIR for the Sunshine Canyon Landfill (EIR Case # 91-0377-ZC/GPA). I use the word SAD quite intentionally. Despite the various mitigation measures associated with this project, the fact remains that a non-replaceable Oak Woodland environment will be almost completely destroyed by the Sunshine Canyon Landfil project.

Response 307: The comments are noted. With respect to coast live oak woodland, there are approximately 45 acres in the project site that would be affected by landfill development (i.e., both City and County jurisdiction). Of that total, approximately 31 acres would be directly affected by the landfill footprint or ancillary facilities areas. Landfill development would result in 69 percent of this resource being removed. Approximately 10 acres would remain undisturbed. (See Draft SEIR, Section 4.4, Biological Resources, Table 4.4-8, Total City/County Impacts on Plant Communities [Excluding Closure Activities], p. 4-173, for a discussion of this issue.)

The proposed project would result in the direct removal of 564 oaks trees (545 coast live oak and 19 canyon live oak trees). However, their removal would be sequenced rather than the entire resource being removed at once.

Recommended mitigation measures (pursuant to the City Oak Tree Ordinance) for impacts on oak tree resources are included in the Draft SEIR, Section 4.4.3, Native and Nonnative Tree Resources, pp. 4-197 through 4-201. Mitigation will result in oak trees being replaced at a 2:1 (replacement:removal) ratio pursuant to the City Oak Tree Ordinance. For an additional discussion of mitigation measures for oak trees, refer to Topical Issue 11.

Comment 308: When I first decided to comment on the pertinent EIR, my intention was to comment only on the Cultural Resources portion of the EIR. This because I was a crew member during one of the archeological surveys of the canyon. Because of this survey participation, I had an opportunity to see the entire canyon for myself. I would like to say that the archaeological portions of the EIR is reasonably adequate . . . although I would have liked to have seen additional sub-soil testing of at least some of the areas where archaeological materials were located. However, I have decided to not comment at length on this aspect of the EIR. . .

Response 308: With respect to subsoil testing, this request will be forwarded to the City decisionmakers for their review and consideration. Regarding archaeological resources, no impacts are anticipated to result; however, mitigation measures will be implemented during project development by the project proponent to minimize any potential disturbance to any undiscovered archaeological resources that may be encountered

during construction activity. These mitigation measures are similar to those imposed for County Landfill development.

Comment 309: I do wish to say that, had the Sunshine Canyon are been personally examined by a large number of members of the local community, the project would have never been allowed to proceed. If a large number of members of the local community been allowed to see the area for themselves, I have no doubt that a considerable number of people would have tried to block the entrance to the canyon, to prevent work from proceeding.

Response 309: This comment is noted. Regarding the project site, the project proponent has always encouraged local residents and other interested parties or groups to visit this site and discuss future landfill development plans.

With respect to tours, BFI encourages members (or groups) to tour the project site. To arrange for a tour of the project site, telephone 800/521-6301. Additionally, the telephone numbers of City staff, the environmental consultant, and BFI personnel are listed in the Draft SEIR, Section 9.0, SEIR Preparers and Contributors, p. 9-1. Those parties can be contacted for additional information pertaining to the Draft or Final SEIR.

Comment 310: In my opinion, and in the opinion(s) of the membership of the SSMPA, the destruction of the Sunshine Canyon ecosystem is a crime against our regional environment.

Response 310: This comment is noted.

Comment 311: The destruction of the 1000s of mature Oak trees in the beautiful canyon bottom. . .

Response 311: As identified in the Draft SEIR, Section 4.4.3, Native and Nonnative Tree Resources, p. 4-197, project development would result in 545 coast live oak trees and 19 canyon live oak trees being removed in Sunshine Canyon. Thus, a total of 564 oak trees will be removed during project development.

The results of the tree survey conducted for the proposed project are included in the Draft SEIR, Appendix B4. Findings of that survey indicate that the majority of oak trees in Sunshine Canyon have fire damage or have been affected by insects or disease.

Comment 312: . . . and the displacement (and death) of the countless animals is not and can not be mitigated, even by the protection of the adjacent canyon, and by the creation of a phony replacement forest, on the slopes above the canyon bottom.

Response 312: Mitigation efforts will be coordinated with the City, BFI, and regulatory agencies. Prior to the implementation of mitigation plans, approval must be obtained from Responsible Agencies or City departments (i.e., City Street Trees Division, Corps, USFWS, CDFG, etc.).

The Draft SEIR, Section 4.4, Biological Resources, assesses impacts on plant communities and wildlife species and provides mitigation measures commensurate with

identified impacts on these resources. As stated in the Draft SEIR, Section 4.4, Biological Resources, p. 4-179:

> Mitigation measures generally follow a three-tiered approach, including "avoidance," which is the most effective type of mitigation, wherein important habitat or other resources are avoided through project design; "protection," where measures allow remaining habitat to continue to function as close to their existing state as possible; and "habitat replacement," where sensitive habitat is replaced as a result of project development.
>
> Significant impacts on arroyo willow series, southern willow scrub, Coast live oak woodland, Venturan coastal sage scrub, slender mariposa lily, and San Diego horned lizard have been identified. Potentially significant impacts have been identified for the California gnatcatcher, least Bell's vireo, western burrowing owl, breeding birds' nests, and raptor nests.

Comment 313: The membership of the SSMPA, including myself, are deeply saddened by the negative effects that this project is having and will have in the future. We all want your office to know that we will never permit another landfill of this type to be established in the Santa Susana Mountains, either in Los Angeles or Ventura County.

Response 313: These comments are noted.

Additionally, it should be noted that the proposed landfill footprint is located in the interior portion of Sunshine Canyon, between perimeter ridgelines. Moreover, the land area being proposed for development is disturbed due to extensive landfilling operations that have taken place in one form or another for a period of nearly 40 years.

As indicated in the Draft SEIR, one of the project objectives is to provide efficient solid waste management and disposal capacity to City and County jurisdictions by developing a landfill to avert an identified short-term and potential future long-term solid waste disposal capacity shortfall in both the City and County.

Comment 314: Please do not give us cause to turn our sadness into anger- by proposing or by planning another massive landfill of this type.

Response 314: This comment is noted.

Comment 315: Please do not continue to see our wonderful regional natural heritage as expendable.... The destruction of Sunshine Canyon ecosystem is an outrage . . . please do not repeat the process elsewhere.

Response 315: This comment is noted. Refer to Response 312 for a discussion of mitigation measures for plant and animal resources impacted by the proposed project. The Draft SEIR, Sections 4.1 through 4.19, thoroughly discusses the environmental effects of proposed project development.

Ed You
9714 Sepulveda, #216
North Hills, CA 91343

Letter 3.8-13

Comment 316: I just heard about the Sunshine Canyon Landfill. There are many aspects of this landfill that disturb me:

1. the health risks from such a huge dump being so close to a residential area (particulates, cancer, asthma, childhood illnesses, assorted infectious diseases);

Response 316: This comment is noted; however, no regulatory agencies, including SCAQMD or the County DOHS, have determined that any health risks exist due to the proximity of Sunshine Canyon.

A revised Health Risk Assessment (HRA) was conducted using updated emissions data from the 1996 source test for the City flare. The HRA modeled the impact of emissions from five landfill flares operating at their combined maximum permitted capacity of 4,400 cubic feet per minute. Based upon updated gas generation rates, it has been determined that five flares will be sufficient to control all gas generated by the City and County landfills. For purposes of the modeling analysis, the destruction efficiency of the flares was assumed to be 98%. In addition to the flare emissions, surface emissions from the landfill were calculated and modeled. Surface emissions were estimated based on the assumption that the gas collection system collects 90% of the gas generated by the landfill and the rest is emitted to the atmosphere. This is a very conservative assumption because monthly surface monitoring shows that emissions from the surface are very low.

Excess cancer risk is calculated by assuming the maximum exposed individual (MEI) remains at the most exposed location for 24 hours per day for 365 days per year, for 70 years of his/her life. The HRA evaluates the risk to health posed by emissions of toxic air contaminants, which include potential carcinogens as well as substances that may cause acute and chronic health effects. The HRA uses predictive models and methodologies recommended by the SCAQMD. The modeling is based upon very conservative assumptions including worst case emission estimates.

Appendix D3, Revisions to Draft SEIR, Appendix B6, Low-Level Health Risk Assessment, in this document provide detailed information on potential health risks associated with proposed project development. That analysis concludes that the cumulative maximum individual cancer risk is less than the significance threshold. The cancer risk to the maximum exposed individual is below any level of concern based on conservative (i.e., overpredictive) assumptions. With less-restrictive input assumptions, the cancer risk would be even lower.

Also, in response to a comment, a second modeling study was done to determine the impact of PM_{10} emissions at the nearest schools (i.e., Van Gogh Street Elementary School, Robert Frost Middle School, and El Oro Way Elementary School). The study modeled emissions from the flares, mobile equipment, and fugitive dust and was based

on worst case assumptions including operations at maximum daily capacity with the working face at the point on the landfill nearest to the nearest school (e.g., Van Gogh Street Elementary School).

The modeling study showed the impact at the Van Gogh Street Elementary School to be less than 2.3 $\mu g/m^3$, which is below the 2.5 $\mu g/m^3$ level of significance for localized impacts as specified by the SCAQMD. Since the other schools are considerably farther from the landfill, and PM_{10} concentrations drop off rapidly with distance, the impacts at those schools are not considered significant. The results of the study are found in Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, in this document.

In addition to individual cancer risk impacts, the TACs listed in Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, in this document were modeled for potential chronic health risks using the hazard index recommended by the California Air Pollution Control Officers Association (CAPCOA). Chronic adverse health effects are those requiring long-term cumulative exposure. They are calculated by dividing the actual exposure to a specified chronic acceptable exposure level (CAEL) summed over all inhaled compounds.

Acute adverse health effects are those that could occur over 1 hour or less. They are calculated similarly as the chronic risk by summing the ratio of the maximum 1-hour exposure to the acute acceptable exposure level (AAEL) for all contaminants with published AAELs.

Based on the results of the ISCST3 modeling included in the health risk assessment, both chronic and acute health risks (using the CAPCOA hazard index) were clearly considered to be less than significant. Results of flaring LFG in combination with surface emissions, both in terms of TACs and criteria air pollutants, would also have a less than significant impact.

Additionally and in response to these types of concerns (identified at the public scoping meeting held for this project), City Planning staff initiated investigations and had several meetings with leading medical authorities such as Paul J. Papanek, M.D., M.P.H. (Chief, Toxics Epidemiology Program, Disease Control Programs of the County of Los Angeles, DOHS) and Thomas M. Mack, M.D., M.P.H. (Professor of Preventive Medicine, University of Southern California, School of Medicine). Based on the review of existing information and the advice of these experts, City Planning staff concluded that an epidemiological study or a human health survey was not warranted for the proposed project. This information is included in the Draft SEIR, Section 4.9.5, Human Health, pp. 4-314 through 4-316.

Dr. Papanek indicated that the potential for significant human health risk impacts to be statistically attributable to a Class III landfill is generally low. His comments were based on his review of published scientific studies of landfill sites located throughout California.

Dr. Mack, who has designed, researched, and prepared a number of epidemiological studies for hazardous Class I waste landfills and other similar-type facilities (e.g., Operating Industries Landfill, Del Amo/Cadillac Fairview Site, Space Ordnance Systems/Sand Canyon Facility, and the BKK Landfill), indicated it would be unlikely that an epidemiological study for the proposed project would produce a definitive finding linking health problems of area residents to the landfill site. The ability to confirm any relationship would be extremely difficult because the population base within the area was relatively small at the time the landfill was originally sited. In addition, during the past 20 years, the population base has not remained stable, with many residents leaving and others moving into the general vicinity. Because cancer population clusters take approximately 10 to 20 years to establish, changes in the population base would make it difficult to define a study group. He indicated that establishing a causal relationship between health problems and the existing inactive landfill would be extremely difficult. (See Draft SEIR, Section 4.9.5, Human Health, pp. 4-314 through 4-316.)

Comment 317: 2. the history of Browning-Ferris Industries in other parts of the nation concerning racketeering;

Response 317: Since the commenter has provided no documentation to support these racketeering charges against the project proponent, responding to such charges by BFI is outside of the realm of this environmental document in accordance with State CEQA Guidelines, §15088.

With respect to BFI, it is known that this company is one of the largest publicly held companies in the United States and that its subsidiaries and affiliates collect, transport, treat, and dispose of commercial, residential, and municipal solid waste and industrial wastes within the United States and internationally.

Comment 318: 3. the history of BFI in regards to uncorrected violations from the old city portion of the dump;

Response 318: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 319: 4. the increased air pollution in the valley from the dump, especially because of its location in the wind tunnel of the Santa Suzanna Pass;

Response 319: Refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Comment 320: 5. the inevitable contamination of the water reservoir downwind and downhill from the dump site;

Response 320: Refer to Response 157 for a discussion of allegations that the previous City Landfill operation caused contaminated particulates to enter the Los Angeles Reservoir and other water treatment and storage systems.

Comment 321: 6. the site not being earthquake unstable, and the resultant "liner" damage and leakage into the water table;

Response 321: Refer to Topical Issues 1, 2, and 8 with respect to seismicity, landfill stability during the Northridge earthquake, and the proposed landfill liner design. In addition, refer to Response 602 for a discussion of the potential for VOCs to pass through an HDPE geomembrane liner. Refer to this same response for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources.

Comment 322: 7. the harmful gases that are generated from the decomposition;

Response 322: Refer to Topical Issue 4 for a discussion of the odor control program and mitigation measures for the proposed City/County Landfill.

Comment 323: 8. the county and city reneging on keeping the old site closed and converted into a recreational center according to the original agreement from the 60's;

Response 323: Refer to Responses 205 and 1296 for a discussion of land use at the project site after the completion of 30-year postclosure maintenance.

Comment 324: 9. the city's and county's rationale being driven purely by money, and the "politics" of it all, verses, what is right and protective of human beings.

Response 324: This comment is noted.

Comment 325: How we'll be able to explain, or not explain, all this devastation to our children and grandchildren.

Response 325: This comment is noted.

Comment 326: . . . and perhaps you know more controversial issues.

Please oppose this landfill expansion. Please.

Response 326: This comment is noted.

Joanne Collins
17731 Candia Court
Granada Hills, CA 91344

Letter 3.8-14

Comment 327: I have many concerns and questions regarding the proposed opening of the Sunshine Canyon Landfill. I understand that disposal of trash in a City the size of Los Angeles is a serious problem; however, quality of life for the citizens of Los Angeles is also of concern.

Response 327: This comment is noted.

The proposed project will not open until after approval by the City and County decisionmakers occurs. Additionally, numerous permits are required and must be authorized by regulatory agencies, in addition to various ministerial permits, which are granted by both jurisdictions. With respect to the Draft SEIR, the reader is referred to Section 4.1 through 4.19, which discuss the proposed project, its effects on the environment, proposed mitigation measures, and the level of significance after mitigation. For a summary of regulatory permits and discretionary actions, refer to the Draft SEIR, Table 2.16-1, pp. 2-98 through 2-102.

Comment 328: It seems the City/County is willing to sacrifice a neighborhood and perhaps the quality of the water supply of Los Angeles in the interest of trash disposal. Some concerns and questions follow.

Response 328: Refer to Response 157 for a discussion of allegations that the previous City Landfill operation caused contaminated particulates to enter the Los Angeles Reservoir and other water treatment and storage systems.

Comment 329: The dump is located upwind of water treatment facilities for the City of Los Angeles and surrounding counties. The issues of blowing dust and ground water contamination exist.

Response 329: Refer to Response 157. In addition, refer to Response 602 for a discussion of the potential for VOCs to pass through an HDPE geomembrane liner. Refer to this same response for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources.

Comment 330: The potential for earthquake damage to the dump liner and damage to the Balboa inlet tunnel with subsequent groundwater contamination is a concern.

Response 330: Refer to Responses 77 through 79 for a discussion of the potential for the proposed City/County Landfill to impact the Balboa Inlet Tunnel or the MWD Joseph Jensen Filtration Plant.

Comment 331: This area experiences heavy winds. In addition to the drinking water reservoir, there are many homes in the area downwind from the dump. It was a problem in the early years of the dump. What will be done so it will not be a problem again with more

dumping and higher volume dumping? Will the dump shut down on extremely windy days in an effort to protect the community?

Response 331: Refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Comment 332: What about the impact on the community and traffic on Balboa Blvd. with the addition of trucks hauling a potential of 14,000 tons of trash a day on an already busy street.

Response 332: Refer to Response 1 for a discussion of proposed project peak and average daily waste intake rates. In addition, refer to Response 106 for a discussion of the prohibition of heavy trucks on Balboa Boulevard.

Comment 333: Will it become the dump for the entire region?

Response 333: The proposed project will serve the entire Los Angeles region. The proposed project is being planned as a Class III nonhazardous landfill, and as such, the majority of the waste stream will be from the Los Angeles region. For additional information, refer to Topical Issue 20.

Comment 334: Has the contamination of the air due to diesel exhaust been addressed or will the trucks be running on clean fuel?

Response 334: This fuel source (i.e., diesel) and its use are discussed in the Draft SEIR, Section 4.2, Air Quality. As noted, diesel fuel would be used by onsite equipment and machinery and waste-hauling vehicles (e.g., transfer trucks and curbside collection trucks) that transport refuse to the project site. Gasoline would be used by landfill employees who commute to the site, service vehicles, and light-duty vehicles that would transport smaller waste loads to the site.

Diesel emissions are based on the EMFAC computer model (which is distributed by Caltrans; it considers commercially available diesel fuel sources). The advent of cleaner-burning fuels in the future will further reduce diesel emissions beyond those presented in the Draft SEIR.

Comment 335: Will there be an independent health inspection process?

Response 335: Refer to Response 188 for a discussion of the requirement for some form of agreement between the City and County to authorize common power over the entire project site.

Comment 336: One basic question remains. What is being done to ensure that the dump is not a terrible mistake? And if it is a mistake, as many people believe, what can be done to close it down?

Response 336: The proposed project will be governed by numerous federal, State, regional, City, and County regulations and permits, which will be followed by the project proponent and monitored by agencies to ensure the highest possible environmental protection both onsite and offsite. In addition, several State, regional, City, and County environmental regulatory agencies will have continuous enforcement power throughout the project's site life and during its closure and postclosure maintenance period. Collectively, these agencies will ensure that the project proponent adheres to all applicable regulatory requirements.

Regulatory agencies will also provide continuous monitoring and inspection activities on the project site throughout its operational life (e.g., estimated at 26 years), its closure, and postclosure maintenance period (e.g., estimated at 30 years after closure). Additionally, strict and enforceable project conditions (imposed for the General Plan Amendment/Zone Change [GPA/ZC]), along with mitigation measures and monitoring programs will be required. It should be noted that the project proponent's failure to implement mitigation measures properly could result in permit actions by the City, such as "stop work" orders, or the denial of subsequent approvals necessary to complete, operate, or occupy the project. In addition, the City as Lead Agency can use a range of enforcement techniques including civil and criminal fines, lawsuits, and even permit revocations.

Additionally, the design and installation of the landfill liner and various environmental protection and control systems must meet federal, State, and local requirements. Monitoring and quality control of these systems during and after installation will be performed by the regulatory agencies. In addition, the environmental protection and control systems would be designed and installed to ensure that the landfill is operated in a safe and sanitary manner, thereby assuring the public that these systems are operated and maintained safely by the project proponent.

For a comprehensive list of enforcement agencies and permitting requirements for the proposed City/County Landfill, refer to the Draft SEIR, Section 2.16, Regulatory Requirements, p. 2-97.

Jeffrey H. Hill
Law Office of Jeffery H. Hill
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Letter 3.8-15

Comment 337: After review and consideration of the above referenced draft subsequent environment impact report the Board of Directors of the Newhall Hidden Valley Homeowners Association has resolved to oppose the development.

Response 337: This comment is noted.

Comment 338: Specifically, increased traffic of heavy vehicles on already crowded roadways and proximity of the development to residential areas constitute a threat to the air quality, safety, and quality of life of the residents of Hidden Valley.

Response 338: It should be noted that the distance of the landfill entrance to homeowners in the Newhall Hidden Valley Homeowners Association is over 5 miles.

For a discussion of potential traffic impacts and recommended mitigation measures, refer to the Draft SEIR, Section 4.13, Transportation and Circulation, pp. 4-333 through 4-387; for potential air quality impacts and recommended mitigation measures, refer to the Draft SEIR, Section 4.2, Air Quality, pp. 4-45 through 4-96; and for safety issues, refer to the Draft SEIR, Section 4.9, Risk of Upset, pp. 4-289 through 4-326.

With respect to potential traffic impacts and risk-of-upset conditions, the Draft SEIR indicates that mitigation measures would reduce both project and cumulative project impacts to a level of less than significant after the implementation of mitigation measures. With regard to air quality, mitigation measures would reduce impacts; however, project and project-related cumulative impacts are considered significant and unavoidable for CO, NO_X, SO_X ROG, and PM_{10} because the project site is within a nonattainment air basin for these criteria air pollutants and emissions of these pollutants after project mitigation will continue to exceed the SCAQMD CEQA significance criteria levels.

Additionally, refer to Topical Issue 20, Planned Haul Routes, in this document for a discussion of the planned haul routes for waste-hauling vehicles associated with the proposed City/County Landfill.

Mary Edwards
North Valley Coalition
17219 Orozco Street
Granada Hills, CA 91344

Letter 3.8-16

Comment 339: We are writing in advance of submitting our comments on the draft EIR for Sunshine Canyon to seek a clarification. The letter that accompanied the EIR states that BFI is seeking a permit to receive 11,000 tpd at the Sunshine Canyon Landfill site. BFI already has permission to import 9,000 tpd in their Solid Waste Facilities Permit (i.e. 6,000-6,600 tpd of buried waste, plus the remainder up to 9000 tpd consisting of waste that the County calls "exempt.") This "exempt waste," of course, arrives by truck creating the same impacts associated with traffic and air quality as the buried waste. Few of these items will leave the site.

Response 339: In regard to the proposed project, the commenter is referred to the Draft SEIR, Section 1.2, Overview, and Section 2.5, Project Characteristics, which defines average and maximum anticipated daily and weekly intake amounts.

As indicated in the Draft SEIR, until the proposed landfill and current operational landfill are combined, the initial proposed landfill would provide a waste intake rate of 5,000 tpd in the City portion of Sunshine Canyon and 6,000 tpd at the County Landfill. The ultimate City/County Landfill would combine landfilling operations and allow an average waste intake rate of approximately 11,000 tpd. The maximum net tonnage that can be deposited per operating day is 12,100 tpd (based on a maximum intake rate of 5,500 tpd in the City and 6,600 tpd in the County) with a maximum weekly intake rate of 72,600 tons (based on a maximum intake rate of 12,100 tpd/6 working days per week).

The Draft SEIR analyzed project impacts associated with a maximum daily intake rate of 5,500 tpd for the City portion, and an average daily intake rate of 6,000 tpd for the County portion, or a combined net tonnage of 11,500 tpd. In addition, the Draft SEIR cumulatively analyzed impacts associated with 33 related projects (inclusive of the now operational County Landfill) located within a 5-mile radius of the project site. The trip generation potential of the County Landfill Extension was forecast based on daily and peak hour trip generation rates developed from actual count data taken at the landfill, when the majority of the materials were delivered to the site by curbside collection trucks. The County Landfill Extension traffic generation and associated impacts are considered conservative and over estimated. They are equivalent to that of a landfill that has an average daily intake of 10,200 tpd (not 6,000 tpd).

It should be noted that the reason why both average and maximum tonnages were discussed in the Draft SEIR is to maintain consistency with the prior FEIR documentation and because this information is required for the project's SWFP.

Currently, the now operational County Landfill (since August 1995) is receiving approximately 4,000 tpd of waste, which is below its permitted CUP tonnage amount. However, the County Landfill, CUP Condition 10(e), authorizes the net tonnage placed

in the landfill not to exceed 36,000 tons per week (i.e., 6,000 tpd average based on 6 working days per week), and Condition 10(f) further authorizes the net tonnage of waste intake on any given day to not exceed 6,600 tpd. Condition 10(g) acknowledges that the net tonnage will not include clean dirt imported to cover and prepare interim and final fill slopes for planting or waste processed and put to a beneficial use on the landfill or separated or otherwise diverted from the waste stream and exported from the landfill for the purpose of recycling. Unless authorized by the County Board, these intake amounts cannot be arbitrarily increased by the project proponent. The County Board may increase the net tonnage allowed by Conditions 10(e)(f) to 48,000 tons per week (or 8,000 tpd) and 8,800 tons maximum per day if the Board of Supervisors, upon the joint recommendation of the County LEA and its Director of Public Works, determines that an increase is necessary to appropriately manage the overall County waste stream for the protection of the public health and safety.

Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 340: Is BFI then seeking approval to import an additional 2,000 tpd to reach 11,000 tpd, as your letter suggests or 5000-5,500 tpd making the inflow requested 14,000-14,500?

Response 340: Refer to Response 339.

Comment 341: This is a very significant difference and we cannot evaluate the potential impacts of this project without it. Knowing the time constraints placed upon submitting our response, please clarify as soon as possible.

Response 341: Refer to Response 339.

Wayde Hunter
[No address provided]

Letter 3.8-17

Comment 342: 4.1 EARTH RESOURCES

FEIR Documentation, Page 4-3
According to the proponent: The following list of references specific volumes, sections, and page numbers of the certified FIER and its incorporated technical documentation that provide background information and technical analyses relevant to the topic of earth resources. Development of the proposed project, including the additional +/-42 acres located in County jurisdiction, has been previously addressed within the context of this certified FEIR. Any new potential earth resources impacts associated with the proposed project and the relocation of ancillary facilities and environmental protection and control systems onto City lands will be addressed in the Draft SEIR." It goes on to cite numerous volumes, Sections, Appendixes, Topical Issues, and goes on to give a summary in Appendix C1. Why wasn't this material included? This material should have been include as a part of the SEIR since it is impossible for the public to determine the difference between old and "new potential impacts".

Response 342: As indicated in the Draft SEIR, Section 1.4, Incorporation by Reference, p. 1-3, the Draft SEIR incorporates by reference all or portions of other documents that are a matter of public record in accordance with the State CEQA Guidelines, §15150. Those documents either relate to the proposed project or project site (in both City and County jurisdictions) or provide additional information concerning the environmental setting in which the project is proposed. Where all or a portion of another document is incorporated by reference, the incorporated language shall be considered to be set forth in full as part of the text of this Draft SEIR.

This material, as referenced by the commenter, is included within the documents that comprise the County FEIR, Sunshine Canyon Landfill Extension. There are 18 separate volumes that comprise the County FEIR, along with associated technical documents. Copies of both the County FEIR and Draft SEIR documents were distributed by the City to 14 public libraries. Copies of these documents were made available for the public during the Draft SEIR public review period (July 25 through December 5, 1997).

Comment 343: Have the reviewing agencies been provided this documentation, if not have they reviewed the referenced material in order to determine whether or not there are any new potential impacts between County FIER and City SEIR?

Response 343: Copies of both the County FEIR and Draft SEIR and the related technical appendices contained therein were made available to Responsible Agencies, public libraries, interested parties, and various County and City departments.

Comment 344: The public must be given more time to review this document.

Response 344: Public agencies and interested parties were afforded 132 days to review and comment on the Draft SEIR. State CEQA Guidelines, §15205(d), state that the normal review period is 45 days for EIRs submitted to the State Clearinghouse and that the review period should not be longer than 90 days, except in unusual circumstances (State CEQA Guidelines, §15097[c]).

Comment 345: The proponent has maliciously denied the local homeowners/organizations copies of this SEIR choosing instead to deliver them to such places a Westwood.

Response 345: In accordance with City EIR Preparation Manual, the Department of City Planning is responsible for the preparation and distribution of the Draft SEIR. In that regard, City Planning distributed copies of the Draft SEIR to the State Clearinghouse, Responsible Agencies, local cities, 62 City-recognized homeowner associations, and improvement associations.

In addition, 14 libraries received copies of both the County FEIR and Draft SEIR. Three of those libraries are located within the immediate area of the project site and include the City of Los Angeles Public Library, Granada Hills Branch; City of Los Angeles Public Library, Sylmar Branch; and the County of Los Angeles San Fernando Public Library. In addition, the Twelfth District Council office has two copies of the Draft SEIR for constituents' use.

It is assumed that the commenter is referencing the North Valley Coalition. That organization is not a recognized homeowner or improvement association in the City of Los Angeles at this time; therefore, the City did not include it on their existing mailing list for environmental document or notice distribution. However, several individual members of this organization are on the City's mailing list and have received all public notices for the proposed project.

Comment 346: It is also stated that several geologic assessments of the entire Sunshine Canyon area (owned by the project proponent) have been conducted including Robert Bean 1978; Geolabs 1981; The Earth Technology Corporation 1988; PRA Group 1982, 1989, 1991, and 1994. Why were these studies not included and where are they located?

Response 346: Baseline geological assessments (derived from the FEIR) have been incorporated by reference into the Draft SEIR. These assessments were made available to the public during the Draft SEIR comment period at the following locations: Regional Water Quality Control Board, Los Angeles Region (4), Planning Unit, 101 Centre Plaza Drive, Monterey Park, CA; County of Los Angeles Department of Health Services, Solid Waste Management Program, 2525 Corporate Place, Monterey Park, CA; City of Los Angeles, Department of Environmental Affairs, Local Enforcement Agency, 201 N. Figueroa Street, 2nd Floor, Los Angeles, CA; and City of Los Angeles Public Library, Granada Hills Branch, 10640 Petit Avenue, Granada Hills, CA 91344-6452.

Comment 347: The review of the referenced data alone would occupy the entire time allotted to review the entire SEIR. How can the working public be expected to review this document and the referenced documents in the time allowed?

Response 347: This comment is noted. Refer to Response 344 for a discussion of the length of the CEQA public review period for the Draft SEIR and the public's opportunity to comment.

Comment 348: Additionally, the referenced EIR does not reflect the actual proposals/mitigations implemented in the County to-date.

Response 348: It is unknown what the commenter is referencing with respect to "actual proposals/ mitigations." In reference to the Draft SEIR, the City determined in 1991 that updated background information was available and site-specific studies relevant to the proposed project (within the City's jurisdiction) were required. That information, combined with prior technical information included within the County FEIR, now comprises the Draft SEIR. The Draft SEIR provides specific information on how the City/County Landfill would be designed, engineered, constructed, operated, and monitored throughout its estimated 26-year site life and how closure and postclosure maintenance and monitoring would be conducted in accordance with regulatory standards and requirements.

With respect to the adopted County Landfill CUP, that document is included in the Draft SEIR, Volume II, Appendix C6.

Comment 349: There are changes in which BFI has sought County approval for modification due to cost, an inability to meet the goals as stated, new regulations, and new technology application. Why have these changes not been identified, the reasons, the approving agency and included?

Response 349: The City is unaware of the changes referenced by the commenter; however, any such changes to the operational County Landfill CUP would have to be approved and authorized by either local or regulatory agencies prior to development or implementation.

The City assumes that any changes relative to the original plans for the County Landfill were made on the basis of engineering refinements, not CUP revisions, and were subsequently submitted by the project proponent to agencies for review and approval. Changes to the County Landfill with respect to engineering design (e.g., structures, features, locations, etc.) generally reflect engineering aspects that have been modified. The County process for reviewing and approving such plans is ministerial, with certain permits required by various departments. A similar process is used in the City.

It should also be noted that even if some landfill plans have been reengineered, it appears that the basic concept of the approved County Landfill has remained consistent with the approved CUP. Furthermore, it is reported that the project proponent has not developed any onsite landfill design features or systems without the consent and authorization of the County.

With respect to the City/County Landfill, the Draft SEIR analyzes the development, operation, maintenance, and monitoring of a Class III nonhazardous solid waste landfill footprint located on ±194 acres within the City and ±42 acres within the County, as well

as its connection with the permitted and operational County Landfill and the existing inactive landfill within the City. Changes to the County Landfill (i.e., relocation of ancillary facilities, environmental protection and control systems, access roadway) relative to the proposed project were extensively analyzed in the Draft SEIR.

It should also be noted that the Draft SEIR, Section 2.5.4, Working Arrangement, p. 2-38, discusses the concept of requirement for some form of agreement between the City and County to authorize common power over the entire project site prior to or concurrent with City/County Landfill Project approval by the City. This type of agreement would recognize existing discretionary approvals, contractual agreements, or other arrangements approved by the County Board and regulatory agencies in connection with the approved County Landfill. It is anticipated that some amendments to the adopted County Landfill CUP will be required for this joint landfill development.

Comment 350: Many of the sections referenced did not address the public's requests for answers during the EIR process. Repeated attempts to have the proponent address the questions asked were ignored and lumped under a topical issue that did not address the questions asked. Further, the proponent frequently sidestepped impacts to the residents by saying that they were only reviewing the County side and that impacts to the City would be addressed later.

Response 350: With respect to comments received from the public during the NOP or scoping process, a matrix is provided in the Draft SEIR, Volume II, Appendix A10. That matrix identifies the commenter, the concern, and where the comment is addressed in the Draft SEIR. Comments received from the City's Environmental Study Advisory Committee (ESAC), Responsible Agencies, and regulatory agencies are also included in the Draft SEIR. Specific to ESAC, the Draft SEIR, Table 1.6-1, p. 1-7, lists the potential areas of impact or concerns that were noted by ESAC.

The Draft SEIR addresses those topical issues identified by the City through its public scoping, NOP process, and from requests by Responsible Agencies; therefore, it is clear that impacts associated with the proposed project are not being "sidestepped."

The project proponent is not the preparer of the Draft SEIR; however, BFI personnel were involved in providing technical information to the environmental consultant and City Planning with respect to the proposed project's development, operation, closure, and postclosure maintenance. Environmental document preparation is under the direct guidance and supervision of City Planning staff. Each database submitted to City Planning from the environmental consultant is independently reviewed and evaluated by an EIR Project Coordinator, a City Planner, if necessary the Head of the Environmental Review Section, and various departments in the City. The City, as Lead Agency, assumes the ultimate responsibility for the Draft SEIR and its content, including the topical sections addressed therein.

It should be noted that 19 separate topical sections were identified and analyzed within the Draft SEIR. The analysis presented in the Draft SEIR is consistent with the City's guidelines and procedures for EIR document preparation and State CEQA Guidelines.

As stated in the Draft SEIR, Section 1.5.1, Prior Environmental Record Pertaining to the Proposed City/County Project and Existing Inactive Landfill, pp. 1-3 and 1-4, the Draft SEIR provides new relevant information and updates existing background data contained in the certified County FEIR. The County FEIR is comprised of 14 volumes that were submitted for public and agency comment. These documents were available during the public review period for the Draft SEIR. Appendix C1 of the Draft SEIR lists the County FEIR volumes and the libraries where these documents were available for review. In addition, the certified County FEIR was deemed legally adequate by the courts. (Refer to the Draft SEIR, Appendix C3, Overview of Litigation Proceedings in Connection with the County Landfill.)

Comment 351: The entire portions of the documents referenced must be included in order for the public and the City agencies to properly assess the information provided.

Response 351: With respect to incorporation by reference, State CEQA Guidelines, §15150(b), states the following:

> ... (b) Where part of another document is incorporated by reference, such other document shall be made available to the public for inspection at a public place or public building. The EIR or Negative Declaration shall state where the incorporated documents will be available for inspection. At a minimum, the incorporated document shall be made available to the public in an office of the Lead Agency in the county offices or public libraries if the Lead Agency does not have an office in the county.

Fourteen public libraries were provided with complete copies of both the County FEIR and Draft SEIR, which included the Technical Appendices, Executive Summary, and Mitigation Monitoring Summary during the Draft SEIR's public review period.

The Draft SEIR, Volume II, Technical Appendices, Appendix A, chronicles the Initial Study and NOP process. Specifically, all comments received during the NOP were included in Appendix A7, Comments Received on Notice of Preparation/Initial Study; A10, Public Scoping Meeting List of Attendees, Speakers, and Comment Matrix (which includes a cross reference of specific comments to the Draft SEIR); and A14, Notice of Early Consultation (NOEC) Mailing List and Responses.

Additionally, refer to Response 342 for an additional discussion of incorporation by reference.

Comment 352: ENVIRONMENTAL IMPACT, Page 4-4
In paragraph 3, it states that: "Excess material from grading activities would be stockpiled and stored within areas of the City/County Landfill footprint, as shown in Figure 4.1-1, throughout project development, and in paragraph 4 it states that: "It is anticipated that stockpiling would initially occur in the County portion of Sunshine Canyon, within the northern canyon area. This area is normally being used as a stockpile area for County Landfill operations." Given the anticipated closure of County operations in favor of the City expansion in 2 -3 years, and given the contours drawn

over the northern canyon area, it appears that this canyon must be filled prior to the need for the stockpiled dirt in the City?

Response 352: The existing County Landfill operation would not close within 2 to 3 years. As stated in Section 1.2, Overview, p. 1-1, of the Draft SEIR:

> . . . Initially, the City and County landfill areas would be operated separately and provide an average daily capacity of 5,000 tons per day (tpd) in the City and 6,000 tpd in the County. However, within 18 to 24 months following the commencement of landfilling operations in the City, the City and County landfilling operations would be subsequently **combined** [emphasis added] into a single landfill operation and at one working face area.

Refer to Response 5 for a discussion of existing and anticipated soils stockpile areas. Sufficient acreage exists on the project site for stockpiling soils; no engineering design or operational problems are anticipated.

Comment 353: If this is so where will this and the already stockpiled County dirt be moved to?

Response 353: Soil stockpile material located in the north canyon area of Sunshine Canyon is used for cover material at the operational County Landfill. This material will continue to be used for the County Landfill and, when approved, the proposed project.

Comment 354: Has this potential moving of stockpiled dirt for a second or third occasion been addressed in the impacts to air quality?

Response 354: The air quality emissions associated with the long-term movement of existing and anticipated soils stockpile areas were incorporated into Section 4.2.8, Air Quality Operational Phase (Long-Term), Table 4.2-8. Emissions have been recalculated using the EMFAC7G model, and these results are included in Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, in this document.

Comment 355: The area shown on the City side and marked as "Anticipated Stock Pile Area" is on the western end of the berm in an area that is most exposed to the wind and in the closest proximity to the residents to the south. Given the fact that BFI has been unable to control dust in this area before (please refer to prior Zoning actions for testimony and pictures) and given the fact that they are unable to mitigate the air quality impacts they should not be permitted to utilize this area for any dump related activities.

Response 355: This information has been changed; a soils stockpile area is no longer being proposed at this location. Refer to Response 5 for a discussion of existing and anticipated soils stockpile areas.

Comment 356: It should also be noted that the existing landfill is closed and that final cover is required for this area.

Response 356: The existing landfill is currently defined as "inactive." The Final Closure and Postclosure Maintenance Plan (FCPMP) for the Sunshine Canyon Landfill was prepared by consulting engineers and submitted to the CIWMB, LARWQCB, and City LEA in November 1990 for their review. That document was subsequently revised and resubmitted to the same agencies in April 1991 (First Revision), April 1992 (Second Revision), November 1994 (Third Revision), and March 1997 (Fourth Revision) in response to comments received by these agencies. The final plan, along with its associated environmental documentation (i.e., Initial Study and Mitigated Negative Declaration) is currently pending approval by the City LEA and CIWMB.

In accordance with CCR, Title 27, §21090 and §21140, final cover material would be placed on the existing inactive City Landfill's top, side slopes, and bench areas. The proposed final cover will consist of a monolithic soil layer (an approved final cover design consisting of a 5-foot-thick, low-permeability soil layer rather than the prescriptive standard final cover design, which consists of a foundation soil layer and low-hydraulic conductivity soil layer). The proposed final cover will rely on evapotranspiration and unsaturated permeability to control water infiltration. The proposed final cover design will have a 1-foot-thick vegetation erosion control layer overlying the 5-foot-thick monolithic barrier comprised of cover soil. The FCPMP indicates that the proposed final cover will provide superior infiltration resistance compared to the prescriptive standard cover. This proposed alternative final cover system would be in compliance with CCR, Title 27, §21090, which states in part:

> The RWQCB can allow any alternative final cover design that it finds will continue to isolate the waste in the Unit from precipitation and irrigation waters at least as well as would a final cover built in accordance with applicable prescriptive standards . . .

Comment 357: **Lithologic Description, Page 4-12**
Figure 4.1-3 is said to represent the locations of monitoring wells and exploratory borings. Based on this map there are no monitoring wells located near the entrance of the landfill. Why not?

Response 357: As shown in the Draft SEIR, Figure 4.3-4, four groundwater monitoring wells are located near the landfill entrance (i.e., MW-1, MW-5, MW-6, and MW-7).

Comment 358: Figure 4.1-4 is reported to depict the geologic formations. Apparently, this figure was intended to be viewed in color as the following items under the legend are indistinguishable from each other. Contact, Mappable Bed within mappable unit, and Fault. Please provide a color map and/or one with legend items sufficiently different to discern the various geologic features.

Response 358: The legend on Figure 4.1-4, Site Geologic Map, presented in the Draft SEIR has been modified to better distinguish the represented geologic features. These modifications of the legend include bolder and/or larger dashed-line symbols for the "Geologic Contact" and "Fault" units. The "Mappable Bed within Mappable Unit" designation

was mistakenly included in the legend and has been removed. The revised Figure 4.1-4 is presented in Section 2.0, Revisions and/or Additions to Draft SEIR.

Comment 359: **Soils, Page 4-19**
The proponent states that: "Surficial soils are important for varying reasons. Soil characteristics have an impact of nearly all aspects of design and construction of the proposed project, ancillary facilities, and areas, in addition to the development of an erosion control and revegetation plan.." Why doesn't the proponent note that this can also have an effect on air quality?

Response 359: The Draft SEIR acknowledges that surficial soils will affect air quality. Regarding this issue, the Draft SEIR, Section 4.2.7, Site Preparation/Construction Sequencing, p. 4-62, states:

> Fugitive dust is defined as the discharge of particulate matter into the atmosphere from a nonpoint source. Fugitive dust is generated either by a mechanical disturbance to soil (i.e., associated with human activities such as grading operations or agricultural tilling) or by wind-related entrainment of dust particles. Site preparation, clearing, surface grading, and the use of heavy equipment and trucks on unpaved surfaces have the potential to generate significant quantities of dust during initial site preparation activities. The actual quantity of fugitive dust emissions generated during the construction phase will be governed by the type and amount of work being done, the soil type and moisture, and the prevailing wind conditions.

Comment 360: Given the depth of soils indicated in paragraph 2, how can the proponent compare and justify the use of TSP from Transit Mixed Concrete's proposed site in Soledad Canyon Road located 10 miles from Sunshine?

Response 360: Refer to Response 63 for a discussion of the use of 1995 AP-42 emission factors to calculate fugitive dust emissions.

Comment 361: **Onsite Landslides, Page 4-20**
It states that landslides are identified on Figure 4.1-4. It goes to state that in paragraph 3 that: "Another landslide is located southeast of the existing inactive landfill, south of the landfill entrance and adjacent to San Fernando Road." The section mentioned is not discernible on the figure. Why?

Response 361: The referenced landslide is located south of the proposed City/County Landfill footprint and would not impact project development. This landslide is not included on Figure 4.1-4; however, the landslide is discussed in Section 4.1.2, Geologic Hazards - Mudflow and Landslide, including Lithologic History, p. 4-20, of the Draft SEIR. It should be noted that this landslide did not undergo any significant seismically induced displacement as a result of either the 1971 San Fernando earthquake or the 1994 Northridge earthquake.

Comment 362: The proponent states that this landslide is not expected to impact proposed landfill development due to its distance from the footprint of the waste fill and drainage systems. Does this landslide pose any danger to any ancillary facilities? Could it possibly affect the County drainage system?

Response 362: Refer to Response 361. The referenced landslide would not result in any significant impacts to the proposed City/County Landfill footprint, environmental protection and control systems, or ancillary facilities. In addition, this landslide would not result in any significant impacts on the County Landfill operations or its environmental protection and control systems or ancillary facilities.

Comment 363: ENVIRONMENTAL IMPACT, Page 4-22
In paragraphs 3, 4, and 5 the proponent dismisses potential landslides either seismically or as a result of future operations. The proponent is not being candid.

Response 363: Environmental impacts associated with the potential seismically induced landslides are analyzed in the Draft SEIR. Specifically, the Draft SEIR, Section 4.1.4, Geologic Hazards - Seismicity, p. 4-63, indicates the following:

> Seismic activity occurring in the site vicinity can produce strong ground shaking, which could result in damage to the landfill waste containment system due to seismically induced displacement of the waste mass. Strong shaking can also induce landsliding in natural geologic materials that could, in turn, result in damage to the landfill containment and surface water control systems. Landfill containment systems are broadly defined in this respect to include the liner, cover, leachate collection and removal systems, and gas extraction system. Surface water drainage systems include drainage channels, down drains on slopes, and sedimentation/stormwater retention basins. Seismic design of the landfill system includes mitigation of landslide potential by appropriate grading of the waste mass and natural slopes, designing the containment system to resist the effects of strong shaking, providing an emergency response plan to mitigate damage to containment systems that may occur (e.g., cracking of pipes or drainage channels, loss of power), and providing redundant systems where damage is not readily observable or repairable (e.g., use of a composite liner system).

Comment 364: Why is it not discussed that the largest landslide during the 1971 San Fernando earthquake was on the northern edge of Caltrans land adjacent to the existing closed City landfill in the area that will undergo extensive grading?

Response 364: The City Landfill did not suffer any damage as a result of seismically induced landslides caused by the 1971 Sylmar earthquake. The landslide referenced by the commenter is located east of the proposed City/County Landfill and is separated from the proposed project by a perimeter ridgeline. No significant impacts on either the inactive City Landfill or the proposed landfill footprint would occur. In addition, this landslide will not affect proposed grading activities at the project site.

Comment 365: What about the collapsed ridge just south of the City/County line?

Response 365: Refer to Response 363 for a discussion of the removal of landslide materials. An old landslide is shown on the Geologic Map (Figure 4.1-4 of the Draft SEIR), which spans the City/County boundary. This landslide is currently in a stable configuration due to the previous grading activities that removed material from the head of the landslide for development of the County Landfill. Grading activities for the proposed project will initially stabilize the landslide and subsequently remove it. Any other localized landslides occurring within the areas designated for the landfill or its ancillary facilities that are encountered during project development will be removed by grading. Those areas graded for the landfill footprint will be lined in preparation for waste placement. The placement of waste would also act as a stabilizing force.

The Draft SEIR discusses existing landslide locations near the City/County boundary. Specifically, Section 4.1.2, Geologic Hazards-Mudflow and Landslide, including Lithologic History, p. 4-23, states:

> Landslide deposits are relatively scarce at the project site within the City. One large landslide deposit was mapped in the area of the City/County boundary. This deposit was studied by geologists in 1992 and 1996. The long axis of the landslide trends approximately southeasterly, and the maximum depth of the slide in that location ranges from approximately 40 to 70 feet. The landslide is a bedding plane block slide with movement along the bedding planes. The slide plane of this landslide is relatively shallow and will be excavated from the top down and completely removed. Construction that would occur within the landslide area would involve excavating the affected soils and ensuring that there are no resulting impacts to slope stability. Excavation would be conducted from the top of the landslide area with heavy equipment, including dozers and scrapers, working in a successive horizontal pattern and terracing down to the lowest extent of the landslide area. This construction methodology ensures the stability of the landslide during removal. No significant operational or worker safety impacts are expected, and no significant impacts on earth resources are anticipated as a result of removing this landslide.

Comment 366: What about the collapsed southeastern end of the berm during the 1994 Northridge earthquake?

Response 366: It is not clear what collapsed berm the commenter is referring to. No berm area in the project site was affected by the 1994 Northridge earthquake, and the toe berm for the County Landfill was unaffected by this earthquake.

The Draft SEIR includes a discussion of the performance of the existing inactive City Landfill during the January 17, 1994, Northridge earthquake. Specifically, Section 4.1.4, Geologic Hazards - Seismicity, p. 4-39, states:

> The Northridge earthquake produced no significant adverse impacts within the project site. No cracking or deformation in the waste mass was found at the

base of the existing inactive landfill by consulting geotechnical engineers or the University of California at Berkeley's reconnaissance team. The minor cracking observed was limited to the landfill's surface cover area, and no waste was exposed. This cracking was repaired immediately by placing additional cover material over the cracks. Similarly, no significant seismically induced displacement was observed in the natural slopes surrounding the existing inactive landfill.

Comment 367: What about the extensive mud slides at the entrance that washed over San Fernando Road during extremely wet period in circa 1996?

Response 367: The project proponent is not aware of any mudslides occurring at the landfill entrance resulting from the 1996 storms or any other cause. With respect to water flowing across San Fernando Road, which has occurred, BFI constructed drainage improvements near its property boundary in 1996, which are part of the landfill entrance improvements developed in connection with the now operational County Landfill.

Currently, surface water flow from the project site (including the main canyon and four tributary canyons) converges at the mouth of Sunshine Canyon near the landfill entrance. Surface water runoff from precipitation, flow from tributary channels, and erosion caused by these flows converge at the canyon's mouth. Currently, surface water from within the upper reaches of Sunshine Canyon is collected in the County Landfill sedimentation basin. Drainage from this basin travels southerly into a wash before reaching the mouth of the canyon near the landfill entrance. From that point, the surface water from the project site flows offsite underneath San Fernando Road into an 8-foot-wide box culvert that is maintained by the City BOE. The culvert is approximately 120 feet long and releases surface water into the Weldon Canyon Flood Control Channel, which is located directly east of the site entrance across San Fernando Road.

Comment 368: Why is there no discussion of the problems with sliding when a water tank and the City incinerator were being constructed on the southwestern end of the berm area? Why aren't these things documented and placed on a map?

Response 368: Refer to Responses 361 and 362. The referenced landslide is located south of the proposed project's landfill footprint and would not result in any significant impacts on that footprint or the proposed environmental protection and control systems or ancillary facilities. No damage to the existing inactive City Landfill's ancillary facilities has ever occurred as a result of seismically induced landslides from major earthquakes.

Comment 369: Given that at various Zoning hearings the proponent has always claimed that land movement problems were unanticipated and that varied and sometimes extensive earthmoving activities were required to correct. If this is true how can the proponent just summarily dismiss landslides?

Response 369: Extensive geologic mapping has been conducted at the project site. This mapping, presented in the Draft SEIR, Figure 4.1.4, Site Geologic Map, has significantly updated

the available geologic information with respect to landslides. While there is extensive landsliding in the County portion of Sunshine Canyon, existing landforms in the City portion of the project site are relatively stable as shown on the geologic map. Therefore, as discussed in the Draft SEIR and in Responses 363 through 365, landsliding will not pose a significant impact on the development of the proposed project with the incorporation of the mitigation measures. Those measures are identified in the Draft SEIR, Section 4.1, Earth Resources, pp. 4-23 and 4-24.

Regarding the Draft SEIR, the importance of onsite landslides or earth movement in Sunshine Canyon has not been dismissed as a subject matter by the City. Specific to that issue, the Draft SEIR, Section 4.1, Earth Resources, pp. 4-3 through 4-44, includes an entire discussion of grading activities and geologic hazards, including landslides and slope stability. Moreover, the City BOE has independently reviewed and evaluated this section of the Draft SEIR and concurs with its methodology, analysis, and treatment of potential impact.

For an additional discussion of potential seismically induced landslides, refer to Response 363 in this document.

Comment 370: **Figure 4.1-5, Page 4-26**
In describing the Santa Susana Fault on page 4-31 the proponent states that the shortest distance between the ground surface at the project site and the fault itself is 3.1 miles. How is this possible since the entrance to the landfill and the I-5 where the fault crosses (Balboa Boulevard) is less than 1.0 mile?

Response 370: The site-to-source distance is measured orthogonally from a mapped fault to the ground surface of the project site. Orthogonal means at right angles or lying at right angles.

Comment 371: CUMULATIVE IMPACTS, Page 4-23
Again the proponent does not even attempt to address the problems. As stated above the proponent is not candid and seeks only to promote the project.

Response 371: The Draft SEIR is authored by City Planning staff, not the project proponent; the City BOE reviewed this particular technical section of the Draft SEIR and concurred with the methodology, technical analysis, and mitigation measures.

With respect to the issues of mudflow and landslides, the Draft SEIR, Section 4.1.2, Geologic Hazards, p. 4-23, states:

> No cumulative impacts are anticipated as a result of project development in conjunction with related projects. Any mudflow or landslide-related impacts would be unlikely to impact offsite-related projects or local conditions due to favorable geologic conditions, construction and engineering mitigation measures, and onsite stormwater diversion and control facilities. The development of related projects in the regional area could increase the risk of mudflow and landslide impacts. However, mudflow or landslide impacts

resulting from related projects are not likely to adversely affect the proposed project.

Comment 372: ENVIRONMENTAL IMPACT, Page 4-32
Regulatory Background
A number of paragraphs discuss State and Federal regulations that address seismic design criteria. Appendix C-15 contains a Static and Seismic Stability Assessment, Proposed Phase II Construction, Sunshine Canyon Landfill Extension, dated November 1996. Exhibit (WH-6), letter from Leslie F. Harder, Jr., Chief, Division of Engineering, Department of Water Resources dated July 21, 1997 to Mr. Rodney Nelson, Chief of Landfills Unit, California Regional Water Quality Control Board should be included as it points out deficiencies in this report. Why hasn't the proponent included this material?

Response 372: The static and seismic stability assessment for Phase II construction for the County Landfill was verbally approved by the LARWQCB in November 1997.

Comment 373: CUMULATIVE IMPACT, Page 4-44
Again the proponent does not even attempt to address the problems. As stated above the proponent is not candid and seeks only to promote the project. See response to Environmental Impact, 4-22.

Response 373: The City BOE reviewed this subsection of the Draft SEIR and concurred with the methodology, technical analysis, and mitigation measures presented therein. Regarding the potential for cumulative geologic hazards related to slope stability, the Draft SEIR, Section 4.1.6, Geologic Hazards - Slope Stability, p. 4-44 states:

> No cumulative impacts are anticipated as a result of project development. Any slope stability impacts would occur onsite and would not impact related or local area projects. The landfill would be designed and operated utilizing state-of-the-art engineering practices to minimize potential slope failures. Offsite related or local area projects would not impact the proposed landfill operation.

In addition, the project site is topographically isolated by surrounding perimeter ridgelines. No cumulative impacts related to slope stability are anticipated to result from project development.

Comment 374: **General Comments and Observations, 4.1 Earth Resources, Pages 4-3 thru 4-44**
Given sections 4.1.3, Geologic Hazards - Subsidence and 4.1.4, Geologic Hazards - Seismicity, the following Exhibit (WH-8), U.S. Geological Survey Open-File Report 96-517 should also be included. Why wasn't this kind of information included?

Response 374: The referenced report, *Damage and Restoration of Geodetic Infrastructure Caused by the 1994 Northridge, California, Earthquake*, contains similar geologic information regarding the Northridge earthquake as other reports prepared by the U.S. Geological Survey that were reviewed and incorporated into the Draft SEIR (refer to Section 10.0, Bibliography). Extensive geologic field investigations and geologic mapping provide

significantly greater site-specific information than that of regional geological reports. The results of site-specific geologic investigations and mapping are presented in the Draft SEIR, Section 4.1.4, Geologic Hazards - Seismicity. All pertinent data, both from regional reports and site-specific investigations, were considered in site design and development.

Comment 375: Does the subsidence and/or elevation as described in this report affect the landfill and the area immediately surrounding it?

Response 375: Refer to Response 374.

For an additional discussion of landfill-engineered slopes, refer to the Draft SEIR, Section 4.1.6, Geologic Hazards - Slope Stability, pp. 4-43 and 4-44.

Comment 376: Is there a possibility groundwater could be altered, drainage problems develop or leachate collection be affected in any way?

Response 376: Refer to Response 374.

For an additional discussion of surface water control measures, groundwater, and engineering design and control measures for the collection and treatment of leachate, refer to Topical Issues 5, 6, and 9, respectively.

Comment 377: 4.2 AIR QUALITY

FEIR Documentation, Page 4-45
According to the proponent: "The following list references specific volumes, sections, and page numbers of the certified FEIR and its incorporated technical documentation that provide background information and technical analyses relevant to the topical issue of air quality. Development of the proposed project, including the additional +/-42 acres located in County jurisdiction, has been previously addressed within the context of this certified FEIR. Any new potential air quality impacts associated with the proposed project and the relocation of ancillary facilities and environmental protection and control systems onto City lands will be addressed in the Draft SEIR."

It goes on to cite numerous volumes, Sections, Appendixes, Topical Issues, and goes on to give a summary in Appendix C1. Why was this material not included?

Response 377: Refer to Response 342 for a discussion of the availability of the County FEIR and Draft SEIR and Technical Appendices during the Draft SEIR public review period.

Comment 378: This material should have been included as a part of the SEIR since it is impossible for the public to determine the difference between old and "new potential impacts".

Response 378: Refer to Response 348 for a discussion of County FEIR background technical studies/analyses incorporated into the Draft SEIR.

Comment 379: Have the reviewing agencies been provided this documentation, if not have they reviewed the referenced material in order to determine whether or not there are any new potential impacts between County FEIR and City SIER?

Response 379: Refer to Response 343.

Comment 380: The public must be given more time to review this document.

Response 380: Refer to Response 344 for a discussion of the length of the CEQA public review period for the Draft SEIR and the public's opportunity to comment.

Comment 381: The proponent has maliciously denied the local homeowners organizations/associations copies of this SEIR, choosing instead to deliver them to such places as Westwood.

Response 381: With respect to document distribution, refer to Response 345.

Comment 382: Additionally, there other related documents incorporated by reference that are supposedly available for review:- Report of Waste Discharge Proposed Sunshine Canyon Extension Site, Report of Disposal Site Information Volumes I, II, and Addendum 1, Final Closure Plan for Sunshine Canyon, Addendum to the Final Closure and Post Closure Maintenance Plans for Sunshine Canyon City Landfill in such diverse sites as Monterey Park and Los Angeles.

Response 382: Copies of all documents that comprise the County FEIR (including technical documents) for the County Landfill Extension are located in the Los Angeles Public Library, Granada Hills Branch. That library is located at 10640 Petit Avenue in the community of Granada Hills, which is the closest library to the commenter.

Comment 383: How can the working public be expected to research the documents referenced which are only located in libraries or remote sites over 25 miles away? Saturday is the only real chance for the working public to review but how are so many people suppose to share the single copy of the FIER located at each library given the time frame allotted?

Response 383: Refer to Response 382. Of the 14 libraries that received the County FEIR and Draft SEIR, four libraries are located less than 10 miles from the project site and include the City of Los Angeles Granada Hills, Porter Ranch, and Sylmar branches, and the County of Los Angeles San Fernando Public Library. One copy of the Draft SEIR and a complete set of the volumes that comprise the County FEIR were provided to each of these libraries (as well as 10 other public libraries). Sections of interest to the reader may also be copied at these locations. In addition, the public was afforded 132 days to review and comment on the Draft SEIR. These documents were also available for purchase through the City Planning Department.

The hours of operation for the closest library (i.e., Granada Hills Branch) to the commenter are:

Monday 10:00 a.m. - 5:30 p.m.

Tuesday	12:30 p.m. - 8:00 p.m.
Wednesday	12:30 p.m. - 5:30 p.m.
Thursday	12:30 p.m. - 8:00 p.m.
Friday	12:00 p.m. - 5:30 p.m.
Saturday	10:00 a.m. - 5:30 p.m.
Sunday	Closed

As noted, this library would be convenient for those individuals who work during the day and live in Granada Hills because the library is open until 8:00 p.m. on Tuesdays and Thursdays, and it is also open during the day on Saturday.

Comment 384: Are the Department of Health Services or the Planning Department for the City of Los Angeles even open on a Saturday?

Response 384: These public departments are closed on Saturdays; however, they maintain extended hours during the week (i.e., 7:00 a.m. to 6:00 p.m.).

Comment 385: The review of this referenced data alone would occupy the entire time allotted to review the entire SEIR.

Response 385: Refer to Response 344 for a discussion of the length of the CEQA public review period for the Draft SEIR and the public's opportunity to comment.

Comment 386: Additionally, the referenced EIR does not reflect the actual proposals/mitigations implemented in the County to-date.

Response 386: It is unclear what the commenter is referencing in regard to "actual proposals/ mitigations." No information or examples of "proposals/mitigations" have been provided to the City by the commenter.

Comment 387: There are changes in which BFI has sought County approval for modification due to cost, an inability to meet the goals as stated, new regulations, and new technology application. Why have these changes not been identified, the reasons, and the approving agency and included?

Response 387: Refer to Response 349 for a discussion of engineering design/operational modifications that have occurred at the County Landfill subsequent to County CUP approval.

Comment 388: Many of the sections referenced did not address the public's request for answers during the EIR process. Repeated attempts to have the proponent address residents concerns were ignored and lumped under a topical issue that did not address the questions asked. Further, the proponent frequently sidestepped impacts to the residents by saying that the they were only reviewing the County side and that impacts to the City would be addressed later.

Response 388: This comment is a repeat of Comment 350 and has been responded to (refer to Response 350).

Comment 389: The entire portions of the documents referenced must be included in order for the public and the City agencies to properly assess the information provided.

Response 389: Refer to Response 342 for a discussion of the availability of the County FEIR and Draft SEIR and Technical Appendices during the Draft SEIR public review period.

Comment 390: **Environmental Setting, Page 4-45**
4.2.1 Existing Conditions & 4.2.2 California's SCAB Regional Climatic Characteristics
Under the Existing Conditions section the reader is lead to believe that site-specific information is about to follow, however, the information presented is only a broad description of the South Coast Air Basin.

Response 390: Refer to Topical Issue 3 for a discussion of wind conditions at the project site.

Comment 391: The next section 4.2.2, California's SCAB Regional Climatic Characteristics under the headings of Climate, Precipitation, and Humidity - the reader is again given only generalities, not site-specific information.

Response 391: Refer to Topical Issue 3 for a discussion of wind conditions at the project site.

Comment 392: Under the heading Temperature, on page 4-46, the reader is informed that a SCAQMD monitoring station located at 24875 San Fernando Road in Newhall may generally be consider to be representative of the project area.

Response 392: As noted in the Draft SEIR, temperature fluctuations within any given area do occur. This monitoring station (Newhall) is the closest station to the project site. Temperatures used in the Draft SEIR are from published data prepared by the SCAQMD. The inclusion of regional temperatures is for reader information only; this information is not used in the air quality analysis.

Comment 393: What other monitoring stations were considered and why were they considered not representative?

Response 393: The Burbank and Van Nuys monitoring stations were considered; however, these stations are farther from the project site than the Newhall monitoring station.

Comment 394: When the topic of Wind on page 4-47 is discussed, site-specific information is now included in the form of figure 4.4.2, Windrose for the Sunshine Canyon Landfill. The proponent again returns to SCAB generalities under the headings of Cloudiness, and Inversions.

Response 394: The section referenced by the commenter describes general environmental conditions for the SCAB including the project site. With respect to Section 4.2.2, California's SCAB Regional Climatic Characteristics, the topic of cloudiness and inversion is provided for general information. Refer to Topical Issue 3 for a discussion of wind conditions at the project site.

Comment 395: What are the site-specific characteristics of this project under the headings presented?

Response 395: Site-specific wind pattern characteristics are included in the Draft SEIR, Section 4.2, Air Quality, p. 4-47, and Appendix B8. Also, refer to Response 394.

Comment 396: What are the impacts of these weather conditions to the proposed project and to the public health?

Response 396: Refer to Response 392. In addition, refer to Response 316 for a discussion of the potential for the proposed City/County Landfill to cause acute or chronic health risks to residents in the community of Granada Hills.

Comment 397: While the topic of Wind on page 4-47 deals in generalities it discusses wind on-site measurements as having an overall averaged wind speed of 9.9 mph with a maximum 1-hour measurement of 45 mph. It goes on to state that it does not preclude the presence of very high wind speeds. Why has this database of readings been included at this point?

Response 397: Refer to Topical Issue 3 for a discussion of wind conditions at the project site.

Comment 398: What high wind speeds have been recorded at the landfill both City and County?

Response 398: Refer to Response 400.

Comment 399: The Windrose and anemometer readings included in Appendix B8 are for Site 1. There are at least two other sites. Where is Site 1 located?

Response 399: Refer to Response 400.

Comment 400: Why has the wind speed data that has already been gathered on-site during the operation of the old City landfill and the currently operating County landfill not been provided?

Response 400: There are three locations at the at the project site where anemometers have been placed in order to record wind directions, speeds, and windroses. Site 1 is located at the southern toe area of the existing inactive City Landfill. Wind directions, speeds, and windroses have been continuously recorded at this location since 1986. In addition, anemometers have been added in the County near the City/County line. One of these anemometers is located at the County Landfill environmental control center (Site 2). The other anemometer is located near the northeast ridgeline area (Site 3). Both of these anemometers were installed at these locations in 1997.

Wind directions, speeds, and windroses recorded at the project site are included in the Draft SEIR, Appendix B8, Air Quality Modeling and Wind Speed and Direction Summary. Additional wind data have been included in this document as Appendix D4, Revisions to Draft SEIR, Appendix B8, Air Quality Modeling and Wind Speed and Direction Summary, to show wind directions, speeds, and windroses recorded for the

last year of the previous City Landfill operation (1991) and the subsequent year (1992). Wind data from 1997 are included for comparison.

Refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Comment 401: During past operations on the City side of the landfill, the South Coast Air Quality Management District inspectors observed the anemometer located there to be holding steady at 100 mph with gusts estimated at 125 mph. As recently as 10/13/97 the Daily Activity Log Sheet for the County landfill and signed by Ken Murray, County Inspector, records winds of 50 - 60 miles per hour.

Response 401: Refer to Response 400.

Comment 402: Santa Ana conditions are said to average 5 -10 occurrences per year. What parameters establish them as Santa Ana's?

Response 402: Refer to Topical Issue 3 for a discussion of wind conditions at the project site.

Comment 403: What speeds and durations were recorded at both city/county landfills?

Response 403: Refer to Response 400.

Comment 404: **4.2.3 Criteria Air Pollutants, Page 4-51**
The definitions of Carbon Monoxide, Reactive Organic Gases, et cetera are taken from what source?

Response 404: As indicated on p. 4-51 of the Draft SEIR, the definitions provided are from the *SCAQMD CEQA Air Quality Handbook*, April 1993.

Comment 405: **4.2.4 Ambient Air Quality Standards and Annual Statistics, Page 4-53**
The proponent merely seeks to advance his own project and does not attempt to provide information for the public or the agencies to evaluated the impacts.

Response 405: The information included in the Draft SEIR is based on and prepared in accordance with the *SCAQMD CEQA Air Quality Handbook.*

With respect to the page noted by the commenter, the discussion relates to existing air quality and federal and State standards, and this information was obtained from the CARB.

Comment 406: When information is presented which does not advance or support the proponents position explanations are included which minimize the impacts, for example: Under the heading Existing Air Quality, on page 4-53 after referencing the SCAQMD monitoring

station located at 24875 San Fernando Road in Newhall and Table 4.4-2 the proponent explains in the last sentence that the larger particles are filtered out by the respiratory system and pose more of a nuisance than a health threat. What studies is this assumption based on?

Response 406: These data are inferred from the definition of PM_{10} (i.e., greater than 10 microns or 0.0004 inch in diameter). The health effects of PM_{10} emissions are further discussed in Response 254.

Comment 407: The proponent goes on talk about (PM_{10}) but other than explaining possible sources does not address the health impacts as they did for the larger particles. Why?

Response 407: The health effects of PM_{10} are discussed in the Draft SEIR, Section 4.2.3, Criteria Air Pollutants, p. 4-52, under the subheading "Particulates."

Comment 408: On page 4-55 the proponent in the last sentence before 4.2.5 states that the data in Table 4.2-2 suggests that the air quality problems in the study area are mainly due to the transport of pollutants into the area from upwind sources. What was this determination based on and who made it?

Response 408: The determination in the Draft SEIR is based on the fact that while ozone levels continually exceed air quality standards, local CO levels do not. Ozone is produced from the secondary reaction of NO_x and ROG in the presence of sunlight. These reactions occur over time as emissions are transported downwind. If high pollutant concentrations are produced locally in an area, one would expect to see augmented concentrations of CO because this contaminant is released directly into the atmosphere and it tends to stagnate in place.

Comment 409: Does the SCAQMD agree with this assessment?

Response 409: Yes, the SCAQMD documents the transport of pollutants from upwind sources in its publication *Air Quality Trends* (SCAQMD, August 1991). With respect to SCAQMD's complete assessment of the Draft SEIR, refer to SCAQMD's comment letter (Letter 3.4-4 in this document). It should be noted that transportation of pollutants from upwind sources was a not a concern of SCAQMD.

Comment 410: If the project area is "(v)ery sensitive to additional O_3 precursor and particulate pollutant . . ." as the proponent suggests and given the fact that landfills are the largest stationary source of pollutants, what impact will this project have on the Santa Clarita Valley since winds blow both directions?

Response 410: Landfills are not the largest stationary source of pollutants. Actual landfill operations produce fewer pollutants than a large factory, utility substation, or refinery. While ozone precursors (i.e., NO_x and ROG) are produced at the landfill, the greatest amount of these pollutants is created from the trucks that deliver refuse to the site. Even with the most aggressive recycling efforts, truck trips to bring waste to the landfill are unavoidable. To the extent the length of the trip is as short as possible, truck emissions

will be minimized. Also, these emissions are spread over thousands of miles throughout the SCAB. With regard to onsite NO_x and ROG emissions, it may take several hours before the NO_x and ROG released at the site undergo photochemical reaction to become ozone. By this time, these emissions have dispersed over a vast area downwind from their point of origin. With regard to particulate emissions, most "fall out" of the air relatively close to the point of release. Some of the finer material (i.e., PM_{10}) is dispersed to greater distances.

Comment 411: Does the SCAQMD have to consider those impacts and if not why?

Response 411: In regard to the Draft SEIR, all information, including the potential impacts that the proposed project would have on air quality, was reviewed by the SCAQMD. The SCAQMD does consider regional impacts on the SCAB in the development of ambient air quality standards and emission thresholds. Refer to Letter 3.4-4 in this document with respect to SCAQMD comments on the Draft SEIR.

Comment 412: What are the impacts to residents of the San Fernando Valley in the area immediately surrounding the landfill given that the Federal standards have been revised and that additional studies such as those exhibits attached are now available?

Response 412: Refer to Responses 254, 255 and 256 for a discussion of the inhalation of particulate matter, NO_x, and CO and potential health implications. In addition, refer to Response 316 for a discussion of the potential for the proposed City/County Landfill to cause acute or chronic health risks to residents in the community of Granada Hills.

Comment 413: The attached Consumer Report excerpt page 36, 37, & 38 and dated August 1997 (Exhibit WH-1) states that: "Scientists have detected a sizable and reliable connection between dirty air and health problems in dozens of communities large and small, old and new, in every type of climate, throughout North America." It further goes on to state that: "So consistent is the association that epidemiologists can even estimate the annual U.S. toll from air pollution-about 50,000 deaths from heart disease, asthma, stroke, bronchitis, and the like."

Response 413: Refer to Response 412.

Comment 414: On page 37, column I of the article, it states that: "Two significant contributors to these effects are ozone and particulate matter (emphasis added). Under ozone it states that many studies have found harmful consequences. "Children at a Connecticut asthma camp were 40 percent more likely to have an acute asthma attack on high ozone summer days than on average days." "The first results of an ongoing 10-year study of southern California school children has found a direct correlation between school absences and lifetime exposure to ozone." "Studies in major U.S. cities show that daily mortality rates increase along with ozone, even if the ozone is below current legal limits".
Under Particulates in column 2 the article says that: "A few weeks ago, researchers reported that infant mortality in the most polluted communities is 25 percent higher than in the cleanest ones. "A study of 13,000 children in 24 North American communities

found that youngsters in the community with the worst fine-particle pollution had 65 percent more bronchitis than those in the cleanest community." "The most striking evidenced comes for the so-called Six City study, in which researchers from Harvard and Brigham Young universities followed more than 8000 adults for an average of 15 years, comparing their health to local fine-particle counts." The results revealed that the city with the most small-article pollution, had 25 percent higher mortality rate (emphasis added) than residents of the cleanest city. The study was repeated using 500,000 adults in 151 communities and similar results were obtained.

Another article that bolsters this information is a story in the Daily News, dated Thursday, November 20, 1997 in which a study paid for by the AQMD tied daily air pollution measurements to patient admissions at Kaiser Permanente hospitals including Woodland Hills and Panorama City (Exhibit WH-2). "This is the first study of its kind conducted in the (Los Angeles) Basin and shows that the region's air pollution continues to be a leading public health concern," said Shankar Prasad, health effects officer for the South Coast Air Quality Management District. The Kaiser study matched ozone levels and particulate emissions throughout 1995 with Kaiser records covering 1.6 million patients. For every 10-microgram increase in the concentration of particulates, hospital admissions rose an average of 7 percent for chronic respiratory illnesses, 3 percent for cardiovascular disease and 3.5 percent for acute respiratory illnesses. Ozone had a similarly hazardous effect. During the study, when ozone concentrations in the air rose by 10 parts per billion, an average of 2.7 percent more people with chronic respiratory problems, 5.7 percent more cardiovascular disease suffers and 1.5 percent more people with acute respiratory disease check themselves into the hospital. Additional excerpts of articles dealing with the harmful effects of emissions and PM_{10} are also included (Los Angeles Times, Sunday, November 23, 1997 - Exhibit WH-3), Coalition for Clean Air, Spring 1997-Exhibit WH-4), The Amicus Journal, Summer 1997 - Exhibit WH-5).

Response 414: With reference to the Kaiser Study, that study confirms that exposure to elevated PM_{10} levels is unhealthful. The Kaiser Study includes exposure to combined fine and coarse particulates and does not distinguish whether the increased hospital admissions are due to fine or coarse particulate inhalation. Refer to Response 254 for a discussion of the inhalation of particulate matter and potential health implications.

Comment 415: Residents have called on numerous occasions in the past for health studies to be performed. It has been stated by residents at past Zoning hearings and in response to the EIR that cancer clusters exist in the Granada Hills neighborhood nearest the landfill. An informal health survey was provided that showed that residents in this area suffered twice the national average of upper respiratory distress.

Response 415: Refer to Responses 183 and 184 for a discussion of human health surveys.

Comment 416: BFI denied the voracity of this information and later failed to provide the health study as ordered by the Zoning Board and Board of Zoning Appeals. BFI has refused to comply with this and other conditions imposed on them by claiming that the City did

not have the right to make them do anything since the Variance had expired. See Exhibit (WH-7), Second Draft, Hearings and Conditions, September 1991.

Response 416: Refer to Responses 183 and 184 for a discussion of human health surveys. In addition, refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 417: How can a proponent with these past failures to comply with City Zoning be trusted or granted another approval when the health and welfare of residents are at risk?

Response 417: Refer to Responses 183 and 184 for a discussion of human health surveys. In addition, refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 418: How can the City even consider this project without adequate health studies?

Response 418: Refer to Responses 183 and 184 for a discussion of human health surveys.

Comment 419: **Fugitive Dust Emissions, Page 4-62**
In the second sentence of this section it is states that AP-42, Compilation of Air Pollutant Emission Factors (USEPA, 1985) is used to derive a factor of 110 pounds of total suspended particulate matter (TSP) per day, per acre graded. It goes on to state that this value is based on a medium level of activity, silt content of about 30 percent, and a semiarid climate. The following statement is not understood. "Test data used to derive the specified value are not sufficient to derive the specific dependence of dust emissions on correction parameters and for the purposes of this analysis, none have been applied".

Response 419: Refer to Response 63 for a discussion of the use of 1995 AP-42 emission factors to calculate fugitive dust emissions.

Comment 420: Is the proponent saying that the proposed expansion site does not meet these criteria? Please explain?

Response 420: Refer to Response 63 for a discussion of the use of 1995 AP-42 emission factors to calculate fugitive dust emissions.

Comment 421: What test data is being referred to and why was it not included?

Response 421: Refer to Response 63 for a discussion of the use of 1995 AP-42 emission factors to calculate fugitive dust emissions.

Comment 422: In the third sentence it refers to tests conducted by Transit Mixed Concrete at their proposed site in Soledad Canyon Road located 10 miles away producing a TSP of only 28.6 percent as opposed to the 45 percent in AP-42. In sentence four, the proponent switches to a new calculation for PM_{10} based on this information. Why wasn't

documentation included to support why this data more accurately reflects conditions at the landfill site?

Response 422: Refer to Response 63 for a discussion of the use of 1995 AP-42 emission factors to calculate fugitive dust emissions.

Comment 423: Does the SCAQMD agree with this assessment?

Response 423: Refer to Response 63 for a discussion of the use of 1995 AP-42 emission factors to calculate fugitive dust emissions.

Comment 424: How does the overall makeup of the soil and geology compare to each other?

Response 424: Refer to Response 63 for a discussion of the use of 1995 AP-42 emission factors to calculate fugitive dust emissions.

Comment 425: Based on this misapplication of data, Table 4.2-6 on page 4-63 is understated by at least 17 percent.

Response 425: Refer to Response 63 for a discussion of the use of 1995 AP-42 emission factors to calculate fugitive dust emissions.

Comment 426: The preparer states that "Construction work at the proposed landfill footprint would disturb a relatively small area (estimated not to exceed 40 acres at any given time). In accordance with information provided by the project proponent, actual excavation operations would be further restricted to an even smaller area not expected to exceed about 10 acres per day of the 40 acre footprint." Forty acres or even 10 acres is not a "relatively small area" when located in the wind tunnel that is the Newhall-Saugus Pass. Given the terrain and the existing weather conditions it is not possible to mitigate the dust.

Response 426: The Draft SEIR, Section 2.10.4, Spreading and Compacting Daily Cover on Refuse, p. 2-75, provides the following description of working face areas:

> . . . The working face areas located in the City and County during the first 18 to 24 months would encompass approximately 3 to 5 acres. Thereafter, combined landfilling at one working face area would consist of landfilling operations occurring on approximately 10 acres.

Refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Comment 427: Past zoning actions and the EIR for the County expansion contain documentation and pictures of dust produced in the City landfill (now closed) of dust being visible for 10.4 miles away, of dust blowing from berms and hillsides, of water from watering trucks being blown into the air without ever touching the ground. What guarantees are in place to insure that all surfaces once disturbed during construction and to the completion of construction are properly sealed and/or watered given the steep nature of the terrain and the ferocious winds?

Response 427: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation. In addition, refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Comment 428: Please explain how the proponent can mitigate dust when they have been unable to revegetate the closed City landfill or even the cut slopes on the County landfill?

Response 428: The project proponent currently takes numerous measures to control fugitive dust emissions at the existing inactive City Landfill and the County Landfill. Refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Comment 429: Please explain how water trucks will gain access to cut slopes?

Response 429: Water trucks do not need to gain access to cut slopes; instead, these areas are hydromulched and hydroseeded (by spray equipment) to provide for interim revegetation.

Comment 430: In the last sentence on this page the preparer accepts that the USEPA, AP-42 estimates that regular watering may (emphasis added) reduce fugitive dust emissions by as much as 50 percent. Here it suits their purposes to accept a rate that as stated before will exceed their ability to attain. What permits the preparer to accept or reject parts of such documents as the AP-42 at will to minimize or promote this project?

Response 430: A 50-percent control efficiency is within the realm of the proposed mitigation measure and in all probability underestimates the actual control efficiency. For example, the *SCAQMD CEQA Air Quality Handbook* estimates that site watering will attain a control efficiency of up to 68 percent; soil stabilizers are estimated to attain a control efficiency of up to 65 percent (and manufacturers' data have shown efficiencies of 95 percent). The SCAQMD readily accepts a 50-percent control efficiency as being attainable for construction and similar projects.

Comment 431: Do the reviewing agencies concur with this approach?

Response 431: Yes, the SCAQMD concurs with this approach.

Comment 432: The PM_{10} emissions given on page 4-63, Table 4.2-6 are totally understated based on BFI's selection/manipulation of data parameters.

Response 432: Refer to Response 63 for a discussion of the use of 1995 AP-42 emission factors to calculate fugitive dust emissions.

Comment 433: Table 4.2-5, Construction Emissions for Initial Site Preparation is not correct. The proponent fails to state the cumulative impacts because the landfill will continue to take trash even while the City side is being constructed. Trash will also be accepted on the City side once the most basic City infrastructure/construction has been attained.

Response 433: Refer to Response 107 for a discussion of the inclusion of the County Landfill as a related project. In addition, refer to Response 108 for a discussion of the methodology used in the Draft SEIR for determining cumulative air quality emissions.

Comment 434: How will construction proceed and how long will construction last?

Response 434: Refer to Response 59 for a discussion of proposed project construction duration and for a discussion of construction and operational activities occurring concurrently at different portions of the project site.

Comment 435: Why hasn't the proponent taken into account the cumulative impacts?

Response 435: The Draft SEIR analyzes both project and cumulative project air quality impacts. Refer to Response 108 for a discussion of the methodology used in the Draft SEIR for determining cumulative air quality emissions.

Comment 436: **4.2.8 Air Quality Operational Phase(Long-Term), Page 4-64**
This section states that: "At full operation, the proposed project (combined landfill within both jurisdictions) will receive an anticipated average solid waste intake of approximately 11,000 tons per day (tpd)". On Tuesday, November 18, 1997 at a Proposed General Plan Amendment/Zone Change Meeting held in Granada Hills, the proponents when asked if the 11,000 tpd was correct indicated that it was not and that the tonnage would be much higher than the 11, 000 stated in the SEIR.

Response 436: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 437: The SIER does not take into account that the County has a permitted inflow rate and that it will continue to operate as the new City/County landfill is constructed. Further, the green waste from both sides has been excluded.

Response 437: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 438: Given that the tonnage will be much higher, all subsequent Tables 4.2-7 Heavy Equipment Emissions for Site Operations, Table 4.2-8 Operation Gaseous Emissions, Table 4.2-9 Permitted Daily Emissions from Flaring Activities, 4.2-10 Estimated Emissions for Truck Travel over Unpaved Surfaces, Table 4.2-11 Estimated Fugitive Dust PM_{10} Emissions for Site Operations, et cetera do not accurately reflect the air impacts.

Response 438: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 439: **Combustion of Landfill Gas Emissions, Page 4-68**
The proponent presents a confusing discussion of the status of flaring stations in the City and County and then goes on the state that the permitted emissions for combustion are presented in Table 4.2-9. It is unclear what this table really represents. Is it two flares (one existing City flare and the one County flare that has been built) or is it three flares (one existing City flare and the two permitted County flares)? The note section under the table on 4-69 makes things no clearer and no calculations are included to show how the proponent arrives at the final lb./day. As stated before this table cannot be correct.

Response 439: Refer to Response 97 for a discussion of data that have been changed in the Draft SEIR air quality assessment to reflect the maximum permitted emissions from five flares.

Comment 440: On Tuesday, November 18, 1997 at a Proposed General Plan Amendment/Zone Change Meeting held in Granada Hills, the proponents when asked if the 11,000 tpd was correct indicated that it was not and that the tonnage would be much higher than the 11,000 stated in the SEIR.

Response 440: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 441: **Fugitive Dust, Page 4-70**
Under the title Active Working Face Area, Page 4-70. Where is the value of 31.5 pounds of PM_{10} per acre per day derived from and what is the basis for reducing it to approximately 19 pounds during daily cover and compaction operations?

Response 441: Refer to Response 63 for a discussion of the use of 1995 AP-42 emission factors to calculate fugitive dust emissions.

Comment 442: Under the title Landfill Area Excavation, Page 4-70. Where is the value of 31.5 pounds of PM_{10} per acre per day derived from and what is the basis for reducing it to approximately 38 pounds during landfill excavation?

Response 442: Refer to Response 63 for a discussion of the use of 1995 AP-42 emission factors to calculate fugitive dust emissions.

Comment 443: Under the title Stockpile Erosion, Page 4-71. It is stated "By adjusting this value to reflect the reduced onsite PM_{10} content, approximately 35 pounds of PM_{10} emissions would be released daily". What was this value? What data supports this reduction? Does the SCAMD agree with this reduction?

Response 443: Refer to Response 63 for a discussion of the use of 1995 AP-42 emission factors to calculate fugitive dust emissions.

Comment 444: The comment is inaccurate. Under the title Vehicular Travel on Paved Surfaces, Page 4-71. The emissions are based on 1110 trucks. The emissions cannot be correct. As stated before on Tuesday November 18, 1997 at a Proposed General Plan Amendment/ Zone Change Meeting held in Granada Hills, the proponents when asked if the 11,000 tpd was correct indicated that it was not and that the tonnage would be much higher than the 11,000 stated in the SEIR.

Response 444: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 445: The comment is inaccurate. Under the title Truck Travel on Unpaved Surfaces, Page 4-71. The emissions cannot be correct. On Tuesday, November 18, 1997 at a Proposed General Plan Amendment/Zone Change Meeting held in Granada Hills, the proponents when asked if the 11,000 tpd was correct indicated that it was not and that the tonnage would be much higher than the 11,000 stated in the SEIR.

Response 445: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 446: **4.2-9 Health Risk Analysis, Page 4-74**
On page it states that the USEPA SCREEN2 dispersion model was utilized to determine the maximum pollutant concentration at downwind receptors locations. On page 4-76 it also states that "It should be noted that the SCREEN2 model is not designed for a complex terrain such as Sunshine Canyon". This is followed by a statement that the model will over predict rather than under predict the health risks. We believe that this is not the case. The assumption that the terrain were flat and that zero plume rising doesn't take into account that there are severe downdrafts, vortexes, and eddies which may cause a plume to be depressed below its exit point. Are there no other models more appropriate?

Response 446: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates.

Comment 447: Is this the model recommended by the SCAQMD?

Response 447: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates.

Comment 448: The risk analysis modeling is based on in-flare exhaust concentrations derived from the existing landfill flare station and augmented to a combustion rate of 4,400 cubic feet per minute. Why doesn't the modeling include the cumulative rates from both the City and the County both existing (2 flares) and future (5 flares)?

Response 448: Refer to Response 97 for a discussion of data that have been changed in the Draft SEIR air quality assessment to reflect the maximum permitted emissions from five flares.

Comment 449: Why aren't the cumulative impacts of all the landfilling, construction and combined with the ambient air also considered?

Response 449: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates.

Comment 450: Does this model, and the Table 4.2-13 on page 4-76 in any way represent the cumulative toxics and the cumulative cancer risks that the public will be exposed to by all landfilling activities or just LFG flaring?

Response 450: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates.

Comment 451: If not, how does the proponent or the AQMD justify presenting it as a true Health Risk Assessment?

Response 451: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates.

Comment 452: **Air Quality Management Plan, Page 4-77**
The determination of consistency with the AQMP given on page 4-78 represents a gross misrepresentation of the facts by the proponent. To begin with, the proponent makes the statement that: "In accordance with that document, a project conforms with the AQMP if the following consistency requirements are met". The reader expects to see a list of the requirements. The proponent now mixes requirements with self-serving explanations in 3 out of 4 bullets. It is apparent that the proponent does not meet the established guidelines.

Response 452: A specific discussion of the referenced consistency requirements is provided in Responses 453 through 456.

Comment 453: The first bullet in part states that: "(t)he County portion of the project site is located within a job-poor region and will positively contribute to job opportunities available within this region". Since the County portion of landfill is only 40 acres and will be the first section to close, and since workers will be hired regardless of where they may live, this statement is plainly not supported by fact.

Response 453: As indicated in the Draft SEIR, Section 4.2.10, Project Consistency with Applicable Plans, p. 4-80:

> . . . The goal of the job/housing balance policy was to relieve the pressure of population and job growth on the transportation system by achieving more balanced future development. . . .Furthermore, a balance of jobs to housing does not ensure that the jobs will be filled by local residents.

The project's furtherance of the jobs/housing balance established by SCAG for the Santa Clarita subarea and the North Los Angeles subregion presents generalized regional trends. The 35 jobs resulting from the proposed project would be a small percentage of the 122,000 jobs projected to occur between 1990 and 2010 for the North Los Angeles subregion. Therefore, this impact, although beneficial, would not be significant.

For an additional discussion of project consistency with regional growth forecasts, refer to Response 30.

Comment 454: In the second bullet the proponent would have you believe that the level of service on traffic routes will not be degraded below acceptable levels. The proponent has understated the total tonnage to be received (City & County in operation at same time plus excluded recycling) and therefore the vehicle trips. The proponent has also not provided current traffic data, has made erroneous assumptions as to the traffic composition, and has not forecast impacts beyond 1998.

Response 454: The Draft SEIR prepared for the proposed City/County Landfill analyzed impacts associated with a maximum 12,100-tpd waste intake rate, although the average intake rate would be 11,000 tpd. This maximum rate is inclusive of the operational County Landfill. For additional information pertaining to waste intake rates, refer to Response 1 in this document.

With respect to the traffic study, the scope for the traffic study was developed in conjunction with the LADOT and City Planning. City Planning and LADOT staff have reviewed, commented on, and authorized the completion of this traffic study prior to its incorporation within the Draft SEIR. The traffic study includes the analysis of 33 related projects. (Refer to the Draft SEIR, Appendix B1.) In addition, the LADOT and Caltrans have reviewed, commented on, and approved preliminary mitigation design drawings for impacted intersections within their jurisdiction. City Planning and LADOT staff have determined that a new traffic study is neither necessary nor warranted.

Comment 455: In the third bullet the proponent reverts to a statement of requirements as addressed in SCAG's Guideline for Implementation of 1989 AQMP Conformity Procedures but does not make any claims that this has been satisfied.

Response 455: The demonstration that the project will not have a significant negative impact on long-term air quality through the job/housing balance and the reduction in vehicle miles traveled/vehicle trips (VMT/VT) are discussed in the Draft SEIR, Regional Comprehensive Plan and Guide, pp. 4-80 and 4-81. The transportation, land use, and conservation measures used in mitigation are discussed the Draft SEIR, pp. 4-84 through 4-91. Moreover, the subregional impact on air quality is discussed throughout the environmental impact portion of the air quality section in the Draft SEIR. Through these discussions and proposed mitigation measures, this portion of the conformity procedures is satisfied.

Comment 456: In the fourth bullet after acknowledging that the impact analysis demonstrates that significant levels of air pollutants will be generated, launches into the most egregious, self-serving, totally asinine justification for imperiling the health and welfare for the residents in the area surrounding the landfill by claiming that "(t)he exhaust and particulate emissions associated with project implementation would be associated with another landfill project".

Response 456: If this proposed landfill is not available to waste haulers, they will have to travel a greater distance to dispose of their loads. This increase in travel distance would increase air emissions in the SCAB. In addition, if refuse that would have been disposed of at the proposed project were to be landfilled at another (more distant) facility, then the particulate emissions that would have been emitted at the proposed project would be emitted at another landfill facility and VMT would also be increased. Therefore, development of a landfill within the Los Angeles County wasteshed would reduce overall particulate emissions in the SCAB.

Comment 457: Page 4-79 further illustrates our point about the confusing mix of fact, data, and the proponent's attempts to minimize any negative information. The continuation of the previous subject addresses the 1997 Draft AQMP but does so with bullets that merely highlight information and do not contain any intrusive and self-serving comments.

Response 457: Each AQMP is based on the previous one, with subsequent changes and modifications made to represent new technology, projections, and goals to comply with attainment of the ambient air quality standards. The Draft SEIR presents changes implemented since the prior AQMP; however, AQMP consistency requirements remain the same.

Comment 458: **Growth Management Chapter, Page 4-79**
On page 4-81 it states that "the project site (within the County) is within the Santa Clarita subarea which has a jobs/housing ratio of 1.18 for the year 2010 making this region jobs poor." It goes on to state that: "Therefore implementation of the project would therefore serve to improve the jobs/housing balance in this subarea and subregion by providing additional job opportunities". This statement is plainly not true for a number of reasons. Workers will be hired regardless of where they may live.

Response 458: Refer to Response 453 for a discussion of this issue.

Comment 459: Additionally, this project involves only 35 jobs and only a fraction of them would be on the County portion of landfill (42 acres) and likely the first section to close.

Response 459: The Draft SEIR indicates that the City/County Landfill at maximum operational capacity would require an additional 35 employees in addition to the 52 employees currently employed for the County Landfill. At peak operating capacity, the total number of employees is estimated at 87. It should be noted that the proposed project will combine landfilling activities and operations into one facility that is in both City and County jurisdictions.

Comment 460: When speaking of the general plan amendment required for the project the proponent noted that: "residential use onsite would not be a feasible option at this location". While this is true it should be noted that SCAG encourages existing or proposed local jurisdictions programs which create opportunities for residents to walk and bike and that the closed City landfill and its environs were to be offered to the Department of Parks & Recreation, City of Los Angeles upon closure.

Response 460: The Draft SEIR, Section 4.2.10, Project Consistency with Applicable Plans, p. 4-80, does state the following relevant policy of the Regional Comprehensive Plan and Guide, Growth Management Chapter:

> . . . SCAG shall encourage existing or proposed local jurisdictions programs. . . which . . . create opportunities for residents to walk and bike.

Also, refer to Comment 16 from SCAG, which found that the proposed project supported this policy. Refer to Responses 205 and 1296 for a discussion of land use at the project site after the completion of 30-year postclosure maintenance period.

Comment 461: The proponent goes on to state that: "The development of a landfill within this project site would significantly reduce infrastructure cost . . ." If relevant policies of SCAG are used which encourage patterns of land use which reduce costs in infrastructure construction and make better use of facilities, why isn't it noted that this is [in] conflict with SCAGs policy to encourage existing or proposed local jurisdictions programs which create opportunities for residents to walk and bike. To what advantage is this to the general public and why would this be a reason to approve the project?

Response 461: The proposed project is not in conflict with the goal of encouraging existing or proposed programs that create opportunities for residents to walk and bike. (See *Regional Comprehensive Plan and Guide*, Growth Management Chapter, Policy 3.12.) The proposed project would not be subject to SCAQMD's Rule 2202 (On-Road Vehicle Emissions Mitigation Options), which requires employers of **more than 250 workers** [emphasis added] to implement ridesharing or other programs to reduce vehicle trips. As stated in Response 459, the total number of employees for this proposed project is estimated at 87.

The Draft SEIR, Section 4.13.6, Public Transportation, pp. 4-385 through 4-387, discusses the designation of a Class II bicycle lane along San Fernando Road in the City's *Bicycle Plan* and proposes the following mitigation measure if this lane is developed in the future:

- Signs acceptable to the City shall be posted at or near the entrance to the landfill facility. These signs shall caution the public that heavy truck traffic exists in the area.

The Draft SEIR concludes that the proposed project would not have a significant adverse effect on bicycle transportation or the development of a bicycle lane in the future. Refer also to Comment 16 from SCAG regarding the proposed project's compliance with Policy 3.12.

As discussed in the Draft SEIR, Section 4.14.5, Hiking and Equestrian Trails, p. 4-425, the proposed project will also provide linkages to local and regional trails through the dedication of East Canyon and Bee Canyon, which were required as CUP Conditions for the operational County Landfill.

There is an environmental advantage of using existing ancillary buildings and infrastructure that are already in place (i.e., utilities, access road, drainage improvements, scale house, access roadway, and administrative offices) rather than developing new infrastructure or buildings because grading impacts would be lessened and the destruction of biological resources would be lessened in the upper reaches of Sunshine Canyon. In this regard, with existing facilities in place, the project site can easily transition into a larger landfill footprint, taking advantage of an already existing operation, its ancillary facilities, and waste hauling infrastructure rather than relying on the development of a landfill in an undisturbed or remote location. Additional disposal capacity can be provided for both City and County jurisdictions to meet its short-, mid-, and long-term solid waste management goals.

Comment 462: The proponent also says that "If project development does not occur, transportation or hauling costs to other landfill facilities located either in-County or out-of-County would increase due to greater travel distances". What data or assumptions is this information based on?

Response 462: Refer to Responses 55 and 456 for a discussion of travel distances for City- and County-generated refuse at either the proposed project or at alternative landfill sites. In addition, refer to the Draft SEIR, Section 5.8, Out-of-County Landfill Site Alternative, pp. 5-31 through 5-36, and Section 5.10, Remote Landfill Facilities In-State/Out-of-State, pp. 5-43 through 5-66, for a comparison of topical issues of the proposed project versus alternative landfill sites.

Comment 463: Does the SCAQMD agree with this assessment?

Response 463: SCAQMD did not comment on this issue. With respect to SCAQMD comments on the Draft SEIR, refer to Letter 3.4-4.

Comment 464: The proponent also states that: the development of the proposed project would minimize many significant environmental impacts such as biological resources, development of new infrastructure, and air quality emission impacts associated with new site development, or the exportation of wastes to other landfills. Where is the data that supports these contentions?

Response 464: Refer to Response 462. With respect to reference material used in preparation of the Draft SEIR, Section 5.0, Alternatives, refer to the bibliography section of the Draft SEIR (Section 10.0).

Comment 465: Does the proponent consider that there may be offsetting factors given that other landfills may in fact reduce travel due to their proximity to the anticipate wastestream or that they may be less environmentally harmful than the project proposed?

Response 465: The "offsetting factors" to which the commenter is referring are not known. With respect to the alternatives analysis, feasibility factors such as site suitability, economic viability, infrastructure availability, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the project proponent can reasonably acquire, control, or otherwise have access to the alternative site were considered in the Draft SEIR.

Also, refer to Response 462 regarding this issue.

Comment 466: **City of Los Angeles Air Quality Element, Page 4-82**
In Goal 1 the proponent states that the project supports consistency with the AQMP and sustenance of Citywide economic growth to obtain good air quality. How can this be when the landfill which is the largest stationary source of emissions is being expanded in an area with already poor quality air?

Response 466: While the proposed landfill is a major source of local emissions, the greatest volume of gaseous emissions associated with the proposed project is from mobile sources (i.e., transfer, collection, and local delivery trucks). As noted in Response 456, if the project is not constructed, these trucks will still collect refuse and deliver that refuse to landfills for disposal. Because drivers typically dispose of their waste loads at the nearest available facility (assuming a competitive tipping fee), fewer daily VMT and emissions will be generated if the project is constructed than if it is not. Also, refer to Response 55 for a discussion on travel distances.

While the commenter notes that the proposed project is located in an area of "poor air quality," it must be noted that the AQMP is based on air quality for the entire SCAB. The SCAB includes Orange County and the nondesert portions of Los Angeles, Riverside, and San Bernardino Counties. Based on these issues, the reduction of VMT is consistent with the goals of the AQMP.

Comment 467: As requested before, where is the data that supports these contentions?

Response 467: Data (primarily derived from project-specific environmental documents) to support the analysis are contained in the Draft SEIR, Section 5.0, Alternatives. For a discussion of project consistency with the City's Air Quality Element, refer to Response 466.

Comment 468: Does the proponent consider that there may be offsetting factors given that other landfills may in fact reduce travel due to their proximity to the anticipate wastestream or that they may be less environmentally harmful than the project proposed?

Response 468: This comment repeats Comment 465. Refer to Response 465.

Comment 469: In Goal 2 how does the proponent justify the statement "and thereby ensure attainment of this goal when fact, a). rideshare programs are not mandatory,

Response 469: As stated in the Draft SEIR, Section 4.2.10, Project Consistency with Applicable Plans, SCAQMD's Rule 2202 is only applicable to employers of more than 250 workers. Because the trips associated with worker travel represent only a small fraction of the total daily trips (and emissions), carpool measures would be expected to meet with only very limited success. However, the underlying assumption of Goal 2 is to reduce the daily number of trips and VMT, and mitigation is provided to reduce the number of daily trips (i.e., "Using a progressive fee schedule, the project proponent shall encourage trucks to carry full loads"). Thus, the intent of Goal 2 is fulfilled.

Because project-related mitigation measures do not specifically address ridesharing, this last sentence (of the discussion of Goal 2) has been deleted from the Draft SEIR. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR

Comment 470: b). that the AQMD is permitting monies to be paid rather than enforcing/encouraging ridesharing, and . . .

Response 470: Payment of fees for on-road motor vehicle mitigation options (Rule 2202) would only be applicable to employers of 250 or more workers and is therefore inapplicable here.

Comment 471: c). that given only 87 employees that they live in close enough proximity to each other to form even one carpool, let alone enough to have any impact on air quality?

Response 471: Impacts resulting from exhaust emissions, fugitive dust, and operation emissions would be reduced by the implementation of mitigation measures. These measures are listed in the Draft SEIR, Section 4.2, Air Quality, pp. 4-84 through 4-91. In addition, the Draft SEIR, Section 4.13, Transportation and Circulation, pp. 4-371 through 4-373, lists recommended intersection improvements to improve traffic at key intersections during peak hours.

Comment 472: In Goal 3 it is stated that transfer trucks that haul partial loads will be penalized, thereby encouraging full loads and reduced truck movement. What data supports this contention?

Response 472: The acceptance of partial loads has not been a frequent or problematic occurrence at the operational County Landfill because it does not serve the economic interest of a waste hauling company or jurisdiction to haul partial loads to the landfill (e.g., fully loaded waste-hauling vehicles result in reduced operating costs because more waste can be transported to the landfill with fewer truck trips overall).

Comment 473: Has BFI in the past enforced penalties and if so were partial loads reduced, what monies were collected and who was the beneficiary?

Response 473: As stated in Response 472, the acceptance of partial loads has not been a frequent or problematic occurrence at the operational County Landfill. Therefore, it has been unnecessary to assess penalties or fines.

Comment 474: In Goal 4 it states that the project should minimize the impacts of land use development on air quality. A CEQA analysis and stand-alone health risk assessment is offered up. As stated by this respondent and others, these studies and others do not accurately reflect the impacts due to the way in which parameters were manipulated, the understated inflow, the exclusion of green waste and wood waste recycling, and due to the fact that the studies do not represent cumulative impacts.

Response 474: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates.

Comment 475: In Goal 5 it states that the project would include development of a green waste and wood waste recycling and public drop-off area to support recycling efforts in order to improve energy efficiency primarily at City facilities. How many tons per day are involved?

Response 475: Green waste/wood waste recycling would be primarily from local deliveries from gardeners and is estimated at 100 tpd (see Draft SEIR, p. 4-346). A specific analysis of the green waste/wood waste component throughout the Draft SEIR would not add substantial new information nor change the conclusions presented therein.

Comment 476: Precisely how does this equate to energy efficiency primarily at City facilities?

Response 476: The proposed green waste/wood waste recycling area is located within City jurisdiction and implement the City's Air Quality Element. Specifically, these facilities further Goal 5, Policy 5.1.4, of the City's Air Quality Element by:

> . . . Reducing energy consumption and associated air emissions by encouraging waste reduction and recycling . . .

Recycling is considered to be energy efficient because it results in the reuse or use of materials that would otherwise be disposed of, thereby lessening the amount of energy consumed to produce new materials.

Comment 477: **Cumulative Impact, Page 4-83**
In paragraph two of this section table 4.2.8 Air Quality Operational Phase (Long-Term), Page 4-64 is referenced. As stated before, on Tuesday, November 18, 1997 at a Proposed General Plan Amendment/Zone Change Meeting held in Granada Hills, the proponents when asked if the 11,000 tpd was correct indicated that it was not and that the tonnage would be much higher than the 11,000 stated in the SEIR.

Response 477: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 478: The SEIR does not take into account that the County has a permitted inflow rate and that it will continue to operate as the new City/County landfill is constructed.

Response 478: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 479: Further, the green waste from both sides has been excluded.

Response 479: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 480: Given that the tonnage will be much higher, all subsequent Tables 4.2-7 Heavy Equipment Emissions for Site Operations, Table 4.2-8 Operation Gaseous Emissions, Table 4.2-9 Permitted Daily Emissions from Flaring Activities, 4.2-10 Estimated Emissions for Truck Travel over Unpaved Surfaces, Table 4.2-11 Estimated Fugitive Dust PM_{10} Emissions for Site Operations, et cetera do not accurately reflect the air impacts.

Response 480: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 481: **City Mitigation Measures, Page 4-84**
Under the title Exhaust Emission the proponent lists a series of bullets claiming that they will variously tune equipment, use catalytic converters, retard diesel engine injection, use high-pressure fuel injectors, use low-emission fuel, not leave equipment idling for long periods, and will curtail construction during smog alerts. As previously asked who will monitor these mitigations to ensure that they are implemented?

Response 481: The monitoring and enforcement agency for the referenced mitigation measures shall be designated by the City.

Comment 482: Have these same mitigations not already been implemented for all on-site equipment because they would have been required mitigations in the County?

Response 482: The mitigation measures referenced in the Draft SEIR for exhaust emissions are currently being used for the operating County Landfill. The monitoring entities are the County LEA and project site manager. The SCAQMD will monitor and enforce

mitigation measures that curtail construction and operation activities during smog alerts. Conditions of project approval for the operating County Landfill and an amended mitigation reporting and monitoring summary are included in the Draft SEIR, Appendices C6 and C17, respectively.

In addition, as part of the conditions of project approval for the County Landfill (Part IX) a compliance committee was established to review, coordinate, and certify completion of mitigation and monitoring requirements. This committee includes a representative from both the County LEA and the SCAQMD. Reports submitted to this committee are available for review at the County's Department of Regional Planning and Department of Health Services.

Comment 483: This comment is inaccurate. Table 4.2.14, Construction Emissions, Control Measure Reduction Efficiency, and Residual Emissions on page 4-85 is not correct. As stated before, on Tuesday, November 18, 1997 at a Proposed General Plan Amendment/Zone Change Meeting held in Granada Hills, the proponents when asked if the 11,000 tpd was correct indicated that it was not and that the tonnage would be much higher than the 11,000 stated in the SEIR.

Response 483: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 484: The SEIR does not take into account that the County has a permitted inflow rate and that it will continue to operate as the new City/County landfill is constructed.

Response 484: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 485: Further, the green waste from both sides has been excluded. Also see our response to Fugitive Dust Emissions, Page 4-62 section.

Response 485: Green waste is not excluded from anticipated intake tonnage amounts. Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 486: CITY MITIGATION MEASURES
4.2.11 Construction, Page 4-84
Under the title Exhaust Emissions the proponent states in a series of bullets that if these items are implemented it will reduce the emissions to the maximum extent possible. It is not clear whether or not this equipment will come from onsite or will be brought in especially for the construction.

Response 486: The referenced mitigation measures are for reducing existing onsite heavy equipment exhaust emissions. As noted in the Draft SEIR, existing onsite heavy equipment will be used for both operations at the existing County Landfill and construction of the proposed project. In addition, any equipment brought onsite by outside contractors will meet these requirements.

Comment 487: What agency will check to insure that these mitigations are implemented?

Response 487: Refer to Response 481.

Comment 488: Given that the County expansion was already materially detrimental to the residents and that it was approved under overriding considerations shouldn't these pieces of equipment already be operated in such a manner? If not why?

Response 488: Refer to Responses 481 and 482.

Comment 489: **Fugitive Dust, Page 4-86**
The statement "Dust from construction activities, including physical site disturbance, material deliveries, employee commuting, and potential wind erosion during high wind episodes, may create a visual and soiling nuisance beyond the property line" should be revised to "will create".

Response 489: Refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Comment 490: It goes on to state that "because dust impacts are expected to be significant during the construction phase, standard mitigation measures (by project design) will be implemented . . . as required by SCAMD Rules 402 (Nuisance) and 403 (Fugitive Dust). What are rules 402 and 403 and why were they not included?

Response 490: Refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Comment 491: Are the mitigations that follow this statement "standard" or are they by "project design"?

Response 491: These mitigation measures have their basis in the "standard" methods outlined in both the *SCAQMD Rules and Regulations*, as well as the *SCAQMD CEQA Air Quality Handbook* and are specifically tailored to the proposed project (e.g., disturbed areas shall be revegetated with an interim ground cover as specified in the proposed revegetation plan). Other measures (e.g., construction areas will also receive a soil stabilization product if they are to be left unattended for periods in excess of 5 days) go beyond the recommendations included in the SCAQMD Handbook (e.g., the SCAQMD Handbook notes that mitigation shall be provided for construction areas left unattended for periods in excess of 10 days).

Comment 492: Rule 403 used to preclude any enforcement if the winds were over 25 mph and the operator was making a reasonable attempt to control. Even if 403 has been revised how will this mitigate dust?

Response 492: Refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Compliance with Rule 403 specifically requires the application of additional mitigation when wind speeds exceed 25 mph based on either SCAQMD forecasts or onsite monitoring. If the mitigation measures provided in the Draft SEIR do not curtail fugitive dust to the extent required by the SCAQMD, or visible emissions create a nuisance in accordance with Rule 402, the SCAQMD will require the project proponent to include additional mitigation measures (above those recommended in the Draft SEIR) or cease operations.

Comment 493: Under the mitigations measures that follow, the daily watering and soil stabilization, the graded areas shall be watered, the disturbed areas shall be revegetated with an interim groundcover as proposed is not attainable as previously outlined in our response to Fugitive Dust Emissions, Page 4-62 in which the preparer states that "Construction work at the proposed landfill footprint would disturb a relatively small area (estimated not to exceed 40 acres at any given time). In accordance with information provided by the project proponent, actual excavation operations would be further restricted to an even smaller area not expected to exceed about 10 acres per day of the 40 acre footprint." Forty acres or even 10 acres is not a "relatively small area" when located in the wind tunnel that is the Newhall-Saugus Pass. Given the terrain and the existing weather conditions it is not possible to mitigate the dust.

Response 493: To reduce the potential for erosion, landfill operations personnel will only use areas for those activities necessary for daily operation of the project. Should an area no longer be required for landfilling operations, activities in these areas will cease. As indicated in the Draft SEIR, the active working face (or area of landfilling activity) would encompass up to 3 to 5 acres at any one time during the first 18 to 24 months of operation and thereafter up to 10 acres at any one time when landfilling is combined within both jurisdictions. This includes a 9-acre truck turnaround and a 1-acre active working face.

It should also be noted that onsite grading activities required for project development will only be conducted in areas necessary for landfill development and operations. New landfill area preparation would not exceed 10 acres at any one time. Soil stockpile activities would not exceed 30 acres at any one time. Areas not requiring access or grading will remain in their existing undisturbed condition.

Refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of

SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Comment 494: Past zoning actions and the EIR for the County expansion contain documentation and pictures of dust produced in the City landfill (now closed) of dust being visible for 10.4 miles away, of dust blowing from berms and hillsides, of water from watering trucks being blown into the air without ever touching the ground. What guarantees are in place to insure that all surfaces once disturbed during construction and to the completion of construction are properly sealed and/or watered given the steep nature of the terrain and the ferocious winds?

Response 494: Refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions. Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 495: Please explain how the proponent can mitigate dust when they have been unable to revegetate the closed City landfill or even the cut slopes on the County landfill?

Response 495: The project proponent currently takes numerous measures to control fugitive dust emissions at the existing inactive City Landfill and the County Landfill. Refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Comment 496: Please explain how water trucks will gain access to cut slopes?

Response 496: Water trucks do not need to gain access to cut slopes; instead, these areas are hydromulched and hydroseeded (by spray equipment) to provide for interim revegetation.

Comment 497: In the next mitigation it states that the wind speed shall be continually monitored using onsite anemometers and excavation shall be halted when the 15-minute average wind speed exceeds 15 mph or when instantaneous wind speed exceeds 25 mph. The proponent fails to provide any details.

Response 497: Refer to Response 400 for a discussion of wind directions, speeds, and windroses that have been recorded at the project site. In addition, refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Comment 498: Since there are 3 anemometers onsite will the data be taken from all three sites and averaged? If not from all three sites, which site will have precedence?

Response 498: Refer to Response 400 for a discussion of wind directions, speeds, and windroses that have been recorded at the project site.

Comment 499: How will all workers be notified to cease operations and how long will this take?

Response 499: During high wind events, monitoring of weather conditions is conducted by BFI personnel stationed in the existing environmental control center. Weather information is conveyed by radio transmission from environmental control system personnel to the BFI foreman and the onsite construction contractors and/or operating personnel. The BFI foreman has control over construction activities and landfilling operations, and has the authority to cease construction activities and/or close the landfill if warranted.

Comment 500: Given the fact that winds spring up very quickly how does the proponent prevent dust from going offsite as the exposed areas can go up to 5 days without sealant, steep terrain will have no water, interim revegetation will not have had a chance to grow, therefore how can the dust be abated in a reasonable short period?

Response 500: Refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Comment 501: **Fugitive Dust, Page 4-88**
The applicant admits that: "past operations have shown that the higher-elevation upper plateau an southern berm areas of the existing inactive landfill have experienced greater wind-generated fugitive dust occurrences than the lower elevations within the canyon", and "the lack of revegetation on the active face of the landfill surface has exacerbated difficulties inadequately controlling fugitive dust emissions during periods of high wind conditions". The proponent claims success in other portions of the site. Specifically, precisely what areas are considered to be successful?

Response 501: With respect to this comment, the commenter did not include the rest of the paragraph, which states:

> . . . However, the project proponent has successfully established ground cover and other revegetation on portions of the existing inactive landfill site. Additionally, the project proponent has implemented enhanced soil treatment measures to stabilize soil conditions and further enhance onsite revegetation.

The side slopes of the existing inactive City Landfill have been successfully hydromulched and hydroseeded to stabilize soil conditions and enhance revegetation.

Refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Comment 502: Do the responsible agencies agree with this assessment?

Response 502: Responsible agencies (that monitor offsite fugitive dust emissions) are the SCAQMD and County and City LEAs. Their comments on the Draft SEIR are provided in Letters 3.4-4, 3.5-1, and 3.6-6, respectively. The ultimate concurrence with the recommended mitigation measures listed in the Draft SEIR will be obtained when the Final SEIR is certified, conditions of project are approved by the decisionmakers, and permits are issued by these respective agencies.

Comment 503: Has final cover been applied and has the required revegetation been accomplished? If not why?

Response 503: Final cover has not been applied to the inactive landfill, and revegetation plans for that landfill are pending since the closure and postclosure maintenance plans for the inactive landfill have not yet been approved by the City and CIWMB.

Refer to Response 356 for a discussion of the status of the Final Closure and Postclosure Maintenance Plan (FCPMP) for the required closure of the existing inactive City Landfill and proposed "monolithic" final cover design.

Comment 504: The proponent's project will occupy precisely the same geographic location, will experience the same winds, and has admitted difficulties in controlling dust emissions. Nothing in the mitigations proffered in this SEIR can prevent dust from blowing off-site.

Response 504: The project proponent did have a problem with dust emissions at the now inactive City Landfill in 1988. Since that time, numerous effective mitigation measures, including the use of soil sealant, have been implemented by the project proponent. Since the implementation of these measures, fugitive dust emissions have been controlled and have not been a problem at the project site, including both the inactive City Landfill and the operational County Landfill.

It should also be noted that the SCAQMD is the Responsible Agency that regulates fugitive dust emissions at the project site. This agency has never issued a Notice of Violation (since 1988) to the project proponent with respect to fugitive dust emissions at either the inactive City Landfill or the operational County Landfill.

Comment 505: Table 4-2-15, Operational Emissions, Control Measure Reduction Efficiency, and Residual Emissions on page 4-89 is not correct. As stated before, on Tuesday, November 18, 1997 at a Proposed General Plan Amendment/Zone Change Meeting held in Granada Hills, the proponents when asked if the 11,000 tpd was correct indicated that

it was not and that the tonnage would be much higher than the 11,000 stated in the SEIR.

Response 505: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 506: The SEIR, does not take into account that the County has a permitted inflow rate and that it will continue to operate as the new City/County landfill is constructed. Further, the green waste from both sides has been excluded. Also see our response to Fugitive Dust Emissions, Page 4-62 section.

Response 506: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 507: Table 4.2-16, Operational Fugitive Dust PM_{10} Emissions, Control Measure Reduction Efficiency, and Residual Emissions on page 4-90 is not correct. As stated before, on Tuesday, November 18, 1997 at a Proposed General Plan Amendment/Zone Change Meeting held in Granada Hills, the proponents when asked if the 11,000 tpd was correct indicated that it was not and that the tonnage would be much higher than the 11,000 stated in the SEIR.

Response 507: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 508: The SEIR does not take into account that the County has a permitted inflow rate and that it will continue to operate as the new City/County landfill is constructed. Further, the green waste from both sides has been excluded. Also see our response to Fugitive Dust Emissions, Page 4-62 section.

Response 508: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 509: **General Observations and Comments**
The SEIR as presented represents nothing more than a self-serving document perpetuated by the proponent in an effort to gain approval for an environmentally unsafe project. The document is a contorted mix of referenced data, which is not included, and of tables based on assumptions without supporting data and which fail to present the cumulative impacts of the project and as such is a violation of California Environmental Quality Act (CEQA).

Response 509: Preparation of the Draft SEIR, including its format, technical analysis, and reference material, is consistent with the City's CEQA Guidelines and Preparation Manual. The City is the author of the Draft SEIR, not the project proponent; therefore, the Draft SEIR reflects the City's independent review and evaluation of technical information contained therein. Moreover, the information included in the Draft SEIR adequately evaluates potential impacts associated with the proposed project in accordance with the requirements of CEQA.

With respect to prior FEIR technical data, information is incorporated by reference and cited in the Draft SEIR. The reader is referred to the Draft SEIR, Section 10.0, Bibliography. This section includes an alphabetic listing of all referenced documents used in preparation of the Draft SEIR.

Comment 510: The SEIR represents an incremental approval of entire original project as proposed (215 million ton City/County Landfill) and as such is a violation of the California Environmental Quality Act (CEQA).

Response 510: The Draft SEIR is not in violation of CEQA or the State CEQA Guidelines. No incremental approval is being sought by the project proponent. Rather, the proposed project was analyzed as part of the prior FEIR, and information contained in the FEIR is being updated pursuant to the City's request. This information is presented in the Draft SEIR.

With respect to the proposed project, its description is summarized in the Draft SEIR, Section 1.2, Overview, pp. 1-1 and 1-2, and fully described in Section 2.0, Project Description, pp. 2-1 through 2-102. As stated in Section 1.2, Overview:

> The combined development of land within both jurisdictions would result in one landfill footprint being constructed in Sunshine Canyon. The landfill footprint configuration would ultimately encompass ±451 acres. Ultimate City/ County Project development within Sunshine Canyon would result in a net waste disposal capacity of 90 million tons (i.e., proposed landfill within City: 55 million tons + additional ±42 acres developed within County: 18 million tons [includes both a vertical and horizontal extension overlapping County Landfill footprint area] + connection with permitted and operational County Landfill: 17 million tons = **90 million tons of potential disposal capacity**) [emphasis added]. This would provide for approximately 26 years of disposal capacity, assuming an average daily tonnage of 11,000 tpd.

Moreover, the following information with respect to the FEIR is presented in the Draft SEIR, Section 1.0, Summary, p. 1-3:

> The City, as the Lead Agency for the proposed City/County Landfill Project, determined (in 1991) that new background information was available and specific studies relevant to the proposed project were required. That information, combined with prior technical information contained within the *Final Environmental Impact Report, Sunshine Canyon Landfill Extension* (herein FEIR), State Clearinghouse Number 89071210, comprises this Draft SEIR. The Draft SEIR provides specific information about how the City/ County Landfill Project would be designed, engineered, constructed, operated, and monitored throughout its estimated site life, and how closure and postclosure maintenance and monitoring would be conducted in accordance with regulatory standards and requirements.

> . . . The proposed City/County Landfill Project was addressed, and potential impacts resulting from development have been analyzed in the FEIR. In that regard, the proposed project was identified as part of a combined "County/City Landfill" Project that would encompass land within both County and City jurisdictions. The envisioned County/City Landfill Project was proposed to have an estimated disposal capacity of approximately 215 million tons and provide a waste intake of approximately 17,500 tpd into Sunshine Canyon. In its original iteration, the County/City Landfill Project footprint encompassed ±706 acres within both City and County jurisdictions. At that time, the project proponent owned ±1,560 acres in and around Sunshine Canyon.

As indicated, the proposed City/County development concept would authorize the development of a 90-million-ton landfill within both City and County jurisdictions.

Comment 511: This document is replete with mitigations that are suggested "as possible" but in fact may not ever be done. Only mitigations that are to be implemented should be permitted to remain.

Response 511: Mitigation measures listed in the Draft SEIR are proposed for each significant effect identified by topical issue. All mitigation measures in the Draft SEIR will be implemented if the proposed project is approved.

In accordance with State CEQA Guidelines, §15126(c), each mitigation measure distinguishes between the measures proposed by the project proponent and those that could reasonably be expected to reduce impact levels if included as conditions of approval. Moreover, and consistent with both State CEQA Guidelines and the City's EIR Preparation Manual, mitigation measures may be voluntary; required by Code; recommendations of City, County, State, or federal agencies; or any other reasonable measures available for decisionmaker consideration.

Comment 512: Recycling will be located on the southern berm in the area that is the nearest to the residents. There is no discussion of the emissions, noise, and odors from this type of operation.

Response 512: The onsite green waste/wood waste recycling area would encompass approximately 3 acres and would be developed near the proposed plant materials center (1,775 feet MSL) on the top-deck area of the existing inactive City Landfill (i.e., larger fill area) following its final closure. This area would be used for placing both recycled green waste and wood waste materials into small static piles for immediate use onsite. Green waste would be used within 24 hours, and wood waste would be used weekly or biweekly.

For additional information, refer to the Draft SEIR, Section 4.2, Air Quality, for a discussion of air quality and odor impacts associated with the proposed green waste/wood waste area, and refer to Section 4.5, Noise, for a discussion of potential noise impacts with respect to this proposed area.

Comment 513: No discussion of truck trips generated.

Response 513: The Draft SEIR provides a comprehensive discussion of project-related and cumulative-project impacts. Refer to the Draft SEIR, Section 4.13, Transportation and Circulation, Table 4.13-4, Project Traffic Generation Forecast within the City, p. 4-347, and Table 4.13-5, Trip Generation for Related Projects, pp. 4-355 through 4-358, for a discussion of project and related project-generated truck trips. Also refer to Response 153 in this document for an additional discussion of this issue.

Comment 514: Also there is no discussion of viewsheds to the residential area to the south of the landfill.

Response 514: An analysis of viewsheds south of the project site in the community of Granada Hills is included in the Draft SEIR, Section 4.18, Aesthetics/Views, pp. 4-457 to 4-463. In addition, photographs have been provided that depict these viewsheds and are included in Section 3.0, General Description of Environmental Setting, and Section 4.18, Aesthetics/Views.

Specific to the community of Granada Hills, refer to Figure 4.18-3, Project Site Views from the Nearest Residential Neighborhood, and Figure 4.18-4, Project Site Views from the Residential Areas of Granada Hills and Sylmar. These figures are included in Section 4.18 of the Draft SEIR.

Comment 515: The landfills past violations and actions relating to City agencies must be taken into account when reviewing this SEIR. BFI, the proponent has refused to comply with their original Variance and the additional Conditions that were applied by various Zoning Administrators, Boards of Zoning Appeals, the Planned Land Use Committee, and the City Council.

Response 515: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 516: Changes to the conditions of final approval at the current County expansion must be taken into account. The proponent makes many proposals for compliance or mitigation in the EIR in order to gain approval but then has subsequently sought changes. These changes were not identified in the SEIR.

Response 516: It is unknown what the commenter is referencing with respect to "changes in the conditions of project approval" regarding the approved County Landfill. Refer to Response 349 for a discussion of approved engineering design and operational modifications that have occurred at the County Landfill subsequent to County CUP approval.

With respect to these changes not being identified in the Draft SEIR, any changes that have been made in regard to the County Landfill CUP are ministerial and have not required discretionary approval by the County decisionmakers. With reference to the adopted County Landfill CUP, it is included in the Draft SEIR, Appendix C6.

Comment 517: There is no discussion on the effects on the property values of residents.

Response 517: Refer to Responses 180 and 778 for a discussion of the proposed project's potential effects on property values.

Comment 518: There is no discussion on the quality of life.

Response 518: Relative to "quality of life," the Draft SEIR analyzed environmental impacts associated with 19 separate topical issues (e.g., air quality, noise, land use, etc.). Refer to the Draft SEIR, Sections 4.1 through 4.19, for a comprehensive discussion and analysis of those topical issues.

Comment 519: A one day traffic study was conducted with the aid of Councilman Bernson's office in late November 1997. The results do not support or validate the proponents outdated studies.

Response 519: The City is unaware of the "traffic study" the commenter is referencing, including who conducted this study, what methodology was used, what intersections were analyzed, and whether consultation occurred with Caltrans. It is known that neither City Planning nor LADOT staff were consulted or contacted with respect to this information.

Refer to Response 151 for a discussion of the methodology used in preparing the Draft SEIR traffic study that was conducted by registered traffic engineers.

Comment 520: The composition of the landfill both City and County would not be the same if the use of tarps and alternate cover continues. The lack of dirt can result in an entirely different structure that will possibly negate the seismic loading data, leachate production, stability, et cetera.

Response 520: Since leachate generation is primarily a function of the waste mass composition and not of the daily cover soil, the use of ADCMs, such as tarps, would not significantly alter the potential for leachate generation.

The effect of utilizing ADCM in lieu of cover soil on the seismic stability of the waste mass has been evaluated. Shear strength testing was performed at the OII Landfill and included samples composed entirely of solid waste, with no soil. The results of this testing indicated that these samples had higher strengths than soil-rich waste samples. No significant impacts on the proposed design and engineering of the proposed City/County Landfill associated with the use of ADCM in lieu of daily cover soil would occur.

Comment 521: The drainage from the County landfill and the upper reaches of Sunshine Canyon are shown to be dependent on concrete culverts located on top of the already closed City landfill both southern and northern portions. The raising of a hill of trash which effectively blocks the drainage of the upper canyon and then routes it over existing trash is a recipe for disaster. Blockages or breaks may occur may occur during flood events and/or in conjunction with seismic activity which may cause the water to overflow or

undercut the channels. These kind of scenarios will result in trash being washed out and that can either contaminate the waters flowing from the mouth of the canyon and/or undermine the integrity of the landfill.

Response 521: Trash being washed out of the canyon, as referenced by the commenter, would not occur. The surface water drainage channels proposed over the existing inactive City Landfill will be designed to withstand anticipated landfill settlement. A variety of flexible, movable materials are available for consideration as construction materials for these portions of the proposed surface water drainage channels. Furthermore, the Operations and Maintenance Plan for the proposed project will include provisions for monitoring and maintenance of these channels, as needed. It should be noted that specific design plans for these channels are subject to regulatory review and approval prior to construction.

Elizabeth Folb
11850 Susan Drive
Granada Hills, CA 91344

Letter 3.8-18

Comment 522: I do not feel it is prudent to expand the Sunshine Canyon land fill for the following reasons:

- Proximity to a critical water supply. Both airborne and underground contaminates are dangers.

Response 522: Refer to Response 157 for a discussion of allegations that the previous City Landfill operation caused contaminated particulates to enter the Los Angeles Reservoir and other water treatment and storage systems. In addition, refer to Response 602 for a discussion of the potential for VOCs to pass through an HDPE geomembrane liner. Refer to this same response for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources.

Comment 523:

- The air quality in the area needs improvement. The landfill will contribute a significant adverse affect on air quality because of the waste itself and the increased traffic.

Response 523: The proposed project and the community of Granada Hills are located in the County of Los Angeles, which is within the South Coast Air Basin (SCAB). The SCAB presently exceeds both State and federal standards for certain criteria air pollutants; therefore, Granada Hills, like many Southern California communities, is located within a nonattainment air basin.

Transporting the refuse to the project site will incrementally contribute to increased air quality impacts within the SCAB. However, traffic impacts resulting from development of the proposed project can be mitigated to a less than significant level with the implementation of mitigation measures. For an additional discussion of potential air quality impacts resulting from project development and operation and a list of recommended mitigation measures, refer to the Draft SEIR, Section 4.2, Air Quality, pp. 4-45 through 4-96.

It should be noted that if this proposed landfill were not available to waste haulers, they would likely have to travel a greater distance to dispose of their loads. This increase in travel distance would increase air emissions in the SCAB. In addition, if refuse that would have been disposed of at the proposed project were to be landfilled at another (more distant) facility, then the particulate emissions that would have been emitted at the proposed project would be emitted at another landfill facility and increase VMT. Therefore, development of a landfill within the Los Angeles County wasteshed would reduce overall emissions in the SCAB.

Comment 524:

- I do not want mature oaks removed and wildlife habitat disturbed. Disturbance of the environmental balance in this area has already been significant. The deer,

bobcat, coyotes, and mountain lions in this area will certainly be affected and subsequently the neighboring communities will be affected by these animals.

Response 524: These comments are noted. Refer to the Draft SEIR, Section 4.4, Biological Resources, pp. 4-139 through 4-202, for a complete analysis of potential project impacts on biological resources (including plant communities and animal species, wetlands and riparian habitat, and native and nonnative tree resources). As indicated in the Draft SEIR, with the implementation of mitigation measures, potential environmental impacts would be mitigated to a less than significant level.

With respect to the proposed project impact and mitigation measures for oak trees and big-cone Douglas fir trees, refer to Topical Issues 10 and 11, which provide a discussion of the proposed project's potential impacts and recommended mitigation measures for sensitive animal species.

Comment 525: I feel these reasons are very important. I feel that there could be a narrow-minded focus on scientific and economic evidence that can be skewed in either direction depending what side of the issue you are on. I think those entrusted with the decision should consider common sense.

Response 525: Various regulatory agencies (i.e., Corps, USFWS, etc.), which have jurisdiction by law over the resources contained on the project site, have reviewed and commented on the Draft SEIR. In addition, these agencies along with City departments will be responsible for monitoring the project-specific mitigation plans that are required for mitigation.

Comment 526: Is it probable that the dump won't affect our water, air, and animal habitat?

Response 526: Refer to Topical Issues 3, 6, and 10 for discussions pertaining to air quality and fugitive dust emissions, groundwater movement within Sunshine Canyon, and the proposed project's impact on sensitive animal species and mitigation measures.

Comment 527: BFI has submitted a business proposal. It is just one way to solve a waste disposal problem. BFI's proposal would create both economic hardship and health risk to the community.

Response 527: BFI's project application was submitted to the City in June 1991 in accordance with approved County Landfill CUP Conditions. Economic considerations with respect to the proposed project are beyond the scope of the Draft SEIR. Refer to Responses 180 and 778 for a discussion of the proposed project's potential effects on property values. In addition, refer to Response 316 for a discussion of the potential for the proposed City/County Landfill to cause acute or chronic health risks to residents in the community of Granada Hills.

Comment 528: There are viable alternatives. As an example: I was able to reduce my own non recyclable waste by a whopping two-thirds after receiving my "Blue Bin". Please work harder at finding a solution to our waste disposal problem. Find a way other than expanding this or any other dump.

Response 528: Refer to the Draft SEIR, Section 5.0, Alternatives, pp. 5-1 through 5-94, for a comprehensive analysis of alternatives to the proposed project and Appendix C13, Regulatory Overview of State-, County-, and City-Enacted Waste Management Acts, for a discussion of existing goals and policies of the City with respect to solid waste.

In addition, with respect to curbside recycling, the City's BOS provides automated refuse collection and curbside recycling to approximately 720,000 households weekly. All households receive one black 60-gallon automated container for refuse, one green 60-gallon automated container for green waste, and one blue recycling bin. Homes serviced by the City receive containers free of charge. Residents are encouraged to recycle the following materials: aluminum, tin, and steel cans; glass jars and bottles; plastic bottles; newspapers; magazines; mixed paper; computer paper; envelopes; brown paper bags; corrugated cardboard boxes; dry food boxes; and phone books. The City is aggressively implementing programs designed to reduce, recycle, and compost solid wastes generated in the City. These programs are identified in the City's *Source Reduction and Recycling Element* and the *City of Los Angeles Solid Waste Management Policy Plan*. Refer to Responses 169 and 936 for a discussion of alternative solid waste management technologies and strategies as potential alternatives to the proposed project.

Ms. Anne Ziliak
[No address provided]

Letter 3.8-19

Comment 529: I would like to start by saying that I can not believe that this is even coming back to the City for expansion. I state this because we have already had 30 plus years of dump on the City side of Sunshine Canyon and the County side is currently operating and there will be no foreseeable end to the County operation.

Response 529: Refer to Response 165 for a discussion of the No Project Alternative and the potential for future development of a 70-million-ton landfill in the County.

Comment 530: The closed City Dump is not lined now and has no leachate collection system now BFI is proposing to put a liner over unstable trash and add more trash this is a accident waiting to happen.

Response 530: Refer to Response 666 for a discussion of the existing inactive City Landfill's compliance with all mandated LARWQCB programs to ensure the quality of groundwater. In addition, refer to Responses 745 through 749 for a discussion of long-term settlement of solid waste landfills and potential impacts on slope stability. In addition, refer to these same responses for a discussion of how the proposed City/County Landfill design and engineering incorporate long-term landfill settlement.

Comment 531: In 1988 as part of developing and promulgating Subtitle D regulations governing landfilling of municipal solid waste, the US EPA stated, " First, even the best liner and leachate collection system will ultimately fail due to the natural deterioration, and recent improvements in MSWLF (municipal solid waste landfill) containment technologies suggest that releases may be delayed for many decades at some landfills," and "Once the unit is closed, the bottom layer of the landfill will deteriorate over time, and consequently, will not prevent leachate transport out of the unit."

Response 531: Refer to Response 602 for a discussion of the potential for VOCs to pass through an HDPE geomembrane liner. Refer to this same response for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources. Refer to Response 974 for a discussion of the long-term viability of HDPE as a containment material. In addition, refer to Response 1035 for a discussion of the evaluation of the performance of landfill liner systems constructed in compliance with Subtitle D requirements.

Comment 532: In reviewing the water section 4.3 of this SEIR:
I wondered if the monitoring data and comments from 1989 are relevant 8 years later? Unfortunately, changes occur and therefore results from any tests on drainage, sedimentation, leachate collection, erosion control and precipitation should be recalculated.

Response 532: The 1989 hydrologic analysis provided in the Draft SEIR evaluated drainage areas for the entire Sunshine Canyon watershed and decades of hydrologic data. The historical data establish a baseline for developing the 100-year, 24-hour design storm for the

project site. Adding 8 additional years of data would not significantly change hydrologic patterns established over many decades and therefore does not necessitate recalculating the hydrologic design criteria for the project site. It should be noted that the design for the proposed project did incorporate calculations involving the current data available.

The 100-year, 24-hour storm event of 9.80 inches for Sunshine Canyon has been accepted by the regulatory agencies, including the City LEA, CIWMB, and LARWQCB.

Comment 533: How will and how has the existing water uses, residential, commercial and industrial water be affected by this project?

Response 533: The proposed City/County Landfill would not impact the supply or quality of groundwater extracted from the San Fernando Valley Groundwater Basin for residential, commercial, or industrial uses. Moreover, both the existing inactive City Landfill and operational County Landfill do not impact groundwater resources. As stated in Topical Issue 6, the only connection between the project site and the San Fernando Valley Groundwater Basin is through the alluvial soils at the project site, which will be completely removed at the time of project construction. In addition, the existing quality of groundwater in the San Fernando Valley Groundwater Basin is poor. As stated in the Draft SEIR, Section 4.3.2, Groundwater, pp. 4-124 and 4-125:

> For the San Gabriel Valley and San Fernando Valley Groundwater Basins, volatile organic compounds (VOCs) from industry, subsurface sewage disposal, and past agricultural activities are the primary pollutants in these groundwater basins. These deep alluvial basins do not have continuous effective confining layers above the groundwater; consequently pollutants have seeped through these upper sediments into the groundwater. Approximately 20 percent of groundwater production capacity for municipal use in the San Gabriel Valley has been shut down due to pollution. Because of widespread pollution in these basins, the California Department of Toxic Substances Control (DTSC) has designated large areas of these basins as high-priority hazardous substances cleanup sites. In addition, the USEPA has designated these areas as Superfund sites. Currently, the LARWQCB and USEPA are overseeing investigations to further define the extent of pollution, identify responsible parties, and begin remediation.[31]

The proposed project would not result in any significant environmental impacts on the San Fernando Valley Groundwater Basin. Prior to landfilling operations occurring at the proposed City/County Landfill, various environmental protection and control systems will be installed (e.g., subdrain system, foundation layer, liner system, LCRS, surface water conveyance systems). Regulatory compliance will be met with respect to these system features.

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[31]/ Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, p. 1-21. June 1994.

For additional information pertaining to groundwater, refer to the Draft SEIR, Section 4.3, Surface and Groundwater.

Comment 534: Is the ground water in the San Fernando/San Gabriel Valley area being distributed to households and businesses for consumption now?

Response 534: Groundwater is extracted from the San Fernando Valley Groundwater Basin in limited locations and then undergoes water treatment. Treated groundwater is then distributed for residential, commercial, and industrial uses. As stated in Response 533, the existing quality of untreated groundwater within this Basin is poor.

Comment 535: When the storm water runoff originating in Sunshine Canyon flows south does it combine with Los Angeles river and go untreated to the ocean?

Response 535: Regarding the conveyance of surface water after leaving the project site, the Draft SEIR, Section 4.3.1, Surface Water, p. 4-102, states:

> Drainage from the project site (including the main canyon and four tributary canyons) converges at the mouth of Sunshine Canyon near the landfill entrance. Surface water runoff from precipitation, flow from tributary channels, and erosion caused by these flows converge at the canyon's mouth. Currently, surface water from within the upper reaches of Sunshine Canyon is collected in the County Landfill sedimentation basin. Water that collects in the basin is periodically monitored under the stormwater monitoring plan for the operational County Landfill. Drainage from the basin travels southerly into a wash before reaching the mouth of the canyon near the landfill entrance.
>
> Offsite, surface water from the project site flows underneath San Fernando Road into an 8-foot-wide box culvert that is maintained by the City BOE. The culvert is approximately 120 feet long and releases surface water into the Weldon Canyon Flood Control Channel, which is located directly east of the site entrance across San Fernando Road. This channel is part of the City's flood control system. Drainage in this channel flows south for approximately 2 miles and then passes through a debris basin located directly west of the Los Angeles Reservoir. After passing through this basin, surface water enters the Bull Creek Flood Control Channel located approximately 3.5 miles south of the project site. This channel is owned, operated, and maintained by the County DPW, Flood Control Division. Surface water then enters the Sepulveda Dam approximately 11 miles south of the project site. This dam is owned, operated, and maintained by the Corps.

Surface waters are released from the Sepulveda Flood Control Basin into the Los Angeles River. The Los Angeles River drains into the Pacific Ocean at San Pedro Bay.

Currently, stormwater runoff originating in Sunshine Canyon is collected in a sedimentation basin prior to discharge. Collection allows the majority of sediment to be removed from the stormwater runoff. In addition, the water is monitored in

accordance with the NPDES permit requirements established for the project site by the LARWQCB. Refer to Response 678 for a discussion of surface water quality monitoring and testing requirements at the project site.

For the proposed City/County Landfill, the project proponent will obtain an NPDES permit from the LARWQCB for nonpoint-source stormwater runoff. In addition, the project site and facility layout would be designed to ensure proper stormwater management techniques, such as monitoring the quality of stormwater discharges, evaluating changing conditions and practices onsite to control pollutants in stormwater discharges, aiding in the implementing the Stormwater Pollution Prevention Plan (SWPPP), and measuring the effectiveness of the best management practices (BMPs) in removing pollutants from stormwater discharge. No significant environmental impacts associated with the release of surface water from the project site are anticipated after the implementation of mitigation measures listed in the Draft SEIR, Section 4.3.1, Surface Water, pp. 4-113 and 4-114.

Comment 536: What year was the rainfall data collected?

Response 536: The evaluation of hydrologic conditions for Sunshine Canyon is based on available historic rainfall data, which span several decades for the local area. The hydrologic analysis was conducted in 1989. With respect to regional conditions and as indicated in the Draft SEIR, Section 4.3.1, Surface Water, p. 4-98, the data were derived from the *Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (RWQCB, 1994).

With respect to local conditions, data were derived from the Aliso Canyon-Oat Mountain climatological station and were used to develop the 100-year design storm. The precipitation depth, duration, and frequency values for the Aliso Canyon-Oat Mountain area were derived from the County of Los Angeles Hydraulic and Water Conservation files in August 1991. The 100-year, 24-hour design rainfall data are provided in the Draft SEIR, Table 4.3-1. For additional information pertaining to rainfall data, refer to Response 532.

Comment 537: What is the annual high rainfall data for the eastern Santa Clara River Valley?

Response 537: The annual high rainfall for the Santa Clara Valley is within the range of variation from 10 to 42 inches given for Los Angeles County and is included in the Draft SEIR, Section 4.3.1, Surface Water, p. 4-98. Providing the annual high rainfall data for the eastern Santa Clara River Valley would not substantially add to the discussion of regional conditions or change the conclusions reached in the Draft SEIR. Refer also to Response 536 for a discussion of regional and local rainfall conditions.

It should also be noted that the annual high rainfall data for the eastern Santa Clara River Valley are not provided in the *Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*, 1994; only the annual low was included.

Comment 538: What is the annual low for Mount Islip?

Response 538: The annual low rainfall for Mount Islip is within the range of variation from 10 to 42 inches given for Los Angeles County and is included in the Draft SEIR, Section 4.3.1, Surface Water, p. 4-98. Providing the annual low rainfall data for Mount Islip would not substantially add to the discussion of regional conditions or change the conclusions reached in the Draft SEIR. Refer to Response 536 for a discussion of regional and local rainfall conditions.

It should be noted that the annual low for the Mount Islip was not provided in the *Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*, 1994; only the annual high was included.

Comment 539: Where is Ducommum street rain gauge?

Response 539: The Ducommun Street rain gauge is located east of the downtown Los Angeles Civic Center in the City of Los Angeles. Ducommun Street trends parallel to and south of the 101 Freeway and east of Alameda Street. Also, refer to the 1997 Thomas Guide, p. 634, Grid G4.

Comment 540: Was the anticipated El Nino condition considered in this SEIR?

Response 540: The Draft SEIR considered El Nino conditions to the extent that drainage and sediment control structures at the project site will be designed to handle the peak discharge resulting from a 100-year-frequency, 24-hour storm event in accordance with regulatory requirements contained in CCR, Title 27. For an additional discussion of regional and local rainfall conditions, refer to Response 536.

Comment 541: What does Zone C on the flood insurance map mean?

Response 541: Zone C is defined as areas of "minimal flooding" on the National Flood Insurance Program Flood Insurance Rate Map (Panels 060137-0001C and 0005C). With respect to this issue, refer to the Draft SEIR, Section 4.3.1, Surface Water, pp. 4-101 and 4-102.

Comment 542: What does Zone A mean?

Response 542: Zone A is defined as "areas of 100-year flood, base flood elevations, and flood hazard factors not determined." As referenced in the Draft SEIR, Section 4.3.1, Surface Water, pp. 4-101 and 4-102, a small portion of the project site near the bottom of the canyon where the streambed area flows offsite is located in Zone A. For a discussion of surface water conveyance from the project site into offsite City and County flood control channels, Refer to Response 535.

Comment 543: Because the drainage for the landfill converges at the mouth of the landfill, what are the safety mechanisms in place besides the trench now to catch the polluted water from exiting the site?

Response 543: Refer to Response 535 for a discussion of surface water conveyance and collection at the project site and the conveyance of surface water from the project site into offsite City and County flood control channels. In addition, refer to Response 602 for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources.

Comment 544: Where is the wash that the water collected in the county travels through located? Is this water tested and then treated? How is this water treated? What will happen to this wash if the proposed expansion is approved?

Response 544: The "wash," or drainage channel, is located north of and runs parallel to the existing access road. This drainage channel will be lined as part of the closure activities at the existing inactive City Landfill. The drainage channel will ultimately be removed prior to liner system placement as part of the proposed City/County Landfill development. Refer to Response 535.

Comment 545: What does off site surface water mean?

Response 545: Offsite surface water pertains to surface water that develops outside of or beyond the Sunshine Canyon watershed. For the proposed City/County Landfill, surface water within the Sunshine Canyon watershed would be collected and routed through a series of downdrains and conveyance channels, and into a sedimentation basins before being released at rates equal to, or less than, predevelopment peak discharge flows to the Weldon Canyon Flood Control Channel.

Comment 546: Has water from the culvert maintained by the City BOE underneath San Fernando Road ever been tested? If it has been tested, what for? What are the results? If not then, why not?

Response 546: Surface water flowing from the project site into the City BOE culvert under San Fernando Road is sampled quarterly as part of the detection monitoring program for the project site. Quarterly water quality data are presented in the *Groundwater Monitoring and Waste Disposal Reports* and are available to the public at the LARWQCB.

Surface water is tested for VOCs, selected metals, and general minerals. VOCs have not been detected at the sampling locations (which are immediately upstream of the City BOE culvert).

Comment 547: If the surface water (water that travels over trash) eventually reaches Sepulveda Dam, does this mean that the water is available for residential, commercial and industrial use?

Response 547: Refer to Response 521 for a discussion of the engineering design and technical feasibility of placing drainage culverts on the top deck and side slopes of the proposed City/County Landfill. In addition, refer to Response 535.

Comment 548: Are these areas that the water travels through to reach Sepulveda Dam, covered areas to prevent people and animals from coming into contact with it?

Response 548: Surface water generally flows through closed culverts as well as open channels to Sepulveda Dam. The specifics of the channel construction, coverings, and restrictions to access can be obtained from the agencies that maintain the channels, such as the City BOE and the County DPW, Flood Control Division.

Comment 549: What is included with the Industrial storm water permit?

Response 549: In regard to the NPDES permitting requirements, the Draft SEIR, Section 4.3.1, Surface Water, pp. 4-102 through 105, states:

> The Porter-Cologne Water Quality Control Act (or California Water Code [CWC]) was enacted in 1969 and became effective in January 1970. This act served as a model for subsequent federal and other state government legislation. This act authorizes the State to adopt, review, and revise policies for all waters within the state (i.e., both surface and groundwaters) and directs the LARWQCB to develop basin plans. Generally, the LARWQCB's Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan designates beneficial uses for surface and groundwaters, sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's policy with respect to the maintenance of high-quality waters, and describes implementation programs to protect all waters in the region. In addition, the Basin Plan incorporates (by reference) all applicable State and LARWQCB plans and policies and other pertinent water quality policies and regulations.[32] The CWC (§ 13170) also authorizes the State to adopt water quality control plans. In the event of inconsistencies among State and basin plans, the more stringent provisions apply.[33]
>
> The Clean Water Act (CWA) enacted by the federal government in 1972 was designed to restore and maintain the chemical, physical, and biological integrity of our nation's waters. One of its goals states that wherever attainable, water quality should provide for the protection and propagation of fish, shellfish, and wildlife, and provide for recreation in and on the water (i.e., fishable, swimmable). The CWA (§ 303[c]) directs states to establish water quality standards for all "waters of the United States" and to review and update such standards on a triennial basis. Provisions of the CWA related to basin planning include § 208 that authorizes the preparation of waste treatment management plans and § 319 (added by 1987 amendments) that mandates specific actions for the control of pollution from nonpoint sources. The 1987 amendments to the CWA (Section 307[a]) mandate that states adopt numerical standards for all

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[32]/ *Water Quality Control Plan, Los Angeles Region*, op. cit., pp. 1-1 and 1-3.

[33]/ Ibid., p. 1-3.

priority pollutants. The U.S. Environmental Protection Agency (USEPA) delegated responsibility for implementation of portions of the CWA to the State and LARWQCB, including water quality planning and control programs such as the National Pollutant Discharge Elimination System (NPDES). The Code of Federal Regulations (Title 40, CFR) and USEPA documents provide direction in implementing the CWA.[34]

In 1987 the CWA was amended to add § 402(p), which established a framework for regulating stormwater discharges under the existing NPDES program. In November 1990 the USEPA published final regulations that established requirements for stormwater discharge permits. In November 1991 the State Water Resources Control Board (SWRCB) adopted General Industrial Activities Stormwater Permit application requirements, which were later amended in September 1992. On April 17, 1997 the SWRCB adopted a revised General Industrial Storm Water Permit that replaced the previously issued industrial storm water permits. Also, in August 1992 the SWRCB adopted General Construction Activities Stormwater Permit requirements. These statewide general permits are intended to regulate stormwater discharges for both construction and industrial activities.[35]

Both public and private industrial facilities (including landfills) that do not have a current NPDES permit had the choice of applying for an individual point source NPDES permit with the USEPA, or enter into the statewide general NPDES permit program. The project proponent elected the later program.

All wastewater discharges in the Los Angeles region whether on surface or groundwaters are subject to Waste Discharge Requirements (WDRs), which are submitted and approved by the LARWQCB. In addition, the USEPA has delegated responsibility to the State and LARWQCB for implementation of the federal NPDES program. The WDRs for discharges to surface waters also serve as NPDES permits. These programs are intended to regulate controllable discharges. It is illegal to discharge wastes into any waters of the State without obtaining appropriate WDRs or NPDES permits. Any facility or person who discharges, or proposes to discharge, wastes or makes a material change to the character, location, or volume of waste discharges to waters in the Los Angeles region (other than into a community sewer system) must describe the quantity and nature of the proposed discharge in a report of waste discharge (ROWD) or an NPDES application.[36]

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[34]/ Ibid.

[35]/ *Fact Sheet for National Pollutant Discharge Elimination System Permit (NPDES) General Permit (as amended September 17, 1992) for Storm Water Discharges Associated with Industrial Activities Excluding Construction Activities*, State Water Resources Control Board, p. 1. September 1992.

[36]/ *Water Quality Control Plan, Los Angeles Region*, op. cit., p. 4-3.

In general, the revised NPDES permit program would consists of four actions:

- the filing of a NOI by the landfill operator for inclusion into the State General Permit;
- the development and implementation of a site-specific SWPPP;
- the development and implementation of a stormwater monitoring program that includes an annual site audit and visual and chemical monitoring; and
- the annual reporting of pollution prevention effort and visual and chemical monitoring to the LARWQCB.

Under the revised General Industrial Storm Water Permit revisions to the NPDES monitoring and reporting program for the Sunshine Canyon City/County Landfill may include:

- quarterly visual observations for the presence of unauthorized non-stormwater discharges (revised from semi-annual;
- quarterly visual observations of authorized non-stormwater discharges (previously there was no requirement);
- the establishment of a wet season from October 1 through May 31 (revised from October 1 through April 30);
- the requirement to sample in the first hour of a storm event (revised from the first ½ hour); and
- the requirement to sample a storm event that produces a discharge (revised from the sampling requirement of storms that produce one hour of discharge).

Upon review of an NPDES application, the LARWQCB requires that appropriate measures and limitations be incorporated to protect public health and water quality. Basic NPDES component requirements include discharge limitations (including, if required, effluent and receiving water limits), standard requirements and provisions outlining the discharger's general discharge requirements and monitoring and reporting responsibilities, and a monitoring program to collect and analyze samples and submit monitoring reports to the LARWQCB on a prescribed schedule.[37]

Discharges are categorized according to water quality threat and operational complexity. Additionally, discharges to surface waters are categorized as either

[37]/ Ibid.

major or minor discharges. Filing and annual fees are based on these categories. WDRs usually do not have an expiration date but are reviewed periodically on a schedule based on the level of threat to water quality. NPDES permits are adopted for a 5-year period.[38]

The general NPDES permit requires development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that emphasizes stormwater best management practices (BMPs). This approach provides the flexibility necessary to establish controls that can appropriately address different sources of pollutants. New dischargers must submit a Notice of Intent (NOI) and develop and implement an SWPPP prior to commencement of operations. All dischargers must prepare, retain onsite, and implement an SWPPP.[39] The NOI is a standard set of forms (that has an accompanying site plan) that provides basic information about the landfill facility, its location, and potential for stormwater discharge. In general, the SWPPP describes site conditions and activities that identify sources of pollution that may affect stormwater discharge quality; describes appropriate stormwater management practices that would reduce pollution in stormwater discharges; certifies that non-stormwater discharges have been eliminated; and provides annual verification through onsite inspection that all elements of the SWPPP are in compliance.

The SWPPPs are considered reports available to the public under §303 (b) of the CWA. Required elements of an SWPPP include source identification, practices to reduce pollutants, an assessment of potential pollution sources, a materials inventory, a preventative maintenance program, spill prevention and response procedures, general stormwater management practices, employee training, record keeping, and elimination of unpermitted non-stormwater discharges to the industrial stormwater system.[40]

Comment 550: What was revised on the April 17, 1997 permit?

Response 550: Refer to Response 549 for a discussion of NPDES regulatory history and permitting requirements.

Comment 551: Which of the NPDES permit program is more stringent, the US EPA or the States?

Response 551: Refer to Response 549 for a discussion of NPDES regulatory history and permitting requirements.

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[38]/ Ibid.

[39]/ *Fact Sheet for NPDES General Permit*, op. cit., p. 6.

[40]/ Ibid.

Comment 552: What are the differences between the programs?

Response 552: Refer to Response 549 for a discussion of NPDES regulatory history and permitting requirements.

Comment 553: Why did BFI choose the State program?

Response 553: BFI is required to comply with the State program, which is based on USEPA requirements as stated in Response 549.

Comment 554: What are the requirements that need to be met by the SWRCB General Construction Activities Storm water Permit?

Response 554: Refer to Response 549 for a discussion of NPDES regulatory history and permitting requirements.

Comment 555: On page 4-104 states that the General Industrial Storm Water permit revisions to the NPDES monitoring and reporting program may include . . . what does the General Industrial Storm Water permit include for Sunshine Canyon?

Response 555: Refer to Response 549 for a discussion of NPDES regulatory history and permitting requirements.

Comment 556: Does the SWPPP have to be specific and how specific for how they will identify sources of pollution, practices they will use to reduce pollutants, assessment of potential pollution sources, etc.?

Response 556: The SWPPP must be specific with respect to how landfill operators plan to address stormwater pollution controls at the project site. The SWPPP is a site-specific document that provides BMPs for identifying and reducing pollutants in the stormwater discharge. The SWPPP includes BMPs for active landfilling areas and ancillary areas associated with landfilling operations such as fuel storage areas.

Comment 557: Did BFI file a Notice of Intent to develop and implement the SWPPP? If so when was it filed?

Response 557: Specific to the County Landfill, the NOI was prepared and submitted to the SWRCB on October 30, 1992.

Comment 558: How safe is it to allow the proponent to self inspect the sites storm water discharge?

Response 558: The SWPPP is retained onsite and is subject to inspection on demand by the LARWQCB or the local stormwater management agency (i.e., County DPW) that receives the site's stormwater discharge.

Comment 559: Are they currently in compliance?

Response 559: The entire project site (both City and County jurisdictions) is currently in compliance with its NPDES requirements.

Comment 560: Why was the wet season changed to exclude June through September? Is the data then averaged for 8 months?

Response 560: The wet season (from October 1 through May 31) is specified in the State's General Industrial Storm Water Permit requirements. Data are not averaged for use in either monitoring or reporting according to General Industrial Storm Water Permit requirements. Visual inspections of the project site are required during the "dry season," which is June through September.

Comment 561: Figure 4.3-2 shows the proposed drainage plan and clearly shows that the drainage will go over existing trash even if it is through a channel the channel will still be on top of trash, how could this possibly be correct?

Response 561: Refer to Response 521 for a discussion of the engineering design aspects and technical feasibility of placing drainage culverts on the top deck and side slopes of the proposed City/County Landfill.

Comment 562: The Sediment basin in the County is to be removed and then there will be no existing collection area in the County. How can the proposed sediment basins B and C possibly contain all the water? Doesn't this open the door to a major disaster?

Response 562: The existing sedimentation basin in the County will be removed and replaced by Sedimentation Basins B and C within the City. These basins will have design capacity to hold both predicted sediment load and provide storage capacity necessary to accommodate stormwater flow from the operational County Landfill and upper reaches of the Sunshine Canyon watershed area.

Comment 563: Figure 4.3-2 shows that the water will flow from the County to the City basins B and C and then the water will travel over channels, built on trash which stability is questionable all to converge on basin A. Is this a common engineered design, to build channels on top of trash, how could this possibly be safe?

Response 563: Refer to Response 521 for a discussion of the engineering design aspects and technical feasibility of placing drainage culverts on the top deck and side slopes of the proposed City/County Landfill.

Comment 564: Basin A is so far away from the county area of operation, what will happen if there is a blockage in the channel, won't this cause a lake or flood of trash?

Response 564: An inspection and maintenance program for the surface water management system will maintain the integrity of the surface water conveyance structures, including downchutes, V-ditches, culverts, perimeter channels, and the sedimentation basins. Any blockage

or leak in the surface water conveyance structures will be expeditiously corrected by the project proponent.

Comment 565: What happens if the channel leaks even a small amount couldn't this cause a sink hole type situation?

Response 565: The hypothetical situation described by the commenter would not occur. Refer to Response 564.

Comment 566: What emergency plan will be in place?

Response 566: Emergency plans at the project site would be implemented immediately following a natural disaster. Following an emergency event, an operations checklist would be used by landfill personnel to inspect all environmental protection and control systems (including surface water conveyance structures) to check for any damage or failure. Any damage or failure would be immediately corrected by the project proponent.

Comment 567: Doesn't this leave all the stress for water drainage in the city?

Response 567: The natural confluence of surface waters is at the entrance to the project site. These general drainage patterns are unaffected by the proposed landfill development. Moreover, the release of surface waters offsite is limited to the peak rate of surface water flow corresponding to predevelopment conditions.

Comment 568: If basin A is designed to capture only 41-acre feet of runoff, how can this one basin accommodate all this water?

Response 568: Refer to Responses 562 and 567. As indicated in the Draft SEIR, Section 2.7.6, Sedimentation Basin, p. 2-62, **three** [emphasis added] sedimentation basins (not one as noted by the commenter) similar to one already constructed in the County would be developed within the City jurisdiction. Two of these basins would each have a design capacity of approximately 41 to 49 acre-feet to provide adequate volume for the expected sediment and divert stormwater runoff without overtopping. The third basin, referenced by the commenter, to be constructed near the landfill entrance, would have a capacity estimated at 41 acre-feet, based on debris storage and additional flood peak attenuation storage, providing peak flow attenuation to pre project condition outflows.

Comment 569: How specifically will these channels for drainage, inceptor ditches, pipelines and sediment basins be designed to minimize ponding, infiltration, inundation, erosion, slope failure, washout and overtopping.

Response 569: Components of the surface water management system will be designed in accordance with CCR, Title 23, Division 3, Chapter 15, Article 3, §2533(c) and County DPW Flood Control Division requirements. These requirements ensure effective collection, removal, and diversion of surface waters away from landfill areas and route surface water safely offsite to predevelopment levels.

Comment 570: What are the standards of a certified laboratory?

Response 570: The standards for laboratories performing drinking water, waste solids, and liquids testing are set by the California DHS. The DHS has an Environmental Laboratory Accreditation Program (ELAP), and DHS staff are responsible for auditing the laboratory's capabilities, facilities, and analytical procedures and certifying that laboratories meet or exceed ELAP criteria. DHS staff involved with the ELAP periodically audit certified or accredited laboratories to maintain their accreditation.

Comment 571: How are these laboratories chosen? By whom are they chosen?

Response 571: The laboratories are independent businesses and must request accreditation by the DHS. The project proponent chose its laboratory from among a list of State-accredited laboratories.

Comment 572: How often are the labs checked for accuracy?

Response 572: The testing methodologies utilized by State-certified laboratories (including checking for accuracy) are reviewed annually by the DHS.

Comment 573: Why is the debris production curve based on the assumption of a "burned" watershed?

Response 573: A burned watershed contains no vegetation to reduce erosion; therefore, it simulates a conservatively high sediment production. The conservative sediment loading is assumed when sizing a sedimentation basin to incorporate a margin of safety (i.e., worst-case analysis) into the surface water management system being proposed.

Comment 574: In debris production area 6 (DPA-6) an assigned area specifically for Sunshine Canyon? or are there other ares that have DPA-6 assignment?

Response 574: Debris production zones, or "areas" as referenced by the commenter, are not acreage determinations. Debris production zones were created by the County DPW to determine the rate of sedimentation production in different areas within Los Angeles County. These zones are rated on a scale of 1 to 11, with Zone 1 having the highest anticipated volume of debris production and Zone 11 having the lowest anticipated volume of debris production. Sunshine Canyon is rated as a Zone 6 debris production zone; East Canyon is rated as a Zone 3 debris production zone.

Comment 575: What County or City agency makes this assignment?

Response 575: The County determines this assignment. Debris production zones are derived from the County DPW *Hydrology Manual.*

Comment 576: Why are the Sediment basins being constructed in phases?

Response 576: Sedimentation basins will be constructed when landfilling operations necessitate modifications to the surface water management system. As indicated in the Draft SEIR, Section 4.3.1, Surface Water, p. 4-110:

> Initially, landfilling operations for the proposed City/County Landfill areas would occur separately for the first 18 to 24 months; thereafter, landfilling operations would be combined. During this period, stormwater runoff in the County would use the existing sedimentation basin located north of the City/County boundary, and runoff within the City would use existing drainage control improvements, until basin A is constructed. As landfill development occurs within the County portion of Sunshine Canyon (near the existing basin), this basin would be removed. However, prior to its removal, basin C would be constructed to capture stormwater flow from both the County Landfill and the upper reaches of Sunshine Canyon watershed. Thereafter, as landfilling progresses back into the City, basin B would be constructed.
>
> It is anticipated that stormwater conveyed into sedimentation basin C will flow via a perimeter channel over the final cover area of the existing inactive landfill before being discharged via surface improvements into basin A located near the landfill entrance. Stormwater contained within basin B would eventually be released and flow into basin A via a drainage channel located along the relocated access road. Stormwater diverted into these basins would be held and dissipated, and sediment loads would be reduced prior to release into City and County flood control improvements. In addition, diverted water would be tested and periodically monitored pursuant to LARWQCB water quality monitoring programs.

Comment 577: After all the dispute about the County being a separate site now they will combine operations and is a clear case that they always sought incremental approval for this project against CEQA.

Response 577: With respect to the proposed project, because the main development area is located in the City, its pending application and environmental process must meet City requirements. Even though the County and City environmental processes are similar, each jurisdiction is required to fulfill its CEQA obligations with respect to processing the proposed project.

As indicated in the Draft SEIR, the proposed project is intended to update existing background data and provide any new relevant information to the previous environmental documents that comprise the certified FEIR (refer to the Draft SEIR, Appendix C1, for a complete list of FEIR documents).

The proposed City/County Landfill and potential impacts resulting from development were analyzed in the FEIR. In that regard, the proposed project was identified as part of a combined "County/City Landfill" project that would encompass areas within both County and City jurisdictions. The envisioned County/City Landfill project was originally proposed (in 1989) in both City and County jurisdictions to have an estimated

disposal capacity of approximately 215 million tons and provide a waste intake of approximately 17,500 tpd into Sunshine Canyon. In its original iteration, the County/ City Landfill project footprint encompassed ±706 acres within both jurisdictions. At that time, the project proponent owned ±1,560 acres in and around Sunshine Canyon.

The FEIR prepared for the Sunshine Canyon Landfill Extension considered the potential environmental impacts of landfill development and operation within both jurisdictions (±1,560 acres) and provided substantial information about the relative merits of developing various landfill configurations (i.e., alternatives) in this canyon area. As indicated in the FEIR, development of the County/City Landfill was to commence in the upper reaches of the canyon area (in the County) and then proceed downgradient toward the mouth of the canyon, extending back into the lower reaches of Sunshine Canyon (in the City). Conceptual planning of this proposed project began in 1984, when the project proponent met with County officials and submitted the project application.

The County/City Landfill project was refined or scaled back in size during its environmental review process by the County Regional Planning Commission (RPC). What was essentially the County Landfill portion of the project was initially approved by the Board of Supervisors in February 1991 and received final approval in November 1993. County approval of this project authorized the development of a 16.9-million-ton landfill encompassing ±215 acres of land in the County.

Condition (10)(b) of the County Landfill CUP directed the project proponent to file an application with the City for a landfill within the City's jurisdiction as part of a combined County/City facility.[41] The project proponent filed those project applications with the City on June 25, 1991. (Refer to the Draft SEIR, Volume II, Appendix A2.)

For additional information pertaining to County/City Landfill Project history, refer to the Draft SEIR, Volume II, Appendix C2.

Comment 578: Who will be the lead agencies now?

Response 578: With respect to processing the Draft SEIR for the City/County Landfill project, the City of Los Angeles is the Lead Agency, with the County of Los Angeles serving as a Responsible Agency. Refer to Response 188 for a discussion of the requirement for some form of agreement between the City and County to authorize common power over the entire project site.

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[41]/ Refer to Sunshine Canyon Landfill Extension CUP and Oak Tree Permit 86-312-(5), Conditions of Project Approval, initially approved on February 19, 1991, by the County of Los Angeles Board of Supervisors. Specifically, CUP Condition 10(b) stated in part, "therefore, as soon as possible, but not later than July 1, 1991, the permittee shall apply to the City of Los Angeles to expand the landfill within the City . . . " At the time of the Board of Supervisors' final approval of the project in 1993, CUP Condition 10(b) was changed and stated in part, "therefore, the permittee shall diligently pursue its application to the City of Los Angeles to expand the landfill within the City . . . " These conditions are incorporated in Appendix C6, Sunshine Canyon Landfill Extension, Findings of Fact and Statement of Overriding Considerations, and Conditions of Project Approval, of this document.

Comment 579: How will the tipping fees be split between the County and City?

Response 579: At this stage of processing, it is premature for the City to speculate what the actual surcharge to tipping fees will be or how they will be split between the jurisdictions (i.e., City and County). However, as indicated in the Draft SEIR, Section 2.5.4, Working Arrangement, p. 2-38, discusses the concept of the requirement for some form of agreement between City and County jurisdictions to authorize common power over the entire project site prior to or concurrent with City/County Project approval by the City. This arrangement would recognize existing discretionary approvals, contractual agreements, or other arrangements that were approved by the County Board of Supervisors and regulatory agencies in connection with the operational County Landfill. Tipping fee arrangement(s) between these jurisdictions would be formalized through this working arrangement (or some form of agreement).

Comment 580: What surface improvements will be made in the existing landfill?

Response 580: The existing inactive City Landfill already has numerous drainage control features such as interceptor ditches and concrete drainage channels designed to divert and convey surface water runoff away from the landfill. These improvements are maintained regularly by landfill personnel and are closely monitored during the rainy season.

The implementation of the FCPMP for the inactive City Landfill will require constructing additional surface water drainage improvements to provide protection from surface water runoff. These improvements consist of a permanent drainage channel located along the northern portion of the inactive City Landfill, two sections of lined surface water drainage channels along the existing streambed area, and construction of a sedimentation basin near the mouth of Sunshine Canyon. The development of these controls would prevent stormwater infiltration and surface water contact with the existing waste mass, provide erosion control protection, and stabilize areas of the access roadway located adjacent to the "S" turn portion of that roadway. These improvements are discussed in the Draft SEIR, Section 4.2, Surface Water, p. 4-106.

Comment 581: Where will the storm water be dissipated?

Response 581: Stormwater will be dissipated in the proposed sedimentation basins. The proposed sedimentation basins would include energy dissipators to slow surface water flows. As identified in the Draft SEIR, Section 4.3.1, Surface Water, pp. 4-110 and 4-111:

> . . . This concrete-lined sedimentation basin incorporates dual spillway outlet towers, an emergency spillway to prevent surface waters from cresting the sedimentation basin in the event both spillway outlet towers become plugged, an energy dissipator downstream of the spillway outlet tower to slow surface water exit velocity, and an additional rip-rap outlet apron to further dissipate surface water exit velocity and minimize erosion downstream of the sedimentation basin outlet.

The Draft SEIR, Figure 2.7-5, County Landfill Sedimentation Basin, depicts the existing energy dissipator at this basin.

Comment 582: What is the proposed testing and monitoring program for the diverted storm water?

Response 582: Refer to Response 678 for a discussion of surface water quality monitoring and testing requirements at the project site.

Comment 583: How does the energy dissipater slow surface water exit velocity?

Response 583: Energy dissipators slow the velocity of surface waters by routing flows around baffle blocks and impact walls, or over riprap material. Refer to the Draft SEIR, Figure 2.7-5, County Landfill Sedimentation Basin, which depicts the existing energy dissipator at the County Sedimentation Basin.

Comment 584: What is the pre-development maximum value of peak discharge?

Response 584: The maximum undeveloped peak discharge is 2,203 cubic feet per second (cfs). This information is provided in the Draft SEIR, Table 4.3-2, Hydrologic Design Requirements, p. 4-111.

Comment 585: The surface water exits the dump site at San Fernando Road, then follows a cracked channel to the Jensen Filtration Plant, where it goes directly to ground. This canyon has received as much as 52 inches of rain a year and has a maximum 100 year, 24 hour projection of 9.80 inches. The base of the canyon is in a 100 year flood plain. Slides, washouts and flooding has occurred at this site before.

What if the surface water is not able to be treated before entering Bull Creek Channel and Sepulveda Dam?

Response 585: Refer to Response 535 for a discussion of surface water conveyance and collection at the project site and the conveyance of surface water into offsite City and County flood control channels. In addition, refer to Response 678 for a discussion of surface water quality monitoring and testing requirements at the project site. Construction of the surface water management system and implementation of BMPs, as discussed in Response 543, significantly reduce the possibility for pollutants to be present at concentrations exceeding NPDES and RWQCB action levels. In addition, the primary areas where pollutants are present (i.e., landfilling and fuel storage areas) are outside of the floodplain area. The 100-year, 24-hour storm event of 9.80 inches for Sunshine Canyon is also based on a 100-year annual rainfall of 50.31 inches (see Draft SEIR, Table 4.3-1). Under these rainfall circumstances "untreated" waters from many other areas within the watershed, besides the Sunshine Canyon facility, may enter the Bull Creek Channel. BMPs implemented at the site and approved by the RWQCB lessen any potential impact that a storm event of this magnitude will have on the quality of water discharged from the site.

Comment 586: How much potential does exist for non-storm water discharge into the storm water conveyance system?

Response 586: It is highly unlikely that a nonstormwater discharge would occur for either the existing County Landfill operation or the proposed City/County Landfill. Environmental controls, such as the waste containment groundwater protection system, and comprehensive environmental monitoring programs, such as the surface water and groundwater monitoring programs currently being conducted in conjunction with existing landfill operations and which will be expanded as part of this project, provide several levels of redundancy with respect to protecting water resources.

Comment 587: What various measures will be used to separate storm water from wastes being disposed of in the proposed landfill?

Response 587: The mitigation measures recommended to reduce refuse contact with stormwater are listed in the Draft SEIR on pp. 4-113 and 4-114. These measures provide for stormwater to be intercepted and diverted from the active landfilling areas, the working face of the landfill to be covered with daily and final cover as quickly as waste cell or final grades are reached, and stormwater to be monitored and tested to document the effectiveness of the stormwater diversion procedures.

In addition to these mitigation measures, practices such as reducing the size of the working area would be utilized during rainy weather conditions.

Comment 588: What methods will be used to control sedimentation load during construction caused by storm water runoff?

Response 588: The project proponent will implement onsite erosion control procedures to reduce sedimentation load in accordance with Construction Activities General Permit requirements. Methods to control sedimentation load during construction include the following: stormwater and surface water will be intercepted and diverted away from active landfilling areas, stormwater and surface water will be intercepted and diverted away from the active construction areas, the surface water collection system will be designed to collect runoff and collect and retain suspended solids in the sedimentation basins, sediment will be removed from sedimentation basins after any significant storm events, erosion control BMPs will be implemented during onsite construction activities, the project proponent will implement a preventative maintenance program to detect conditions that would detract from the BMPs, and stormwater will be monitored in accordance with NPDES requirements and to document the effectiveness of the stormwater diversion procedures.

Comment 589: What methods will be used to control debris caused by storm water runoff?

Response 589: Similar methods used to separate stormwaters and control sedimentation load will be used to control debris. Refer to Responses 587 and 588 for a discussion of those methods.

In addition, each sedimentation basin will be equipped with an outlet structure, which is designed to avoid clogging. These structures have openings to allow water flow while retaining debris. (See Figure 2.7-5 in the Draft SEIR, which shows the existing sedimentation basin.) Any debris remaining in the sedimentation basin after it has been drained will be removed along with other sediments, as soon as possible after a major storm event.

Comment 590: What methods will be used to control erosion caused by storm water runoff?

Response 590: Listed mitigation measures to control erosion are provided in the Draft SEIR on pp. 4-113 and 4-114. These measures include implementing an erosion control plan during construction and operation activities, conducting construction material loading and unloading in designated areas to reduce the potential of washout due to stormwater runoff, and implementing preconstruction controls such as using a sandbagging system to reduce runoff velocities and sediment in stormwater runoff.

Comment 591: What are the requirements of the NPDES permit for point source and non-point source discharges?

Response 591: Point and nonpoint source discharges to waters of the State are regulated by the SWRCB. These discharges are defined in 40 CFR §122.2. A Memorandum of Agreement (dated September 22, 1989) between the USEPA and the SWRCB authorized and established procedures for the State to issue general NPDES permits in accordance with 40 CFR §122.28 and 122.44. The SWRCB, through its regional water quality control boards (e.g., LARWQCB), establishes WDRs for stormwater and nonstormwater point source discharges through the following:

- SWRCB Order No. 97-03-DWQ, Industrial Activities General Permit;
- SWRCB Order No. 92-08-DWQ, Construction Activities General Permit;
- LARWQCB Order No. 96-054, Municipal Stormwater and Urban Runoff Discharges;
- LARWQCB Order No. 90-148, Land Treatment of Petroleum Hydrocarbon Contaminated Soil;
- LARWQCB Order No. 91-92, Discharges of Groundwater to Surface Waters;
- LARWQCB Order No. 91-93, Discharge of Non-Hazardous Contaminated Soils;
- LARWQCB Order No. 91-94, Subsurface Sewage Disposal Systems; and
- LARWQCB Order No. 91-111, Discharges of Hydrostatic Test Water to Surface Waters.

These orders provide specific regulatory rules and requirements. As stated, the proposed project would be regulated as a point source. Nonpoint sources (e.g., as referenced by the commenter) are defined as the result of man's use of the land such as urbanization, roads and highways, vehicles, agriculture, construction, industry, mineral extraction, physical habitat alteration (e.g., dredging/filling), hydromodification (e.g., diversion, impoundment, channelization), silviculture (e.g., logging), and other activities that disturb land. These sources may be regulated by the local jurisdiction (i.e.,

City), regulatory agency (e.g., SCAQMD), or under specific guidelines issued by the LARWQCB.

Comment 592: Where will the water be monitored until the sediment basins are built?

Response 592: Surface water is currently collected at the project site quarterly (e.g., four times per year) for testing. Samples are collected at four onsite locations (e.g., Locations A through D), primarily at downstream tributary areas. Testing of collected surface water samples shows that the only elevated constituent of concern found has been trihalomethanes. Trihalomethanes are produced during the chlorination process for water treatment. The origin of these trihalomethanes is from DWP-treated water used onsite for dust control.

In accordance with current WDRs and NPDES permit requirements, surface water and stormwater samples for the existing inactive City Landfill are collected and analyzed quarterly and during prescribed rain events. The results are submitted to the LARWQCB for review. For the proposed project, sedimentation basins will be constructed during the initial stages of project development. The basin outfall will be sampled according to LARWQCB requirements. Based on the existing program, sampling would be conducted quarterly and during prescribed rain events and dry season periods.

Comment 593: Is the flood control channel the same one that is referred to that is located directly east of the project entrance?

Response 593: Yes. Refer to Response 535.

Comment 594: Won't the temporary unlined drainage facilities, consisting of diversion ditches to intercept natural runoff, cause too much erosion if it rains excessively?

Isn't vegetation the best way to prevent erosion?

Response 594: Temporary, unlined drainage facilities will be designed to control erosion. These channels will use riprap, geo-netting, and temporary diversion methods to reduce the potential of erosion. Permanent water conveyance structures will be part of the initial construction for the City/County Landfill, and all permanent water conveyance structures will be developed in phases as areas are developed or the inactive areas of the landfill are closed. These temporary drainage facilities will convey surface water to sedimentation basins that will remove sediment from the discharge. Vegetation, as well as other engineered methods of erosion control such as matting or turf reinforcement, will be used as applicable to protect against erosion.

Comment 595: What is meant by areas of disturbance shall be kept at a minimum during active filling operations? What is minimum disturbance? How will this be done?

Response 595: Refer to Response 493 for a discussion of the proposed City/County Landfill active working face area of disturbance.

Comment 596: What is the best % gradient for final landfill cover to preclude percolation of water?

Response 596: Gradients that prevent water ponding are the most appropriate for landfill development. A minimum gradient of 3 percent over native or fill material is an accepted design criterion.

Comment 597: What is BFI's erosion control plan for Sunshine Canyon?

Response 597: The erosion control plan provides for a permanent vegetative cover for long-term erosion and dust control. To ensure optimal growing conditions, this plan includes soil testing, selecting a variety of native and nonnative seed mixes and hydroseeding, and identifying potential soil erosion areas. Revegetation would occur on all final and temporary cut slopes and temporary and final cover surfaces of the landfill. Selected plant species would be chosen for rapid establishment, and once established, these species would be self-propagating and not require excessive irrigation. To ensure successful revegetation, a 3-year monitoring and maintenance program would be implemented by the project proponent.

Comment 598: When will this be completed?

Response 598: The Erosion Control Plan for the proposed project will be submitted as part of the Joint Technical Document to regulatory agencies (including the City) at the time the project proponent submits its application for an SWFP. In accordance with CCR, Title 27, §21780, the preliminary closure and postclosure maintenance plans for the proposed City/County Landfill will include an Erosion Control Plan.

Comment 599: Who will approve this plan?

Response 599: The City LEA would have primary responsibility for approving the Erosion Control Plan. Other Responsible Agencies that have discretionary approval over the project include the CIWMB and LARWQCB.

Comment 600: How can any clear thinking person believe that the potential impacts can be mitigated to less than a significant level?

Response 600: The impact on a resource is determined after careful analysis. Impacts are measured against agency threshold levels to determine significance. With respect to the proposed project, all impacts associated with project development (except for certain air quality impacts) will be mitigated to less than a significant level. The reader is referred to each topical area within the Draft SEIR, which addressed the environmental setting for each topical issue, the threshold level for determining significance, potential environmental impacts, mitigation measures for environmental impacts deemed to be significant (if necessary), and any impacts that cannot be reduced below a level of significance even with the implementation of mitigation measures.

Comment 601: This project will put a liner on top of existing trash, 30 plus years of trash that will continue to settle and then they will put over 11,000 tons of trash a day 6 days a week on top.

Response 601: Refer to Responses 745 through 749 for a discussion of how the proposed City/County Landfill design and engineering incorporate long-term landfill settlement.

Comment 602: Vinyl Chloride which has a Maximum Contaminant Level of 0.5 ppb has already been detected on the City Side at 5.0 ppb. Vinyl Chloride can rapidly pass through intact FML's (Flexible Membrane Liners) without holes.

Response 602: Diffusion of vinyl chloride through the geomembrane liner will not be rapid and does not pose a threat to groundwater, human health or the environment. Diffusion of VOCs, including vinyl chloride, through geomembrane liners was recognized as a contaminant transport mechanism at the time Subtitle D was developed. The prescriptive Subtitle D liner system was developed to provide adequate protection to the environment against all modes of contaminant transport, including VOC diffusion, without relying upon any additional natural or engineered systems. In addition, in a letter from Robert Dellinger of the USEPA, Office of Solid Waste and Emergency Response, Municipal and Industrial Waste Division to Dr. G. Fred Lee of G. Fred Lee & Associates, dated February 9, 1998, Mr. Dellinger states:

> While you contend that landfills will always be a threat if they release any constituent, we believe that controlled releases of certain constituents from landfills may be acceptable provided the releases do not exceed regulatory levels that have been established to protect human health and the environment. Our risk assessment supports our position. It concludes that disposal of municipal waste in properly located, designed, operated, closed, and monitored landfills poses very low risks to human health and the environment.

In addition to a liner system that meets or exceeds Subtitle D standards, the proposed City/County Landfill provides several additional barriers and systems which mitigate the potential for impacts to groundwater, human health and the environment by VOCs, that include vinyl chloride. These barriers and systems include natural geologic and hydrogeologic conditions, and vadose zone and groundwater monitoring systems.

Comment 603: When was the data pertaining to the ground water collected?

Response 603: Data for determining the quality of groundwater at the project site are compiled from groundwater monitoring that occurs quarterly (e.g., four times a year) at the project site. These reports are submitted to the LARWQCB. Groundwater data collection by the project proponent is ongoing and included as part of the Detection Monitoring Program, which began in 1987.

As stated in Section 4.3.2, Groundwater, p. 4-125, of the Draft SEIR:

Currently, there are 22 groundwater monitoring wells installed at the project site to monitor groundwater conditions and water quality. Both shallow and deep groundwater monitoring wells have been installed. The shallow wells are screened exclusively within alluvial material and bedrock to properly evaluate and compare groundwater quality upgradient and downgradient in similar geologic formations. Upgradient wells were installed and designed to monitor natural groundwater conditions present within the water-bearing strata. These wells are intended to supplement monitoring groundwater conditions around the perimeter of the existing landfill and monitor for possible offsite pollution migration. Downgradient wells (i.e., deep monitoring wells) were installed to monitor potential impacts resulting from the existing inactive landfill. Of the 22 wells installed, 13 specifically monitor groundwater downgradient from the existing landfill. The County Landfill is hydrogeologically upgradient of the existing inactive landfill.

Comment 604: Who conducted the exploration borings? Who decided to where the borings should be taken?

Response 604: Exploratory borings were drilled by various engineering consultants under contract to the project proponent. The locations were jointly selected by BFI and the consultants. The LARWQCB and other State and City departments also determined the locations of some exploratory borings and have reviewed the resulting documentation.

Comment 605: What ground water studies were done? By whom? Was this company a BFI subsidiary or a company chosen by BFI or the City / County?

Response 605: Groundwater studies (to date) have been performed by BFI and contracted engineering consulting firms (Earth Technology Corporation, GeoSyntec Consultants, and PRA Group). The engineering consulting firms were selected by the project proponent; these companies are not subsidiaries of BFI. The following groundwater studies are referenced in Draft SEIR, Section 10, Bibliography:

- BFI. "Chloride Concentrations." Groundwater Services. December 1994.
- BFI. "Expanded Chloride Investigation." August 1996.
- Earth Technology Corporation. "Hydrogeologic Assessment of Proposed Sunshine Canyon Landfill Extension, Sylmar, California." May 6, 1988.
- Earth Technology Corporation. "Hydrogeologic Assessment of the Proposed Sunshine Canyon Extension." September 1988.
- GeoSyntec Consultants. "1994 Fourth Quarter and Annual Report. Groundwater Monitoring and Waste Disposal Report. Sunshine Canyon Landfill. Sylmar, California." March 1, 1995a.
- GeoSyntec Consultants. "1995 Fourth Quarter and Annual Report. Groundwater Monitoring and Waste Disposal Report. Sunshine Canyon Landfill. Sylmar, California." March 1, 1996a.
- GeoSyntec Consultants. "Groundwater Monitoring Systems Report. First Quarter 1995. Sunshine Canyon Landfill. Sylmar, California." August 9, 1995d.

- GeoSyntec Consultants. "Groundwater Monitoring and Waste Disposal Report. First Quarter 1995. Sunshine Canyon Landfill. Sylmar, California." May 1, 1995b.
- GeoSyntec Consultants. "Groundwater Monitoring and Waste Disposal Report. Second Quarter 1995. Sunshine Canyon Landfill. Sylmar, California." August 1, 1995c.
- GeoSyntec Consultants. "Groundwater Monitoring and Waste Disposal Report. Third Quarter 1995. Sunshine Canyon Landfill. Sylmar, California." November 1, 1995e.
- GeoSyntec Consultants. "Groundwater Monitoring and Waste Disposal Report. First Quarter 1996. Sunshine Canyon Landfill. Sylmar, California." May 1, 1996b.
- GeoSyntec Consultants. "Groundwater Monitoring and Waste Disposal Report. Second Quarter 1996. Sunshine Canyon Landfill. Sylmar, California." August 1, 1996c.
- PRA Group. "Report of Disposal Site Information, Proposed Sunshine Canyon Sanitary Landfill Extension Site, Los Angeles County, California." Volumes I, II, and Addendum. August 16, 1991, and December 9, 1991.
- PRA Group. "Report of Waste Discharge." April 1987.
- PRA Group. "Report of Waste Discharge, Proposed Sunshine Canyon Sanitary Landfill Extension Site, Sylmar, California." Job No. 2-0118/3040-01. Prepared for Browning-Ferris Industries, Inc. Unpublished report. September 16, 1988.
- PRA Group. "Supplemental Information Regarding the Groundwater Extraction Trench & Chloride Levels at Sunshine Canyon Sanitary Landfill." January 1992.
- PRA Group. "Water Monitoring and Analysis Program." July 1987 and July 1988.

These studies are available for review in their entirety at the Regional Water Quality Control Board, Los Angeles Region (4), Planning Unit, 101 Centre Plaza Drive, Monterey Park, CA; County of Los Angeles Department of Health Services, Solid Waste Management Program, 2525 Corporate Place, Monterey Park, CA; and City of Los Angeles, Department of Environmental Affairs, Local Enforcement Agency, 201 N. Figueroa Street, 2nd Floor, Los Angeles, CA.

Comment 606: Why is the average horizontal ground water velocity in the fractured bedrock such a wide range (3 to 10 feet per year)?

Response 606: The range of groundwater velocities (3 to 10 ft/yr) in the fractured bedrock is due to the heterogeneous nature of the geologic strata located within the saturated zones of the Towsley Formation bedrock. Measured hydrogeologic properties of the saturated zones, such as hydraulic conductivity, porosity, and hydraulic gradient, that are used to calculate groundwater velocities vary spatially across Sunshine Canyon.

Comment 607: Don't earthquakes effect the water flow and change the permeability of water?

Response 607: Earthquakes can cause upward and downward fluctuations in the water table but generally have little impact on groundwater flow. Water does not have a permeability; however, the saturated zones through which groundwater flows do have measurable permeabilities. Permeabilities of saturated zones in the vicinity of a fault can be

changed during an earthquake because the fault may generally act as a barrier to groundwater flow.

Comment 608: Were the velocity tests done prior to the 1994 earthquake?

Response 608: Measurements of hydrogeologic properties used to calculate groundwater velocities were conducted prior to, and continue to be conducted after, the 1994 Northridge earthquake. Groundwater flow conditions at Sunshine Canyon, as reflected by the hydraulic head distribution calculated from water levels measured quarterly in the groundwater monitoring well network, have not changed significantly since the 1994 Northridge earthquake.

Comment 609: How will the alluvium be removed? Does this mean trash will be dug up and moved?

Response 609: Alluvium will be removed as necessary during development of the proposed City/County Landfill by excavation using heavy equipment such as scrapers and bulldozers. Alluvium overlies bedrock, not disposed refuse, and will be excavated in various locations when development of the proposed landfill footprint occurs.

Comment 610: How were the estimates of Hydraulic conductivity done?

Response 610: Hydraulic conductivity values were calculated from aquifer tests conducted in monitoring wells located within Sunshine Canyon. In the absence of aquifer tests, the lithology of the soil reported in the boring logs is compared with published values of hydraulic conductivities for different soil types.

Comment 611: How were the estimates for ground water discharge velocity made?

Response 611: Groundwater discharge velocity is synonymous with groundwater velocity. Groundwater discharge velocities (v) were calculated from hydraulic conductivity values (K) and effective porosity values (ne) estimated from published sources and the measured hydraulic gradient (i) using the equation $v = Ki/ne$.

Comment 612: At this time the ground water flows slowly toward the mouth of Sunshine Canyon and nothing is in place to contain the water which as data shows is high in Chlorides in MW-1.

Response 612: Refer to Response 674 for a discussion of naturally occurring chlorides found in groundwater samples collected at the project site.

Comment 613: In a letter to Mr. Frank Meneses dated January of 1991 Mr. Blevins, Watermaster for the upper Los Angeles River states that the potential for contamination can be mitigated by installing a low permeability cutoff wall to the bedrock in the area of thin alluvium near the outlet area this would collect the water high in Chlorides. And as a fail-safe procedure a monitoring well should be placed in the alluvium a short distance downstream from the cutoff wall. Has this cutoff wall been installed yet? Was the extraction trench built instead of the cut off wall?

Response 613: A groundwater extraction trench, which functions as a cutoff wall by intercepting alluvial flows, was constructed at the entrance area or "mouth" of Sunshine Canyon in 1991. The trench is approximately 200 feet long and is located across the access roadway (underneath) near the southeast toe of the existing inactive City Landfill. This groundwater extraction trench is part of a comprehensive groundwater monitoring system (recognized by LARWQCB Board Order No. 87-158) implemented for the existing inactive City Landfill. In accordance with this order, groundwater is extracted from this trench and treated onsite. Current results of groundwater monitoring indicate that the groundwater extraction trench is performing satisfactorily.

Comment 614: I thought that BFI told the County Board of Supervisors, before they approved the County Project that the cut-off wall was installed through the alluvium and keyed to bedrock across the mouth of the canyon in May 1990.

Response 614: Refer to Response 613 for a discussion of the existing groundwater extraction trench that was installed at the "mouth" of Sunshine Canyon.

Comment 615: This trench was installed over a weekend without staff from any agency present.

Response 615: The opinion of the commenter is noted.

Comment 616: Also in the same letter Mr. Blevins that there was a mistake made in the County Final EIR document. He states that "There is a hydrologic connection between Sunshine Canyon and the ground waters of the San Fernando Basin."

Response 616: Refer to Topical Issue 6, Hydrogeologic Relationship Between Sunshine Canyon and the San Fernando Valley Groundwater Basin, for a discussion of groundwater movement within Sunshine Canyon. The hydrologic connection between Sunshine Canyon and the San Fernando Valley Groundwater Basin is restricted to the movement of shallow groundwater in the alluvium at the project site, as stated in Section 4.3.2, Groundwater, p. 4-127, of the Draft SEIR.

Comment 617: In another letter to Mr. Meneses received January 10, 1991, the MWD confirms this hydrologic connection. MWD doesn't agree that the ground water movement leaving the landfill would be slow.

Response 617: Refer to Response 616.

Comment 618: Even though the water in the general vicinity has relatively high mineral content. Similar quality ground water reserves are being developed elsewhere in Southern California to deal with the regional water shortage.

Response 618: This comment is noted.

Comment 619: When were the Hydrogeologic field studies done? Who conducted these studies? How were the Hydrogeologic field studies done?

Response 619: Refer to Response 605.

Comment 620: I have included copies of two letters one from Mr. Blevins and the other from MWD to verify my comments made above.

Response 620: The inclusion of these letters is noted.

Comment 621: Where is the Hydrology report by Robert Bean dated July, 1978 available to review?

Response 621: This hydrology report referenced by the commenter was originally incorporated (by reference) into the Report of Waste Discharge, Sunshine Canyon Landfill Extension Site, prepared by Purcell, Rhoades & Associates (PRA) in 1988. This Report of Waste Discharge and its accompanying technical appendices volumes are available for review at the following locations: Regional Water Quality Control Board, Los Angeles Region (4), Planning Unit, 101 Centre Plaza Drive, Monterey Park, CA; County of Los Angeles Department of Health Services, Solid Waste Management Program, 2525 Corporate Place, Monterey Park, CA; City of Los Angeles, Department of Environmental Affairs, Local Enforcement Agency, 201 N. Figueroa Street, 2nd Floor, Los Angeles, CA; and City of Los Angeles Public Library, Granada Hills Branch, 10640 Petit Avenue, Granada Hills, CA 91344-6452.

Comment 622: Is this the most recent Hydrology report done on Sunshine Canyon, it is almost 10 years old?

Response 622: The most recent hydrology report for the project site was prepared by GeoSyntec Consultants in July 1997 and was incorporated into the Draft SEIR.

Comment 623: The SEIR states that the alluvium will be removed, how will this be done? Will the trash be removed?

Response 623: Refer to Response 609 for a discussion of alluvium removal for the proposed City/County Landfill. "Trash" removal would not occur.

Comment 624: The SEIR states that seeps and springs that were found in the County, does this mean that there were more wetland areas destroyed than the County final EIR predicted and mitigated for?

Response 624: Springs and seeps associated with alluvial materials in the drainage channels within the County portion of Sunshine Canyon were accounted for in the wetlands assessment prepared for the County Landfill FEIR. That assessment, coupled with field review, was the basis for the formal determination by the U.S. Army Corps of Engineers of the extent of "waters of the United States" and wetlands subject to its jurisdiction within Sunshine Canyon. The FEIR evaluated impacts on all wetland resources identified within the footprint of the County Landfill as verified by the Corps, including the seeps and springs in the drainages. Mitigation was also established based on the extent of these impacts.

As stated in the Draft SEIR, Section 4.3.2, Groundwater, p. 4-121:

> Several springs have been located and identified within Sunshine Canyon. These springs and seeps are seasonal; flow is transient and dependent on seasonal precipitation. Springs and seeps occur where downgradient parts of aquifers or other water-carrying materials are exposed to the surface, as in outcrops of aquifers at mountainsides or canyon walls or shallow water tables reaching the surface at the base of long slopes. Springs also form where discontinuities such as faults or dikes present hydraulic barriers and force groundwater to flow upward, or where faults cause weak spots in confining layers, allowing water to flow upward and reach the surface if the piezometric surface in the aquifer is sufficiently high. In fractured rock, fissures can fill with rainwater, which then flows through the same fissure system to emerge as springs at lower day lighted elevations.

These seeps and springs were not located within wetland areas of the County portion of Sunshine Canyon.

Moreover, in November 1993, a Nationwide Permit No. 26 was issued by the Corps for filling 3.78 acres of waters of the United States, including about 1.18 acres of intermittent streambed, 1.45 acres of dispersed wetland areas adjacent to the intermittent streambeds, and 0.52 acre of additional waters of the United States within the County portion of Sunshine Canyon. Approximately 4.46 acres of related nonjurisdictional riparian habitat were impacted.

To mitigate for the loss of that acreage, as required by the permits issued for the project, the project proponent, in coordination with the Corps, USFWS, and CDFG, selected an area within the Lower Arroyo Seco (located in the City of Pasadena) to provide in-kind, offsite restoration of wetland and riparian habitat. Replacement ratios of 2:1 were specified within the CUP (Condition 38) granted for the County Landfill. Restoration within the Lower Arroyo Seco has been completed by the project proponent in cooperation with the City of Pasadena. This restoration provides new and enhanced areas of wetland and riparian habitat while ensuring that no net loss results from developing the County Landfill.

Comment 625: How will the seeps and springs even though seasonal be kept from pooling once there is trash on top?

Response 625: With respect to seeps and springs, and as indicated in the Draft SEIR, Section 2.7.1, p. 2-52:

> To control water from onsite springs within Sunshine Canyon and reduce potential hydrostatic pressures, the gravel subdrain system would be constructed, if determined to be necessary, beneath the liner system to capture spring water and other potential groundwater seeps. The gravel subdrain system is composed of a central corridor along the existing drainage channel tied into spring capture schemes. Subsequent to subdrain installation, a compacted soil foundation layer (3 feet minimum) would be placed on top of

the subdrain to provide the necessary 5 feet of separation between the deposited waste and groundwater.

A subdrain system is currently installed beneath the operating County Landfill to capture and control springs and seeps and convey water into the existing sedimentation basin. Prior FEIR documentation indicated that few springs or seeps exist within the City.

Comment 626: How can the public be assured that the stated non-active faults will become active gain?

Response 626: Most faults designated as nonactive have not moved in at least 1 million years and were active when the tectonic environment (the patterns of crustal movement) in California differed significantly from the present tectonic environment. Thus, it is highly unlikely that these faults will be reactivated. Faults on which displacement has occurred in the current tectonic environment are considered either Holocene-active or potentially active and were considered in the seismic hazard analysis.

Comment 627: As stated ground water is used for emergency and all surface and ground waters of the State are considered to be suitable or potentially suitable for municipal or domestic water supply.

The existing closed City side of the landfill has no liner and will continue to pollute the ground water unlike the County operation area there is no existing leachate collection system and all the leachate can combine directly with the ground water.

This is why it is so important to protect the ground water under the landfill from further degradation.

Response 627: The City agrees that it is important to protect groundwater resources. To accomplish this, the project proponent maintains the extraction trench at the mouth of the canyon and performs quarterly monitoring of the 22 groundwater monitoring wells installed at the project site. The detection monitoring program, as approved by the LARWQCB, will continue to be used to monitor groundwater quality and will be enhanced, as necessary, as the proposed project is implemented. Refer to Response 666 for a discussion of the existing inactive City Landfill's compliance with all mandated LARWQCB programs to ensure the quality of groundwater.

Comment 628: The Report dated August has indicated that problems do still exist?

Response 628: Refer to Response 666 for a discussion of the existing inactive City Landfill's compliance with all mandated LARWQCB programs to ensure the quality of groundwater.

Comment 629: Will the new monitoring wells be drilled for the proposed expansion?

Response 629: If required by the LARWQCB, additional monitoring wells will be installed for the proposed project. The existing monitoring well network (within both the County and City) is being proposed to monitor the proposed project.

Comment 630: Will they be sited under the new guidelines of the LAWRWQCB Article 5 of chapter 15?

Response 630: In the event that the LARWQCB requires additional groundwater monitoring wells, they will be sited in accordance with CCR, Title 27, §§20415 and 20420.

Comment 631: How many Lysimeters are being used now? Are they in good working order? Who decided where to place the Lysimeters?

Response 631: For the proposed City/County Landfill, lysimeters will not be part of the landfill's groundwater monitoring network. Instead, the vadose or unsaturated zone will be monitored with perimeter gas probes placed outside the liner system and into the gravel subdrain.

Currently, vadose zone monitoring at the inactive landfill is accomplished by four lysimeters that have been installed within the vadose zone. Quarterly monitoring records (since lysimeter installation) have indicated that no liquid is being collected from the lysimeters. Monitoring of the vadose zone is also conducted using a series of gas sampling probes installed around the waste mass. These probes are monitored on a monthly basis for the presence of methane, as required by the SCAQMD. One sample is collected in one of the probes exhibiting the highest methane concentration, as required by the SCAQMD. Monitoring at the County Landfill is accomplished by sampling the underdrain system outfall points instead of using lysimeters. For both landfill areas, sampling is performed quarterly by the project proponent and findings are reported to the LARWQCB. Quarterly sampling will also be used for the proposed City/County Landfill. This requirement is incorporated into this Final SEIR. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR (Section 4.3.2, Groundwater).

Comment 632: It is stated that the land in close proximity to the landfill is underlain by Holocene alluvial soils that are liquefiable to shallow ground water. Have any investigations been conducted to assure the public that the same Holocene alluvial soils do not exist in Sunshine Canyon?

Response 632: Holocene alluvial soils within Sunshine Canyon are shown in the Draft SEIR, Figure 4.1-4, Site Geologic Map, and are designated as Qal. The Draft SEIR, p. 4-42, includes the following mitigation measure regarding alluvial soils:

- Alluvium in the canyon bottoms beneath the footprint of the waste containment system and beneath ancillary structures shall be excavated and, if necessary, replaced with compacted structural fill during construction. A qualified geologist shall be onsite during construction activities to observe removal and replacement of alluvium and verify that all alluvium within the landfill footprint has been removed prior to

placement of any compacted fill or construction of any containment system elements.

In addition, prior to placement of structural fill or containment system construction, LARWQCB geologists are notified so that they can verify the extent of Holocene alluvium removal.

Comment 633: If so when and how and by whom was this done?

Response 633: Additional geologic mapping was conducted by GeoSyntec Consultants in 1997, and relevant updates were included in the Draft SEIR, Figure 4.1-4, Site Geologic Map. For additional information on this subject, refer to Response 632.

Comment 634: The landfill is in an area of active faults. The neighbors of the landfill who lived through the 1971 Sylmar Quake and the 1994 Northridge quake know that this area is seismically active. Homes were severely damaged, or condemned. In 1971 Van Gogh Elementary School, which is just South of the landfill, had to be closed for a long time just to repair the damages. Because of the 1994 quake the school had to be demolished. North of the landfill, adjacent to the County site, freeway bridges collapsed completely in both the 1971 and 1994 quakes experiencing what Cal Trans said to be the highest G forces recorded in the Northridge Quake. To the East, the Van Norman Dam cracked, the community beneath it was evacuated in 1971, and the Dam was later reconstructed as the Los Angeles Reservoir. Fortunately, the Dump was very small at the time (before BFI purchased it). The California Department of Mines and Geology recorded a huge landslide on Dump property, that was the largest slide produced by the quake of 1971. Researchers from the U.S. Geological Service consider this area of the Santa Susanas to be one of the most active landslide areas in the entire world. In 1994, the Balboa Inlet Tunnel which brings California Aqueduct water to Los Angeles for treatment, was severely damaged.

Response 634: The Draft SEIR, Section 4.1.3, Geological Hazards - Seismicity, pp. 4-24 through 4-41, includes a seismic evaluation that considers information gathered from both the 1971 San Fernando earthquake and the 1994 Northridge earthquake. In addition, the Draft SEIR, Appendix C8, Northridge Earthquake Information, includes information pertaining to the Northridge earthquake, and Appendix C16, Assessment of the Performance of Class III Nonhazardous Solid Waste Landfills in Recent Earthquakes, discusses, in detail, the impact of the Northridge earthquake on landfill design. Also, refer to Topical Issue 1 for additional information pertaining to seismicity.

Comment 635: The records at Cal State Northridge show 3 small quakes, whose epicenters are in Sunshine Canyon. The Alquist maps show active faulting extending into the site. BFI discounts this, based on an extrapolation form a letter written by Mr. Saul, of Mines and Geology. However, when Mr. Saul was asked about this letter he said that he just did not see the fault where they had trenched, not that it wasn't there. He also said that the Santa Susanas were among the most faulted and folded ranges in California.

Response 635: The Alquist-Priolo Special Study Zone (APSSZ) maps delineate areas in which ground surface rupture has occurred from primary faulting in Holocene time. The APSSZ map for the Sunshine Canyon area does project fault rupture observed in the 1971 San Fernando earthquake onto the Sunshine Canyon landfill property but not within the footprint of the proposed landfill. However, the trenching referred to in this comment extended across the projection of the 1971 surface rupture and into pre-Holocene soils, indicating that the projection of surface rupture from the 1971 earthquake onto the landfill property was in error. This is what Mr. Saul acknowledged in his letter.

With respect to the three small earthquakes whose epicenters may lie within Sunshine Canyon, earthquakes of magnitude less than 4.5 are rarely, if ever, associated with ground surface fault rupture. The epicenter is the point on the ground surface directly above the point in the subsurface from which an earthquake initiates and is not directly related to ground surface rupture. Therefore, the location in Sunshine Canyon of three epicenters from small earthquakes does not contradict the finding that there are no ground surface Holocene fault ruptures within the project limits. Similarly, neither does the statement that the Santa Susana Mountains are "among the most faulted and folded ranges in California" contradict this finding.

Comment 636: The Santa Susan Fault, that runs through the current berm, was declared to be inactive in the County EIR. Now, the County has declared it to be active, based on its seismic studies of Brown's Canyon. State Law prohibits, in Subchapter 15, the siting of new landfills on Holocene faults. This landfill sits on the upper plate of the thrust fault.

Response 636: The Santa Susana Fault was considered active in the seismic hazard analysis performed for the proposed project. The Santa Susana Fault does not pass through the current berm or any other feature on the project site. Rather, the Santa Susana Fault passes beneath the project site at a depth of approximately 3.1 miles. Regulations prohibit the siting of landfills on top of the surface trace of a Holocene active fault but do not prohibit the siting of landfills on the ground surface above a thrust fault. Several landfills within the Los Angeles region are located on the ground surface above a thrust fault, including the Lopez Canyon and Puente Hills Landfills.

As stated in Section 4.1.4 Geologic Hazards - Seismicity, p. 4-31, of the Draft SEIR:

> The Santa Susana Fault is a steeply dipping thrust fault that passes beneath the site at a depth of between 3.1 and 6.2 miles (5 and 10 km). The shortest distance between the ground surface at the project site and the Santa Susana Fault is approximately 3.1 miles (5.0 km). This is referred to as the "site-to-source" distance used in evaluating the intensity of ground motions expected at the site should an earthquake occur on the Santa Susana Fault. The fault stretches approximately 17 miles (27.4 km) from the edge of the San Gabriel Mountains, where it interacts with the San Fernando-Sierra Madre Fault, westward into Ventura County. The Santa Susana Fault is a complex structure with numerous strands mapped by field investigators. The eastern edge of the Santa Susana Fault, where it interacts with the San Fernando-Sierra Madre Fault, was active during and following the 1971 San Fernando earthquake, and

that fault may have been the source of the 1893 Pico Canyon earthquake (Yeats, 1987). Yeats et al. (1993) divided the fault into three discrete segments, each of which could rupture independently.

The Santa Susana Fault is considered active in the seismic hazard analysis included within the Draft SEIR. CCR, Title 27, §20260 prohibits the siting of solid waste landfills on top of the surface trace of Holocene active faults but does not prohibit the siting of landfills on the upper plate of a thrust fault, provided that the RWQCB finds that the unit's proposed containment structures would be designed, constructed, and maintained to preclude failure.

Comment 637: Can earthquake faults act as conduits for water?

Response 637: Faults typically act as barriers to transverse groundwater flow (i.e., a barrier to groundwater flow across faults). However, groundwater flow can be deflected such that the direction of flow is along a particular fault. This possibility, along with available regional and up-to-date site-specific geologic and hydrogeologic data (gathered during geologic mapping activities conducted for the project site), is considered when establishing the groundwater monitoring system for Sunshine Canyon. The groundwater monitoring system plan is reviewed and approved by the LARWQCB prior to implementation and is periodically reevaluated by both the project proponent and the LARWQCB.

Comment 638: The water in the Los Angeles Reservoir is 2 miles away and holds Post treated and filtered water. The only disinfectant treatment is done before being released to the public it is not filtered again. Any particulate matter (PM_{10}'s) including dust and bird droppings that fall into the water remain in the water. The Reservoir is so large that it can not be covered to prevent this airborne contamination. To state that there will be no impact is far from a true statement.

Response 638: Neither the MWD nor DWP has asserted that the now operational County Landfill or the inactive landfill in the City (when operational) has resulted in any contamination of MWD or DWP water treatment facilities with respect to fugitive dust emissions. Both of these agencies reviewed the Draft SEIR during its public review period and submitted correspondence (Letters 3.4-5 and 3.6-3) that are included in Section 4.0, Comments Received on the Draft SEIR in this document. As shown by their correspondence, the comments **do not** [emphasis added] state that either agency believes that the proposed City/County Landfill would have a fugitive dust impact on their facilities.

After the incorporation of mitigation measures, vector activity at the project site will be minimized. Therefore, no significant impacts on offsite land uses are expected to result. Vector activity at the now operational County Landfill is negligible due to the onsite implementation of vector prevention and control measures.

For an additional discussion of vector prevention and control measures for the proposed City/County Landfill, refer to Response 84.

Comment 639: One of MWD's concerns was about the Balboa inlet tunnel, which carries imported water from the State water project to MWD's Jensen Filtration plant and to the DWP's Aqueduct Filtration plant which together supply approximately 3 1/2 million people, the inlet tunnel is located immediately east of the landfill.

MWD states that because this tunnel runs directly underneath the drainage path leaving the landfill site, if the landfill leakage saturates the geologic formation surrounding this tunnel, hazardous landfill leachate could seep into the tunnel.

The following excerpt was taken from the findings of the State Water Resources Board (September 17, 1992):

> The Metropolitan Water District of Southern California owns the Balboa Inlet Tunnel, which conveys untreated drinking water to the Jensen Filtration Plant. The 14-foot tunnel comes within 500 feet of the eastern boundary of the existing landfill (closed City side) situated at the mouth of Sunshine Canyon. The top of the tunnel, at its shallowest point, lies 25 feet below the surface. Depth to ground water, at the same location is about 10 feet or less. Dependent upon flow rates, the hydraulic pressure head in the tunnel is approximately 3 to 19 feet lower than the ground water level. Under these conditions water may seep into the tunnel.

Response 639: Refer to Responses 77 through 79 for a discussion of the potential for the proposed City/County Landfill to impact the Balboa Inlet Tunnel or the MWD Joseph Jensen Filtration Plant.

Comment 640: MWD and DWP are not capable of treating landfill leachate so they requested that BFI construct and operate a monitoring system between the landfill and the tunnel. Is this monitoring system in place now?

Response 640: Refer to Topical Issue 6 pertaining to groundwater issues. Groundwater quality at the project site is monitored using the detection monitoring well network. That network consists of 22 monitoring wells that monitor existing groundwater conditions (i.e., both upgradient and downgradient of the existing inactive landfill and County Landfill) and groundwater quality at the project site. Of the 22 wells installed, 13 specifically monitor possible offsite pollution migration from the existing inactive landfill. Currently, as required by the LARWQCB, groundwater is sampled and analyzed quarterly. In addition to the monitoring wells, a groundwater extraction trench is located across the bottom of Sunshine Canyon to effectively cut off any possible groundwater migration.

Comment 641: It is stated that the water beneath Sunshine canyon is of poor quality and is not potable, however, you do not state that the water is still treatable if not contaminated by leachate, is it not?

Response 641: Although groundwater within Sunshine Canyon is nonpotable, this water can be treated whether or not this nonpotable groundwater is contaminated by leachate (as stated by

the commenter). However, the high treatment costs for removing the naturally occurring, high concentrations of minerals such as total dissolved solids (TDS), sulfate, and iron necessary to make the water safe for human consumption, combined with the low yield of the groundwater within Sunshine Canyon, render this groundwater inappropriate for extraction for drinking water supply purposes.

Comment 642: Water is useful for more than drinking.

Response 642: This comment is noted.

Comment 643: As MWD previously stated in a letter to Mr. Meneses of the County, the water in the general vicinity of the landfill has relatively high mineral content. However, similar quality ground water reserves are being developed elsewhere in Southern California to deal with the regional water shortage situation. Although brackish water desalination technology has become technically and financially attractive in recent years allowing improved basin management strategies for brackish ground water, such technology would not probably treat all landfill contaminants.

Response 643: Treatment by desalination could remove the salts or minerals that comprise the majority of the chemical constituent mass in the nonportable groundwater and leachate but not the VOCs that comprise a minor component of leachate. VOCs could be removed using a granular activated carbon, ozone, or other type of water treatment system.

Comment 644: MWD also mentions that they are concerned about the High Chlorides found in MW-1 and felt that BFI's assertion that these high levels were attributable to nearby oil drilling activities and natural geologic conditions unsupported.

Response 644: Refer to Response 674 for a discussion of naturally occurring chlorides found in groundwater samples collected at the project site.

Comment 645: MWD goes further to state that because the explanation of high chlorides values is not provided, they recommend that a comprehensive analysis be conducted and submitted to the LARWQCB for its independent assessment of the leakage.

Response 645: Refer to Response 674 for a discussion of naturally occurring chlorides found in groundwater samples collected at the project site.

Comment 646: Is this the same report that has not yet been approved by the LARWQCB?

Response 646: It is not clear as to which "report" the commenter is referring. The most recent report on the chloride investigation is dated August 1996. This report is on file with the LARWQCB.

Comment 647: How long has this been since the request from MWD to conduct this analysis of the high chlorides?

Response 647: Refer to Response 674 for a discussion of naturally occurring chlorides found in groundwater samples collected at the project site.

Comment 648: The MWD thought that the project should not go forward until the high chloride problem was resolved and it has been a long time now and the chloride issue is still not resolved.

Response 648: As far as the LARWQCB (which has regulatory jurisdiction over water quality matters in Sunshine Canyon) is concerned, the chloride issue has been resolved due to 1994 and 1996 chloride investigations that were conducted by the project proponent. Refer to Response 674.

Comment 649: Even if the high Chlorides are found to be from oil drilling as BFI states, are they still responsible for cleaning this up, after all they lease out the property that the oil wells are drilling upon?

Response 649: Oil drilling activities that occur on BFI-owned property, directly adjacent to the project site, have not resulted in any contamination that would require cleanup or remediation.

Comment 650: I reviewed the second quarter ground water and waste disposal report for Sunshine Canyon, inactive City landfill. I wondered why they are allowed to monitor themselves and chose the laboratories to conduct their own testing without any check and balance system?

Response 650: The project proponent's existing detection monitoring program is performed in compliance with CCR, Title 27, §20420 requirements and other applicable LARWQCB requirements. BFI uses a State-certified laboratory for testing all groundwater samples in compliance with LARWQCB mandates.

Refer to Responses 570 through 572 for a discussion of the standards for State-certified laboratories conducting testing of surface and groundwater samples collected at the project site.

Comment 651: In their August 1997 ground water monitoring and waste disposal report BFI has reported that there was detection of volatile organic compounds, 1,1-Dichloroethane, Chloroethane, Trichloroethane in Monitoring Well 10 (MW-10). MW-10 is located near MW-1 which is near the mouth of Sunshine Canyon.

In the same report Chloromethane was detected in two Monitoring Wells CM-5 and MW-11. According to the map included with the August 1997 report these Monitoring Wells are located very near the imaginary County side/closed City side boundary. CM-5 is on the County Side and MW-11 is on the City side and are at opposite ends from one another. The ground water in these Monitoring Wells is found at 18-19 feet. I have included a copy of the map that shows the distance between these Monitoring Wells.

BFI claims that this Chloromethane is believed not to originate at the landfill because they are up gradient form the city side. This explanation seems to have no foundation. They say that they will continue to monitor this in the future.

Response 651: Groundwater at Sunshine Canyon generally flows to the southeast, following the topography and trend of the canyon bottom. Monitoring wells are located northwest of the existing inactive landfill and therefore are considered to be upgradient wells. In the August 1997 quarterly groundwater monitoring report (second quarter 1997) for the project site, chloromethane was reported to be detected in upgradient Monitoring Wells CM-5 and MW-11 in trace concentrations (i.e., below the laboratory reportable limit). Subsequent to the chloromethane detections at concentrations below the reporting limit in CM-5 and MW-11, samples were collected again in the third quarter of 1997. Results indicate that chloromethane was not detected (November 1997). Conducting an investigation was not necessary since the detections of choromethane had not been confirmed by the second sampling.

Comment 652: Why is there no investigation to discover the reason that the Chloromethane was detected?

Response 652: Refer to Response 651.

Comment 653: Could this be an indication that contamination is spreading?

Response 653: The results of the most recent sampling on the project site (November 1997) do not indicate chloromethane contamination or that "contamination is spreading" as stated by the commenter.

Comment 654: What type of testing or investigation would be needed to discover the reason for this Chloromethane existence?

Response 654: Because chloromethane was not detected in the third quarter 1997 groundwater samples, the detection has not been confirmed in these wells. At this time, an investigation is not warranted by the LARWQCB, which has regulatory authority over onsite groundwater issues.

Comment 655: Chloroform was also detected in station S-D. They state that Chloroform is a trihalomethane and that it is commonly detected in municipal water supplies as a disinfection by-product. They also state that this did not originate at Sunshine Canyon, because S-D is up gradient from the landfill. Then where did it come from?

Response 655: The presence of trihalomethanes (e.g., chloroform is a trihalomethane) in upgradient surface water is due to the landfill operator's use of DWP-provided water for dust suppression. Trihalomethanes are byproducts of chlorine disinfection (e.g., used in water treatment). Disinfectants are used to keep water free of bacteria and waterborne diseases. When chlorine mixes with certain naturally occurring organic substances in

water, trihalomethanes are formed.[42] Chloroform was detected in trace concentrations (i.e., below the laboratory reportable limit) at the upgradient surface water monitoring point of the project site, which is designated S-D.

Comment 656: What is not stated is that trihalomethanes are produced by the interaction of chlorine with organic material. Could this be something that could occur when water comes into contact with organic materials that may be found at a landfill?

Response 656: Refer to Response 655.

Comment 657: Aren't THM's suspected carcinogens?

Response 657: Trihalomethanes are suspected carcinogens, as listed by the U.S. Department of Health and Human Services. Drinking water standards specify that 100 ppb of trihalomethanes are allowable in domestic water supplies.

Comment 658: In the same report, ground water levels in most of the Monitoring Wells had decreased but, three of them showed an increase. The amount they decreased is given but the levels of increase are not given. How much of a ground water level increase was present for MW-8, DW-3 and CM-9R?

Response 658: Groundwater level increases from the first quarter of 1997 to the second quarter of 1997, as stated in the August 1997 report, were as follows: 0.27 foot in MW-8, 1.23 foot in DW-3, and 2.59 foot in CM-9R.

Comment 659: What is meant by a general decrease?

Response 659: A general decrease means water levels in most wells, except those where increases occurred, declined from their levels measured during the previous monitoring event.

Comment 660: What is meant by the ground water was found to occur generally under confined conditions?

Response 660: Confined groundwater is under pressure due to the presence of an overlying impermeable layer (aquitard) that confines the water from flowing upward. It should be noted that the groundwater monitoring report (August 1997) states that groundwater generally occurs under "unconfined conditions," not confined conditions as mentioned by the commenter.

Comment 661: When it is stated that the ground water velocity was estimated, is this the same method used by MWD and DWP? How can the velocity be measured?

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[42]/ City of Los Angeles Department of Water and Power, Water Quality Division: 1995 Annual Water Quality Report, p. 2. March 1996.

Response 661: Yes. The accepted standard of practice used throughout the engineering community is to calculate groundwater velocity from the estimated hydraulic conductivity and hydraulic gradient for a given project site.

Comment 662: What is the typical range of hydraulic conductivity for Sunshine Canyon? How was this range chosen?

Response 662: The hydraulic conductivity of alluvial soils within Sunshine Canyon has been estimated to range from 1×10^{-2} to 1×10^{-4} centimeters/second, based on soil descriptions from boring logs and comparing typical values reported in the literature. The deeper bedrock aquifers would have much lower values of hydraulic conductivity.

Comment 663: What is the work plan describing the investigation of the presence of VOC's in MW-10?

Response 663: Elevated levels of VOCs have been detected sporadically in one groundwater monitoring well (MW-10) located near the entrance of the project site. As a result, BFI has worked with the LARWQCB to determine the source of the VOCs. Preliminary investigations indicated that the probable source of these VOCs was LFG migration from the existing inactive City Landfill. A work plan to investigate the presence of the VOCs in MW-10 was submitted to the LARWQCB by BFI in December 1996. An engineering report prepared by GeoSyntec Consultants that describes the execution of this work plan was submitted to the LARWQCB in October 1997. This engineering report describes the procedures used for evaluating the source of VOCs detected in MW-10, including resampling of MW-10, analyzing groundwater samples, a soil gas survey, and landfill gas chemistry and leachate chemistry evaluation. Evaluation of the results of the investigation indicated that the origin of VOCs in MW-10 was from LFG and that the extent of impact was confined to the immediate vicinity of the monitoring well (i.e., LFG had not migrated to the site's property line).

As a result of the report's conclusions, in September 1997, BFI drilled seven additional gas collection wells within the existing inactive City Landfill to increase the overall effectiveness of the gas collection system and therefore reduce the potential for VOC migration. Analytical testing of samples collected from MW-10 in February 1998 showed no VOCs, indicating that the gas well modifications had eliminated the problem.

In addition, samples collected from the groundwater extraction trench, located downgradient of MW-10, in May and November 1997 showed no elevated VOC concentration levels. During these sampling events, the only two constituents found were chlorobenzene at 0.44 ppb and 1,4-dichlorobenzene at 0.44 ppb. The MCLs for chlorobenzene and 1,4-dichlorobenzene are 70 and 5 ppb, respectively; therefore, the groundwater extraction trench showed no elevated constituents. These results indicate that the additional gas wells installed by BFI have eliminated the cause of the VOCs in MW-10.

The project proponent is currently in compliance with all LARWQCB-mandated programs for the protection of groundwater quality including detection monitoring, verification monitoring, and unsaturated zone monitoring.

Comment 664: What company conducted the investigation?

Response 664: GeoSyntec Consultants, consulting engineers to the project proponent, conducted the investigation.

Comment 665: It has been a year since the investigation started. What if any results have been found?

Response 665: Refer to Response 663.

Comment 666: In this report, what is considered the maximum contaminant level for VOC's found in Leachate? In Leachate Monitoring Well 4 (LR-4) shows that 50 ppb of ethylbenzene and 5 ppb vinyl chloride was discovered.

Response 666: There is no maximum contaminant level for VOCs found in leachate. Maximum contaminant levels (MCLs), both primary and secondary, are regulatory standards for drinking water. For drinking water supplies, primary MCLs are enforceable by law and secondary standards are used as guidelines. MCLs may be used for nondrinking water sources, such as leachate, strictly for comparison purposes with a known threshold; however, no MCLs exist for leachate. The concentrations of ethylbenzene and vinyl chloride cited for leachate from Leachate Monitoring Well LR-4 are neither surprising nor alarming.

Regarding leachate monitoring and testing at the project site, leachate monitoring wells LR-2, LR-3, and LR-4 are installed in waste. Leachate is produced by migration of liquid through the municipal solid waste mass, and consequently consists of a highly complex liquid mixture of varying chemical, physical, and biological characteristics. MSW leachate is expected to contain low concentrations of VOCs and inorganic compounds, as documented by Tchbanoglous, 1993 and Qasim and Chiang, 1994, among others. Liquids present in leachate wells therefore typically contain low concentrations of VOCs such as vinyl chloride, benzene, ethylbenzene, and 1,4-dichlorobenzene. In addition, low concentrations of VOCs and inorganics such as soluble minerals and salts can contribute to total dissolved solids (TDS).

For the proposed City/County Landfill, the Subtitle D liner system, including the leachate collection and removal system and the composite liner, provides an effective barrier to the transport of these substances. In addition to a liner system that meets or exceeds Subtitle D standards, the proposed City/County Landfill provides several additional barriers and systems which mitigate the potential for impacts to groundwater, human health, and the environment by migration of VOCs, including vinyl chloride and ethylbenzene. These barriers and systems include natural geologic and hydrogeologic conditions, and vadose zone and groundwater monitoring systems.

Comment 667: According to the appendix (Cl9) the maximum contaminant level for vinyl chloride (Chloroethene) is 0.5 and the tests results for LR-4 was 5 ppb, is anything being done to find out why this level exists?

Response 667: Appendix C19 refers to maximum contaminant levels for drinking water. LR-4 is a leachate well in waste. Hence, drinking water standards do not apply. Vinyl chloride is a known constituent of MSW leachate and the level in LR-4 is neither surprising or alarming and no special studies are needed. Refer to Response 666.

Comment 668: What explains these levels at this particular Well because the other Leachate Monitoring Wells did not show such levels?

Response 668: The landfill contains a heterogeneous mixture of materials. Spatial variation in leachate quality is expected.

Comment 669: There are a few synthetic volatile organic compounds that were higher than the maximum contaminant level (MCL). The lab tests done on a sample from LR-2 on 6/2/97 shows that benzene was 3 ppb higher than the MCL of 1 ppb.

Response 669: Refer to Responses 666 and 667.

Comment 670: 1,4-dichlorobenzene was 3.4 ppb higher than the MCL of 5 ppb.

Response 670: Refer to Responses 666 and 667. Liquid present in leachate wells, which are installed in waste, typically contains low concentrations of VOCs such as 1,4-dichlorobenzene.

Comment 671: The lab tests done on a sample from LR-4 on 6/2/97 shows that benzene was 2.7 ppb higher than the MCL of 1 ppb.

Response 671: Refer to Responses 666 and 667. Liquid present in leachate wells, which are installed in waste, typically contains low concentration of VOCs such as benzene.

Comment 672: 1,4-dichlorobenzene was 10 ppb higher than the MCL of 5 ppb.

Response 672: Refer to Responses 666 and 667.

Comment 673: The lab tests done on a sample from LR-3 on 6/2/97 shows that 1,4-dichlorobenzene was 5 ppb higher than the MCL of 5 ppb.

Response 673: Refer to Responses 666 and 667.

Comment 674: The MCL for chlorides is 500 ppb, LR-2 and LR-3 had exceeded the MCL, LR-2 was 411 ppb higher and LR-3 was 900 ppb higher.

Response 674: Regarding the issue of naturally occurring chlorides, the Draft SEIR, Section 4.3.2, Groundwater, p. 4-130, states:

Elevated concentrations of constituents in the groundwater, including chloride and VOCs, were detected at the project site in 1994. Elevated chloride concentrations have been detected in groundwater collected from the "toe" or bottom fill area of the existing inactive landfill. At the request of the LARWQCB, the project proponent performed an initial chloride investigation to evaluate its potential sources (BFI, December 1994). A work plan for an expanded investigation was submitted to the LARWQCB and approved in February 1996. The expanded chloride investigation was completed by July 1996, and a report was filed with the LARWQCB in August 1996. The report concluded that the elevated levels of chloride were the result of oil field brine, migrating to the well sites via natural migration pathways in the underlying bedrock. This is confirmed by documentation received from the LARWQCB that states, "Chloride levels within alluvial wells located near the mouth of the canyon continue to be high. However, monitoring results to date suggest an offsite source is responsible."

Comment 675: LR-2 and LR-3 also exceeded the MCL for turbidity which is 5 ppb for ground water.

Response 675: No MCL exists for turbidity of groundwater. The leachate monitoring wells (LR-2, LR-3, and LR-4) are installed in the waste. These wells are not developed in a similar way as groundwater monitoring wells. These wells have been installed to monitor quality of the leachate generated at the landfill. The turbidity of samples collected from leachate wells will be higher than samples collected from groundwater monitoring wells. Concentrations of constituents in leachate (which is not used as drinking water) do not need to be lower than the MCL for drinking water but should be compared to concentrations found in other landfill leachate.

Comment 676: LR-2 was 3.4 ppb over the MCL and LR-3 was 37.1 ppb over the MCL.

Response 676: Refer to Response 675.

Comment 677: And also higher for total dissolved solids which has a MCL of 1000 ppb. LR-2 was 2560 ppb over the MCL and LR-3 was 1980 ppb over the MCL.

Response 677: Refer to Response 666.

Comment 678: The surface water testing shows that S-A, S-B, S-C all exceeded the MCL for total dissolved solids of 1000 ppb by at least 1500 ppb.

Response 678: Surface water sample quality is evaluated per NPDES requirements that are not equivalent to MCLs for drinking water. In accordance with current WDRs and NPDES requirements, surface water and stormwater samples for the existing inactive City Landfill are collected and analyzed quarterly and during prescribed rain events. The results are submitted to the LARWQCB for review. Surface water quality sampling results comply with NPDES guidelines. Testing of collected surface water samples shows that the only elevated constituent of concern found has been trihalomethanes.

Trihalomethanes are produced during the chlorination process for water treatment. The origin of these trihalomethanes is from DWP-treated water used onsite for dust control.

Comment 679: S-A was 1670 ppb over the MCL, S-B was 2140 ppb over the MCL and S-C was 2120 over the MCL.

Response 679: Refer to Response 678.

Comment 680: Is the HELP model widely used in the waste industry? If so, where has it been used? Why was the HELP model chosen?

Response 680: The HELP model was developed by the USEPA and is the industry and regulatory agency-accepted method for conducting infiltration analyses through the landfill final cover. The HELP model is the model of choice because it provides an advanced method for predicting infiltration. The HELP model was first developed by the USEPA in 1984, and updated versions have been developed including HELP Version 2 (1988) and HELP Version 3 (1994). HELP Version 3 (HELP-3) has been used for conducting the Sunshine Canyon infiltration analysis incorporating soil, temperature, precipitation, representative liner, and final cover design information.

Comment 681: Doesn't this method grossly underestimate the amount of leachate that will be produced over an extended period of time?

Response 681: No, this method does not underestimate the amount of leachate that will be produced. Rather, the HELP-3 model provides a conservative infiltration analysis for estimating leachate generation rates over an extended period of time.

Comment 682: Is there any other method that is used to predict leachate production, estimate surface runoff and drainage?

Response 682: The HELP model is viewed by federal and State regulatory agencies as an accurate model for conducting infiltration analyses.

Comment 683: Is HELP based on ideal situations? Is there an error factor?

Response 683: The HELP-3 model is not based on ideal situations. Rather, the model provides a site-specific infiltration analysis and a conservative evaluation of landfill performance. This model is widely accepted by both federal and State regulatory agencies. In addition, the HELP-3 model allows the input of site-specific data such as temperature, precipitation, geomembrane liner, and final cover soil design information.

Comment 684: How much moisture can be transmitted through the cap annually if the design specifications are achieved in the construction? What is the anticipated increase in cap permeability with age? How will the amount of moisture that penetrates the cap change as the permeability of the cap increases with age?

Response 684: The actual final cover design will be developed subsequent to the approval of the proposed project, and corresponding design plans will be submitted to regulatory agencies (e.g., the City LEA) for their review and approval. The final cover must perform equal to, or better than, the minimum prescriptive final cover and better than the underlying geologic formation or liner in accordance with applicable Subtitle D and Title 27 regulations. If properly maintained, the permeability of the final cover would not increase with time. The final cover for the proposed project will be maintained throughout its closure and postclosure maintenance period or as long as waste constituents may pose a threat to groundwater resources. As such, a comprehensive final cover inspection and maintenance program, reviewed and approved by the regulatory agencies, will help maintain the integrity of the final cover as an infiltration barrier. Refer to Response 1050 for a discussion of the proposed final cover design to be provided in the Final Closure and Postclosure Maintenance Plan (FCPMP) to be implemented after the completion of the proposed project. In addition, refer to this same response for a discussion that the future closure and postclosure maintenance of the proposed City/County Landfill is not part of the proposed project and therefore was not analyzed in the Draft SEIR.

Comment 685: How did the preliminary design of the project site indicate that infiltration would be lessened by reducing the area of percolation in the canyon?

Response 685: The proposed liner and final cover systems provide an effective waste containment groundwater protection system that will meet or exceed liner and final cover performance criteria included in Subtitle D and Title 27. Installation of these systems will provide an infiltration barrier over the landfill footprint (i.e., the limits of waste).

The permeability of the geologic materials within the Sunshine Canyon watershed are greater than the proposed liner and final cover systems. Precipitation that would ordinarily infiltrate the Sunshine Canyon wastershed (located within the proposed limits of the landfill footprint) will be diverted from the final cover infiltration barrier to surface water conveyance structures, such as downdrains and channels, and routed to concrete-lined sedimentation basins. Therefore, given the installation of the infiltration barrier and waste containment groundwater protection systems, areas within the Sunshine Canyon watershed that could allow infiltration of precipitation or surface water would be reduced to areas outside the proposed waste footprint.

Comment 686: How can the area of percolation in the canyon be reduced?

Response 686: Refer to Response 685.

Comment 687: What materials were reviewed to make the conclusion about landfill leachate decreasing in pollution load over time? Where can these references be obtained for review?

Response 687: The author of the letter documenting the literature review (as referenced in the Draft SEIR) is M. Reinhard, Ph.D., from Stanford University. The author should be contacted for a list of these materials and locations where they can be reviewed.

Comment 688: What observed studies were done that show leachate will decrease substantially in concentration upon landfill closure? Where can these studies be obtained?

Response 688: Refer to Response 687.

Comment 689: The HELP model estimates leachate production based on the County production rate of 120 gallons per minute. What will happen after the landfill is full, the County side has only been open for a short time?

Response 689: The comment is correct with respect to HELP model estimates. As indicated in the Draft SEIR, Section 4.3.2, Groundwater, p. 4-133:

> For the proposed project, the HELP Model projected the amount of leachate generation expected to occur. Additional modeling for the proposed City/County Landfill Project is anticipated to be performed during preparation of its ROWD. It was estimated by using the HELP model that the County Landfill had an estimated leachate production rate of 120 gallons per minute (gpm). No leachate has been detected in the groundwater monitoring wells at the County Landfill, and all extracted, treated alluvial groundwater has been approved for onsite irrigation and dust control use by the LARWQCB.

The LCRS will be operated and maintained throughout the operational life of the proposed project (estimated at 26 years) and during its anticipated closure and postclosure maintenance period (a minimum period of 30 years) in accordance with the regulatory requirements of 40 CFR Part 258 (Subtitle D) and Title 27.

Comment 690: What will happen to this 120 gallons per minute of untreated leachate when the leachate collection system is closed in the County operating area?

Response 690: When the County Landfill closes, intercepted leachate will be collected in the LCRS and travel in HDPE pipes over lined areas of the existing inactive City Landfill. The combination of the HDPE pipes and the protective liner system provide a dual containment safeguard for protecting water resources. The network would extend from the County portion of Sunshine Canyon into the City. Leachate collected by the LCRS would be directed by gravity to sumps and then discharged to a leachate transmission pipeline for conveyance to a holding tank at the leachate treatment facility, where it will eventually be treated.

Based on the locations of the current County LCRS and the proposed City/County LCRS, which is depicted on Figure 4.3-2 in the Draft SEIR, the travel distance would be approximately 4,400 feet. As indicated in the Draft SEIR, the proposed LCRS would be installed directly on top of the liner system in all areas of the proposed landfill footprint including the side-slope and waste-on-waste areas of the existing inactive landfill. The LCRS would be of the blanket type and overlay the FML. The LCRS or granular drainage layer is shown on Figure 2.7-1 in the Draft SEIR. This blanket system would include HDPE slotted pipes embedded into the drainage blanket of free-draining material. The drainage blanket would be a minimum of 1 foot in thickness,

cover the bottom (or floor) of the canyon, and be connected to the side-slope geonet LCRS. The drainage blanket would collect and direct the intercepted leachate toward leachate sumps where it is collected and removed from beneath the waste. The blanket system would be sloped toward the sumps to prevent ponding of leachate.

Comment 691: Is this untreated leachate to travel through the County area and into the City all the way to the proposed leachate collection system on the City side? How far will this untreated leachate travel total? Will it travel in pipes over the old landfill?

Response 691: Refer to Response 690.

Comment 692: This seems like it has great potential for disaster. If any earthquake occurs and cracks any pipe carrying leachate, what is your plan to handle the spill?

Response 692: The LCRS will have double containment to provide extra protection in the event of seismic damage or other natural causes. Breaks in the LCRS are unlikely since the LCRS is designed to withstand a maximum credible earthquake (MCE). The Draft SEIR states that using the MCE exceeds the regulatory standard for seismic design and evaluation. (Refer to the Draft SEIR, Section 4.1.4, Geologic Hazards - Seismicity, pp. 4-32 and 4-33.) Leak detection sensors are typically installed between the inner and outer pipe walls of dual-wall pipe. The purpose of the sensors is to enable early detection of a leak in the inner pipe and affect an earlier and more rapid response and repair. Moreover, emergency response and repair of any broken leachate pipes will be conducted in accordance with the Emergency Response Plan and Health and Safety Plan prepared for the project site.

Comment 693: The proposed LCRS drainage network will be able to withstand how large a seismic event?

Response 693: The MCE for the project site is a magnitude 6.9 earthquake event on the Santa Susana Fault.

Comment 694: What size seismic event will the HDPE pipe be able to withstand?

Response 694: Refer to Responses 692 and 693.

Comment 695: What is meant by the drainage network will have the ability to deform without leakage?

Response 695: The HDPE pipe material is flexible, allowing for deformations associated with potential settlement and seismic displacements that could occur during an MCE event. In addition, the HDPE piping was chosen because of the material's compatibility with a wide variety of chemical constituents that could be in the leachate and its availability in various diameters and thicknesses. Dual-wall piping typically contains leak detection sensors between the inner and outer pipe walls, as described in Response 692.

Comment 696: Why is rainfall data from 1969 relevant in 1997? Be realistic. Why are we preparing for El Nino conditions?

Response 696: Refer to Responses 532 and 536 within this document for a discussion of historic rainfall conditions in the project area and how this information was used by project engineers to determine the required capacities of surface water collection and conveyance structures for the proposed City/County Landfill.

Comment 697: Do you think that the same rain that falls less than a mile away from the landfill will not fall onto the landfill?

Response 697: Based on the watershed (i.e., where rainfall falls less than 1 mile), that rainfall may or may not flow toward the project site. The watershed area for Sunshine Canyon is incorporated into the hydrologic evaluation to estimate precipitation and surface water flows.

Comment 698: Is there not more recent data on rainfall information than 1969?

Response 698: Refer to Responses 532 and 536 within this document for a discussion of historic rainfall conditions in the project area and how this information was used by project engineers to determine the required capacities of surface water collection and conveyance structures for the proposed City/County Landfill.

Comment 699: What design and operational characteristics will ensure the integrity of the ground water resources and its quality within Sunshine Canyon?

Response 699: Several design and operational characteristics would be installed to preserve groundwater resources at the project site. These include a composite landfill liner system under the landfill footprint; subgrade gravel drainage blanket with a series of underdrains to collect and divert groundwater in areas of natural groundwater seepage away from the landfill area; LCRS installed at the base and side slopes of the landfill; operation of an extensive LFG collection system; ongoing detection and monitoring of the groundwater using a network of monitoring wells; application of daily, intermediate, and final cover to restrict leachate formation thereby inhibiting water infiltration into the landfill; and continuous monitoring of the design, operation, and closure of the landfill and its ancillary facilities by the City LEA, CIWMB, and LARWQCB

Comment 700: What environmental protection and control systems will ensure the integrity of the ground water resources and its quality within Sunshine Canyon?

Response 700: Refer to Response 699.

Comment 701: Who will do this continuous monitoring during landfilling operations, closure and post closure that will ensure the integrity of the ground water resources and its quality within Sunshine Canyon?

Response 701: The project proponent is responsible for performing monitoring of the landfill during operation, closure, and postclosure maintenance in accordance with applicable federal and State regulatory requirements.

Comment 702: The ground water is already impacted by the nonoperating City landfill how can anyone state with honesty that there is not expected to be an impact, what does not expected mean? This is a non-committal statement.

Response 702: Refer to Response 666 for a discussion of the existing inactive City Landfill's compliance with all mandated LARWQCB programs to ensure the quality of groundwater.

Comment 703: When has there ever been any landfill company that was in total compliance, without any warnings or violations?

Response 703: It is impossible for City Planning staff to determine what the commenter is referring to in this comment. The City along with other local, regional and State agencies will impose conditions and specific regulatory requirements for landfill development. These conditions and regulatory requirements will be strictly enforced by the designated LEA.

Comment 704: When it states that the impacts would be less than significant if the operator stays in compliance, Can this really happen? Be honest now.

Response 704: To support its decision on the project for which an EIR was prepared, a Lead and Responsible Agency must prepare written findings of fact for each significant environmental impact identified in the EIR. A finding is a written statement made by the decision-making body of the Lead and Responsible Agency that explains how it dealt with each significant impact and alternative in the EIR. Each finding must contain an ultimate conclusion regarding each significant impact, substantial evidence supporting the conclusion, and an explanation of how the substantial evidence supports the conclusion. Specifically, the agencies must make findings for each significant impact that the project has been changed (including the adoption of mitigation measures) to avoid or substantially reduce the magnitude of the impact. The agency must ensure that adopted mitigation measures are fully enforceable through permit conditions, agreements, or other measures. If the Lead or Responsible Agency cannot make these findings, it must make the finding either that changes to the project are within another agency's jurisdiction, and such changes have been or should be adopted, or specific economic, social, legal, technical, or other considerations, such as employment opportunities for highly trained workers, make the mitigation measure or alternative infeasible.

The findings must be based on substantial evidence in the administrative record and must include an explanation that bridges the gap between evidence in the record and the conclusions required by CEQA. Responsible Agencies, in granting subsequent approvals for projects initially studied in an earlier EIR, cannot rely on the Lead Agency's findings but must make their own findings. When it makes findings on significant effects identified in an EIR, an agency must also adopt a program for

reporting or monitoring mitigation measure as that were adopted or made conditions of project approval. The reporting or monitoring program must ensure compliance with mitigation measures during project implementation. Also, refer to Response 511.

Comment 705: Does the RCRA Subtitle D, 40 CFR part 258, Subpart D ss 258.40 (design criteria) take into account that the liner will be placed on 30 plus years of landfill that will continue to sink?

Response 705: Refer to Responses 745 through 749 for a discussion of how the proposed City/County Landfill design and engineering incorporate long-term landfill settlement.

Comment 706: What will happen over time as the gap between the old trash and this proposed liner widens?

Response 706: There will be no gap with respect to the proposed waste-on-waste liner and the existing inactive City Landfill. The proposed waste-on-waste liner and the refuse placed above it would settle on top of the deposited refuse in place at the existing inactive City Landfill. Therefore, no gap would develop between the proposed liner system and the existing waste. Refer to Responses 745 through 749 for a discussion of how the proposed City/County Landfill design and engineering incorporate long-term landfill settlement.

Comment 707: Where will the holding tank for leachate be located? Will it be permanent or temporary? Where will the pipes that carry this leachate run, on top of trash, underneath the trash? Is the LCRS design based on the 120 gallons per minute of leachate?

Response 707: As noted in the Draft SEIR, Figure 2.5-1, a permanent leachate holding tank will be located next to the proposed leachate treatment facility, which is located near the existing landfill entrance. All holding tanks would be provided with secondary containment with sufficient capacity to contain the full tank volume.

The LCRS will be designed to hydraulically accommodate twice the design flow of leachate, which will be routed to the leachate holding tank and treatment facility through underground HDPE pipes located on top of the protective liner and below the operations soil layer and the deposited refuse.

Comment 708: This idea to add a liner over a landfill that is 30 plus years old and unlined is puzzling and reminds me of the trash bag commercial where too much trash is put into a plastic bag and as it weakens, it bursts open causing a big mess. The only difference is that if it happens at this site the mess would be of extremely serious proportions.

Response 708: Refer to the Draft SEIR, Section 2.7.3, Liner System, and Appendix B5 for a discussion of the side-slope and waste-on-waste liner systems. Refer to Responses 745 through 749 for a discussion of how the proposed City/County Landfill design and engineering incorporate long-term landfill settlement.

Comment 709: I would like to close with one very important question, would you like this project if you lived near it and your children attended school less than a mile from it?

Response 709: The closest school to the project site is Van Gogh Street Elementary, located approximately 1¾ mile from the landfill entrance and approximately ¾ mile from the nearest site boundary.

Comment 710: **Permitting of Landfills Questions**

1. Is there a hydraulic connection between the landfill and aquifer potentially affected by the landfill and groundwaters beneath adjacent properties that could, at any time in the future, be used for domestic water supply purposes?

Response 710: Refer to Topical Issue 6 in this document for a discussion of the hydrogeologic relationship between Sunshine Canyon and the San Fernando Valley Groundwater Basin and groundwater movement within Sunshine Canyon. Also, refer to Response 533 for a discussion of existing groundwater quality conditions of the San Fernando Valley Groundwater Basin.

Comment 711: 2. Will the landfill design (cap, liner, leachate collection-removal system, etc.) prevent leachate from being formed in the landfill, and prevent leachate's leaving the landfill through the liner system for as long as the wastes in the landfill represent a threat to groundwater quality?

Response 711: The final cover would be designed to reduce surface water infiltration and reduce the potential for leachate generation. The LCRS would be designed to collect and remove leachate from the lined areas of the proposed landfill. The final cover, LCRS, and liner systems would be designed to provide protection of groundwater resources within Sunshine Canyon. The performance of these systems would be monitored throughout the project's site life and closure and postclosure maintenance period in accordance with applicable federal and State regulations.

Comment 712: 3. How much leachate will be generated annually in the landfill over the period during which the wastes represent a threat to groundwater quality?

Response 712: The USEPA HELP model was used to estimate the quantity of leachate that would be generated from the proposed project. Based on the HELP model, leachate production is expected to be 120 gpm. Based on the leachate production estimate of 120 gpm, the proposed landfill can be expected to generate up to approximately 63 million gallons of leachate annually. The onsite leachate treatment facility will be able to accommodate these estimated leachate production rates. However, it is expected that the amount of leachate generated will be substantially less than this conservative estimate.

Comment 713: 4. How will desiccation-cracks and differential-settling cracks in the cap of the landfill be detected and remediated?

Response 713: Desiccation and settlement cracks (should they occur) will be identified during the postclosure final cover inspection program and repaired in accordance with the final cover maintenance program. Both programs (i.e., cover inspection and cover maintenance) will be developed as part of a comprehensive postclosure maintenance program and incorporated into the FCPMP . Refer to Response 1050 for a discussion of the proposed final cover design to be provided in the FCPMP, which will be implemented after the completion of the proposed project. In addition, refer to this same response for a discussion that the future closure and postclosure maintenance of the proposed City/County Landfill is not part of the proposed project and therefore was not analyzed in the Draft SEIR.

Comment 714: 5. What will be the costs, and how and by whom will the costs be paid, for cap maintenance for as long as the wastes represent a threat to groundwater quality?

Response 714: BFI is obligated by State law to provide financial assurances for postclosure maintenance costs. These costs will be evaluated during preparation of the FCPMP for the proposed project.

As stated in the Draft SEIR, Section 2.15.2, Preliminary Closure and Postclosure Plans:

> The preliminary closure plan prepared for the proposed City/County Landfill Project would define the closure cost estimates (i.e., closure and postclosure) by the project proponent, enable the CIWMB and the designated LEA the opportunity to assess the reasonableness of the cost estimates, and allow a registered civil engineer to verify and certify the accuracy of the cost estimates.

Comment 715: 6. What will be the rate of leachate transport (gallons/acre/year) through the landfill liner and out of the leachate collection and removal system through the liner at the time of construction? How will the leakage rates change over the time that the wastes in the landfill represent a threat to groundwater quality? What is the potential impact of such leakage on groundwater quality in the vicinity of the landfill?

Response 715: Refer to Response 712 for a discussion of the estimated amount of leachate that would be generated per year over the life of the project and the ability of the LCRS and treatment systems to accommodate this volume.

The LCRS will be designed and constructed to maintain less than a 30-cm depth (or 12 inches) of leachate over the liner system in accordance with 40 CFR Part 258. The proposed LCRS would be installed directly on top of the side-slope and waste-on-waste liner systems. The LCRS would be constructed, maintained, and operated to collect and remove twice the maximum anticipated volume of leachate that may be generated from the landfill.

Refer to Response 602 for a discussion of the potential for VOCs to pass through an HDPE geomembrane liner. In addition, refer to this same response for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources. In

addition, refer to Response 974 for a discussion of the long-term viability of HDPE as a containment material.

Comment 716: 7. For landfills incorporating composite liners, what will be the potential impact of desiccation-cracking of the soil-clay layer of the composite on the rate of leachate transport? What is the anticipate area of the liner in which intimate contact between the FML and the soil-clay layer will not be achieved? What will be the impact on the rate of leachate transport of not achieving intimate contact between the FML and the soil-clay layer over that area?

Response 716: The project proponent will implement a strict construction quality assurance (CQA) program during installation of the liner system. The CQA program will reduce the potential for desiccation cracking of the soil-clay layer through field testing of moisture content and compaction. The CQA program will identify desiccation cracks in the low-permeability soil liner through field inspections and require appropriate repairs prior to certification of the low-permeability soil liner. With the implementation of a strict CQA program (during liner construction) and the weight of the overlying granular drainage layer, the operations layer and waste mass will maintain close contact between the FML and soil-clay layer. Close contact between the FML and soil-clay layer will prevent potential leachate transport. Desiccation cracking beneath the membrane following construction is not considered to pose a significant threat to the effectiveness of the proposed liner systems.

As stated in Section 2.7.3, Liner System, p. 2-57, of the Draft SEIR:

> The proposed liner systems would be designed and field tested in accordance with QA/QC programs that will be submitted to the LARWQCB for approval prior to installation. A QA program consists of sampling, conducting selected laboratory analyses, and field testing to provide an evaluation of whether the completed item is of the specified quality. A QC program consists of selected tests and inspections during construction to assist the project proponent in producing a quality product as required. The primary purpose of the QA/QC program is to ensure evidence that satisfactory materials and good construction practices are used in accordance with the design specifications. Throughout construction, the progress of the work will be monitored and measured. Any changes to scheduled procedures must be approved by the LARWQCB and documented by the project proponent.

Comment 717: 8. How will the problem of desiccation-cracking of the compacted soil layer of the composite liner be identified, and remedied? How will the desiccation-cracking that occurs affect leachate transport through the liner?

Response 717: Proper compaction of the soil layer at the design moisture contents, during construction and verification of the proper compaction and moisture content through a formal CQA program, will reduce the potential for desiccation cracking. The absence of desiccation cracking will reduce leachate transport; therefore, associated effects on leachate transport are not an issue. The overlying membrane and underlying soils of higher

porosity mitigate the potential for desiccation cracking unless it is thermally driven. Temperature measurements of active landfills do not indicate that temperatures at the liner are high enough to induce the desiccation referred to in this comment.

The CQA program will reduce the potential for desiccation cracking of the soil-clay layer through field testing of moisture content and compaction. The CQA program will identify desiccation cracks in the low-permeability soil liner through field inspections and require appropriate repairs prior to certification of the low-permeability soil liner. Desiccation cracking beneath the membrane following construction is not considered to pose a significant threat to the effectiveness of the proposed liner systems.

Comment 718: 9. What is the expected composition of the leachate? What is the potential for each of the components to pollute groundwater in the vicinity of the landfill, rendering it unusable or impaired for use as a domestic water supply?

Response 718: It is expected that the leachate would include relatively low concentrations of various VOCs and semivolatile organic compounds and relatively high concentrations of inorganics. Because the landfill is designed with several environmental protection and control systems to prevent leachate migration into groundwater, including a composite liner and LCRS, there is very limited potential for components of the leachate to pollute groundwater in the vicinity of the site. Groundwater in proximity to the site is of poor quality and not used for domestic supply.

For additional information, refer to Responses 533 and 666 for a discussion of the existing groundwater quality of the San Fernando Valley Groundwater Basin, a definition of leachate, a discussion of VOCs and inorganic compounds typically found in landfill leachate, and the existing inactive landfill's compliance with all mandated LARWQCB programs required to ensure groundwater quality.

Comment 719: 10. What is the potential for TCE and other chlorinated solvents in the proposed landfill to pollute groundwater with known human carcinogens?

Response 719: Refer to Response 666 for a discussion of VOCs and inorganic compounds typically found in landfill leachate and the existing inactive City Landfill's compliance with all mandated LARWQCB programs to ensure adequate groundwater quality. In addition, refer to Response 602 for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources.

Comment 720: 11. What is the potential impact of any possible seismic activity that could occur in the vicinity of the landfill on the landfill structures? After a seismic event of any magnitude, how will the integrity of structures be examined and damage assessed before widespread groundwater pollution occurs.

Response 720: The potential impact of seismic activity in the vicinity of the landfill on the landfill structures is addressed within the Draft SEIR, Section 4.1. The LARWQCB requires landfill operators to submit the results of a thorough inspection of all landfill structures following any earthquake of significance in the vicinity of the landfill. Inspection

procedures include both direct observations of damage (e.g., leaking pipes) and indirect observations of conditions indicative of damage (e.g., a falling water level in a water storage tank).

Comment 721: How will it be possible to make repairs on those structures when they are located beneath buried solid waste that may be hundreds of feet thick?

Response 721: Refer to Response 720.

Comment 722: 12. What is the ability of the groundwater monitoring system proposed to detect leakage from the landfill liner before widespread groundwater contamination occurs?

Response 722: The groundwater (i.e., saturated zone) monitoring and unsaturated zone monitoring systems are designed in accordance with regulatory agency requirements to enable detection of waste constituents and will therefore help protect water quality. The site currently uses an extensive monitoring network of groundwater wells, vadose zone probes, lysimeters, and surface water monitoring points to detect potential releases from the site. These systems would be maintained and enhanced, as necessary, over the life of the project. This system will be approved and monitoring data reviewed by the LARWQCB.

Refer to Response 666 for a discussion of the existing inactive City Landfill's compliance with all mandated LARWQCB programs to ensure the quality of groundwater.

Comment 723: 13. Can municipal solid waste leachate-contaminated aquifers be "cleaned up" to the point at which the groundwater and the aquifer can be used again for domestic water supply purposes? If so, how can this be done?

Response 723: Leachate-impacted waters are treatable. Numerous technologies are available for the treatment of constituents commonly detected in leachate including reverse osmosis to remove inorganic salts, granular activated carbon to remove organics, and many other technologies that are selected based on site-specific conditions. It should be reiterated, however, that the groundwater in the vicinity of the site is naturally of poor quality and is not used for domestic water supply.

Comment 724: 14. Did the consulting firm for landfill design and the EIR/EIS firm make a plausible worst-case scenario evaluation for the pollution of groundwaters by the proposed landfill? Have they estimated the total cost of groundwater and aquifer clean-up to the extent that clean-up can be accomplished? Who will pay those costs?

Response 724: The proposed project would be designed in accordance with applicable regulatory requirements to avoid impacts on groundwater resources. As part of future permitting for the landfill, it will be necessary to provide cost estimates for remediation in the highly unlikely event that a pollutant would be released from the landfill. The landfill

owner is financially responsible for groundwater protection from potential landfill impacts.

Comment 725: 15. What are officials in the local political jurisdiction doing toward investigating and remediating current groundwater pollution from existing landfills, and toward preventing future groundwater pollution by landfills?

Response 725: Within the Los Angeles Basin, the LARWQCB reviews groundwater detection monitoring results submitted by landfill operators and, if a release is confirmed, directs the operator to conduct an evaluation monitoring program to investigate the source, nature, and extent of the release. Based on the results of an evaluation monitoring program, the LARWQCB may then direct the operator to implement corrective action to remediate the groundwater pollution following regulations in Title 27 of the CCR. Additional regulatory agencies such as the DHS and SCAQMD also have enforcement jurisdiction over the landfilling of wastes and the protection of water and air quality. Regulatory agencies continuously monitor the permitting, design, construction, operation, groundwater monitoring, and closure of landfills to reduce the potential for environmental health and safety concerns.

Comment 726: 16. How will the moisture content of the waste in the closed landfill affect the rate of fermentation (gas production) and leaching of contaminants from the wastes?

Response 726: Over time, the low-permeability final cover on a closed landfill will reduce the infiltration of moisture into the waste mass, and the overall moisture content will decrease over time. Similarly, the decreasing moisture content and decreasing rate of decomposition will cause the production of gas to decrease over time.

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Letter 3.8-20

Comment 727: We, the Members of the Board of Directors of the Knollwood Property Owners Association, who represent 550 homeowners, are concerned about the impact of the proposed expansion of the Sunshine Canyon landfill on the health of the families who live in this area.

Response 727: This comment is noted. Refer to Response 316 for a discussion of the potential for the proposed City/County Landfill to cause acute or chronic health risks to residents in the community of Granada Hills.

Comment 728: We ask you to put yourself in our position and understand our concerns about the proposed expansion. For years we have been shocked by the way Browning Ferris Industries (BFI) has blatantly violated major restrictions placed on them by their operating permits. (BFI has opened areas for dumping when they didn't have the permits, has constantly operated without watering down the active areas as required, has built berms higher than allowed, has not covered raw dumping as required, has continued operations on even the windiest days, and has even delayed inspections.) We are sure you are aware of these infractions.

Response 728: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation. With respect to landfilling areas or operational activities within Sunshine Canyon (either past or present), no landfilling operation has occurred without the approval of either the City or County. It should be noted that since the landfill extension within the County has been in operation (August 1995), no Notices of Violation or Notices to Comply have been issued by regulatory agencies to BFI that were not immediately rectified. This landfill facility currently has very strict and enforceable CUP Conditions, which ensure compliance by the project proponents. Also, a County LEA inspector is onsite during all hours of operation when refuse is received and processed. The County LEA has the authorization to cease landfill activities (at any time) if it is determined that the health, safety, or welfare of the general public is being endangered or regulatory or permit conditions are not being complied with by BFI.

Comment 729: Even if they were to comply with all the precautions as they have promised, which is very unlikely considering their record, we, the residents of Granada Hills, would still be faced with having the world's largest dump in our backyard.

Response 729: The proposed landfill will not be the world's largest landfill. Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 730: According to the Environmental Impact Report the expansion will significantly raise the level of air pollutants in the area. There will be a significant increase in nitrogen

oxides, reactive organic gases, carbon monoxide, sulfur oxides, and suspended particulate matter which cannot be mitigated.

Response 730: Refer to Response 68 for a discussion of the environmental determination within the Draft SEIR, stating that the proposed project would create an unavoidably significant adverse impact on air quality, for construction and operational emissions.

Comment 731: We understand that the City now has an economic interest in Sunshine Canyon because of the long term reduced price agreed upon by BFI if they are to accept half of the city's refuse. Please assure us that your major consideration will not be economic.

Response 731: Following an extensive Request for Proposal process in the City, BFI was awarded a contract by the City to dispose of solid wastes (e.g., collected by City BOS collection vehicles in residential areas of the City) at the County Landfill. The City Council approved the contract between the City and BFI on May 1, 1996. The City contract with BFI is for a 7½-year period at a competitively bid price. The contract became effective on August 5, 1996, coinciding with the opening of the County Landfill. As a result of the award, BFI disposes of approximately one-third of the City's collected solid waste.

Comment 732: Those of us residing in Knollwood and Granada Hills do not feel that we should provide the necessary burial ground to meet the solid waste needs of the city of Los Angeles. We support Councilman Hal Bernson in his suggestion (July letter) that, instead of expanding to within the Los Angeles city limits, it be moved further north.

Response 732: Refer to Response 165 for a discussion of the No Project Alternative and the potential for future development of a 70-million-ton landfill in the County.

Comment 733: BFI says the landfill will have little effect on the adjacent land uses; however, we know, that they cannot get rid of 100% of the methane gas created by so large a landfill. We know that our very lives and those of our children are in danger if we continue to live here after expansion of the dump.

Response 733: Refer to Response 316 for a discussion of the potential for the proposed City/County Landfill to cause acute or chronic health risks to residents in the community of Granada Hills.

Comment 734: If the proposed expansion is approved by your office the landfill will be a mere 1700 feet from the nearest home. Again we ask you to imagine what our environment will be like if you approve the expansion of the Sunshine Canyon landfill.

Response 734: These comments are noted.

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Letter 3.8-21

Comment 735: A. Refer to Section 4.13-transportation/circulation; Page 4-346, passenger car equivalents (PCE) under Traffic Generation Criteria. It is stated that "one transfer truck is assumed to have approximately the same impact on normal traffic operations as three passenger cars, and one curb side collection trash truck is equivalent to two passenger cars". These assumptions appear to be understatements generally, and do not relate to the fact that the impact of a truck will vary significantly depending on the conditions of the road, e.g., a sloped entrance ramp, the conditions of traffic and signalization.

Please provide the following clarifications in response to this comment:

Response 735: As stated in the Draft SEIR, Section 4.13.1, Traffic, p. 4-346, the truck traffic expected to be generated by the proposed project has been converted to passenger car equivalents (PCEs) based on the methodology presented in the *Highway Capacity Manual (HCM), Special Report No. 209,* Chapters 3 and 7 (Transportation Research Board, 1985). The type of terrain modeled for the surrounding project study area, street system, and freeway segments was "rolling terrain." The HCM defines rolling terrain as any combination of grades and horizontal or vertical alignment that causes heavy vehicles to reduce their speeds substantially below those of passenger vehicles but that does not cause heavy vehicles to operate at crawl speeds for any significant length of time. Tables 3-3 and 7-7 of the HCM present the PCE factors for general extended freeway segments and general multilane highway segments. The categories and PCE factors in these tables are most useful in the planning stage of analysis (i.e., preparation of a traffic study) where alignments are not known but approximate capacity computations are needed.

As shown in these tables, a PCE factor of 3.0 is recommended for trucks and buses (E_t) under "rolling terrain" conditions. Because transfer trucks are approximately 60 feet long and have a volume capacity of 23.5 tons per truck, consulting traffic engineers (and concurred with by LADOT) assumed the trucks would have approximately the same impact on normal traffic operations as three passenger cars (i.e., a PCE factor of 3.0). However, because refuse trucks only measure 40 feet long (with a 9-ton volume capacity) and are equivalent in length to two passenger cars (assuming the average car length is 20 to 22 feet), a PCE factor of 2.0 was used. It should be noted that this procedure (i.e., methodology and assumptions) by which the project trips associated with the proposed project were forecast and calculated was approved by the LADOT.

The Draft SEIR, Appendix B1, LADOT/City Planning Staff Correspondence and the Traffic Impact Study Report (included in Appendix B of the Draft SEIR), includes the detailed trip generation calculations for the proposed project.

Based on LADOT and City Planning staff concurrence, no revisions to either the project trip generation forecast calculations or the traffic impact analysis methodology presented in the Draft SEIR are required.

Comment 736: 1. The source and precise conditions and data from which the assumptions were derived;

Response 736: Refer to Response 735.

Comment 737: 2. Supporting data that shows that the assumptions apply to each of the analyzed intersections;

Response 737: Refer to Response 735. Supporting technical data are provided in the Draft SEIR, Volume II, Appendix B1, LADOT/City Planning Staff Correspondence and Traffic Impact Study Report.

Comment 738: 3. Quantify the common occurrence of having multiple trucks occupy a short stretch of road and how that may produce impacts which are different than the assumptions. Note, experience shows that trucks neither enter nor leave landfills at an even spacing. Multiple trucks at an intersection, or even a stretch of road (for example where one truck attempts to pass another) can create much greater impact than an equal number of trucks evenly spaced out in traffic.

Response 738: The traffic impact study report for the proposed project analyzes the project's potential traffic impacts on the surrounding street system during both the a.m. and p.m. peak hour of a "typical weekday." This methodology is consistent with the *Los Angeles Department of Transportation (LADOT) Traffic Study Policies and Procedures.* The traffic impact study report considers and evaluates the arrival and departure patterns of landfill truck traffic during the a.m. and p.m. peak hours. The traffic impact study report also assessed transfer trucks and refuse collection vehicles, in the form of PCEs, at each of the 13 key intersections during the critical morning and evening peak commute hours, and identified appropriate mitigation measures.

Comment 739: 4. If the assumptions cannot be fully supported by data, they should be revised and the impact should be recalculated.

Response 739: The Draft SEIR assumptions are fully supported by the data that have been verified by both LADOT and City Planning staff. Refer to Response 735.

Comment 740: B. Please refer to page 4-372, table 4.13-9 (project specific mitigation measures).

1. The second paragraph where the San Fernando Road at Balboa does not provide a specific mitigation, but rather refers to a recommended traffic surveillance and an indication that preliminary discussion with LADOT staff indicate a computer signal control system with a possible mitigation that could be implemented.

Response 740: Refer to Response 141 with respect to this mitigation measure.

Comment 741: Since a mitigation is supposed to be an inherent part of a proposed proposal project, on what basis can this be considered a mitigation?

Response 741: Refer to Response 141 with respect to this mitigation measure.

Comment 742: 2. Is there an absolute commitment that this mitigation will be provided?

Response 742: Refer to Response 141 with respect to this mitigation measure. The implementation of this mitigation measure by the project proponent is required prior to the start of the ATSAC system, which is scheduled for the year 2003. The City will enforce this specific mitigation measure.

Comment 743: 3. If there is no assurance that the mitigation will be provided as part of the proposed project, the mitigation should be removed from the impact analysis.

Response 743: Refer to Response 742.

Comment 744: C. Refer to page 4-44. Under City Mitigation Measures it is stated that "final maximum refuse slope, gradients shall be no more steeper than 2H to 1V for the landfill".

It is difficult to see how a 2H:1V slope can be considered a mitigation. Most landfills in earthquake prone areas in California are designed at 3H:1V or flatter.

Response 744: There are numerous landfills throughout California with final faces that slope at 2H:1V. A number of these landfills were located in the epicentral region (close to the center) of the Loma Prieta and Northridge earthquakes, and these landfills did not suffer serious damage as a result of earthquake events. Landfills with 2H:1V slopes near the epicenter of the 1989 magnitude 7.1 Loma Prieta earthquake that survived this earthquake without major damage include the Santa Cruz and the Kirby Road Landfills. Landfills with 2H:1V slopes near the epicenter of the 1994 magnitude 6.7 Northridge earthquake that survived this earthquake without major damage include the Lopez Canyon Landfill (City owned) and the inactive Sunshine Canyon Landfill (within City jurisdiction).

Comment 745: There are a number of critical factors relating to slope stability that the Environmental Impact Report has not addressed. For example:

1. The contents of a landfill vary considerably throughout a given landfill.

Response 745: The variability of solid waste is implicitly accounted for in the stability analysis by using a waste shear strength based on historical analyses of stable slope conditions at existing landfills and the lower bound shear strength from laboratory test data on samples with variable composition.

Comment 746: 2. The strength of any section of a landfill can change with time as decomposition (see page 2-65 "Refuse Decomposition Processes") and settlement takes place.

Response 746: Based on observations at existing landfills, there is no reason to believe that decomposition and settlement adversely affect landfill stability. Furthermore, the waste shear strengths used in stability analyses are based on analysis of existing landfills that, in some cases, are over 40 years old (e.g., OII Landfill). In addition, refer to Response 1112 for a discussion of solid waste landfill sites where waste-on-waste liner systems have been successfully designed, permitted, and constructed.

Comment 747: 3. The contents of municipal landfills can be expected to change significantly with changes in technology, e.g., a paperless work place and with greater emphasis on recycling.

Response 747: Laboratory strength tests used to develop the waste shear strength values used in the stability analysis within the Draft SEIR used specimens with a wide variety of waste composition including specimens composed almost entirely of paper waste and some with no paper waste. The lower bound strength envelope, corresponding to specimens composed almost entirely of decomposed soil-like materials, was used to establish a representative lower bound strength for solid waste.

Comment 748: Given the many variables in trying to assess landfill performance, it is prudent to make conservative assumptions. It should be noted that an engineered fill (which is not the case here) is normally constructed with a maximum slope of 2:H to 1:V. An engineered fill uses graded and defined earth materials, moisture condition and compacted within narrow limits. By contrast, a sanitary landfill has a content which is to a large degree undetermined, which is loosely compacted, which is subject to significant settlement and changes in strength characteristics over time. These calculations are absent.

Response 748: Engineered fills for highways and other civil facilities are routinely constructed with maximum slopes as steep as 1.5H:1V. Numerous landfills throughout California and the continental United States have been safely constructed with 2H:1V slopes. Landfill settlement is generally considered to result in an increase in the waste shear strength due to the accompanying increase in waste density. The proposed City/County Landfill would be designed to incorporate the future settlement of the landfill so that no significant impacts on slope stability would occur. In addition, refer to Response 1112 for a discussion of solid waste landfill sites where waste-on-waste liner systems have been successfully designed, permitted, and constructed.

Comment 749: Please state in your response to this comment how the stability analyses that have been conducted have reasonably considered the above variables.

Response 749: The variability in waste composition has been accommodated in the stability analyses by using a lower bound shear strength for solid waste.

Comment 750: Also provide the basis for claiming that a 2H to 1:V slope is mitigation given that many experts including myself, would consider this an overly steep slope.

Response 750: Numerous landfills have been safely constructed with 2H:1V slopes. Some landfills have been safely constructed with slopes as steep as 1.5H:1V (e.g., Lopez Canyon,

BKK, OII Landfills). There is no record of any stability problems at landfills with 2H:1V waste slopes built on firm foundations. Therefore, considering that the proposed landfill will be built on a firm foundation, restricting the final slope to 2H:1V is considered a mitigation measure with respect to slope stability.

For an additional discussion of the refuse slope gradient for the proposed City/County Landfill, refer to Response 744.

Comment 751: D. Refer to page 5.1. In considering potential sites for major new landfills, it is customary to perform a site selection study. Such a study uses a rigorous methodology which looks at all significant variables and (those normally cover by an EIR) within a geographic area. Additionally, the study evaluates acquisition variables. There is no indication that such a study was performed in developing alternative sites for evaluation.

Response 751: The proposed project is not a "new" landfill project. Conceptual planning of this proposed project began in 1984, when the project proponent filed project applications with County Planning staff. The Draft SEIR is intended to update existing background data and provide new information to the previous environmental documents (there are 18 documents) that comprise the County-certified County Landfill Extension FEIR.

The FEIR considered the potential environmental impacts of landfill development within Sunshine Canyon and the operation of a landfill within both County and City jurisdictions (±1,560 acres). The FEIR provided substantial information about developing various landfill configurations (or alternatives) in Sunshine Canyon. The proposed City/County Landfill was addressed in the FEIR, and its potential impacts resulting from development were also analyzed in those FEIR documents.

In addition, the proposed project was identified as part of a combined "County/City Landfill" project that would encompass land area in both the County and City. The envisioned County/City Landfill was originally proposed to have an estimated disposal capacity of approximately 215 million tons and provide a waste intake of approximately 17,500 tpd. In its original iteration, the County/City Landfill footprint encompassed ±706 acres within both jurisdictions.

The project site has undergone landfilling operations since 1958 when a zone variance was issued for a landfill operation in the City. Moreover, the project site is recognized as a landfill site in adopted County and City integrated solid waste management plans. The development of the proposed project would be consistent and in accordance with those plans. Those plans were fully described in the Draft SEIR, Volume II, Appendix C13.

Additionally, landfill site assessments were performed by County staff in regard to siting in-County landfills, and this information was presented in the Draft SEIR. Specifically, and as stated in the Draft SEIR, Section 5.7, Potential/Proposed Landfill Sites in Los Angeles County, pp. 5-21 and 5-22:

In late 1987 a Preliminary Alternate Site Study (Alternate Study) was prepared by the staffs of the County Department of Public Works (DPW), the County Chief Administrative Office, and the Sanitation Districts. This study encompassed a three-phase approach that considered a comprehensive set of technical, environmental, and social criteria. In total, 101 potential landfill sites within Los Angeles County were investigated. The first phase of this study determined the site study area, the second phase identified the candidate sites by using a comprehensive screening process, and the final phase consisted of a numerical rating of the candidate sites. Recommendations from this study were subsequently incorporated into the *Solid Waste Management Status and Disposal Options in Los Angeles County* (February 1988), the *Los Angeles County Solid Waste Management Action Plan* (March 1988), the *City of Los Angeles Solid Waste Management Action Plan* (June 1988), the County's *Integrated Solid Waste Management System for Los Angeles County, Draft Program Environmental Impact Report* (August 1990), the *City of Los Angeles Source Reduction and Recycling Element* (October 1994), the *County of Los Angeles Source Reduction and Recycling Element* (August 1993), and the *Los Angeles County Countywide Siting Element* (January 1996).

All the above-noted documents recognize the Sunshine Canyon site as appropriate for landfill development to provide the necessary disposal capacity for the Los Angeles region.

Comment 752: Please respond to this comment by describing the methodologies (not the public processes which are described) used in selecting and analyzing the alternative sites.

Response 752: As stated in Section 5.1 (Alternatives) Introduction, p. 5-1 and 5-2, of the Draft SEIR:

> Pursuant to §15126, subd. (d) of the State CEQA Guidelines, an EIR must describe a range of reasonable alternatives to the project, or to the location of the project, which would feasiblely attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. Moreover, feasible is defined in the CEQA statutes (§21061.1) as capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.
>
> Furthermore, §15126, subd. (d)(5) of the State CEQA Guidelines, states that, "The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasiblely attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making."

In regard to feasibility, State CEQA Guidelines, §15126, subd.(d)(5)(A), states that, "among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent)."

Based on the Notice of Preparation (NOP) and Notice of Early Consultation (NOEC) responses, verbal testimony received during the public scoping meeting, written comments received from internal City departments, and comments received from Responsible Agencies, the City Planning staff held a "postscoping" meeting on June 4, 1992, with the environmental consultant and the project proponent. Many of the alternatives originally considered by the Environmental Study Advisory Committee (ESAC) and identified by City Planning staff were subsequently determined to be infeasible by the City based on State CEQA Guidelines, §15126. These alternatives are briefly discussed in Section 1.9.1, Alternatives Not Evaluated, of this Draft SEIR. Meeting minutes pertaining to City staff discussions are available and contained in the project's administrative record or case file. Appendix A8, in this Draft SEIR identifies those alternatives that City staff determined should be addressed within this Draft SEIR.

Those alternatives considered for evaluation by City Staff include the following:

- No Project
- Reduced Volume
- Immediate Combined City/County Landfill Operations
- Potential/Proposed Landfill Sites in Los Angeles County
  - Blind Canyon
  - Elsmere Solid Waste Management Facility
- Out-of-County Landfill Site
  - El Sobrante
- Waste Management Technologies and Strategies
  - Source Reduction
  - Recycling
  - Composting
  - Waste-to-Energy (WTE)
  - Alternative Daily Cover Materials (ADCMs)
- Remote Landfill Facilities In-State/Out-of-State
  - Eagle Mountain
  - Railcycle-Bolo Station
  - Mesquite Regional
  - La Paz
- Environmentally Superior Alternative

Comment 753: E. Refer to page 5.4. Under section 5.3, "Methodology Used for Analyzing Alternatives," it is stated that "these alternatives were evaluated based on their ability to satisfy the specific objectives of the proposed project." This approach puts a major emphasis on the project proponent's stated development objectives and therefore shades the analysis in favor of their proposal. This approach does not appear to satisfy any reasonable standard for objectivity. Even referring to the project proponent's development objectives is misleading. Please describe what was done to insure objectivity given the project proponent's active participation in the alternative selections and the fact that these alternatives are evaluated by a consultant paid directly by the project proponent.

Response 753: Pursuant to §15126(d) of the State CEQA Guidelines, an EIR must "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasiblely attain most of the **basic objectives of the project** [emphasis added] but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Based on this directive, the project proponent's stated development objective must be used in selecting the alternatives to be analyzed in an EIR. It should be noted that the alternatives selected for analysis in the Draft SEIR were approved by City Planning Staff.

In selecting the range of alternatives, both specific development and solid waste objectives were used to meet the anticipated short-, mid-, and long-term disposal needs within the region.

Moreover, these alternatives were evaluated based on their ability to satisfy the basic objectives of the proposed project. Project objectives are based on the primary goals set forth by the City, County, and project proponent that provide in-County disposal capacity to meet the anticipated short-, mid-, and long-term disposal needs of the Los Angeles region. It is appropriate to identify applicable public policy objectives that have been established for the jurisdiction within which the project is located and the project proponent's objectives as they may relate to the proposed development plan. Project objectives and related public policy objectives were presented in the Draft SEIR, Section 2.2.1, Primary Purpose and Objectives of the Proposed Project, and the development objectives were included in Section 2.2.2, Development Objectives.

Comment 754: F. Section 2.10 page 2-75 states that the "combined landfilling at one face would consist of landfilling operation occurring on approximately 10 acres." This is a huge working face. Bulldozers, trucks, and other landfilling equipment will be operating from 5:00 a.m. to 6:00 p.m. dumping and spreading garbage on an area equal in size to about 15 football fields. The Environmental Impact Report describes litter control devices that will be employed to control the blowing of garbage. In the past litter control was a problem at Sunshine Canyon even with a smaller operation.

1. Describe what modeling or methodologies have been used to ensure the effectiveness or litter control.

Response 754: Refer to Topical Issue 18 for a discussion of litter control.

Comment 755: What are the potential impacts of wind on the 10 acres that will constitute the working face with respect to garbage, dirt and air quality?

Response 755: Refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions. In addition, refer to Topical Issue 18 for a discussion of litter control.

Comment 756: What methodology, models and documents were relied upon?

Response 756: Refer to Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, within this document.

Comment 757: OBJECTIVITY

As an individual who has been involved in the EIR process since its inception, it is obvious that even the most objective EIR consultants cannot maintain complete objectivity when they are working directly for a project proponent. Their interaction with the project proponent, their client, and their desire to maintain an ongoing relationship with that client, creates a major conflict for the consultant who is trying to be objective and professional. Additionally, the consultants often get caught up in their client's view of trying to deal with an unreasonable public and they use their knowledge to craft an EIR which has an appearance, but not the reality, of objectivity. This is self evident in reviewing the Sunshine Canyon Environmental Impact Report. The above comments provide examples of advocacy of drafting the Environmental Impact Report in a manner to support the project rather being clearly objective. An additional problem is that the public must depend on the lead agency to identify statements in the Environmental Impact Report which lack objectivity. First an EIR of this scope and complexity is frequently beyond the review expertise of the agency staff. Secondly, the EIR can be crafted to deceive the reviewers.

Given the above, please describe exactly what has been done to ensure the objectivity of this EIR.

Response 757: The Draft SEIR was prepared in a manner consistent with the requirements of CEQA, State CEQA Guidelines, City CEQA Guidelines, and the City EIR Preparation Manual. During the Draft SEIR's preparation, the document was thoroughly reviewed, commented on, and approved by numerous City departments to ensure technical adequacy and objectivity prior to public distribution. Issues raised during the public review and comment period are responded to in this Final SEIR.

As stated in the State CEQA Guidelines, §15084(e):

> Before using a draft prepared by another person, the Lead Agency shall subject the draft to the agency's own review and analysis. The draft EIR which is sent out for public review must reflect the independent judgment of the Lead Agency. The Lead Agency is responsible for the adequacy and objectivity of the draft EIR.

As stated in the City's EIR Preparation Manual, Policy I, Submittal of Environmental Documents to City Planning Staff:

> An Environmental Impact Report shall be considered a City document from the time an NOP is filed. The ERS, EIR Consultants and Applicants shall work collaboratively on the preliminary draft documents. This includes databases, preliminary draft EIRs, draft responses to comments, draft technical reports and draft background studies such as traffic studies or biology surveys. All reports required by the Department of Planning as part of the environmental review are covered, including subconsultant reports or draft technical studies.
>
> During the first and second preliminary draft stages, the applicant, the EIR consultant and subconsultants, and the City's Environmental Review Section shall communicate concerning the EIR as set forth in Section III.3.2 of this document. From the point at which the applicant, EIR consultants and subconsultants, and the ERS determine the project's definition, the ERS will control the writing of the preliminary draft.

As further stated in Policy 1.1:

> In preparation for scoping, project descriptions (including objectives) should be reviewed by the applicant for accuracy prior to their submittal.

As stated in Policy III, 3.1, 3.2:

> The principal contact with the City during the review of preliminary databases shall be between the ERS staff and the prime environmental consultant.
>
> The Applicant, the EIR Consultant and the ERS shall maintain regular telephone contact and the ERS shall hold periodic status meetings at reasonable intervals during the preliminary draft stages of the EIR. When supplemental meetings or discussions are held between the applicant, the EIR consultant, and the EIR subconsultants to discuss the database, the ERS coordinator shall be invited to participate in the meeting or discussion. If the ERS coordinator does not participate, the EIR consultant shall provide them with a written summary of the meeting concerning the database, including a description of proposed revisions to the scope of the database or to the language. Any comments on these proposed revisions shall be communicated by the ERS coordinator to the EIR consultant within one week after the description is received by the ERS. If no comments are received by the EIR consultant within the one-week period,

the proposed database revisions may be made, subject to final ERS review of the database.

As indicated in EIR Preparation Manual, Policy 1.1, Planning Department Authority:

> The Los Angeles Department of City Planning is the legal author of EIRs published for private projects requiring Planning Department discretionary review. The EIR reflects the City's independent judgement and evaluation of potential impacts.
>
> The EIR may be prepared with the assistance of a professional environmental consultant hired by the developer and/or project applicant. The consultant may provide technical and other data base information necessary for preparation of the EIR. Such information shall be provided consistent with instructions established in the Manual, subject to City staff review and approval.

The preparation of the Draft SEIR and its technical appendices, which has been ongoing since 1991, has been a collaborative effort between City Planning staff and the environmental consultant.

Since 1991, there have been over 50 scheduled meetings between City Planning staff and the environmental consultant on this proposed project. Since that period, all meetings between the City Planning staff and the consultant have been documented. Meeting minutes with respect to the proposed project are part of the project's administrative record, which is available for public review.

Additionally, three separate databases have been prepared prior to distribution of the Draft SEIR. All databases were reviewed and commented on by City Planning staff, in addition to other City departments. All information contained in those databases is also part of the project's administrative record.

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Letter 3.8-22

Comment 758: With respect to page 4-47, the Environmental Impact Report state that "on most spring and on early summer days, the daily air pollutants produced within the SCAB are moved out of the air basin through mountain passes or are lifted upwards by the warm vertical currents produced by the heating of mountain slopes. In those seasons, pollutants within the SCAB are disbursed and transported "often to a distance of sixty miles or more by ocean air currents during the afternoon."

a) What studies, methodologies, reports and/or documents are relied upon for this assertion?

Response 758: The information referred to in the comment was obtained from the *SCAQMD CEQA Air Quality Handbook.* The SCAQMD is the agency responsible for comprehensive air pollution control within the SCAB.

Comment 759: b) What are the dispersion rates from carbon monoxide which is related to the proposed operation of Sunshine Canyon?

Response 759: Dispersion rates vary with the type of source (e.g., elevated versus ground level, hot exhaust versus ambient temperature, stack versus fugitive, etc.), the meteorology (e.g., wind speed, wind direction, vertical stability structure, etc.), the source-receptor distance, and intervening topography. Many of these factors vary with source location and time of day.

Because the determination of dispersion rates and the characterization of atmospheric chemistry that further converts emissions into other pollutant forms are generally not feasible on a single-project basis, the SCAQMD has developed other means of determining impact significance based on the amount of pollution emitted. Because high CO concentrations from motor vehicle emissions can cause localized problems, an additional analysis of CO emissions is provided in the Draft SEIR, Section 4.2.8, Air Quality Operational Phase (Long-Term), pp. 4-73 through 4-75. Dispersion rates and directions associated with CO are used in projecting concentrations at intersections, and this analysis is included in the Draft SEIR, Table 4.2-12. This analysis in the Draft SEIR concluded that neither State nor federal CO standards would be exceeded as a result of project development. Refer to Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, within this document.

Comment 760: c) What are the dispersion rates from reactive organic gasses which is related to the proposed operation of Sunshine Canyon?

Response 760: Refer to Response 759 for a discussion of dispersion rates. This discussion also applies to reactive organic gases (ROGs).

Comment 761: d) What are the dispersion rates from nitrogen oxide which is related to the proposed operation of Sunshine Canyon?

Response 761: Refer to Response 759 for a discussion of dispersion rates.

Comment 762: e) What are the dispersion rates from sulfur dioxide which is related to the proposed operation of Sunshine Canyon?

Response 762: Refer to Response 759 for a discussion of dispersion rates.

Comment 763: f) What are the dispersion rates from particulates which is related to the proposed operation of Sunshine Canyon?

Response 763: Refer to Response 759 for a discussion of dispersion rates. The dispersion of PM_{10} emissions due to onsite operations, including exhaust emissions produced by heavy equipment and flare gas, as well as PM_{10} emissions produced by soil disturbance, have now been modeled using the ISCST3 model (refer to Response 97). Emission concentrations at the nearest school (Van Gogh Street Elementary School) do not exceed the 2.5 $\mu g/m^3$ standard for a significant change in air quality concentration as noted in SCAQMD Rule 1303.

Comment 764: g) What are the dispersion rates from fugitive dust which is related to the proposed operation of Sunshine Canyon?

Response 764: Refer to Responses 759 and 763.

Comment 765: h) What are the dispersion rates from ozone which is related to the proposed operation of Sunshine Canyon?

Response 765: Refer to Response 759. Ozone is the byproduct of NO_x and ROG reacting in the presence of sunlight and is not produced directly at the site.

Comment 766: i) What are the dispersion rates from nitrogen dioxide which is related to the proposed operation of Sunshine Canyon?

Response 766: Refer to Response 759.

Comment 767: 2. With respect to the federal ozone standards discussed at page 4.53, the Environmental Impact Report states that these [ozone] concentrations increased during the summer, with daily concentrations increasing from the late morning to the afternoon.

a) How much ozone will be released during the summer months?

Response 767: As noted in the Draft SEIR, Section 4.2.3, Criteria Air Pollution, p. 4-52, ozone is the byproduct of NO_x and ROG reacting in the presence of sunlight and is not produced directly at the project site. Ozone is affected by all emission sources within the SCAB.

Consequently, there is no way to estimate the project's contribution to ozone. This is why the SCAQMD lists daily criteria for NO_x and ROG, which are the major ozone precursors. Because ozone is not released directly by the project and cannot be directly ascertained, this pollutant is not studied or addressed in the impact criteria.

Comment 768: b) How much ozone will increase by each year?

Response 768: Refer to Response 767.

Comment 769: c) What methods, studies and documents have you utilized to analyze this issue?

Response 769: Refer to Response 767.

Comment 770: d) What will the affect of increased ozone have on the health of children in the affected area?

Response 770: Refer to Response 767.

Comment 771: e) What will the affect of increased ozone have on elder people or people with respiratory problems in the affected area?

Response 771: Refer to Response 767.

Comment 772: f) Have there been any studies done with respect to the increase of O_3 over a localized area?

Response 772: As noted in Response 767, localized area increases are not characteristic of predominantly regional ozone patterns. Ozone formation entails a complex photochemical process that converts NO_x and reactive organic compounds to ozone. This process usually requires several hours. The areas of highest ozone concentration in the SCAB are usually 10 to 20 miles downwind of the source. Localized area increases are not characteristic of predominantly regional ozone patterns.

Comment 773: g) What, if any, attempts have there been made to mitigate the affects of increased ozone?

Response 773: Refer to Responses 767 and 772.

Comment 774: 3. Have alternative sites been examined, as a possible mitigating factor? If so, please state the methodology used for analyzing alternative sites and all supporting documentation upon which the analysis was made.

Response 774: Alternatives to the proposed project were examined in the Draft SEIR, Section 5.0, Alternatives. For a discussion of the methodology used for selecting and analyzing alternatives to the proposed project, refer to Responses 751 through 753.

Comment 775: 4. What will be the affect of increased particulate matter on the population on the affected area?

Response 775: Refer to Response 254 for a discussion of the inhalation of particulate matter and potential health implications.

Comment 776: 5. What will be the specific health affect of increased particulate matter on the elderly?

Response 776: Refer to Response 254 for a discussion of the inhalation of particulate matter and potential health implications.

Comment 777: a) Upon children aged 0-5?
b) On children aged 6-10?
c) on children aged 11-15?
d) on children aged 16-25?

Response 777: Refer to Response 254 for a discussion of the inhalation of particulate matter and potential health implications.

Comment 778: 6. What is the affect upon increased particulate matter on property values?

Response 778: Refer to Response 180 for a discussion of the proposed project's potential effects on property values.

Comment 779: 7. Has a modeling been done which examines levels of increased particulate matter as the usage of the landfill continues over time?

Response 779: Refer to Response 254 for a discussion of the inhalation of particulate matter and potential health implications.

Comment 780: 8. Have any studies been performed which examines the affect of increase particulate matter on the affected population?

a) If so what studies? If not, why not?

Response 780: Refer to Response 254 for a discussion of the inhalation of particulate matter and potential health implications.

Comment 781: 9. On page 4-55 the report states that "because the area is subject to frequent violations of both State and federal air quality standards for ozone and state standards for particulate matter the project area is very sensitive to additional ozone precursor and particulate pollutant emissions.

a) What, if anything, have been done to mitigate the affect of additional ozone and particulate matter in an area that is acknowledged to be an area "subject to frequent

violations of both state and federal air quality standards for ozone and particulate matter"?

Response 781: Refer to Response 254 for a discussion of the inhalation of particulate matter and potential health implications. In addition, refer to Responses 767 and 772 for a discussion of ozone.

Comment 782: b) Exactly, what does it mean when Environmental Impact Report states that "the project area is very sensitive to additional ozone precursor and particulate pollutant emissions?"

Response 782: Because the project area exceeds clean air standards for these pollutants, any action that increases their exposure exacerbates an unhealthful condition; thus, the area is considered "sensitive."

Comment 783: c) What, if any, studies have been done in this area to ascertain the "sensitivity"? Are we talking about affects on people's health? This area must be addressed with specificity.

Response 783: Refer to Response 254 for a discussion of the inhalation of particulate matter and potential health implications. In addition, refer to Responses 767 and 772 for a discussion of ozone.

Comment 784: d) What studies if any, have been done to ascertain the effect of additional O3 and PM_{10} pollutants on the residential population which lives in the vicinity of the Sunshine Canyon?

Response 784: Refer to Response 254 for a discussion of the inhalation of particulate matter and potential health implications. In addition, refer to Responses 767 and 772 for a discussion of ozone.

Comment 785: e) If no studies have been performed, does BFI intend to perform any studies by a qualified health care professional prior to the expansion of Sunshine Canyon?

Response 785: Refer to Response 254 for a discussion of the inhalation of particulate matter and potential health implications. In addition, refer to Responses 767 and 772 for a discussion of ozone.

Comment 786: 10. With respect to the table utilized on page 4-56 (table 4.2-2 "Air Quality Monitoring Summary for Santa Clarita Monitoring Station") the report notes that with the exception of inhalable particulates, all values are based on 365 days per year.

a) on what basis were the inhalable particulates measured?

Response 786: Particulate matter is usually collected from midnight to midnight every sixth day. Therefore, approximately 61 samples are collected per year, which conforms with EPA and/or CARB criteria for representativeness.

Comment 787: b) Were the particulates analyzed by specific size?

Response 787: Suspended particulate matter is collected on an 8- by 10-inch quartz fiber filter using a high-volume sampler equipped with a size-selective inlet. The PM_{10} sampler is designed to collect 50 percent of all particulates 10 μm in aerodynamic diameter. Smaller particles are collected at an increased fraction, whereas larger particles are collected as a decreased fraction.

Comment 788: c) If so, what methodology and documents were utilized?

Response 788: Refer to Response 787.

Comment 789: d) Why is Sunshine Canyon being expanded when the report itself states that there will be an unavoidable adverse impact on air quality when Sunshine Canyon resides in an area that already has very poor air quality?

Response 789: This project is being proposed to meet the disposal capacity needs of the City and County of Los Angeles. The proposed project is further acknowledged in adopted City and County integrated waste management plans as a potential landfill site that would provide for the short-, mid-, and long-term waste disposal needs of the entire Los Angeles region. It is also being proposed because of an existing County Landfill CUP Condition that requires the project proponent to file applications with the City for a landfill within the City's jurisdiction as part of a combined County/City facility.

The SCAB as a whole must be considered, and if other potential landfill sites (located farther distances) are used for disposal, significant air quality emissions would be generated due to longer distances traveled by waste-hauling vehicles. Because truck emissions constitute the greatest source of project-generated emissions at a landfill facility, use of landfills located at farther distances would generate significantly more daily emissions.

Comment 790: 11. The Los Angeles Times in its November 20, 1997, edition reported a year long study by the Kaiser Foundation Research Institute which found a particularly strong correlation between hospital admissions and elevated levels of course particulates that typically come from road dust, tire wear and airborne erosion from construction sites. As indicated in the EIR, particulate matter along with other pollutants will rise significantly and the impact cannot be mitigated. Have the recent health studies (including Kaiser's) been reviewed, especially those concerning particulate matter, in relationship to the particulate matter that will be generated by Sunshine Canyon?

Response 790: The Kaiser Study confirmed that exposure to elevated PM_{10} levels is unhealthful. The Kaiser Study evaluated exposure to combined fine and coarse particulates and did not distinguish whether the increased hospital admissions are due to either fine or coarse particulate inhalation. Refer to Response 254 for a discussion of the inhalation of particulate matter and potential health implications.

Comment 791: a) If yes, what studies have been reviewed?

Response 791: Refer to Response 254 for a discussion of the inhalation of particulate matter and potential health implications.

Comment 792: b) If no studies have been reviewed that have specifically reviewed the relationship to the affects that particulate matter have on individuals, why is this project going forward?

Response 792: Refer to Response 254 for a discussion of the inhalation of particulate matter and potential health implications.

Comment 793: 12. The Environmental Impact Report fails to address the topic of potential diminution of property values. BFI has operated other municipal landfills in proximity to residential neighborhoods.

a) Have there been any studies which attempted to correlate the affect that the opening of a municipal landfill or the expansion of a municipal landfill has on residential property values?

Response 793: Refer to Response 180 for a summary of property valuation studies presented in the Draft SEIR, Appendix C14, and the findings of the City's Associate Zoning Administrator regarding this issue.

Comment 794: b) If there have been any studies done, why were they not cited?

Response 794: The referenced studies were cited in the Draft SEIR, Section 4.11, Housing, p. 4-329, and Appendix C14, Summary of Property Valuation Studies.

Comment 795: c) If there have been studies done, please specify the study, when it was performed and in relationship to which landfill?

Response 795: Refer to Response 180 for a summary of property valuation studies presented in the Draft SEIR, Appendix C14, and the findings of the City's Associate Zoning Administrator regarding this issue.

Comment 796: d) If studies have not been performed, indicate why a study has not been performed which would demonstrate the impact, if any, the proposed expansion of Sunshine Canyon have on existing residential property values?

Response 796: Refer to Response 180 for a summary of property valuation studies presented in the Draft SEIR, Appendix C14, and the findings of the City's Associate Zoning Administrator regarding this issue.

Comment 797: 13. On Page 4.57 the Environmental Impact Report indicates that the Page Four SCAQMD is the first local agency in the country to adopt a market-based approach for controlling stationary source emissions of oxides of nitrogen and sulfur and, in

accordance with the pending revisions, is proposing additional market-based control measures.

a) Does the Environmental Impact Report adopt a market based approach for evaluating air quality?

Response 797: The Draft SEIR does not rely on a "market-based approach" to evaluate air quality impacts. As noted in the Draft SEIR, Section 4.2.5, Air Quality Management Plans, p. 4-59, air quality impacts are based on major stationary and mobile sources of emissions.

The major stationary source of emissions associated with the proposed project is from the flare stations. Those emissions are regulated by SCAQMD Rule 1150.1 and subject to best available control technology (BACT).

Comment 798: b) If a market-based approach is being adopted by BFI with respect to air quality, on what basis is it being implemented?

Response 798: Refer to Response 797.

Comment 799: c) If a market based approach is being adopted by BFI with respect to air quality, how does the report relate to the health consequences of the residential population which resides adjacent to Sunshine Canyon?

Response 799: Refer to Response 797. The Draft SEIR does not rely on a "market-based approach" to evaluate air quality impacts.

Comment 800: 14. The Environmental Impact Report, beginning Section 4.2.7 (site preparation/ construction sequencing) provides a model for pollution.

a) Does the model show the variations from month to month and season to season?

Response 800: Because SCAQMD impact thresholds are based on "project-generated" daily and quarterly emission rates, the air quality analysis in the Draft SEIR is based on a "worst-case" day and applies this value throughout the construction period. No daily or seasonal distinctions were made. It should be noted that this analysis produces emission projections that would overestimate actual emission levels.

Comment 801: b) If no, why not, especially since pollution levels are significantly higher in the summer months?

Response 801: As noted in Response 800, air quality impacts are based on project-generated daily and quarterly emissions rates based on worst-case days regardless of the season in which they occur. The CO hotspot analyses presented in the Draft SEIR were modeled during winter months in accordance with SCAQMD and CARB methodology.

Comment 802: c) If yes, what model was used and what factual basis was used for the extrapolation?

Response 802: Refer to Response 800.

Comment 803: 15. Under 4.2.7, of the Environmental Impact Report further states that "based on the projected emission presented herein, a significant air quality impact is predicted for nitrogen oxide.
a) What levels will the nitrogen oxide increase to and how will those levels vary over months?

Response 803: NO_x projections were included in the Draft SEIR, Table 4.2-5, Construction Emissions for Initial Site Preparation. This table represents a "worst-case" day with all equipment operating 10 hours per day. No methodology is available to quantify seasonal emission differences for heavy equipment operations, and heavy equipment includes the majority of construction emissions. Refer to Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, within this document.

Comment 804: b) In addition, how will the increased levels of nitrogen oxide adversely affect the local residents?

Response 804: Refer to Response 255 for a discussion of the inhalation of nitrous oxides (NO_x) and potential health implications.

Comment 805: c) Have health studies been performed to ascertain the health affects of the increased nitrogen oxide on the affected population?

d) If yes, what studies were done?

Response 805: Refer to Response 255 for a discussion of the inhalation of nitrous oxides (NO_x) and potential health implications.

Comment 806: e) If no studies have been performed, is BFI going to perform any studies into the potential health affects on the subject population for increased nitrogen oxide prior to the opening of the expansion of Sunshine Canyon?

Response 806: Refer to Response 255 for a discussion of the inhalation of nitrous oxides (NO_x) and potential health implications.

Comment 807: 16. Why is the air quality monitoring a summary for Santa Clarita of monitoring station (table 4.2-2) only go through 1994?

Response 807: At the time the Draft SEIR was prepared, this was the most current year of reported data. Data for 1995 and 1996 are included in Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, Table 4.2-2, in this document.

Comment 808: 17. In light of the fact that figures are available through 1996 wouldn't it not be more prudent for the Environmental Impact Report show the most current figures for the number of days standard for the exceeded maximum levels for monitoring such violations?

Response 808: Refer to Response 807.

Comment 809: 18. Based on the current Federal Clean Air Act requirements, how many days of the year will the PM_{10}'s exceed the federal standards for the proposed expansion?

Response 809: Refer to Response 245 for a discussion of SCAB exceedance of State and federal ambient air quality standards. In addition, if a project is located within the SCAB and the project results in emissions in excess of a CEQA significance level, the project has not violated State or federal law.

Comment 810: 19. Based on the current Federal Clean Air Act requirements, how many days of the year will the ozone exceed the federal standards for the proposed expansion?

Response 810: Refer to Response 245 for a discussion of SCAB exceedance of State and federal ambient air quality standards. In addition, if a project is located within the SCAB and the project results in emissions in excess of a CEQA significance level, the project has not violated State or federal law.

Comment 811: 20. Based on the current Federal Clean Air Act requirements, how many days of the year will the carbon monoxide exceed the federal standards for the proposed expansion?

Response 811: Refer to Response 245 for a discussion of SCAB exceedance of State and federal ambient air quality standards. In addition, if a project is located within the SCAB and the project results in emissions in excess of a CEQA significance level, the project has not violated State or federal law.

Comment 812: 21. Based on the current Federal Clean Air Act requirements, how many days of the year will the nitrogen dioxide exceed the federal standards for the proposed expansion?

Response 812: Refer to Response 245 for a discussion of SCAB exceedance of State and federal ambient air quality standards. In addition, if a project is located within the SCAB and the project results in emissions in excess of a CEQA significance level, the project has not violated State or federal law.

Comment 813: 22. Based on the current Federal Clean Air act requirements, how many days of the year will the sulfur dioxide exceed the federal standards for the proposed expansion?

Response 813: Refer to Response 245 for a discussion of SCAB exceedance of State and federal ambient air quality standards. In addition, if a project is located within the SCAB and

the project results in emissions in excess of a CEQA significance level, the project has not violated State or federal law.

Comment 814: 23. Based on the current Federal Clean Air Act requirements, how many days of the year will the inhalable particulates exceed the federal standards for the proposed expansion?

Response 814: Refer to Response 245 for a discussion of SCAB exceedance of State and federal ambient air quality standards. In addition, if a project is located within the SCAB and the project results in emissions in excess of a CEQA significance level, the project has not violated State or federal law.

Comment 815: 24. What affect will the increase fugitive dust emissions have on the population adjacent to the Sunshine Canyon?

Response 815: Refer to Response 254 for a discussion of the inhalation of particulate matter and potential health implications.

Comment 816: 25. What studies have been done in relationship to the affect that fugitive dust emissions will have on the subject population?

Response 816: Refer to Response 254 for a discussion of the inhalation of particulate matter and potential health implications.

Comment 817: 26. Project construction is projected to produce nitrogen oxide (893.8 pounds per day) and PM_{10} (203.8 pounds per day) in excess of those levels deemed by the SCAQMD as significant.

a) What studies have been done to determine the health affects of the increased nitrogen oxide and PM_{10}'s?

Response 817: Refer to Response 254 for a discussion of the inhalation of particulate matter and potential health implications. In addition, refer to Response 255 for a discussion of the inhalation of nitrous oxides (NO_x) and potential health implications.

Comment 818: b) What is the dispersion rate of the nitrogen oxides and PM_{10}'s?

Response 818: Refer to Response 759 for a discussion of dispersion rates.

Comment 819: c) What studies delineate the dispersion rates of the nitrogen oxides and PM_{10}'s?

Response 819: Refer to Response 759 for a discussion of dispersion rates.

Comment 820: d) If studies have not been done or reviewed which delineate the dispersion rates of the nitrogen oxides and PM_{10}'s why not?

Response 820: Refer to Response 759 for a discussion of dispersion rates.

Comment 821: 27. At page 4-64 the Environmental Impact Report indicates an anticipated fuel consumption of 23.5 miles per gallon (which is comprised of transfer trucks, curb side collection trucks, and local delivery trucks).

a) Please identify the make and model of any transfer truck, curb side collection truck or local delivery truck that is able to obtain 23.5 miles per gallon.

Response 821: The identified value of 23.5 miles per gallon (mpg) is for construction worker vehicles (i.e., automobiles and light-duty pickup trucks) and not heavy trucks. This value was revised to 24.3 mpg for worker vehicles based on the 1997 BURDEN 7G model. (Refer to Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, in this document.)

Comment 822: b) please indicate the source of the calculations which were used to support the emissions estimated therein (it appears the calculations were based on an eight hour day as opposed to the ten hours of operational use which is indicated in the EIR).

Response 822: Refer to Response 61 for a discussion of the number of hours per day heavy equipment would be in use for the proposed project.

Comment 823: 28. On what basis was the conservative method utilized in the derivation of heavy equipment and vehicle emissions?

Response 823: Values are considered as "conservative" (or overpredictive) because they include all equipment and trucks operating 10 hours daily, with no downtime or worker breaks.

Comment 824: a) Would it be more appropriate to use a less conservative methodology?

Response 824: Refer to Response 823.

Comment 825: 29. Which respect to Fuel Storage and Dispensation, what are the calculations utilized to compute that daily diesel consumption for heavy equipment is estimated at 900 pounds per day.

Response 825: The value provided in the Draft SEIR is 900 **gallons** [emphasis added] per day (gpd) not 900 **pounds** [emphasis added] per day. The 900-gpd value is based on the project proponent's operational experience (with the inactive City Landfill [when operational] and the current County Landfill). Emissions associated with fuel storage and dispensation account for 0.3 pound per day of vapor emissions.

Comment 826: 30. Under Stock Pile Erosion (page 4-71) the report indicates that "At height of ten feet, a stockpile would require a land area of approximately thirty acres."

a) What is the height limitation on stockpiles?

Response 826: The height of the stockpile is based on the proposed area size available for stockpiling as well as the equipment used to "stack" this material. The height and configuration are covered by the stability analysis and need for storage.

Comment 827: b) What is the height limitation based upon?

Response 827: Refer to Response 826.

Comment 828: c) How do the calculations of PM_{10}'s differ with respect to the height of the stockpile?

Response 828: The AP-42 reference source used in the Draft SEIR calculations does not differentiate emissions based on the height of the stockpile, only by the total area. A higher stockpile area would encompass a smaller area with the same volume of material; thus, a lower value would have been calculated.

Comment 829: d) How many stockpiles could be utilized at any one time?

Response 829: Refer to Response 352 for a discussion of existing and anticipated soil stockpile areas.

Comment 830: 31. In the EIR's calculation on page 4-71, on what basis is .22 utilized for PM_{10} particulates?

Response 830: Refer to Response 63 for a discussion of the use of 1995 AP-42 emission factors to calculate fugitive dust emissions.

Comment 831: a) What studies support the use of .22 for PM_{10} particulates?

Response 831: Refer to Response 63 for a discussion of the use of 1995 AP-42 emission factors to calculate fugitive dust emissions.

Comment 832: 32. With respect to the calculations shown on page 4-72 .36 is used for calculation of PM_{10} particulates.

a) On what basis is .36 utilized for PM_{10} particulates and what studies form the basis for utilizing .36 for said calculation?

Response 832: Refer to Response 63 for a discussion of the use of 1995 AP-42 emission factors to calculate fugitive dust emissions.

Comment 833: 33. In the carbon monoxide micro-scale analysis passenger car equivalents of 2 to 1 were used for curb side collection trucks and 3 to 1 were used for transfer trucks.

a) Is there any published documentation or studies on which justify or support such a conversion or ratio?

b) If such studies exist, please identify said studies.

Response 833: Refer to Response 735 for a discussion of truck traffic conversion to passenger car equivalents (PCEs).

Comment 834: 34. With respect to page 4-76, which indicates that Screen Two model was utilized in the health risk analysis (4.2.9) which was not designed for a complex terrain such as Sunshine Canyon, why was such a model utilized?

Response 834: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates.

Comment 835: a) How can you have accurate assessments of the health risks when the model utilized (Screen Model Two) is not designed for use in complex terrain such as Sunshine Canyon?

Response 835: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates.

Comment 836: 35. Has BFI studied the health risk associated with landfills in which a residential population is situated within a half mile of the landfill?

a) If yes, what have those studies revealed?

b) If no, why not consider the potential adverse consequences?

Response 836: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates. In addition, refer to Response 316 for a discussion of the potential for the proposed City/County Landfill to cause acute or chronic health risks to residents in the community of Granada Hills.

Comment 837: 36. On page 4.77, the Environmental Impact Report indicates the chronic health impacts were predicated on conservative impact assumptions. Why are conservative impact assumptions utilized?

Response 837: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates.

Comment 838: 37. Under the Health Risk Analysis, was the health risk analyzed for the 9 carcinogenic material and the five noncarcinogenic constituents which were utilized in table 4.2-13.

a) If no, why were no such studies performed?

Response 838: The excess cancer risk, chronic exposure noncancer risk, and acute exposure noncancer risk are TAC constituents that are listed in the Draft SEIR, Table 4.2-13, p. 4-76. Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air

quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates.

Comment 839: 38. With respect to page 4-78 on the third indented paragraph the Environmental Impact Report that "the project environmental document should provide an analysis to demonstrate ... the project will not have significant negative impact on air quality in the long term (5 years or longer.) However, the next paragraphs states "the impact analysis demonstrates that significant levels of air pollutants will be generated over the long term." How does BFI square these two competing contentions?

Response 839: Refer to Responses 453 through 456 for a discussion of the proposed project's consistency with the most recently approved SCAQMD Air Quality Management Plan.

Comment 840: 39. The Environmental Impact Report further states that page 4-78 that "with resent finding by nationally recognized health experts, the new 1997 draft AQMP puts greater emphasis on PM_{10} particulate matter." Identify the recognized health experts identified in this statement as well as their reports.

Response 840: The commenter is referred to the SCAQMD to obtain additional information regarding preparation of SCAQMD's 1997 draft Air Quality Management Plan (AQMP). In addition, refer to Responses 453 through 456 for a discussion of the proposed project's consistency with the most recently approved SCAQMD AQMP.

Comment 841: 40. If the air quality will be adversely impacted and cannot be mitigated, why are sites not thoroughly reviewed which are situated in an area which is not contiguous to a residential population?

Response 841: Refer to Responses 751 through 753 for a discussion of the methodology used for selecting and analyzing alternatives to the proposed project. In addition, refer to Response 893 for a discussion of an environmental comparison between the proposed project and waste-by-rail landfill alternatives.

Comment 842: 41. With respect to the City of Los Angeles Air Quality Element, how is this project consistent with the goal of the obtainment of good air quality when the EIR admits that air quality will suffer and that the affects cannot be mitigated?

Response 842: Refer to Response 466 for a discussion of the proposed project's consistency with the City of Los Angeles Air Quality Element.

Comment 843: 42. With respect to goal four listed on page 4-83 identify the "stand-alone health risk assessments".

Response 843: Refer to Appendix D3, Revisions to Draft SEIR, Appendix B6, Low-Level Health Risk Assessment, within this document.

Comment 844: a) What studies documents and/or research demonstrate that the "air pollutants admitted from the flare station, which is a pollution control device, was shown to induce no potential adverse health affects" as indicated under goal four on page 4-83.

Response 844: Refer to Appendix D3, Revisions to Draft SEIR, Appendix B6, Low-Level Health Risk Assessment, within this document.

Comment 845: 43. The Environmental Impact Report states that the "project is currently out of attainment for both ozone and PM_{10} suspends particulate pollutants."

a) Please identify how far out of attainment the project will be for O3 and PM_{10} for the life of the project and further indicate whether the project area will not be in attainment for other pollutants over the life of the project.

Response 845: Refer to Response 245 for a discussion of SCAB exceedance of State and federal ambient air quality standards. In addition, if a project is located within the SCAB and the project results in emissions in excess of a CEQA significance level, the project has not violated State or federal law.

Comment 846: b) Further, specifically identify the methodology, assumptions, studies and documents, upon which the requested information is based.

Response 846: The information provided in the Draft SEIR, Table 4.2-3, is derived from the 1991 AQMP, which was developed by the SCAQMD in association with the USEPA, CARB, SCAB, and local governments. The information included in the Draft SEIR, Table 4.2-1, was prepared in accordance with CARB methodology.

Comment 847: 44. As indicated on page 4-84 the project is considered significant on cumulative level with respect air pollutants. This being the case, on a year to year basis through the life of the project, identify how the amount of pollutants which will exceed the federal maximum standards.

Response 847: Refer to Response 245 for a discussion of SCAB exceedance of State and federal ambient air quality standards. In addition, if a project is located within the SCAB and the project results in emissions in excess of a CEQA significance level, the project has not violated State or federal law.

Comment 848: a) Furthermore, identify the health risks associated with increased NO_2, SO_2, PM_{10}, CO, ROG.

Response 848: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates. In addition, refer to Responses 254 through 256.

Comment 849: b) Furthermore, please identify the methodology, studies, experts and information utilized in arriving at said yet unstated conclusions.

Response 849: The significance of air pollution impacts was determined in accordance with the emission-based significance thresholds provided in the *SCAQMD CEQA Air Quality Handbook* (1993). These thresholds are the pollution levels considered safe by public health experts. The linkage between the Draft SEIR conclusions and "methodology, studies, experts, and information utilized" is based on this SCAQMD guidance document.

Comment 850: 45. What are the dispersion rates for NO_2, SO_2, PM_{10}, CO, ROG, and at what distance do they meet the federal air quality standards? Please provide the documents, methodology, studies, which support the EIR, yet unstated conclusions, regarding these matters.

Response 850: Refer to Response 759 for a discussion of dispersion rates.

Comment 851: 46. With reference to page 4-86, to what level will fugitive dust be mitigated?

Response 851: Refer to Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, Table 4.2-16, within this document. In addition, refer to Response 68 for a discussion of the environmental determination within the Draft SEIR, stating that the proposed project would create an unavoidably significant adverse impact on air quality, for construction and operational emissions.

Comment 852: 47. On page 4-86, under the heading Exhaust Emissions, the report states that significant impacts are anticipated. Accordingly, what affect will the mitigation measures for heavy equipment and site construction have on the air quality?

Response 852: Refer to Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, Tables 4.2-14 and 4.2-15, within this document. In addition, refer to Response 68 for a discussion of the environmental determination within the Draft SEIR, stating that the proposed project would create an unavoidably significant adverse impact on air quality, for construction and operational emissions.

Comment 853: a) What studies, if any, were performed to calculate the level of mitigation air quality?

Response 853: Refer to Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, within this document. In addition, refer to Response 68 for a discussion of the environmental determination within the Draft SEIR, stating that the proposed project would create an unavoidably significant adverse impact on air quality, for construction and operational emissions.

Comment 854: b) To what degree will the air quality be mitigated by such mitigation measures set forth for heavy equipment operation and site construction?

Response 854: Refer to Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, Tables 4.2-14 and 4.2-15, within this document. In addition, refer to Response 68 for a discussion of the environmental determination within the Draft SEIR, stating that the proposed project would create an unavoidably significant adverse impact on air quality, for construction and operational emissions.

Comment 855: 48. With respect to page 4-87, how does the project proponent's commitment to reduce traffic congestion translate into the actual implementation of plan to reduce traffic congestion? Is the "commitment" legally binding on BIF?

Response 855: Mitigation measures to reduce traffic congestion are included in the Draft SEIR, Section 4.13.1, Traffic, pp. 4-371 through 4-373. Those measures were developed in consultation with City staff, LADOT, and Caltrans. Implementation of the identified roadway improvements will become conditions of project approval and will be enforced by the LADOT. A Revised Mitigation Concept Plan is included in Appendix D1 of this document. Refer to Table 7.4-1 (Revised) in this document regarding mitigation monitoring for the proposed project.

Comment 856: 49. With respect to table 4.2-15 (operational emissions, control measure reduction efficiency, and residual emissions), please describe how Ultrasystems Environmental Incorporated derived the numbers utilized in said table.

Response 856: Refer to Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, Table 4.2-15, within this document.

Comment 857: 50. With respect to table 4.2-16, please describe the source of the numbers utilized by Ultrasystems Environmental Incorporated.

Response 857: Refer to Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, Table 4.2-16, within this document.

Comment 858: 51. With respect to table 4.2-16, the EIR notes that control efficiency are conservative: On what basis are conservative control efficiencies utilized?

Response 858: Values are considered as "conservative" if they are overpredictive.

Comment 859: a) The EIR admits that in the past, the landfill was subject to prior dust control problems, how do the mitigation efforts used in the past differ from those that are planned to be used when Sunshine Canyon is expanded?

Response 859: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation. In addition, refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Comment 860: 52. On page 4-91 the Environmental Impact Report states that "even with the implementation of mitigation measures, project-generated and project-related cumulative impacts are considered significant and unavoidable". The EIR appears to suggest that there will not be any health affects, this being the case, why are the impacts still considered "significant."?

Response 860: Refer to Response 68 for a discussion of the environmental determination within the Draft SEIR, stating that the proposed project would create an unavoidably significant adverse impact on air quality, for construction and operational emissions. In addition, refer to Response 316 for a discussion of the potential for the proposed City/County Landfill to cause acute or chronic health risks to residents in the community of Granada Hills.

Comment 861: 53. With respect to odor impacts, what studies, if any, have been done to support the EIR's claim there are formidable barriers to odor migration?

Response 861: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates. In addition, refer to Response 316 for a discussion of the potential for the proposed City/County Landfill to cause acute or chronic health risks to residents in the community of Granada Hills.

Comment 862: 54. On what basis is the EIR's claim that the 1,700 foot separation between the nearest residential unit to the timber ridge is sufficient to eliminate potential odor nuisance problems emanating from the working face of the landfill.

Response 862: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates. In addition, refer to Response 316 for a discussion of the potential for the proposed City/County Landfill to cause acute or chronic health risks to residents in the community of Granada Hills.

Comment 863: 55. With respect to the wind under 4.2.2 (California's SCAB regional climate characteristics report indicates "with very light average wind speeds, the SCAB's atmosphere has a limited capability to disperse their contaminates horizontally". It is common knowledge that average wind speeds do not reflect the extreme in wind variations and high winds often common in the hills surrounding Granada Hills. Especially, it is common knowledge that the winds can reach very high speeds in the canyon passes including, Sunshine Canyon.

a) Is it appropriate for the EIR to use a model that reflects the average wind speed? What methodology, models and documents were relied upon?

Response 863: Refer to Topical Issue 3 for a discussion of wind conditions at the project site. Pollutant dispersion is based on a number of factors, and wind speed is one of the most critical. Reduced wind speeds cause pollutants to stagnate in place, and modeling predicts higher concentrations, whereas higher wind speeds aid in pollutant dispersal and result

in lower predicted values. This then presents a "worst-case scenario." In addition, refer to Response 759 for a discussion of dispersion rates.

Comment 864: b) What is the dispersion of air contaminants horizontally during periods of high winds? What methodology, models and documents were relied upon?

Response 864: Refer to Response 863.

Comment 865: c) What is the dispersion rate of air contaminants when they are disbursed with reference to various wind speeds? What methodology, models and documents were relied upon?

Response 865: Refer to Response 864.

Comment 866: 56. What affect will the air contamination caused by the project have on the LA Water Treatment Plant located off Balboa? What methodology, models and documents were relied upon?

a) Please provide the exact methodology and documents used to support any information on this matter.

Response 866: Refer to Response 157 for a discussion of allegations that the previous City Landfill operation caused contaminated particulates to enter the Los Angeles Reservoir and other water treatment and storage systems.

George Kane
11916 Mallot Place
Granada Hills, CA 91344

Letter 3.8-23

Comment 867: I write not as a resident of Granada Hills alone, but as one who is very concerned about the environment as well. It appears that the biggest waste dump in LA, perhaps the world, is nearing a reality.

Response 867: The largest landfill facility located in Los Angeles County (unincorporated area) is the Puente Hills Landfill. This facility is owned and operated by the County Sanitation Districts of Los Angeles County and is currently permitted to accept up to 13,200 tpd of refuse. The total acreage for that landfill site is approximately 1,365 acres.

Comment 868: Big business and money probably have more clout than one more concerned citizen, but how can this be on the cusp on happening when, from the information I have received, there should be great alarm over the Final Environment Impact Report. What about that today, tomorrow? There appears dangerous potential for harm not to just those nearby, but to those much further away. What about us, our children?

Response 868: These comments are noted. It is unknown what "information" has been received by the commenter; therefore, the City cannot respond to this concern.

Comment 869: A landfill of this monstrosity should not be located so near people and a fresh water supply. Seems common sense, let alone a formal report, should make that clear.

Response 869: Refer to Response 157 for a discussion of allegations that the previous City Landfill operation caused contaminated particulates to enter the Los Angeles Reservoir and other water treatment and storage systems.

Comment 870: You have "the clout" of the opinion of one more concerned LA resident.

Response 870: This comment is noted.

Lynn A. Plambeck, Chairperson
Jeff Yann, 2nd Vice President
Landfill Alternatives Save Environmental Resources (LASER)
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Letter 3.8-24

Comment 871: We would like to begin by making some general remarks. We want to express concern that there is no material recovery facility planned in conjunction with this expansion. If we are really to re-direct our solid waste management policies, recovery facilities must be built.

Response 871: Refer to Response 243 for a discussion of reasons why the project proponent is not proposing an onsite materials recovery facility/transfer station as part of the proposed project.

Comment 872: An existing landfill is an obvious and logical site as it would facilitate redirection of waste already arriving at the landfill and extend capacity. (We would not be supportive of an increase in daily tonnage to support a MRF as the daily tonnage approved for Sunshine is already substantial.) An industrial site away from residential areas would be even more suitable. This option should be explored.

Response 872: Refer to Response 243 for a discussion of reasons why the project proponent is not proposing an onsite materials recovery facility/transfer station as part of the proposed project. *The Los Angeles County Countywide Siting Element, Volume I - The Element* (Los Angeles County DPW, Environmental Programs Division, June 1997) discusses proposed waste-by-rail MRFs/transfer stations that may serve Los Angeles County. As stated on page 9-8 of the Siting Element, "Currently, there are no existing solid waste stations with rail-loading facilities in Los Angeles County. However, there are several proposals for development of new solid waste stations with this capability, upgrading existing facilities to add to rail-loading capability, and for the use of existing intermodal facilities (currently operating for other commercial purposes), for the transport of waste by rail cars." Eleven proposals are discussed within the Siting Element.

Comment 873: The SEIR does not seem to adequately address air pollution problems that may impact the Santa Clarita Valley. Prevailing winds often produce "Newhall only" days of excessively high air pollution. The Santa Clarita Valley is designated as a non-attainment zone for compliance with ozone standards under the Clean Air Act. Landfills produce ozone precursors. These problems must be addressed and mitigated in the SEIR.

Response 873: The Draft EIR includes an air quality analysis in accordance with SCAQMD standards and the methodology used in the *SCAQMD CEQA Air Quality Handbook.* Daily emission levels generated both onsite and offsite are included in that analysis. Mitigation measures and residual impacts are also presented.

Comment 874: We object to "exempt waste" being calculated in such a fashion as to substantially increase the real amount of waste that is actually delivered to the landfill. It appears that the traffic and air pollution studies do not include this additional "exempt" waste delivery. This is a deficiency.

Response 874: Refer to Responses 1 and 186 for a discussion of proposed peak and average daily waste intake rates.

Comment 875: It seems that mitigations for impacts have changed between the County and City portions of the landfill. These changes sometimes appear in the text in locations that do not make them readily apparent.

Response 875: Mitigation measures being recommended for the proposed project are similar to those already adopted for the operational County Landfill. However, additional mitigation measures are recommended for the proposed project because of project-specific impacts on a resource (i.e., that was not located within County jurisdiction) or on the advice of a regulatory agency or City department.

In regard to the operational County Landfill's mitigation measures (either imposed as project conditions or included as part of the County Landfill Extension Mitigation Reporting and Monitoring Summary), those measures are adopted and will not change unless the County Landfill CUP is amended. Any new mitigation measures or changes will be included in the County Landfill Mitigation Reporting and Monitoring Summary. Any new amendments to either the adopted County Landfill CUP or its Mitigation Reporting and Monitoring Summary will require some form of discretionary approval by the County decisionmakers.

Comment 876: We request that the Planning Department prepare a table that identifies each County mitigation with a corresponding column for the comparable city required mitigation so that the decision makers may be informed as to the comprehensiveness and cohesiveness of the mitigation requirements for both areas.

Response 876: For comparative purposes, the City provided the Mitigation Reporting and Monitoring Program for the proposed project in the Draft SEIR, Section 7.0, Mitigation Reporting and Monitoring Program. The "amended" Sunshine Canyon Landfill Extension Mitigation Monitoring and Reporting Summary for the County Landfill Extension (inclusive of any new mitigation measures) was also included in the Draft SEIR, Appendix C17, Amended Mitigation Monitoring and Reporting Summary.

Comment 877: **Surface Water**

The reports required for monitoring under the state General NPDES Permit and the General Industrial Stormwater Permit should be included in the appendices so that the decision makers and the public can make informed decisions regarding problems with control or pollution of surface water run-off from the landfill.

Response 877: It is not known what reports the commenter is referencing with respect to the State General NPDES Permit and the General Industrial Stormwater Permit. Existing permit

conditions at the operational County Landfill have been complied with by the project proponent. Copies of BFI's permits, regulatory reports, or documents are on file with the respective regulatory agencies such as the LARWQCB. Refer to Response 549 for a discussion of NPDES permitting requirements.

Comment 878: It has been stated in public scoping sessions and in the SEIR that the closed section of the Landfill will be covered by a liner and surface run-off diverted around this area. With the well-established settling phenomenon experienced by all landfills, we question the reliability of any liner that will undergo that much movement.

Response 878: Refer to Responses 745 through 749 for a discussion of long-term settlement of solid waste landfills and potential impacts on slope stability. In addition, refer to these same responses for a discussion of how the proposed City/County Landfill design and engineering incorporate long-term landfill settlement.

Comment 879: The liner at Chiquita Canyon Landfill suffered a substantial tear from movement caused by the Northridge earthquake. It seems probable that a similar failure would be experienced by any liner subject to the stress of landfill settling.

Response 879: The liner tear at the Chiquita Canyon Landfill was not due to landfill settling. This tear was apparently triggered by the rigid body movement of the waste mass. This tear occurred close to the anchor trench where the largest static (pre-seismic) stresses in the HDPE geomembrane would be expected as a result of the settlement and compaction of the waste fill.[43] Side-slope liners at numerous landfills have been subjected to landfill settlement without any documented evidence of tearing. The side-slope liner design for the proposed landfill will accommodate landfill settlement. This design has been used successfully at the Lopez Canyon Landfill (owned by the City) and at other Southern California landfills.

As stated in the Draft SEIR, Section 4.1.4, Geologic Hazards - Seismicity, pp. 4-39 and 4-40:

> After the Northridge earthquake, cracks were observed in all waste cells of the Chiquita Canyon Landfill. Tears were also discovered in the landfill liner at the landfill. They were caused by a combination of factors, including stress concentrations and inadequate shear resistance at the base of the landfill. The tears occurred adjacent to an anchor trench at the crest of a slope where the largest static (pre-seismic) stresses in the HDPE geomembrane would be expected as a result of the settlement and compaction of the waste fill. This is generally recognized as one of the locations where the stress on the liner is the greatest. The tear initiated from the corner of a rectangular "cutout" where a QA/QC sample was collected during construction for destructive testing. Rectangular holes in the liner are points of stress concentration. A smooth liner was used at the base of the landfill, providing inadequate shear resistance to

[43]/ Preliminary Report on the Principal Geotechnical Aspects of the January 17, 1994 Northridge Earthquake, prepared by U.C. Berkeley, College of Engineering, Earthquake Engineering Research Center, p. 213. June 1994.

restrain the base from sliding, thereby resulting in a large deformation. Several feet of sliding displacement at the base resulted in slumping along the side slope, and additional stress was applied to the liner in the vicinity of the rectangular cutout.

Comment 880: Also it was indicated that seam weld tests were only made to 30 PSI. Again, this does not seem adequate for the amount of stress that this line would potentially incur.

Response 880: The 30-psi pressure used in nondestructive field testing of fusion-welded seams is applied to test for leaks, not weld strength. This pressure is significantly greater than the maximum liquid head to which the seam is expected to be subjected. Seam strength is measured using destructive tests performed in the laboratory and on samples recovered at a frequency of at least once every 500 feet. The criterion for passing (in these strength tests) is that the seam strength exceeds the strength of the intact material.

Comment 881: Were surface water and flood flow controls analyzed for capacity to handle "El Nino" events?

Response 881: Refer to Responses 532 and 536 for a discussion of historic rainfall conditions in the project area and how this information was used by consulting engineers to determine the required capacities of surface water collection and conveyance structures for the proposed City/County Landfill.

Comment 882: Page 4-112 states that "The potential exists for non-stormwater discharges into the stormwater conveyance systems. Various measures would be used to separate stormwater from wastes being disposed of in the proposed landfill . . ." These measures should be formulated into a table for easy review and conditioned to be followed by the CUP.

Response 882: Mitigation measures were formulated and listed in the Draft SEIR, Section 4.3, Surface and Groundwater, pp. 4-113 and 4-114. In addition, the mitigation measures were also provided in the Draft SEIR, Table 1.10-1, Summary Matrix of Potential Environmental Impacts, Mitigation Measures, Net Unmitigated Adverse Impacts, Mitigation Compliance Responsibility and Monitoring Phasing and Enforcement Program. Table 1.10-1 has been revised and is included in Section 2.0, Revisions and/or Additions to Draft SEIR, within this document.

It should be noted that a CUP is not a requested City entitlement for the proposed project.

Comment 883: **Groundwater**

Although there is a chart in the SEIR entitled "Site Ground Water Monitoring Wells Map" provided by GeoSynthetic Consultants indicating the location of Groundwater Monitoring Wells, Exploratory Borings/monitoring wells and lysimeters, there is no indication of the location of water quality data collected from leachate recovery wells, springs, surface streams and subdrains. It is therefore impossible for the public or the decision makers to determine if these samples were

taken from downstream or upstream of the landfill and any hydrological movement of pollutants that may have occurred. This makes the data deficient for purposes of analysis.

Response 883: Maps showing locations of leachate recovery wells, surface water sampling points, and subdrains are provided in the *Semi-Annual Detection Monitoring Reports* for the County Landfill Extension and the *Quarterly Groundwater Monitoring and Waste Disposal Reports* for the inactive landfill in the City.

Comment 884: Groundwater Data included in Appendix C18 is not comprehensive. Why was data included on surface streams only from 1995 to 1996 1st and 2nd quarter. Are these the required NPDES reports? Did the requirement begin in 1995? Page 4-129 states that "a comprehensive network of 22 groundwater monitoring wells was installed within Sunshine Canyon. Since installation, groundwater is sampled and analyzed quarterly for possible contamination." Why is data not included for monitoring wells other than CM-11 3rd Quarter, 1996? This is a deficiency.

Response 884: The surface water and groundwater monitoring data presented in Appendix C18 are provided as examples of laboratory chemical data for reference purposes. Inclusion of all analytical data collected at the site, which are already provided in other documents that are available to the public, would add significantly to the volume of the Draft SEIR and is not required by CEQA. Refer to Response 666 for a discussion of the existing inactive City Landfill's compliance with all mandated LARWQCB programs to ensure the quality of groundwater.

Monitoring data for both the County Landfill and inactive City Landfill are available in reports (e.g., *Semi-Annual Detection Monitoring Reports* for the County Landfill Extension and the *Quarterly Groundwater Monitoring and Waste Disposal Reports*) prepared for the LARWQCB.

Comment 885: Appendix C19 is entitled "DWP and MWD Water Quality Background Data". The data in this appendix refers only to imported water. Water quality of imported water would not be an indication of background quality of surface or ground water. Imported water has in fact no relation at all to the surface or ground water sources that might be impacted by the landfill and in no way can provide "background data". Was there any water quality information generated from the area of Sunshine Canyon prior to the original installation of the landfill? If so, this information should be included in the SEIR.

Response 885: Appendix C19 was included in the Draft SEIR to show the results of comprehensive water quality testing that is performed on treated water at the DWP Los Angeles Aqueduct Filtration Plant and the MWD Jensen Filtration Plant to ensure the safety of these water supplies for use as drinking water. The DWP and MWD can be contacted for additional data pertaining to their facilities.

Background surface water and groundwater quality data collected prior to development of the County Landfill are available for review at the LARWQCB. This information is

included within the *Semi-Annual Detection Monitoring Reports* for the County Landfill and the *Quarterly Groundwater Monitoring and Waste Disposal Reports*.

Comment 886: It is important for decision makers to note that a discussion of high chloride levels on page 4-129 discloses that the operator has been asked to do additional investigation to determine the sources of these elevated levels occurring downgradient of the landfill. Page 4-130 states that VOCs have been detected in one ground water monitoring well. Elevated Chlorides and VOC detection have been an indication of leachate leakage at other sites. These elevated levels could be an indication of pollutant migration within the ground water, an occurrence which the operator has denied could happen. Close attention should be paid to these points and all questions should be answered thoroughly to ensure the safety of the public.

Response 886: Refer to Response 674 for a discussion of naturally occurring chlorides found in groundwater samples collected at the project site. In addition, refer to Response 666 for a discussion of VOCs and inorganic compounds typically found in landfill leachate and the existing inactive City Landfill's compliance with all mandated LARWQCB programs to ensure the quality of groundwater.

Comment 887: Among the measures defined on page 4-134 to reduce leachate production is a statement that "Additionally, the proposed City/County Landfill will not accept liquid wastes or wastes with high moisture content." "High moisture content" should be defined by a percentage number, and this statement should be made part of the conditions of approval so that it is enforceable.

Response 887: Liquid wastes are defined in CCR, Title 27, §20200 as wastes containing less than 50 percent solids by weight. Similar to the County Landfill, the proposed City/County Landfill would be prohibited from accepting any liquid wastes. As an added measure to reduce leachate production, onsite landfill personnel continuously monitor waste received at the landfill for visible evidence of high-moisture content such as liquids ponding on the surface of the refuse or excessive liquid discharge from the waste. These waste types are not disposed of in the landfill.

It should also be noted that assigning and enforcing moisture content criteria, which is defined by an acceptable percentage, is difficult because of the heterogeneous nature of the waste and the different ability of waste material to absorb and retain moisture.

Comment 888: Section 4.3-..3 Flood Hazard/Mudflow Hazard - These hazards do not seem to have been addressed for El Nino events or the proposed greater height of the landfill. This is a deficiency.

Response 888: Refer to Responses 532 and 536 for a discussion of historic rainfall conditions in the project area and how this information was used by consulting engineers to determine the required capacities of surface water collection and conveyance structures for the proposed City/County Landfill.

Comment 889: Please find attached to this letter:

1) MWD Letter of January 1991 which remains relevant to the discussion of water quality.
2) Comments by our 2nd Vice President, Jeff Yann regarding alternatives to landfills.

Response 889: The referenced MWD letter is included in Appendix C6 in this document. This letter was previously submitted (in 1991) and responded to as part of the *Final Environmental Impact Report, Sunshine Canyon Landfill Extension, Comments Received and Responses for the Los Angeles County, Board of Supervisors*, Section 3.3, Surface Water/Groundwater, pp. 15 through 17 (Ultrasystems Engineers & Constructors, Inc., February 1991).

Mr. Yann's comments and responses to those comments are provided in comments and Responses 890 through 919 in this document.

Comment 890: 1. Why, with solid waste alternatives available that can produce jobs across the labor spectrum, is the City willing to settle for an alternative that only generates 35 jobs at the project site?

Response 890: The Draft SEIR, Section 2.13, Personnel Requirements, p. 2-89, assumes that the proposed project at maximum operational capacity would require an additional 35 employees. Those employees are in addition to the 52 employees currently employed by BFI at the County Landfill. Therefore, the total number of employees for the proposed project is 87. As a result of these employment opportunities, both indirect and secondary revenue sources to the community would be realized, and indirect employment opportunities would be created by the proposed project.

Comment 891: 2. Why are the County projections of landfill shortfalls used as a basis for this project any more credible now than they have been over the last 15-20 years, over which time history has shown them to be highly inaccurate?

Response 891: Los Angeles County solid waste disposal capacity projections were included in the Draft SEIR, Section 2.3.2, Remaining Permitted Landfill Capacity in Los Angeles County, pp. 2-4 through 2-11. These projections were derived from the *Los Angeles County Countywide Siting Element, Preliminary Draft*, dated January 1996, prepared by the County DPW, Environmental Programs Division. When the Draft SEIR was being prepared, County projections were the most current and credible data available.

The operational County Landfill projections were not used as a basis for this proposed project. As stated in the Draft SEIR, Section 2.3, Need for the Proposed Project, p. 2-3:

> The necessity for the proposed project is addressed in many long-range waste management planning documents (refer to Appendix C13) developed and adopted by both the City and County. These documents define essential waste management policies of these jurisdictions. Moreover, these documents present the demonstrated need for the expansion of existing solid waste landfills within

the Los Angeles region to ensure sufficient solid waste disposal capacity for residential, industrial, and commercial sectors.

Summaries of the documents and adopted policies by the City and County are provided in the Draft SEIR, Appendix C13, Regulatory Overview of State-Enacted Waste Management Acts.

Comment 892: 3. Why is it considered more acceptable to offer a landfill proposal with a "buyback center," which is not conveniently located or efficient, in lieu of a full recycling facility without the landfill that can effectively reduce environmental impacts of solid waste disposal?

Response 892: Refer to Response 190 for a discussion of the reason why the public buyback center is no longer being considered as part of the proposed project. In addition, refer to Response 243 for a discussion of reasons why the project proponent is not proposing an onsite MRF/transfer station as part of the proposed project.

Comment 893: 4. Why is hauling 11,000 tons of waste per day from all over the basin by trash truck to Sunshine Canyon considered to be more beneficial to air quality than centrally located waste processing facilities and waste reduction programs, with residues, if any, rail shipped to more remote sites?

Response 893: A significant percentage of the daily intake received at the proposed City/County Landfill would be end-disposal wastes that have been processed at existing MRFs/transfer stations. These facilities would initially receive, process, and recycle waste. Residual wastes (i.e., material not recovered from the waste stream) would be transported by transfer trucks to the project site for end disposal. Approximately 46 percent of the maximum daily intake to the site would originate from MRFs/transfer stations.

Comprehensive analysis of remote landfill facilities alternatives (both in-state and out-of-state), including the Eagle Mountain, Railcycle-Bolo Station, Mesquite Regional, and La Paz Landfills, were included in the Draft SEIR, Section 5.10, Remote Landfill Facilities In-State/Out-of-State, pp. 5-43 through 5-66.

In addition, a summary comparison of alternatives by each topical issue was included in the Draft SEIR, Table 5.3-1. Alternative landfills using waste-by-rail systems would result in greater environmental impacts than the proposed project because their footprint area and project areas of disturbance are larger. These projects will require the construction and operation of several MRFs/transfer stations to accommodate each project. Additionally, significant impacts on sensitive and endangered biological resources (which are located in desert environments) would occur, and increased impacts on air quality resources would be imminent with project development.

Comment 894: 5. What analyses have been done of the overall environmental impacts of the total City/County proposed project to support the contention that the substantial

environmental impacts it poses will be less than using alternative disposal sites (e.g., desert sites) or technologies?

Response 894: Refer to Response 893.

Comment 895: 6. Why is using Sunshine Canyon for landfilling considered to facilitate implementation of A.B. 939 than use of solid waste technologies that don't require landfilling (A.B. 939's true objective)

Response 895: Specific to A.B. 939, this law mandates that cities and counties throughout the State establish goals of reducing the generation of solid waste by 25 percent by 1995 (short-term planning) and 50 percent by the year 2000 (mid-term planning). A.B. 939 also promotes activities that would limit the production of waste at its generated source, mandates recycling and composting, and mandates the development of safe landfill disposal and waste transformation facilities.

Development of the proposed project would be consistent with the goals of A.B. 939. Specifically, solid wastes delivered for disposal would only be accepted from those jurisdictions that are in compliance with mandatory source reduction and recycling requirements in accordance with A.B. 939.

As an integral part of the County of Los Angeles Integrated Waste Management Plan (CoIWMP), counties were required to prepare a Countywide Siting Element, describing the site areas to be developed as landfill disposal or waste management facilities. This element is based on the existing information provided by the individual Source Reduction and Recycling Element (SRRE) of the unincorporated area of the County and the SRREs of the incorporated cities located within the County's boundary.

These documents would contain the following (A.B. 939 mandated) information: (1) goals and policies for the environmentally safe transformation or disposal of solid waste that cannot be reduced, recycled, or composted; (2) an estimation of the total transformation or disposal capacity (in cubic yards and in years) that will be needed for a 15-year planning period to safely handle solid wastes generated within the county that cannot be reduced, recycled, or composted; (3) a statement of the remaining capacity of existing solid waste transformation and disposal facilities (in cubic yards and years) at the time the element was prepared or revised; and (4) specified areas for new or expanded solid waste transformation or disposal facilities, consistent with the county or city General Plans (identification of new facilities is only required if the county determines that existing capacity will be exhausted within the 15-year planning horizon). The CoIWMP stated that one of its primary goals is to "assure adequate long-term solid waste disposal capacity for the cities and County unincorporated areas."[44] The CoIWMP further stated that the County and participating cities in Los Angeles County will support the development of new disposal facilities and expansion of

[44] *Preliminary Draft Summary Plan of the Los Angeles County Countywide Integrated Waste Management Plan, Volume I: The Plan*, Los Angeles County Department of Public Works, Environmental Programs Division, p. 2-5. January 1996.

existing facilities identified in the Los Angeles County Solid Waste Management Action Plan adopted on April 5, 1988, by the County Board of Supervisors (as revised by the Countywide Siting Element [CSE]), as long as they are found to be technically and environmentally feasible.

Los Angeles County Countywide Siting Element

The CSE was prepared by the staff of the County DPW under the auspices of the Solid Waste Management Committee/Integrated Waste Management Task Force (SWMC/ IWMTF). The CSE was prepared pursuant to the statutory requirements for the content and format of the CSE found in the California Public Resources Code, §§41700 through 41721.5. These requirements are further clarified in regulations adopted by the CIWMB and approved by the Office of Administrative Law for the preparation of a Siting Element found in CCR, Title 14, Division 7, Chapter 7, Article 6.5, §§18755 through 18756.7.

The CSE stated as one of its goals that:

> The cities in Los Angeles County, the County, and the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force will encourage and assist other jurisdictions in utilizing, to the maximum extent feasible, disposal capacity available for expansion within their boundaries, provided it is technically feasible and environmentally safe." This goal further stated, "Specifically, the jurisdictions in Los Angeles County will encourage the following: . . . the expansion of the Sunshine Canyon Landfill located in the northern San Fernando Valley within the City of Los Angeles and the County unincorporated area." In addition, the Siting Element identified the Sunshine Canyon Landfill in the City of Los Angeles as a "potential Class III landfill expansion." The document further stated that, "The proposed project would consist of a horizontal expansion of the City side, and vertical expansions of the currently closed City site and the recently approved County site. The expansion, if approved, will provide approximately 75 million tons . . . of additional capacity and would increase the facility's daily capacity to 11,000 tons.

The CSE further mentioned the Sunshine Canyon Landfill as:

> The proposed expansion of this facility [Sunshine Canyon] consists of an area which is partially located in the City of Los Angeles and partially in the unincorporated area. Conditional Use Permit 86-312 approved by the Los Angeles County Board of Supervisors on October 21, 1993, allows for initial expansion in the unincorporated areas. This permit also allows further expansion should the City of Los Angeles also approve the requested expansion into the area within the jurisdiction of the City of Los Angeles.

The CSE identified the proposed Sunshine Canyon Landfill in the City as a potential expansion site.

Comment 896: or using other sites with less proximity to population centers with less potential to be harmful to nearby residents?

Response 896: It is assumed that the commenter is referring to "remote landfill facilities." The Draft SEIR analyzes remote landfill sites (located in-state and out-of-state) as part of the alternatives analysis. In comparison to the proposed project, greater impacts on the environment would occur if these remote landfill facilities are developed because project development would result in disturbances on desert environments, the need for secondary transfer station facilities, and the use of waste-by-rail systems or long haul by truck. Impacts associated with remote landfills are presented in the Draft SEIR, Table 5.3-1.

Comment 897: 7. How can an analysis that assumes Puente Hills will be filled in 2003 (when the County approved its expansion on a footprint that will last to or beyond 2013) and that Chiquita Canyon can only take 5,000 tpd (when the County approved it at 10,000 tpd) be considered anything but ultra conservative and biased toward approval of Sunshine Canyon?

Response 897: As stated in the Draft SEIR, Table 2.3-1, the Puente Hills Landfill is authorized under its land use permit (LUP) and limited to 72,000 tons per week. The LUP expires in November 2003. No wastes are currently accepted into this landfill from either the City of Los Angeles or Orange County.

The Chiquita Canyon Landfill CUP allows for a total of 23 million tons of disposal capacity, and the landfill is limited to a maximum daily intake of 5,000 tpd based on 6 days per week. This information is also provided in the *County's Countywide Siting Element* (Los Angeles County DPW, Environmental Programs Division, June 1997), p. 3-28 and p. 7-11. Table 2.3-1 has been revised to state that the land use permit for Chiquita Canyon expires in 2019. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR in this document.

Comment 898: How does this analysis actually square with the reality of virtually no in-County impacts when BKK, Lopez Canyon and Azusa all closed within a few months despite drastic projections of adverse impacts?

Response 898: When operational, the Azusa Land Reclamation, BKK, and Lopez Canyon Landfills were collectively authorized under their SWFPs to accept up to 22,000 tpd. Their 1995 average intake totals (as referred to in the Draft SEIR, Table 2.3-1) indicated that 13,956 tpd were disposed of at these facilities (in the aggregate). The closure of these landfills has placed increased demands on existing landfills located in-County and may necessitate that future wastes be transported to out-of-County landfills to balance this additional waste burden.

Comment 899: 8. How can County DPW figures be relied upon to support landfill expansions when they are largely generated by L.A. County Sanitation Districts, who, with limited exceptions, is largely a landfill operator (Calabasas, Spadra, Puente Hills, Scholl

Canyon, Savage Canyon), and strongly biases these figures to support their landfill operations?

Response 899: Refer to Response 891 for a discussion of these issues.

Comment 900: 9. How can conformity with solid waste management plans be listed as a compelling EIR basis for expanding Sunshine Canyon when environmental analysis of landfill expansion listed in those plans was not performed and left to individual site-specific evaluations at the time of expansion?

Response 900: The solid waste management plans referenced in the Draft SEIR (Sections 2.2.2, 4.7.3, and Appendix C13) identify potential sites for new landfill development or landfill expansions such as Sunshine Canyon. The identification of the proposed project within referenced plans does not preclude the need for environmental review; it only indicates that based on the fact that an inactive City Landfill and operating County landfill are already located within Sunshine Canyon, the proposed project should be considered and would provide needed disposal capacity for the Los Angeles region.

Comment 901: 10. How can projected impacts of expansion of other landfills elsewhere in the county and outside the county be used as a basis for assuming that full expansion of Sunshine Canyon lessens regional impacts, when specifics of those alternative solutions are not identified?

Response 901: An environmental comparison by topical issue of the proposed project and alternative landfill projects was provided in the following sections of the Draft SEIR: Section 5.7, Potential/Proposed Landfill Sites in Los Angeles County, pp. 5-21 through 5-31; Section 5.8, Out-of-County Landfill Site Alternative, pp. 5-31 through 5-36; Section 5.10, Remote Landfill Facilities In-State/Out-of-State, pp. 5-43 through 5-66; and in Table 5.3-1, Summary Comparison of Alternatives by Topical Issue, pp. 5-72 through 5-94.

Based on the technical analysis presented in the Draft SEIR, development of the proposed project in comparison to the alternatives analyzed would have less impact than alternative landfill sites, including those in-County, out-of-County, or out-of-State.

Comment 902: 11. How can expansion of Sunshine Canyon be judged environmentally superior on a regional basis to using non-landfill alternatives, which are being successfully used to eliminate landfilling in other jurisdictions, without a detailed analysis of those alternatives and how they could be used?

Response 902: Refer to Response 169 for a discussion of alternative waste management technologies and strategies. As indicated in Response 169, City staff have determined that, even with the implementation of advanced and aggressive waste management alternatives, landfills would be needed to adequately provide for the amount of waste being generated within the City.

Comment 903: 12. What back-up is provided for the assumption that non-landfill alternatives cannot resolve the need for disposal capacity? How can this analysis be considered complete without citing examples of locations where techniques like landfill mining and recovery are actually being done to not only eliminate current landfilling but reduce the volume of environmentally hazardous landfills?

Response 903: Refer to Response 169 for a discussion of alternative waste management technologies and strategies. Specific waste management plans adopted by the City and cited in the Draft SEIR (Sections 2.2.2, 4.7.3, and Appendix C13) document the reasons why nonlandfill alternatives alone cannot provide for adequate disposal capacity for the City. Landfill mining in addition to other waste transformation technologies was determined by City staff to not be feasible alternatives to the proposed project. That information is presented in the Draft SEIR, Section 1.9.1, Alternatives Not Evaluated, p. 1-14, which states in part:

> . . . Solid waste transformation technologies such as co-composting, pyrolysis, landfill mining, and high-volume shredding are considered speculative, and the effects of these technologies on the environment could not be reasonably predicted; therefore, these types of technologies are not feasible alternatives to the proposed City/County Landfill Project and were not included in the alternatives analysis discussion presented in this Draft SEIR.

Comment 904: 13. How can inconsistency with project objectives be used as a basis for eliminating nonlandfill solutions when, in fact, those objectives were specifically established by landfill proponents, including the project proponent, to support landfill expansion?

Response 904: Inconsistency with project objectives was only one of several reasons why nonlandfill technologies were eliminated from further alternative evaluation by the City. As indicated in the Draft SEIR, Section 1.9.1, Alternatives Not Evaluated, p. 1-14, nonlandfill technologies cannot by themselves be considered as feasible alternatives to the proposed project. Specific information pertaining to nonlandfill technologies is provided in adopted City and County integrated solid waste management plans. These plans are listed in the Draft SEIR, Appendix C13.

For additional discussions of the methodology used for selecting and analyzing alternatives to the proposed project, refer to Responses 751 through 753.

Comment 905: 14. Why is disturbance of desert sites, which represents a far greater habitat resource than native habitat in Los Angeles County canyons, considered to be a greater environmental impact than full development of Sunshine Canyon, particularly for a site like Eagle Mountain where existing terrain has been heavily disturbed by open pit mining?

Response 905: City staff acknowledge that both desert and nondesert habitats are equally important. The Draft SEIR analyzes the environmental impacts associated with the development of several mega-landfills (landfills with waste intakes of over 20,000 tpd) that would

be supported by MRF and use rail haul systems to transport waste through multiple jurisdictions.

Even though the Eagle Mountain Landfill project would be located in a remote portion of a sensitive desert environment, the environmental impacts associated with development of this landfill, ancillary facilities, and railhaul system to support this project would far exceed the development of the proposed project. Development of the proposed Eagle Mountain Landfill would result in greater impacts on biological resources than the proposed project due to significant impacts on a desert ecosystem that includes sensitive and endangered wildlife species (i.e., desert tortoise, bighorn sheep). The Eagle Mountain project site comprises ±4,654 acres of federal and patented lands. The landfill footprint would encompass ±2,164 acres, with a disposal capacity of 350 million tons. At full-scale operation, the facility would have an intake rate of 20,000 tpd and a site life of 50 years. Approximately 16,000 tpd would be transported via a rail haul system that would traverse three counties (e.g., Ventura, Los Angeles, and Riverside) and impact numerous sensitive habitats. The remaining 4,000 tpd would be transported via transfer truck or waste-hauling vehicles. The proposed landfill would be operational 7 days per week, 24 hours per day.

By contrast, development of the proposed City/County Landfill footprint and ancillary facilities would be located in areas of Sunshine Canyon that have been disturbed by nearly 40 years of prior landfilling activities.

A comparative assessment by topical issue was performed and included in the Draft SEIR, Table 5.3-1, for both the proposed project and the Eagle Mountain Landfill project. Figure 5.10-2 in the Draft SEIR depicts the Eagle Mountain Landfill footprint boundaries. As shown in the figure (which is derived from the Eagle Mountain Landfill EIR), only a small portion of the landfill footprint would be located in an open mining pit area.

It should also be noted that a recent Superior Court (San Diego) ruling was issued in February 1998 that rejected certain aspects of the Eagle Mountain Landfill FEIR, therefore delaying the development of this project.

Comment 906: Does this statement also consider the number of residents adjacent to the Sunshine Canyon site and to the desert sites?

Response 906: The Draft SEIR considered the environmental effects on both the residents proximate to the project site and the alternative sites evaluated.

Even though potential rail haul landfill projects would be located in remote desert locations, development of these landfills will result in the rail hauling of wastes through numerous jurisdictions in Southern California (e.g., Los Angeles, Orange, San Bernardino, Riverside, San Diego, Ventura, and Santa Barbara Counties). The environmental effects of developing these landfills would impact a greater population base than the proposed development of the City/County Landfill.

Comment 907: 15. How can the proponent automatically assume that if the City of Los Angeles finds the environmental impacts of expansion of Sunshine Canyon to be unacceptable that the County expansion will still be allowed, so that environmental benefits of not allowing the City expansion will be minimal?

Response 907: Refer to Response 165 for a discussion of the No Project Alternative and the potential for future development of a 70-million-ton landfill. The Draft SEIR does not indicate that the environmental effects of developing the proposed City/County Landfill would be "minimal." Rather, the environmental effects relative to project development are specifically addressed in each of the 19 topical sections provided in Section 4.0 of the Draft SEIR. Numerous mitigation measures would need to be implemented to reduce potential significant impacts (e.g., geology, land use, noise, etc.) to a less than significant level. Refer to Revised Table 7.4-1, Section 2.0, Revisions and/or Deletions to Draft SEIR, in this document.

Comment 908: 16. Why aren't the cumulative impacts of disposal at Chiquita Canyon, Elsmere Canyon, and Sunshine Canyon considered together, since these projects are not mutually exclusive? How can this inconsistency be justified in light of the reality of what might be projected to happen if the premise that all four near-term landfill closures cited in the document as one of the bases for this expansion actually occurred?

Response 908: The cumulative impacts of 33 related projects, including the County Landfill and potential development of Elsmere Canyon and Towsley Canyon Landfills, were analyzed in the Draft SEIR. The specific geographical boundary of the related-project area was determined by the LADOT in September 1992 and was concurred with by City Planning staff. Pursuant to the City direction, the Chiquita Canyon Landfill was not included as a related project because it is located outside of the related-project area (i.e., greater than a 5-mile radius) and three Class III landfill projects were already included in the related project list.

Comment 909: 17. Why is there no in-depth analysis of use of non-polluting waste-to-energy technologies, volume-based disposal fee structures, in-vessel composting, and other technologies that both provide economic benefit through resource recovery and job creation, as well as eliminate of adverse landfill impacts.

Response 909: Refer to the Draft SEIR, Section 5.9, Waste Management Technologies and Strategies, pp. 5-36 through 5-43, and Response 169 in this document for a discussion of alternative waste management technologies and strategies.

As described in the Draft SEIR, Section 5.9, Waste Management Technologies, those technologies (source reduction, recycling, waste-to-energy, composting, and alternative daily cover) are not considered by themselves as feasible stand-alone alternatives to the proposed project. Collectively, these alternatives would not meet either the project development or solid waste disposal objectives of the proposed project.

Comment 910: 18. How can cost be used as a major basis for eliminating consideration of the Reduced Volume Alternative when no economic analysis is provided and CEQA does not allow cost to be used as a basis to eliminate environmentally superior alternatives?

Response 910: Cost was not a major factor for eliminating the Reduced Volume Alternative as the environmentally superior alternative. Rather, the Reduced Volume Alternative was not selected as the Environmentally Superior Alternative because even though site-specific environmental impacts would be alleviated (i.e., development would occur within areas of the City and County that have been disturbed), its implementation would create regionally significant impacts.

In comparison to the proposed project and on a site-specific basis, the Reduced Volume Alternative would be environmentally superior to the proposed project. However, due to its shortened site life, regional environmental impacts (e.g., air quality, biological resources, traffic, public services, energy conservation, infrastructure, and cultural resources) would be more significant with the implementation of the Reduced Volume Alternative, in comparison with the proposed project, because this waste stream would need to be transferred to other landfill facilities. For that reason, significant regional impacts would occur because the burden of providing additional disposal capacity would be placed on more distant in-County or out-of-County landfill facilities and/or potentially remote landfill locations. This information is addressed in the Draft SEIR, Section 5.5, Reduced Volume Alternative, pp. 5-10 through 5-17.

Comment 911: 19. How can destruction of California Gnatcatcher habitat be considered consistent with guidelines which site the importance of habitat preservation as a key objective of preserving sensitive species?

Response 911: The Draft SEIR, Section 4.4.1, Vegetation and Wildlife Habitat Assessment, indicates that professional biologists conducted several onsite focused field surveys for the California gnatcatcher and other sensitive species. Even though suitable habitat (Venturan coastal sage scrub) is present within the project site, this species was absent during the six focused field surveys performed for the California gnatcatcher (conducted at least 1 week apart during the breeding season).

The Draft SEIR acknowledges that project development will impact ±82 acres of Venturan coastal sage scrub. The Draft SEIR, Section 4.4-1, p. 4-179, also states that onsite mitigation with a replacement value greater than 1:1 will be provided to offset the loss of this sensitive habitat. The Draft SEIR, p. 4-181, states that following the implementation of mitigation measures, such as the revegetation plan for Venturan coastal sage scrub, impacts will be reduced to a less than significant level.

In addition, mitigation measures for potential impacts on the California gnatcatcher were identified in the Draft SEIR, p. 4-180. Surveys conducted in accordance with USFWS protocol will be performed to determine whether California gnatcatchers are present onsite prior to initial grading activities taking place. If present, a Section 10(a) permit from the USFWS would be obtained by the project proponent.

Comment 912: Are Gnatcatcher surveys to be conducted systematically, or simply by casual field observation on site visits, which does not conclusively demonstrate that rare species are not present?

Response 912: Surveys for the California gnatcatcher have been and will be conducted in accordance with USFWS protocol as stated in the Draft SEIR, Section 4.4.1, Vegetation and Wildlife Habitat Assessment.

Comment 913: 20. What permit requirements will be imposed to assure that odor and associated harmful gas migration will be properly mitigated if such impacts prove to be more of an operational problem than the EIR anticipates? Experience at other landfills demonstrates that the proposed mitigation measures described here are not effective.

Response 913: Specific permit requirements in accordance with the California Health and Safety Code, § 40400 et seq., will be imposed for the proposed project. Specific permits include the Authority to Construct by the SCAQMD. This permit would allow the installation of equipment (e.g., LFG flaring system, gas collection system, and LCRS) at the City/County Landfill to eliminate, reduce, or control the emission of air contaminants. This permit remains in effect until the Permit to Operate, Regulation II-Permits, Rule 203 is granted by the SCAQMD.

As stated in the Draft SEIR, Table 2.16-1, Summary of Regulatory Permits and Discretionary Actions Required for the Proposed City/County Landfill Project, p. 2-99:

> . . . Rule 1150.1 requires the project proponent to submit a compliance plan for implementation of a LFG control system in an active landfill to prevent public nuisance and possible detriment to public health caused by exposure to such emissions. A design and compliance plan must be approved by the Executive Officer of the SCAQMD.

In regard to "experience at other landfills demonstrates that the proposed mitigation measures described here are not effective," it is not known what type of landfills (Class I, II, or III) are described, where they are located, or what type of odor problems exist at these facilities. Therefore, City Planning staff cannot respond to this specific question.

Refer to Topical Issue 4 for a discussion of the odor control program and mitigation measures for the proposed City/County Landfill.

Comment 914: 21. Will the permit include requirements for conformance to the level of significance used by the City as a basis for approval, if approved, with possible cessation activities if proposed mitigation measures are not effective in bringing landfill operations into conformance with EIR commitments in areas like traffic impacts, odors or release of other harmful gases, seismic slope stability, ground water containment leakage, dust, and litter?

Response 914: Various regulatory permits and discretionary actions listed in the Draft SEIR, Table 2.16-1, for the proposed City/County Landfill project will be issued by regulatory agencies that have jurisdiction by law over the proposed project. Each authorized permit has specific threshold levels to ensure compliance with applicable federal, State, regional, or local requirements. After issuance by a regulatory agency (e.g., SCAQMD, USFWS, etc.), permit conditions will be monitored and enforced by that particular agency that has jurisdiction over the specified resources. If permit conditions are not adhered to by the project proponent, the corresponding enforcement agency (refer to Table 7.4-1 [Revised] in this document) has the authority to temporarily cease landfill operations.

Comment 915: 22. Since replacement habitat plans are not yet available for review, will opportunities be provided under a formal City process for interested residents to participate with public agencies in assuring that these replacement plans are truly effective?

Response 915: It is assumed that "replacement habitat plans" are in reference to the specific biological revegetation and restoration plans proposed as recommended mitigation measures for the proposed project (see Draft SEIR, Section 4.4.1, Vegetation and Wildlife Habitat Assessment, pp. 4-179 through 4-181). These plans would be prepared by the project proponent for review and approval by the City Planning staff, CDFG, and USFWS. Subsequent revegetation efforts would be monitored by the City Planning Department. Replacement mitigation plans for wetland and riparian habitat would also be reviewed for approval and subsequently monitored by the USFWS, CDFG, Corps, and SWRCB (see Draft SEIR, p. 4-189 through 4-190).

In regard to onsite oak tree revegetation plans, the City Planning Department and the City Forester would monitor and ensure the success of native and nonnative tree replacement (see Draft SEIR, pp. 4-197 through 4-200).

Comment 916: Will destruction of on-site sensitive natural areas, including trees, riparian habitats, and other significant resources, be prevented until such time as agreement is reached that replacement plans are truly equivalent?

Response 916: All mitigation plans will be approved by the City and, where applicable, the USFWS and CDFG prior to removal of these resources (i.e., sensitive habitat, oak trees, riparian and wetland habitats).

Comment 917: Will landfill activities be reviewed during operations by a Citizens Advisory Committee composed of resident representatives including LASER member North Valley Coalition?

Response 917: Currently, a citizen's advisory committee that includes LASER members has been active with regard to the operational County Landfill pursuant to the CUP, Part XI. This committee was appointed by the Board of Supervisors to serve as a liaison between BFI and the community. The committee also provides a way for the community to communicate with the Regional Planning Commission and regulatory agencies about issues pertaining to the development and operation of the County Landfill. A similar

citizen's advisory committee would be formed for the proposed City/County Landfill, if deemed necessary by the City Council or Planning Commission, through a project condition. This information is incorporated into the Final SEIR. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR.

Comment 918: Will members of this group be granted opportunity for actual onsite verification of conditions described to them at meetings?

Response 918: Refer to Response 917.

Comment 919: It is assumed that notification for such visits should require no more than 24 hours and should be subject to denial only if conditions exist that would compromise their safety?

Response 919: Refer to Response 917. Visits onto BFI's property would be arranged in conjunction with City staff; therefore, at least a 72-hour notification would be required.

Thomas K. Murphy
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Letter 3.8-25

Comment 920: I am writing to comment on the B.F.I. "E.I.R." report prepared in regard to opening the City portion of the Sunshine Canyon Dump. First I have difficulty with the objectivity of an E.I.R. report bought and paid for by the company that wants to create something that is obviously an environmental disaster. I would also be interested in learning how such a self-serving and biased system of doing "your own" E.I.R. reports was ever allowed.

Response 920: The Draft SEIR was prepared by City Planning staff in a manner consistent with the requirements of CEQA, the City CEQA Guidelines, and the City EIR Preparation Manual. Refer to Response 757 for a discussion of environmental consultant objectivity in the preparation of the Draft SEIR.

Comment 921: That said, I have some other problems with B.F.I's "E.I.R." report. There is no mention in the E.I.R. of how home owners will be compensated for the loss of value of our property if this huge dump is permitted to open.

Response 921: Refer to Response 180 for discussions pertaining to the proposed project's potential effect on property values.

Comment 922: It does mention the revenue the City Of Los Angeles will receive, conveniently omits the revenue B.F.I. will receive and makes no mention of the revenue losses property owners will "receive."

Response 922: Pursuant to the requirements of State CEQA Guidelines, §15131(a), economic considerations, including the potential revenues to be realized by BFI, are beyond the scope of the Draft SEIR. Refer to Response 180 for discussions pertaining to the proposed project's potential effect on property values.

Comment 923: Why is this dump even being considered? The City closed it once because it caused such problems in our neighborhood.

Response 923: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation. As indicated in the Draft SEIR, the proposed project is being considered to provide additional solid waste disposal capacity to meet the anticipated short-, mid-, and long-term disposal needs within the Los Angeles region and as recognized in both City and County integrated solid waste management plans. In addition, the County Landfill CUP, Condition (10)(b), directed the project proponent to file applications with the City to commence the environmental processing and permitting of a landfill within the City's jurisdiction as part of a combined County/City facility. The project proponent filed those applications with the City in June 1991.

Comment 924: Why, in B.F.I.'s E.I.R. report is every alternate sight including sights that are not that distant, can accept more garbage for many more years and are located away from residential areas always somehow found to be environmentally less acceptable, except when it comes to "humans" living next to this location? Is it because B.F.I. doesn't own these other locations?

Response 924: Refer to Response 893 for a discussion of an environmental comparison between the proposed project and waste-by-rail landfill alternatives.

Comment 925: I'm concerned with this E.I.R.'s apparent dismissal of any earthquake danger in the dump. To say the faults in the canyon are inactive is a rather careless assumption. The Northridge "Fault" was not only "inactive", it wasn't even known to exist. Also to say the dump can withstand a "direct-hit" equal to the Northridge quake is at best speculation and at worst careless. This carelessness not only endangers the people who live close to the dump but if the dump doesn't withstand the "direct-hit" and tons of garbage end up in the nearby City water facilities it will effect thousands of others, too.

Response 925: Refer to Topical Issues 1 and 2 for discussions pertaining to seismicity and the existing inactive City Landfill's performance during the January 1994 Northridge earthquake. In addition, refer to Response 636 for a discussion of siting and designing a solid waste landfill above a thrust fault.

Comment 926: In the very few instances that the B.F.I. E.I.R. report even admits there are "adverse" effects on our community, from this dump, there is no suggestion what might be done to alleviate these adverse effects. Is it just . . . "too bad, folks?"

Response 926: Mitigation measures are listed in each of the topical sections of the Draft SEIR.

Also, refer to Section 2.0, Revisions and/or Additions to Draft SEIR, Table 1.10-1 (Revised), Summary Matrix of Environmental Impacts, Mitigation Measures, and Monitoring Phasing for the Proposed Project, in this document. That matrix provides a detailed summary of the proposed City/County Landfill's environmental impacts, including (1) the potential environmental impacts, (2) the adverse impacts associated with the environmental impact, (3) mitigation measures that would either eliminate or lessen the potential impact of the project, (4) the net unmitigated adverse impacts remaining after mitigation measures are imposed, (5) the Responsible Agencies involved with implementation of the mitigation measures, and (6) the monitoring phase, monitoring agency, and the responsible enforcement agency.

In addition, refer to Section 2.0, Revisions and/or Additions to Draft SEIR, Table 7.4-1 (Revised), Mitigation Reporting and Monitoring Program (MMRP) Sunshine Canyon Landfill-City of Los Angeles. This MRMP identifies responsible parties, provides the mitigation measures and reporting requirements, identifies the implementation time frame, establishes specific compliance criteria, and establishes a reporting mechanism including monitoring frequency, the identification of the monitoring party, and lists of agencies that should receive periodic activity reports pertaining to monitoring activity at the project site.

Comment 927: With approximately 1000 trucks dumping garbage everyday what besides telling private haulers they can't dump their loads of garbage if their trucks are emitting excessive smoke what will be done? Will City owned trucks be told the same thing or will they receive a "pass?"

Response 927: Truck emission controls are enforced by the State of California Department of Motor Vehicles (DMV) and are spot checked by the SCAQMD at emission check points. BFI does not have the authority to enforce emission control regulations applicable to the owners of private waste hauling vehicles; however, BFI will immediately notify the owners of waste-hauling vehicles using the proposed City/County Landfill if their vehicles are observed to have excessive exhaust emissions. BFI will also notify the SCAQMD if such conditions exist.

Comment 928: Also, what besides "encouraging" small commercial and private users of the dump not to use Balboa Blvd., will prevent these operators from totally taking over Balboa Blvd., to get to the dump?

Response 928: Refer to Response 106 for a discussion of prohibiting heavy trucks on Balboa Boulevard.

Comment 929: I would also like to express concern that another huge brush fire similar to the 1989 Granada Hills fire could start in the middle of the night in the Dump. Although B.F.I. denies the fire started in their dump, it was never said to have started anywhere else either.

Response 929: Refer to Response 159 for a discussion of a fire alleged to have started at the previous City Landfill operation.

Comment 930: In B.F.I.'s E.I.R. report it mentions at some point entire operation of the dump will be visible by motorists driving Northbound on the 1-5 freeway. What, if any, thought has been given to the danger of distracting drivers and what about the possibility of the considerable wind that blows in the area blowing debris onto the 1-5?

Response 930: Refer to the Draft SEIR, Section 4.18, Aesthetics/Views, pp. 4-457 through 4-463, for a discussion of how motorists traveling on regional freeways near the project site would be affected by the proposed project development. Due to the limited duration of views and the proximity of other developed areas near to the landfill, this impact would not be considered significant. The viewing duration would be less than 30 seconds because traffic is driving by at 60 to 65 miles per hour on the I-5 Freeway. Furthermore, there has never been a documented occurrence of blowing debris onto the I-5 Freeway from the project site.

Comment 931: Finally, although I have other concerns I would like to emphatically state that there was horrible dust and debris from the old, now finally closed, city portion of the dump. In the B.F.I. E.I.R. report it is stated that during the often windy periods they will water down the garbage. A few years ago while preparing the hills at the end of Jolette Avenue to build houses during the grading work the contractor watered down the dirt.

Believe me during 90 degree heat with the wind blowing the dust wasn't abated and this was just "dust/dirt" not dirt full of pollution, germs and other filth generated by garbage.

Response 931: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation. In addition, refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Comment 932: Even in B.F.I.'s own E.I.R. report they have to admit that there would be much less environmental damage if they confined their operation to only the Canyon portion.

Response 932: Refer to Response 910 for a discussion of the proposed project and the Reduced Volume Alternative.

Comment 933: They do point out they'll have cut down another 1300 Oak trees in addition to the 2700 they've already chopped down if they're not permitted to reopen the City portion of the dump. While I'm not in favor of the dump at all and not in favor of chopping down another 1300 Oak trees I would prefer the cutting down of trees as opposed to the cutting down of human beings especially children which this "Mega-Dump" could very well accomplish.

Response 933: Refer to Response 165 for a discussion of the No Project Alternative and the potential for future development of a 70-million-ton landfill in the County.

Comment 934: At the recent B.F.I. "Key Group Meeting" I couldn't find one B.F.I. employee that lived in our neighborhood. Perhaps we could get an answer why.

Response 934: This comment is noted.

Esther Simmons
13222 Whistler Lane
Granada Hills, CA 91344

Letter 3.8-26

Comment 935: In addressing the Alternatives to the proposed project, Section 5.0 of the EIR states that an EIR must "describe a range of reasonable alternatives to the project or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." The difficulty is in evaluating the comparative merits of the alternatives, particularly when we have a County and City believing that we are facing an imminent "time to crisis". As we run around in circles, arms flailing in the air above our heads close to panic, we fail to see that the alternative to landfilling in one area is not to landfill in another.

Response 935: The Draft SEIR, Section 5.0, Alternatives, provided an in-depth analysis of the following alternatives to the proposed project: No Project; Reduced Volume; Immediate Combined City/County Landfill Operations; Potential/Proposed Landfill Sites in Los Angeles County (i.e., Blind Canyon and Elsmere Solid Waste Management Facility); Out-of-County Landfill Site (i.e., El Sobrante Landfill); Waste Management Technologies and Strategies (i.e., source reduction, recycling, composting, waste-to-energy and alternative daily cover materials); and Remote Landfill Facilities In-State/Out-of-State (i.e., Eagle Mountain, Railcycle-Bolo Station, Mesquite Regional, and La Paz Landfills).

Onsite alternatives to the proposed project include the No Project, Reduced Volume, and Immediate Combined City/County Landfill Operations. These feasible alternatives were selected for evaluation by the City, based on their ability to meet the primary purpose of the project, which is to meet the anticipated short-, mid-, and long-term disposal needs within the Los Angeles region and to meet identified solid waste and development objectives (listed in the Draft SEIR, pp. 2-2 and 2-3).

Comment 936: The EIR pits one potential landfill site against the other, all with similar significant impacts. The "viable" alternatives are all landfills with the same objectives as the proposed project therefore not fitting the strict definition of an "alternative." Of the eight (8) "alternatives" analyzed only the subsection Waste-to-Energy under Waste Management Technologies and Strategies is strictly an alternative. The others under that same section are waste diversions.

Response 936: As indicated in the Draft SEIR, alternatives are discussed pursuant to §15126(d) of the State CEQA Guidelines. An EIR must:

> . . . describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.

Both waste-to-energy and composting were analyzed in the Draft SEIR, Section 5.9, Waste Management Technologies and Strategies, pp. 5-40 through 5-42, as solid waste transformation technologies that could act as alternatives to the proposed City/County Landfill. However, it has not been proven that either of these alternatives would be able to accommodate the 11,000 tpd of refuse being proposed as the waste intake for the City/County Landfill nor would implementation of one or both of these alternatives eliminate the need for new landfill sites or expanding existing landfills in Los Angeles County. Therefore, it was concluded in the Draft SEIR that these transformation technologies would not be viable alternatives to the proposed project.

In addition, as stated in the *Los Angeles County Countywide Siting Element, Volume I - The Element* (June 1997), pp. 4-18 and 4-19:

> As previously indicated, currently two waste-to-energy facilities with a combined permitted daily capacity of 1,977 tons (six days/week) operate in Los Angeles County. Based on information provided in Chapter 3, it is expected that these two facilities will operate at their current permitted daily capacity during the planning period 1996-2010. Currently, owners/operators of these facilities have indicated that there are no plans for any increase in permitted daily capacity of these facilities even though waste-to-energy facilities conserve the greatest amount of landfill capacity.
>
> The successful operation of two existing transformation facilities in Los Angeles County has proven waste-to-energy transformation technology to be commercially, technically, and environmentally feasible while at the same time meeting stringent air quality standards. However, the development of additional transformation facilities in Los Angeles County during the 1996 - 2010 planning period is unlikely due to the high capital costs involved in developing these facilities, uncertainty caused by deregulation of the energy industry, the current low prices for power, and the unavailability of power contracts.
>
> As such, the CSE assumes that the two existing waste-to-energy facilities will provide approximately 1,977 tons per day, six days per week (their combined maximum permitted daily capacity, equivalent to 616,800 tons per year), of the Los Angeles County permitted daily disposal capacity needs through the 15-year planning period. The remaining permitted disposal needs must be handled by the in-County Class III landfills and/or out-of-County solid waste disposal facilities.

Comment 937: The EIR fails to address and evaluate non-landfill disposal alternatives. Why were these alternatives not addressed?

Response 937: Refer to Response 936.

Comment 938: The EIR also states that "feasible is defined in the CEQA statutes (2106 1.1) as 'capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors.'"

Response 938: This comment is noted. As also indicated in Section 5.0, Alternatives, p. 5-1, of the Draft SEIR:

> Furthermore, §15126(d)(5) of the State CEQA Guidelines, states that, "The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.
>
> In regard to feasibility, State CEQA Guidelines, §15126(d)(5)(A), states that, "among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent).

Comment 939: At this point in time, there have been 2 documents produced that address these factors directly. Both are included for the record. The first document, Approaching an Integrated Solid Waste Management System for Los Angeles County, California, defines how the County and thereby the City can implement certain scenarios with waste diversion and recycling that, I believe, will give us the period of time to address the economic, environmental, social and technological factors of feasible, viable alternatives. (Figure E-1, Page E-4) The Solid Waste Task Force Report gives us an introduction to those alternatives.

Response 939: This comment is noted.

Comment 940: The fact that the proponent is requesting a permit for the proposed project, an Immediate Combined City/County Landfill Operation, leads me to believe that the following discourse and and the submission to the record of these documents is relevant.

Response 940: The Immediate Combined City/County Landfill Operation is an alternative to the proposed project. This alternative is addressed in the Draft SEIR, Section 5.6, Immediate Combined City/County Landfill Operation, pp. 5-17 through 5-21.

Comment 941: GBB Solid Waste Management Consultants, the producer of the report entitled "Approaching an Integrated Solid Waste Management System for Los Angeles County, California" states the objectives of the report on page E2:

1. To offer alternatives to the Board of Supervisors and the public for urban landfills.
2. To provide suggestions for extending the life of existing landfills.
3. To foster a policy consistent with AB 939 to divert solid waste away from landfills.

Response 941: This comment is noted.

Comment 942: GBB depended on the 1996 Siting Element and the 1995 Draft Environmental Impact Report/Draft Environmental Impact Statement for Elsmere Canyon to arrive at their suggestions. The County also "relied on these two documents to sustain their current landfill policy."

Response 942: The County of Los Angeles, Public Works Department, Environmental Programs Division, preparers of the CSE (June 1997), did not rely on the Elsmere Solid Waste Management Facility DEIS/DEIR (January 1995) in preparing the CSE. The CSE states the following:

> The CSE is prepared by the staff of the Los Angeles County Department of Public Works under the auspices of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force). The CSE is prepared pursuant to the statutory requirements for the content and format of the Countywide Siting Element found in the California Public Resources Code, Sections 41700-41721.5. These requirements are further clarified in regulations adopted by the CIWMB, and approved by the Office of Administrative Law, for the preparation of a Siting Element (California Code of Regulations, Title 14, Division 7, Chapter 7, Article 6.5, Sections 18755 through 18756.7).

The CSE also states:

> The California Integrated Waste Management Act of 1989 (AB 939), as amended, Section 4000 et seq. of the Public Resources Code requires each county to prepare a countywide siting element which identifies how the county and the cities within the county will address the need for 15 years of disposal/transformation capacity to safely handle solid waste generated in the county which cannot be reduced, recycled, or composted. AB 939 recognizes that landfills and transformation facilities are necessary components of any integrated solid waste management system.
>
> As mandated by AB 939, the County of Los Angeles CSE establishes goals, policies, and guidelines for proper planning and siting of solid waste transformation and land disposal facilities on a Countywide basis. It offers strategies and establishes siting criteria to be used as an aid to evaluate sites

proposed for development of needed solid waste transformation and land disposal facilities.

Comment 943: According to GBB "A review of the County's reports reveal that they exaggerated the projection of waste generation and the need for additional landfill capacity. When critically analyzed, there is a clear discrepancy between the two documents regarding the amount of waste generated per day. The Siting Element projects waste generation per day for 1997 to be some 4,200 tons more than the DEIR/DEIS document. The County has employed the higher estimate presented in the Siting Element document, thus accelerating their claim that additional new landfill capacity is required or the "time to crisis" is imminent." (Page E-3)

Response 943: It does not appear that the County has exaggerated anticipated solid waste projections or the need for additional landfill disposal capacity within the County. Since the preparation of the County's *Los Angeles County Countywide Siting Element, Preliminary Draft* (January 1996), three major solid waste landfills in Los Angeles County have been closed, including the Lopez Canyon Landfill, which was the last publicly owned and operated landfill in the City with a permitted disposal capacity of 4,000 tpd; the BKK Landfill, located in the City of West Covina with a permitted disposal capacity of 12,000 tpd; and the Azusa Landfill located in the Cities of Azusa and Irwindale with a permitted disposal capacity of 6,500 tpd.

Known future landfill closures include the Spadra Landfill located in the City of Pomona with a permitted disposal capacity of 2,500 tpd (in 1999), Bradley West Landfill located in the City with a permitted capacity of 10,000 tpd (in 2000), and the Puente Hills Landfill with a permitted capacity of 13,200 tpd (in 2003) located in the County.

In addition, as indicated in the *Los Angeles County Countywide Siting Element, Volume I, The Element* (June 1997), p. 4-23:

> Based on Scenario A, Table 4-5 (or Table 4-6, Summary) analysis, a daily disposal capacity shortfall of approximately 2,000 tons per day (six days per week) will be experienced by 2000. After the year 2000, the shortfall increases gradually to over 4,800 tons per day (six days per week) by the year 2003. The shortfall would increase to over 17,000 tons per day in the year 2004 due to the expiration of the Puente Hills Landfill conditional use permit in November 2003.

Comment 944: (In November of 1993 when the proponent (BFI) asked and eventually received a permit to expand into the County portion, Dr. Gerald Simmons arrived at the same conclusions as GBB. The County gave an overriding consideration to the expansion because of the "time to crisis" phenomenon. All based on exaggerated figures.)

Response 944: The City is not aware of "Dr. Gerald Simmons" or his conclusions with regard to solid waste projections.

Regarding the County Landfill and the adopted Statement of Overriding Considerations by the County Board, refer to Response 488. The adopted Statement of Overriding Considerations acknowledged that the FEIR prepared for the County Landfill Extension identified and discussed significant effects that would occur as a result of developing an approximate 17-million-ton landfill within Sunshine Canyon and that certain **biotic effects** [emphasis added] (not a "time to crisis" phenomenon as mentioned by the commenter) could not be mitigated to a level of insignificance. (Refer to the Draft SEIR, Appendix C6, County Landfill Findings of Fact and Statement of Overriding Considerations, and Conditions of Project Approval.)

For an additional discussion pertaining to the projected future solid waste disposal capacity shortfall in Los Angeles County, refer to Response 943.

Comment 945: From the evaluation and analyzation of the Siting Element and the DEIR/DEIS, GBB presents a strategic approach to addressing the County's short term 15 year "time to crisis" by "selecting a series of proven low risk alternatives" which will enable the "County to develop waste disposal policy well beyond the AB 939 planning period."

Response 945: Refer to Response 943 for a discussion of the recent closures of major Los Angeles County solid waste landfills and the projected future solid waste disposal capacity shortfall in Los Angeles County.

Comment 946: In order for the County to accomplish its long term goal a set of Scenarios are proposed that can operate independent of one another or combined to have a cumulative impact. These same scenarios, I believe, can be applied to the City.

Response 946: Refer to Response 943 for a discussion of the recent closures of major Los Angeles County solid waste landfills and the projected future solid waste disposal capacity shortfall in Los Angeles County.

Comment 947: "Scenarios 1-6 is relatively low cost and politically risk-free compared to the cost of landfill expansion." (Figure E-1, Page E-4). If these scenarios were to be utilized, 24 years of capacity could be realized, thus giving the County and the City ample time to address and implement viable alternatives.

Response 947: Refer to Response 943.

Comment 948: The viable alternatives are presented to us in a report by the Solid Waste Task Force in conjunction with a Technical Advisory Group. They address recycling and diversion but they go one step further and address alternatives to landfills, not alternative landfills to landfills. Although the information is not detailed nor do they in some instances look at costs, nonetheless they introduce alternatives some of which should have been addressed in the EIR. (Enclosed for the record-11/7/97 Draft, Section 3.0, Page 9.)

Response 948: Refer to Response 936 for a discussion of solid waste transformation technologies (e.g., waste-to-energy, composting) as alternatives to the proposed project.

Comment 949: Given that we have two documents that will enable the County and the City to make a beneficial change in the policies and procedures of solid waste management, that diversion and recycling will give us 20 odd years to explore alternatives without the need of further expansion or new landfills, I would like to request an evaluation of the Scenarios introduced and addressed in the GBB document and an evaluation of the alternatives presented in the Solid Waste Task Force Document before permitting the Combined City/County Operation for Browning Ferris Industries.

Response 949: Refer to Response 936 for a discussion of solid waste transformation technologies (e.g., waste-to-energy, composting) as alternatives to the proposed project.

Comment 950: Section 5.4 - There were ten major Class III landfill facilities as of January 1996, since then 3 have closed. Figure 5.4-1 shows 8. Three from ten is 7 . . .?

Response 950: Figure 5.4-1, Existing Landfills in Los Angeles County, as referenced by the commenter is from the Sanitation District of Los Angeles County. As indicated in the Draft SEIR (p. 2-6 and 2-7), a "major landfill" is defined as a permitted landfill that receives more than 1,500 tpd. There are currently seven Class III landfills in the County that are classified as major landfills: the Bradley West, Calabasas, Chiquita Canyon, Puente Hills, Scholl Canyon, Spadra, and Sunshine Canyon.

Comment 951: Section 5.4 page 5-9 When other in-County landfills exhaust their capacities and close, won't the increased reliance on the existing landfill (if permitted) Combined City/ County Landfill at Sunshine Canyon experience the same increase of environmental impacts to a level of greater significance?

Response 951: No. As indicated in the Draft SEIR, the proposed project would be designed to accept a maximum waste intake rate of 12,100 tpd. Because other major landfills in Los Angeles will close (in the future), it will be necessary for the County to site other new landfills in-County, expand other existing landfills in-County, or enter into contracts to use other landfills located outside the County in order to guarantee future solid waste disposal capacity and accommodate the volume of solid waste generated in Los Angeles County on a daily basis (e.g., currently estimated at 36,000 tpd).

Comment 952: Section 5.4 page 5-9 How can there occur rapid depletion of the County's long-term landfill disposal capacity if the County's goal is toward recycling and diversion?

Response 952: Refer to Response 943 for a discussion of the recent closures of major Los Angeles County solid waste landfills and the projected future solid waste disposal capacity shortfall in Los Angeles County.

Comment 953: The Immediate Combined City/County landfill will be the new kid on the block. Won't the increased reliance be placed on the proposed project facility due to landfill closures, thereby increasing environmental impacts to significant levels at that facility?

Response 953: Refer to Response 951.

Comment 954: Are we to assume that this landfill will not import trash, nor will the other landfills exhaust their capacity making it unlikely that that waste stream will be diverted to Sunshine Canyon?

Response 954: Refer to Response 951.

Comment 955: The burden of providing disposal capacity at Sunshine Canyon will create local significant impacts. How do you justify placing that burden on local over remote locations when you factor in the population quotient in close proximity to the landfill?

Response 955: Environmental impacts associated with the proposed project are discussed in Section 4.0 in the Draft SEIR. The Draft SEIR addressed both direct and indirect impacts attributable to a maximum waste intake rate of 12,100 tpd. For an environmental comparison between the proposed project and waste-by-rail alternatives, refer to Response 893.

Comment 956: The Immediate Combined City/County Landfill Operations will have greater significant impacts after the first 18-24 months. What will those impacts be?

Response 956: Refer to Topical Issue 23 for an environmental comparison between the Immediate Combined City/County Landfill Operations alternative and the proposed project.

Comment 957: In conclusion, the responsibility of permitting landfills falls squarely on the shoulders of the agencies making the decisions. It is to these agencies that the Council looks for guidance in making its decisions. This holds true for the County as well. By assuming that position of authority the agencies must look at and take into consideration all the factors at work in a project. When we speak of significant impacts, we are talking about children, the elderly, the ill and all others in between.

Response 957: The approval of the proposed project and certification of the Final SEIR are being sought from the City decisionmakers. Subsequent approval of this project will be sought from Responsible Agencies such as the County of Los Angeles.

Comment 958: If economics is the driving force for the permitting of these necessary landfills, then the long term economic effect on the residents closest to the project must be evaluated. This would include property, health and livelyhood.

Response 958: Economics is not the only driving force for permitting solid waste landfills. Refer to Response 180 for a discussion of the proposed project's potential effects on property values. In addition, refer to Response 316 for a discussion of the potential for the proposed City/County Landfill to cause acute or chronic health risks to residents in the community of Granada Hills.

Comment 959: If the EIR addresses to "reduce the project proponent's long-term capital outlay for site infrastructure" then the EIR must also address the long-term capital outlay for the residents that will be significantly impacted by this landfill. You cannot make an informed decision in a vacuum. All factors must be considered. The long-term capital

outlay for the residents of the area will far exceed that of BFI for their infrastructure when there are consistent impacts of a significant nature to the resident's that, by BFI's own admission, cannot be mitigated to a non-significant level. That admission can be found under the Section of Air Quality in the EIR.

Response 959: Refer to Response 180 for a discussion of the proposed project's potential effects on property values. In addition, refer to Response 68 for a discussion of the environmental determination within the Draft SEIR, stating that the proposed project would create an unavoidably significant adverse impact on air quality, for construction and operational emissions.

Comment 960: We are looking at increased health problems over the long-term caused by the existence of a landfill in close proximity to a residential area as opposed to health and safety problems caused by the lack of landfill capacity.

Response 960: Refer to Response 316 for a discussion of the potential for the proposed City/County Landfill to cause acute or chronic health risks to residents in the community of Granada Hills.

Comment 961: Which in your determination, in the long-term is easier and more cost effective for a County or City to resolve?

Response 961: Refer to Response 316 for a discussion of the potential for the proposed City/County Landfill to cause acute or chronic health risks to residents in the community of Granada Hills.

Comment 962: By first evaluating and implementing a strict diversion and recycling program the County and the City will increase the period of time needed to evaluate cost-effective alternatives that will not produce the significant impact that the proponent of this landfill admits cannot be mitigated.

Response 962: As stated in goal 9F of the *Citywide General Plan Framework* (December 1996), the City is required to provide the following:

> Adequate collection, transfer and disposal of mixed solid waste - the City shall seek to ensure that all mixed waste that cannot be reduced, recycled or composted is collected, transferred and disposed of in a manner that minimizes adverse environmental impacts.[45]

Comment 963: Serious consideration must be given to the proposals stated in this letter before permitting the project site.

Response 963: This comment is noted.

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[45]/ The Citywide General Plan Framework - An Element of the City of Los Angeles General Plan, p. 9-11, Approved by City Council on December 11, 1996.

North Valley Coalition
13222 Whistler Lane
Granada Hills, CA 91344

Letter 3.8-27

Comment 964: In response to (1) the Sunshine Canyon Landfill Expansion Environmental Impact Report, and (2) BFI's application for a zoning change in connection with the landfill expansion, the following questions and comments are submitted by members of the North Valley Coalition and other members of the community. Please provide a copy of your response to:

North Valley Coalition
13222 Whistler Lane
Granada Hills, CA 91344

Response 964: Responses to your comments will be forwarded to the address noted above.

Comment 965: **Importance of Protecting Groundwater Quality**

How important is it to protect groundwater resources in the area where the landfill is proposed to be sited or expanded from pollution by landfill leachate?

Response 965: It is very important to protect groundwater quality where the landfill is proposed, which is why federal and State regulations require that the landfills be designed with numerous environmental protection, control, and monitoring systems for protecting groundwater resources.

For a detailed discussion of groundwater resources and the monitoring of that resource, refer to the Draft SEIR, Section 4.3.2, Groundwater.

Specific design elements and site features would ensure the protection of groundwater resources within Sunshine Canyon. The project site is located in a relatively dry area, and the foundation base-grade elevations for the proposed landfill would be prepared by excavating all alluvium, weathered rock, and other unsuitable foundation materials followed by the installation of the gravel subdrain system, compacted soil foundation layer, liner system, LCRS, and surface and water drainage controls.

The proposed bottom composite liner system would be comprised of nine separate components that would meet or exceed regulatory requirements, an LCRS would be constructed over the liner and designed to collect twice the estimated daily peak quantity of liquid in the landfill, the landfill surface drainage controls would be designed to divert offsite runoff around the landfill, and groundwater monitoring wells would provide early detection of constituents to allow timely corrective action in the unlikely event of an uncontrolled discharge.

Additionally, specific operational elements would be implemented, which include no liquid wastes would be accepted at the proposed landfill; waste would be compacted to decrease its permeability and increase its ability to shed water, and each 2-foot layer of

waste within the working face would be compacted with a minimum of five passes over its surface; deposited waste would be compacted and covered daily with approximately 6 inches of clean, compacted soil or ADCMs; waste areas would be graded to promote runoff moving away from the active working face area and prevent stormwater from entering the waste mass; and areas not receiving additional wastes for a period of 180 days would be provided with a minimum 12-inch-thick interim soil cover and properly graded and revegetated to prevent ponding and minimize onsite erosion.

Regarding the requirements for the protection of water resources, refer to the Draft SEIR, Section 4.3.2, Groundwater, pp. 4-124 and 4-125.

As indicated in the Draft SEIR, the proposed project will not significantly affect groundwater resources within Sunshine Canyon because of existing onsite features and the implementation of specific project-design elements, environmental protection, and control features. In addition, the project proponent will perform continuous monitoring at the project site to meet the applicable federal and State requirements. Upon the completion of the proposed City/County Landfill (e.g., with an operational life estimate at 26 years), BFI will close the landfill in compliance with CCR, Title 27, §21090 through 21200. Upon completion of closure, BFI will continue to monitor groundwater at the project site throughout the 30-year postclosure maintenance period as required by CCR, Title 27, §21180.

Refer to Topical Issue 9 for a discussion of leachate generation, collection, and treatment for the proposed City/County Landfill. In addition, refer to Response 712 for a discussion of the estimated amount of leachate that would be generated per year over the life of the project and the ability of the LCRS and treatment systems to accommodate this volume.

Comment 966: Should the people who dispose of garbage today pay the true cost of garbage disposal to protect future generations' groundwater resources from impaired use?

Response 966: Construction of the groundwater protection system (including the liner system, final cover, environmental protection and control systems) and closure and postclosure maintenance costs at BFI landfills are paid for by BFI. BFI funds these costs from the tipping fees it charges at its existing operational landfills.

For an additional discussion of groundwater protection resources throughout the life of the proposed project and during its mandatory 30-year postclosure maintenance period, refer to Response 965.

Comment 967: Do US EPA Subtitle D regulations require protection of groundwater resources from impaired use by landfill-derived leachate at the proposed landfill or landfill expansion site for as long as the wastes in the landfill will be a threat?

Response 967: Subtitle D requires that leachate be managed until it no longer poses a threat to human health and the environment (40 CFR §258.61, Post Closure Requirements). For additional information on this subject, refer to Response 965.

Comment 968: **Adequacy of Staff Review of Submitted Materials**

Exhibit 1 is an example of a list of the enclosures that have be submitted to the regulatory agency on the technical deficiencies of the proposed landfill.

Were these materials reviewed by the staff in connection with developing the permitting of the landfill? If not, why not?

Response 968: Exhibit 1 was reviewed by City Planning staff and consulting engineers to BFI, and it is included in Appendix C6 in this document. The design and construction of the proposed project will be in accordance with industry and regulatory-accepted design principles and shall meet all applicable federal, State, and local regulatory requirements.

Exhibit 1 lists landfill-related articles about various topics such as landfill design considerations, groundwater quality, and public health considerations. These articles were not included with the comments submitted by the NVC to City Planning, except for "Environmental Ethics: The Whole Truth" (noted as Exhibit 8), and "Geosynthetic Liner Systems for Municipal Solid Waste Landfills: An Inadequate Technology for Protection of Groundwater Quality" (noted as Exhibit 9).

The Draft SEIR, Section 2.5, Project Characteristics, describes how the proposed landfill facility would be designed, engineered, constructed, operated, and maintained in accordance with applicable federal, State, regional, and local regulatory requirements. Also refer to Table 7.4-1, Mitigation Reporting and Monitoring Program (MRMP) (revised) for a discussion of mitigation measures, mitigation compliance responsibility, monitoring phase, and monitoring and enforcement agencies.

Comment 969: **Pollutional Characteristics of MSW Landfill Leachate**

Is the staff familiar with the composition of municipal landfill leachate?

Please examine Exhibit 2 and indicate if you find that the information provided on the composition of MSW leachate is representative of municipal landfill leachate.

Response 969: City staff are familiar with the composition of MSW landfill leachate. The information provided in Exhibit 2 appears to be consistent with documented findings regarding MSW landfill leachate. Generally, leachate characteristics are dependent on the type of waste accepted at the landfill, the age of the wastes, the moisture conditions within the waste, and other factors.

Comment 970: Based on the results of the studies of approximately 100 landfills-shown in Exhibit 2, do small amounts of municipal landfill leachate represent a significant potential threat to pollute large amounts of groundwater?

Response 970: The terms "small" and "large" are unquantified in the comment, rendering this comment difficult to respond to by City Planning staff. However, at a typical landfill, groundwater resources are protected from landfill leachate by the numerous engineered

barrier systems. In addition, the natural hydrogeologic conditions and the attenuation of leachate by natural geochemical or biological processes also help reduce the potential impact of leachate on groundwater resources.

Comment 971: **Threat of the Proposed Landfill to Impair Groundwater Quality**
What is the staff"s understanding of how long the wastes in the proposed landfill or landfill expansion will be a threat?

Response 971: After completion of the proposed City/County Landfill (estimated operating life of 26 years), the final cover system will be designed to meet or exceed regulatory requirements at the time of closure. The final cover would reduce the potential for surface water infiltration into the landfill. Consequently, over time, leachate and LFG generation will progressively decrease and eventually cease. Stabilization of waste (i.e., conversion of the decomposable organic constituents and leaching or fixation of chemical waste constituents) may occur by the end of the postclosure period (a minimum 30-year period in California), although this process will likely be incomplete due to a deficit of moisture in the landfill [Tchobanoglous et al., 1993]. In a landfill with no supplemental moisture addition, LFG and leachate generation will eventually cease and therefore reduce the need for ongoing maintenance of these systems (other than the final cover system). Upon the completion of the 30-year postclosure maintenance period, should regulatory agencies deem that the wastes within the landfill still pose a potential threat to air or groundwater resources, the landfill owner would continue to monitor the landfill for as long as wastes within the landfill pose a threat to the public health.

Comment 972: What is the basis for any assessment that the wastes in this landfill will be a threat for less than hundreds to a thousand or more years?

Response 972: Refer to Response 971 for a discussion of solid waste decomposition inside a landfill after the completion of closure, during the mandated 30-year postclosure maintenance period. In addition, refer to Response 974 for a discussion of the long-term viability of HDPE as a containment material.

Comment 973: **Landfill Liner Issues**
What will be the liner for the proposed landfill? Is it a minimum Subtitle D single composite liner?

Response 973: The proposed liner system will comply with Subtitle D liner design requirements. The proposed liner system is discussed in the Draft SEIR, Section 2.7, and illustrated on Figure 2.7-1 (Preferred Base Liner), Figure 2.7-2 (Preferred Side Slope Liner), and Figure 2.7-3 (Preferred Waste-on-Waste Liner). Figure 2.7-3 has been revised. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, Figures 2.7-3a (Revised) and 2.7-3b (Revised), in this document.

Comment 974: What is your estimate of how long a 60 mil HDPE liner (plastic sheeting) in the proposed landfill liner will function as an effective barrier to prevent leachate from passing through the liner on its way to cause groundwater pollution?

What is the basis for your estimate?

Response 974: In accordance with State regulations, the proposed liner system (as referenced in Response 973) will be designed to serve as an effective waste containment system for as long as wastes pose a threat to groundwater resources. The basis for this conclusion includes national research and laboratory testing that have evaluated the long-term effectiveness of landfill liner systems. Specific to the issue of HDPE geomembranes, recent studies at Drexel University have indicated the long-term viability of HDPE as an effective containment material. Laboratory testing has shown that HDPE material can maintain its integrity in excess of 700 years (Koerner, 1994). Furthermore, the underlying low-permeability soil is a geologic material that should remain stable for hundreds of thousands of years. In addition, refer to Response 602 for a discussion of the potential for VOCs to pass through an HDPE geomembrane liner. Refer to this same response for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources.

Comment 975: Do you believe the plastic liner for the proposed landfill will be able to prevent leachate from passing through it in sufficient quantities to prevent groundwater pollution by landfill leachate for as long as the wastes in the landfill will be a threat?

Response 975: Refer to Response 974.

Comment 976: Is the staff aware that landfill liner companies only warrant the flexible membrane liners for a period of 20 years?

Response 976: Reportedly, manufacturers' warranties are based on the length of time the manufacturers are willing to pay insurance premiums, not the anticipated service life of the product.

Comment 977: Does the staff know that this warranty is pro-rated over this period and that the landfill owner/operator must remove the wastes above the defective area so the liner can be fixed?

Response 977: The length of the manufacturer's warranty has no relevance to repairing the liner system, should that be required. In the unlikely event that the liner system would require a repair, the project proponent must take appropriate measures to have it repaired, and any repairs must meet with the approval of the regulatory agencies.

Comment 978: How does a landfill owner know precisely where a liner is leaking?

Response 978: For the proposed City/County Landfill, in the unlikely event that a leak should occur, a Remedial Action Plan that accommodates all feasible leak locations will be implemented by the landfill operator. The Remedial Action Plan will follow the response guidelines established in the Emergency Response Plan and Site Safety Plan and environmental monitoring criteria established in the Systems Monitoring Plan.

Comment 979: Is this warranty of significant value in protecting groundwater from pollution by landfill leachate?

Response 979: The landfill owner, not the geomembrane manufacturer, is responsible for groundwater protection from potential landfill impacts. Warranty claims by the landfill owner against the manufacturer have no bearing on groundwater protection or regulatory compliance.

Comment 980: Does this highly limited warranty reflect the fact that landfill liner companies believe the flexible membrane liners they manufacture will protect groundwaters from impaired use for as long as the wastes in the landfill will be a threat?

Response 980: Refer to Responses 976, 977, and 979 for discussions of landfill liner warranties and the landfill owner's responsibility in the event of potential groundwater impacts.

Comment 981: Is it your position that the plastic sheeting liner and compacted clay layer, i.e. composite liner, in the proposed landfill will be an effective barrier to prevent leachate from passing through it on its way to polluting the groundwaters underlying the landfill for as long as the wastes will be a threat?

Response 981: Refer to Response 602 for a discussion of the potential for VOCs to pass through an HDPE geomembrane liner. In addition, refer to this same response for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources. In addition, refer to Response 974 for a discussion of the long-term viability of HDPE as a containment material.

Comment 982: **Subtitle D Regulations**

Is the staff familiar with the part of the US EPA's Subtitle D regulations proposed in 1988 which stated.

> *"First, even the best liner and leachate collection system will ultimately fail due to natural deterioration, and recent improvements in MSWLF (municipal solid waste landfill) containment technologies suggest that releases may be delayed by many decades at some landfills."*

Further, the US EPA in their Criteria for Municipal Solid Waste Landfills (July 1988) stated:

> *"Once the unit is closed, the bottom layer of the landfill will deteriorate over time and, consequently, will not prevent leachate transport out of the unit."*

US EPA, "Solid Waste Disposal Facility Criteria; Proposed Rule," Federal Register 53(168):33314-33422, 40 CFR Parts 257 and 258, US EPA, Washington, D.C., August 30 (1988a).

US EPA, "Criteria for Municipal Solid Waste Landfills", US EPA Washington D.C., July (1988b).

Do you disagree with the US EPA's reported finding, as part of promulgating Subtitle D, that the single composite liner will eventually deteriorate and allow leachate to pass through it and thereby not be collected in the leachate collection system?

If you do not agree, what is the basis for your disagreement?

Response 982: Refer to Response 602 for a discussion of the potential for leachate to pass through an HDPE geomembrane liner.

Comment 983: What new information has been developed that shows that plastic sheeting liners of the type that are proposed for the landfill will prevent leachate from passing through them for as long as the wastes in the landfill waste management cells will be a threat?

Response 983: Refer to Response 974 for a discussion of the long-term viability of HDPE as a containment material.

Comment 984: **Subtitle D Landfill Design Requirements**

Is the staff familiar with US EPA Solid Waste Disposal Criteria Final Rule, October 9,1991, Subpart D (Subtitle D) requirements for groundwater quality protection § 258.40 Design Criteria which requires,

> *"(a)(1) The design must ensure that the concentration values listed in Table 1 of this section will not be exceeded in the uppermost aquifer at the relevant point of compliance . . ."*

Also, the US EPA states in their Subtitle D regulations,

> *"For landfills located where ground water is currently used or reasonably expected to be used for drinking water, the performance standard requires States to prevent contamination from exceeding drinking water standards."*

Exhibit 3 presents Table 1 from the US EPA Subtitle D requirements.

Response 984: Yes, City Planning staff are familiar with these provisions, and this comment is noted.

Comment 985: Will the single composite liner specified in the permit for the proposed landfill be expected to meet Subtitle D requirements of preventing exceedances of Table 1 constituents at the point of compliance for groundwater monitoring for as long as the wastes represent a threat at all sites where a landfill could be constructed?

Response 985: The proposed City/County Landfill liner system would be designed in compliance with Subtitle D requirements. Refer to Response 1035 for a discussion of the evaluation of

the performance of landfill liner systems constructed in compliance with Subtitle D requirements.

Comment 986: What was the technical basis used to select the spacing of the monitoring wells at the point of compliance for the proposed landfill or landfill expansion?

Response 986: The saturated zone and unsaturated zone monitoring programs for the proposed project have not been finalized. The technical basis that will be used by BFI to select spacing of the monitoring wells (at the point of compliance) will include an evaluation of the hydrogeology of the site, site configuration, and the applicable requirements of federal and State regulations. In accordance with applicable LARWQCB regulations, a Monitoring Systems Report (MSR) is required to be submitted to the LARWQCB Board for approval. The MSR provides the technical rationale for selecting the spacing for the monitoring wells, including a site-specific hydrogeological evaluation.

Comment 987: Should a site-specific evaluation be made by the landfill permitting agency to determine if a minimum Subtitle D liner would be expected to be protective of groundwater resources as required by Subtitle D at the point of compliance for groundwater monitoring for as long as the wastes in the landfill will be a threat?

Response 987: A site-specific evaluation of the landfill liner design by the City LEA and the LARWQCB is expected, following the submittal of permit documents (e.g., technical reports and working drawings) by the project proponent.

Comment 988: Is the staff familiar with US EPA Subtitle D Subpart E--Ground-Water Monitoring and Corrective Action §258.51 Ground-water monitoring systems which states,

> *"(a) A ground-water monitoring system must be installed that consists of a sufficient number of wells, installed at appropriate locations and depths, to yield ground-water samples from the uppermost aquifer (as defined in §258.2) that:*
> *(2) Represent the quality of ground water passing the relevant point of compliance specified by Director of an approved State under §248.40(d) or at the waste management unit boundary in unapproved States."*

and §258.53 Ground-water sampling and analysis requirements,

> *"(c) The sampling procedures and frequency must be protective of human health and the environment."*

and §258.54 Detection monitoring program,

> *"(a) Detection monitoring is required at MSWLF units at all ground-water monitoring wells defined under §258.51 (a)(1) and (a)(2) of this part. At a minimum, a detection monitoring program must include the monitoring for the constituents listed in Appendix I to this part."*

and §258.55 Assessment monitoring program,

> *"(a) Assessment monitoring is required whenever a statistically significant increase over background has been detected for one or more of the constituents listed in the appendix I to this part or in the alternative list approved in accordance with §258.54(a)(2).*
> *(b) Within 90 days of triggering an assessment monitoring program, and annually thereafter, the owner or operator must sample and analyze the ground water for all constituents identified in Appendix II to this part."?*

Response 988: City Planning staff are familiar with the requirements of Subtitle D.

Comment 989: Do these sections of Subtitle D requirements prohibit a landfill from causing a statistically significant increase in the concentrations of constituents presented in Appendices I and II of Subtitle D at the point of compliance for groundwater monitoring for a Subtitle D landfill?

Response 989: Subtitle D regulations do not prohibit a landfill from causing an indication of release; rather, these regulations require landfill operators and owners to handle such indication by monitoring, assessment, and, if necessary, corrective action.

Comment 990: **Groundwater Monitoring**
Exhibit 4 presents an example of a plan for a municipal solid waste landfill site which shows the position of monitoring wells as allowed by a California regional water quality control board. This monitoring well array is typical of that allowed by regulatory agencies permitting Subtitle D landfills throughout the US. Would this array of monitoring wells comply with Subtitle D requirements providing a sufficient number of monitoring wells which will collect samples that represent the groundwater quality passing the point of compliance?

Response 990: The situation posed is a hypothetical example, and insufficient data have been provided by the commenter to respond to this question.

Comment 991: Where is the point of compliance for the landfill shown in Exhibit 4?

Response 991: As defined in CCR, Title 27, §20405, the point of compliance is a vertical surface located at the hydraulically downgradient limit of the waste management unit that extends through the uppermost aquifer underlying the unit.

Comment 992: What are the Subtitle D requirements with respect to the ability of the groundwater monitoring system for the proposed landfill to detect leachate-polluted groundwaters at the point of compliance?

Response 992: Subtitle D (40 CFR §258.51) requires that a groundwater monitoring system be installed at the landfill, consisting of a sufficient number of groundwater monitoring wells at appropriate locations and depths to yield groundwater samples from the uppermost aquifer.

Comment 993: What is the spacing between the monitoring wells?

Response 993: It is assumed that this comment refers to Exhibit 4, which has been provided by the commenter. Exhibit 4 is not to scale; therefore, the spacing of the wells cannot be determined or evaluated by City Planning staff.

Comment 994: Should a map of the site contain a scale showing the approximate distances so that reviewers of the map can determine the spacing between the monitoring wells?

Response 994: This comment is noted.

Comment 995: Assume that the map is one inch equals 100 feet. Is the spacing between the monitoring wells along the downgradient edge of the waste management unit, i.e. point of compliance - hundreds of feet apart?

Response 995: The situation posed is a hypothetical example, and insufficient data has been provided by the commenter to respond to this question.

Comment 996: Is this typical of groundwater monitoring wells for Subtitle D landfills at the point of compliance?

Response 996: There is no typical well spacing for Subtitle D landfills because each monitoring well system is project specific.

Comment 997: Are there a sufficient number of monitoring wells located such that they provide assurance of earliest possible detection of leachate releases from the waste management unit?

Response 997: Refer to Response 999.

Comment 998: How can the staff be certain that the monitoring wells spacing and location will provide assurance of detection of leachate releases from the waste management unit and thereby provide for the assurance of earliest possible detection of releases from the waste management unit?

Response 998: Refer to Response 986.

Comment 999: Was a site-specific evaluation conducted to determine whether the proposed monitoring well spacing and location would have a high probability of detecting landfill leachate-polluted groundwaters at the point of compliance for as long as the wastes in the landfill will be a threat? If not, why not?

Response 999: Groundwater monitoring wells at the project site are spaced in such a way at the point of compliance to provide monitoring redundancy. This redundancy is necessary in order to ensure that in the unlikely event that one groundwater monitoring well does not detect migrating constituents, they will be detected by another groundwater monitoring well. The groundwater monitoring network consists of 22 monitoring wells that monitor

existing groundwater conditions (i.e., both upgradient and downgradient of the existing inactive City Landfill and County Landfill) and groundwater quality at the project site. Of the 22 wells installed, 13 specifically monitor possible offsite pollution migration from the existing inactive City Landfill. Currently, as required by the LARWQCB, groundwater is sampled and analyzed quarterly. In addition to the monitoring wells, a groundwater extraction trench is located across the bottom of Sunshine Canyon to effectively cut off any possible offsite groundwater migration.

A site-specific evaluation was conducted for the County Landfill and determined that the proposed monitoring well spacing and location would have a high probability of detecting pollutants at the point of compliance. Site-specific hydrogeologic data were used to determine the lateral placement of detection monitoring wells and select the length and vertical position of monitoring well intakes. Potential pathways for pollutants are three dimensional and, hence, the design of the detection monitoring network that intercepts these potential pathways requires a three-dimensional approach. The local groundwater flow direction and gradient were the major factors in determining the lateral placement of compliance wells. These factors were used to select the compliance monitoring wells lateral spacing.

Comment 1000: Does the staff agree that a site-specific evaluation is an appropriate requirement in order to evaluate whether the groundwater monitoring system has the potential to comply with Subtitle D requirements? If not, why not?

Response 1000: City staff agree that a site-specific evaluation of the proposed groundwater monitoring system is an appropriate requirement.

Comment 1001: How was the groundwater monitoring system designed for the proposed landfill or landfill expansion?

Response 1001: Refer to Responses 986 and 999.

Comment 1002: Was a site specific evaluation made to ensure that the well spacing and location would detect leachate polluted groundwaters when they first reach the point of compliance?

Response 1002: A site-specific evaluation will be conducted by the project proponent prior to the design of the groundwater monitoring well network and in compliance with applicable federal and State regulations including the requirements of LARQWCB Order No. 93-062. Refer to Responses 986 and 999.

Comment 1003: Did the staff review the paper, "A Groundwater Protection Strategy for Lined Landfills," published by Dr. G. Fred Lee and Dr. Anne Jones-Lee, in *Environmental Science and Technology,* concerning the problems of trying to monitor groundwater pollution by leakage through plastic-sheeting lined landfills?

Response 1003: The engineering consultant for the proposed project (GeoSyntec Consultants) has reviewed the above-referenced paper and numerous other technical papers prepared by

Dr. Lee. Refer to Response 602 for a discussion of the USEPA response to the solid waste landfill design and engineering concerns of Dr. G. Fred Lee.

Comment 1004: Exhibit 5 is adapted from the Parsons and Davis paper showing an array of monitoring wells along the downgradient edge of a waste management unit which displays zones of capture of these wells, indicating that the monitoring wells zones of capture should overlap in order to prevent leachate from passing between the monitoring wells and fail to be detected by them.

Do you agree with Parsons and Davis' suggested approach that the zones of capture of the monitoring wells and the well spacing should be such that there is a low probability of leachate-polluted groundwaters from passing the point of compliance without being detected? If not, why not?

Response 1004: City staff agree that the zones of capture for monitoring wells should overlap to provide for enhanced leachate detection. Refer to Responses 986 and 999.

Comment 1005: Exhibit 6 is a figure developed by Dr. John Cherry of the University of Waterloo from his 1990 paper which indicates that lined landfills produce finger plumes of leachate of a few meters width at the point of compliance for groundwater monitoring.

Does the staff agree that Dr. Cherry has properly assessed this situation? If not, why not?

Response 1005: Exhibit 6 (provided by the commenter) shows a generalization of a phenomenon. This phenomenon is distinct, and the width of the "finger plumes" will be different for every landfill, depending on the site hydrogeology and project site configuration. Additionally, refer to Responses 986 and 999 for discussions of the required spacing between groundwater monitoring wells at the point of compliance.

Comment 1006: What are the zones of capture of the groundwater monitoring wells that the staff has proposed for use at the proposed landfill?

Response 1006: Refer to Responses 986 and 999.

Comment 1007: Is there a high probability that with the Proposed monitoring well spacing of hundreds of feet apart and zones of capture of the monitoring wells of about one foot on each side, that leachate-polluted groundwaters that occur from leaks near the downgradient edge of the waste management unit could pass by the point of compliance and not be detected by the monitoring well array that the staff have proposed?

Response 1007: Refer to Responses 986 and 999.

Comment 1008: Does the monitoring well array proposed by the staff for the proposed landfill provide assurance of the earliest possible detection of releases from the waste management unit?

Response 1008: Refer to Responses 986 and 999.

Comment 1009: Is there significant probability that the concentrations of the constituents listed in Table 1 (Exhibit 3) will be exceeded in the groundwaters at the point of compliance for groundwater monitoring for the proposed landfill? If not, why not?

Response 1009: Refer to Responses 986 and 999.

Comment 1010: Should the staff/board be proactive in groundwater quality protection, or must pollution occur before the regulatory agency will act to protect groundwater resources?

Response 1010: Regulatory agencies are proactive in protecting groundwater quality.

Comment 1011: Are there locations where a site-specific evaluation would show that a minimum Subtitle D landfill should not be constructed at that location because,

- the liner system will not prevent leachate from leaving the landfill and entering the groundwater system underlying the landfill for as long as the wastes represent a threat;
- the proposed groundwater monitoring system does not have a high reliability of complying with Subtitle D requirements of *a sufficient number of wells to yield ground-water samples from the uppermost aquifer that represent the quality of ground water passing the relevant point of compliance?*

Response 1011: The siting of a landfill facility is a very complicated process that includes many considerations, including required liner systems and environmental protection and monitoring systems. Acceptable locations have to be evaluated based on these considerations. Refer to Responses 986 and 999 for a discussion of the required spacing between groundwater monitoring wells at the point of compliance.

Comment 1012: Should the implementation of Subtitle D requirements of groundwater quality protection require a site-specific evaluation of the expected performance of the landfill containment system components (liner and cover) and groundwater monitoring system reliability (monitoring well spacing and zones of capture) to protect *"human health and the environment"* for as long as the wastes in the landfill will be a threat?

Response 1012: The implementation of federal and State regulations (including Subtitle D) requires site-specific studies to evaluate the design performance of the landfill and its environmental protection and monitoring systems. Refer to Response 1017 for a discussion of the requirement for the landfill owner to monitor the landfill after the 30-year postclosure maintenance period if the municipal solid waste still poses a threat to human health and the environment.

Comment 1013: Could pollution-impaired use of groundwaters occur by proposed MSW landfill leachate-derived constituents that are not on US EPA Subtitle D Table I and appendices I and II lists?

Response 1013: This comment refers to the potential presence of unregulated chemicals in landfill leachate and the potential impact of these chemicals on groundwater resources. This

question cannot be answered by City staff because it is unknown what future "chemicals" (aside from those now documented by the USEPA) would be added to the referenced Subtitle D "Table I" by the USEPA. Should additional chemicals be added to Table I, the project proponent will be required to evaluate these new chemicals as part of the ongoing detection monitoring program at the project site.

Comment 1014: Is the staff familiar that a large number of unregulated chemicals (unconventional pollutants) are present in municipal landfill leachate?

Response 1014: Refer to Response 1013.

Comment 1015: Could there be hazardous or otherwise deleterious chemicals in the unregulated chemicals in leachate that do not now have drinking water MCLs?

Response 1015: Refer to Response 1013.

Comment 1016: Is it appropriate to assume, as the US EPA is doing in their Subtitle D regulations, that because all drinking water MCLs are met as set forth in Table I that a groundwater polluted by landfill leachate is safe to consume considering the presence of unregulated hazardous or otherwise deleterious chemicals in MSW leachate?

Response 1016: Refer to Response 666 for a discussion of VOCs and inorganic compounds typically found in landfill leachate and the existing inactive City Landfill's compliance with all mandated LARWQCB programs to ensure the quality of groundwater. In addition, refer to Response 1013.

Comment 1017: **Post-Closure Care Period**

Does Subtitle D only limit groundwater protection to 30 years after closure of a landfill?

Response 1017: After the 30-year postclosure maintenance period is completed, if the municipal solid waste in the landfill still poses a threat to human health and the environment, the owner must continue to maintain the landfill and monitor air and groundwater quality. BFI will conduct postclosure maintenance activities in accordance with all applicable State and federal regulatory requirements for as long as wastes pose a threat to human health and the environment.

Comment 1018: Are you familiar with Subtitle D, Subpart F Closure and Post-Closure Care requirements which state that,

> *§258.61 Post-closure care requirements.*
> *(b) The length of the post-closure care period may be:*
> *(2) Increased by the Director of an approved State if the Director of an approved State determines that the lengthened period is necessary to protect human health and the environment."*

Response 1018: Yes. City Planning staff are aware of Subtitle D requirements.

Comment 1019: Will the wastes in a Subtitle D "dry tomb" landfill be a threat after the landfill has been closed for 30 years?

If no, what will happen to the heavy metals, inorganic salts and persistent organics that are present in the wastes that will cause them not to be a threat?

Response 1019: Refer to Response 971 for a discussion of solid waste decomposition inside a landfill after the completion of closure during the mandated 30-year postclosure maintenance period.

Comment 1020: Will they still be available to be leached from the wastes and, for some of the organics, produce landfill gas?

Response 1020: Refer to Response 971 for a discussion of solid waste decomposition inside a landfill after the completion of closure during the mandated 30-year postclosure maintenance period.

Comment 1021: Given that the wastes after a 30-year post-closure period will still be a threat to cause groundwater pollution through leachate generation and develop landfill gas, does the staff believe that the Board will allow the landfill owner/operator to no longer maintain and to continue to provide post-closure care required by Subtitle D at the proposed landfill?

Response 1021: Refer to Response 1017.

Comment 1022: Since wastes will be a threat forever, will post-closure care be required forever?

Response 1022: Refer to Response 1017. Deposited wastes are not a threat "forever" as stated by the commenter.

Comment 1023: Are Subtitle D landfills significantly better than the unlined landfills with respect to their ultimate protection provided for groundwater quality? If so, how?

Response 1023: It is generally accepted that Subtitle D landfill liner requirements provide an enhanced level of protection to groundwater resources compared with unlined landfills. The engineered liner, including the barrier layers and overlying leachate recovery system, significantly reduces the potential for migration of waste constituents from the landfill.

Comment 1024: Is it better to postpone groundwater pollution so future generations will have to address it rather than requiring that those who generate the wastes address the problems associated with the landfill during the time that the wastes are generated?

Response 1024: Refer to Response 1017 for a discussion of the requirement for the landfill owner to monitor the landfill after the 30-year postclosure maintenance period if the municipal solid waste still poses a threat to human health and the environment. In addition, refer to Response 979 for a discussion of landfill owner responsibility in the event of groundwater impacts.

Comment 1025: Subtitle D, Subpart D - Design Criteria states,

§258. 40 Design criteria

(a) New MSWLF units and lateral expansions shall be constructed:
(1) In accordance with a design approved by the Director of an approved State or as specified in §258.40(e) for unapproved States. The design must ensure that the concentration values listed in Table 1 of this section will not be exceeded in the uppermost aquifer at the relevant point of compliance, as specified by the Director of an approved State under paragraph (d) of this section, or
(2) With a composite liner, as defined in paragraph (b) of this section and a leachate collection system that is designed and constructed to maintain less than a 30-cm depth of leachate over the liner.
(b) For the purposes of this section, composite liner means a system consisting of two components; the upper composite must consist of a minimum 30-mil flexible membrane liner (FML), and the lower component must consist of at least a two-foot layer of compacted soil with a hydraulic conductivity of no more than 1×10^{-7} cm/sec. FML components consisting of high density polyethylene (HDPE) shall be at least 60-mil thick The FML component must be installed in direct and uniform contact with the compacted soil component.
(c) When approving a design that complies with paragraph (a)(1) of this section the Director of an approved State shall consider at least the following factors:
(1) The hydogeologic characteristics of the facility and surrounding land;
(2) The climatic factors of the area; and
(3) The volume and physical and chemical characteristics of the leachate.
(d) The relevant point of compliance specified by the Director of an approved State shall be no more than 150 meters from the waste management unit boundary and shall be located on land owned by the owner of the MSWLF unit. In determining the relevant point of compliance State Director shall consider at least the following factors:
(1) The hydrogeologic characteristics of the facility and surrounding land;
(2) The volume and physical and chemical characteristics of the leachate;
(3) The quantity, quality, and direction, of flow of ground water;
(4) The proximity and withdrawal rate of the ground-water users;
(5) The availability of alternative drinking water supplies;
(6) The existing quality of the ground water, including other sources of contamination and their cumulative impacts on the ground

water, and whether the ground water is currently used or reasonably expected to be used for drinking water,
(7) Public health safety, and welfare effects; . . ."

Did the staff perform the site-specific evaluations specified in the above quoted section from Subtitle D regulations as part of developing the permit for the proposed landfill? If not, why not?

Response 1025: Landfill permitting and design plans will be prepared in compliance with applicable State and federal regulatory requirements. The evaluations referred to in this comment will be contained in those documents. Regulatory approval is required prior to construction. Significant site-specific data are already incorporated in the figures presented throughout the Draft SEIR.

Comment 1026: If this evaluation was conducted, what was the conclusion with respect to each of the listed items that led the staff to believe that a single composite liner of the type that the staff proposed for the landfill would prevent any of the constituents listed in Table 1 from exceeding the drinking water MCLs at the point of compliance for groundwater monitoring for as long as the wastes represent a threat?

Response 1026: Refer to Response 602 for a discussion of the potential for VOCs to pass through an HDPE geomembrane liner. In addition, refer to this same response for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources. Refer to Response 974 for a discussion of the long-term viability of HDPE as a containment material. Refer to Responses 986 and 999 for a discussion of the required spacing between groundwater monitoring wells at the point of compliance.

Comment 1027: In developing the permit for the landfill, did the staff assume, without conducting the evaluation required in Subtitle D, that a minimum Subtitle D liner system, landfill cover and the proposed groundwater monitoring system would comply with the Subtitle D groundwater protection requirements of preventing pollution by Subtitle D Table I constituents that exceed a drinking water MCL at the point of compliance for groundwater monitoring for as long as the wastes represent a threat?

Response 1027: Refer to Response 1026.

Comment 1028: Have the staff properly developed the permit for the landfill based on Subtitle D requirements for site-specific evaluations?

Response 1028: Yes. Refer to Response 1025 for a discussion of landfill permitting and design plans for the proposed City/County Landfill.

Comment 1029: **Lysimeters**

Is the purpose of the vacuum cup lysimeters that are installed under each of the landfill waste management unit cells that of providing early warning of leakage through the liner?

Response 1029: For the proposed City/County Landfill, lysimeters will not be part of the landfill's groundwater monitoring network. Instead, the vadose or unsaturated zone will be monitored with perimeter gas probes placed outside the liner system and into the gravel subdrain.

Comment 1030: How many lysimeters will be placed under each landfill cell?

Response 1030: Refer to Response 1029.

Comment 1031: What is the total area of each landfill cell?

Response 1031: Refer to Response 1029.

Comment 1032: What is the zone of capture of each lysimeter, i.e. how far does a lysimeter sample into the vadose zone underlying a waste management unit?

Response 1032: Refer to Response 1029.

Comment 1033: Is it possible that leaks through the liner system which will develop would not be sampled by the lysimeters that the staff have proposed in the permit for the landfill?

Response 1033: Refer to Response 1029.

Comment 1034: Will the lysimeters that have been proposed provide a reliable, effective warning system for leakage through the liner?

Response 1034: Refer to Response 1029.

Comment 1035: **Comments by Staff**

One of the two areas that the staff chose to comment on with respect to the extensive comments that were provided to them on the deficiencies in the proposed landfill was,

"*1. The ultimate failure of minimum Subtitle D liner systems will allow leachate to enter groundwater. New landfill units should be constructed with a double composite liner. Staff agree that a double composite liner will provide greater protection of groundwater than the single composite liner specified in the tentative permit. Staff have not observed that single composite liners beneath Subtitle D landfills have failed to contain wastes. There is ample evidence that unlined landfills leak wastes to groundwater. However, the single composite liner standard, which was implemented through RCRA Subtitle D has resulted in the construction of a significant number of single composite-lined landfills. Although the time period for observing of these single composite-lined landfills is short, they are functioning well.*"

What is the basis for stating that the Subtitle D landfill liner systems that have been installed since 1993 are "functioning well"?

Response 1035: Subtitle D was promulgated in October 1991 and required compliance by October 1993. However, there are landfills at which Subtitle D-compliant liner systems were constructed prior to 1991. Evaluation of the environmental monitoring systems (i.e., groundwater, surface water, LFG migration, and unsaturated zone) at landfills with liner systems that comply with Subtitle D indicates that these liner systems have performed as intended, providing a very high level of protection for human health and the environment (Bonaparte and Gross, 1993).

Comment 1036: How does the staff know that the minimum Subtitle D liner systems that have been installed are functioning well?

Response 1036: Refer to Response 1035 for a discussion about the performance of landfill liner systems constructed in compliance with Subtitle D requirements.

Comment 1037: What conditions would have to exist to be able to determine that the Subtitle D liner systems that have been installed since 1993 are not functioning well?

Response 1037: If these liner systems were not functioning well, monitoring data would indicate evidence of a release of constituents from the waste mass. There are landfills at which Subtitle D-compliant liner systems were installed prior to 1993.

Comment 1038: Did the staff review the report that was submitted in the packet of materials as back-up to the comments on the deficiencies in the proposed permit for the proposed landfill entitled, "Detection of the Failure of Landfill Liner Systems," dated April 1996 developed by Drs. Lee and Jones-Lee?

Response 1038: The referenced report was reviewed by the project engineering consultant. Refer to Response 602 for a discussion of the USEPA's response to the solid waste landfill design and engineering concerns of Dr. G. Fred Lee.

Comment 1039: Does the staff agree with the assessment presented in that report that there is little possibility that minimum Subtitle D landfills would, at this time, be demonstrating the inevitable failure of the liner system to prevent leachate from passing through them for as long as the wastes in the landfill will be a threat?

Response 1039: Refer to Response 602 for a discussion of the potential for VOCs to pass through an HDPE geomembrane liner. In addition, refer to this same response for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources. Refer to this same response for a discussion of the USEPA's response to the solid waste landfill design and engineering concerns of Dr. G. Fred Lee. In addition, refer to Response 974 for a discussion of the long-term viability of HDPE as a containment material.

Comment 1040: Did the staff, in their comment above, provide the Board with a reliable assessment of what is known and to be expected with respect to the performance of minimum Subtitle D landfill liner systems to prevent leachate from passing through them for as long as the

wastes in the landfill represent a threat that can cause groundwater pollution, as required in Subtitle D?

Response 1040: Yes. Refer to Response 1039.

Comment 1041: Is the staff aware that New York, New Jersey, Pennsylvania, Michigan, Florida, Arizona, Oregon, Kentucky, Arkansas, and possibly other states will not allow a minimum Subtitle D lined landfill to be constructed over vulnerable groundwaters such as those that exist under the proposed landfill site within their state?

Response 1041: City Planning staff are aware of the fact that some states require more than the "minimum" Subtitle D liner system in some circumstances. However, other states, including Arizona, employ the prescriptive Subtitle D liner. Furthermore, the proposed City/County Landfill would not be "constructed over vulnerable groundwaters." Groundwater beneath the project site is classified by the Department of Water Resources (DWR) as not suitable for beneficial use and has very low yields. In addition, the majority of the states referenced in this comment, which require double composite liner systems, have a much higher level of precipitation than California; therefore, landfills within these states will have a greater potential for leachate generation. A double composite liner system would not be required for the proposed City/County Landfill.

Comment 1042: Is the staff aware that these states require at least a double composite-lined system for municipal solid waste landfills located over vulnerable groundwater?

Response 1042: Yes. Refer to Response 1041.

Comment 1043: Is the staff aware that several of these states, particularly Michigan, have addressed the problems of trying to monitor landfill liner leakage that can lead to groundwater pollution by landfill leachate by requiring that a double composite liner be used where the lower composite liner is a leak detection system for the upper liner?

Response 1043: Refer to Response 1041.

Comment 1044: Is the Michigan Rule 641 approach which sets forth the requirement of a double composite liner as a more reliable approach for detecting leakage through liners than the approach that the staff have adopted for the proposed landfill?

Response 1044: Refer to Response 1041.

Comment 1045: Is it appropriate to assume that the hydraulic gradient underlying a landfill will be the hydraulic gradient that exists in perpetuity, i.e. for as long as the wastes in the landfill will be a threat?

Response 1045: As hydrogeologic conditions change, the hydraulic gradient cannot be expected to remain the same in perpetuity.

Comment 1046: Is it possible that the adjacent property owner could install a production well for either domestic or agricultural water supply that would change the hydraulic gradient and, therefore, the rate of groundwater movement underlying the proposed landfill?

Response 1046: Based on the hydrogeologic conditions such as low yield and depth and quality of water in the area, it is unlikely that a production well installed by an adjacent property owner would be permitted. Nevertheless, if it were permitted, it is highly unlikely that the well would be located sufficiently close to the landfill to produce enough water to alter the hydraulic gradient beneath the landfill.

Comment 1047: Could a change in the hydraulic gradient lead to a greater probability that leachate generated through leakage through the minimum Subtitle D liner system would pass the point of compliance without being detected by the monitoring wells spaced hundreds of feet apart that have zones of capture of only one foot?

Response 1047: Significant changes in hydraulic gradient that would cause a change in flow direction could conceivably alter the ability of a monitoring system to detect a release. However, the hydraulic gradient is monitored regularly (i.e., at least quarterly) so that significant changes in the hydraulic gradient would be detected and could be evaluated relative to potential impacts on the reliability of the detection monitoring well network.

Comment 1048: What provisions exist that prevent adjacent property owners from utilizing the groundwaters under their property for domestic or other water supply purposes and thereby changing the hydraulic gradient and therefore the rate at which off-site pollution of groundwaters occurs that is not detected by the monitoring well system proposed by the staff?

Response 1048: Permitting requirements enforced by the State (i.e., well standards) and the County DHS restrict the locations of new domestic or other water supply wells and monitoring wells.

Comment 1049: The second comment selected by the staff covering the many issues that were raised on the significant technical deficiencies in the proposed permit for the landfill was:

> *"2. The minimum Subtitle D, Chapter 15 approach to closure is insufficient. A single composite barrier is required in the cover system for areas overlying compositely lined areas (module 13 and subsequent modules). This single composite barrier exceeds the minimum requirements of Subtitle D. The minimum RCRA Subtitle D requirement does not require a 1×10^{-6} cm/sec clay barrier layer. A four foot thick cover is required over unlined modules. This cover consists of two feet of foundation material, one foot of clay, and a foot of topsoil to support vegetation. As long as the clay layer is properly maintained and repaired during the closure/post-closure period, this cover will provide protection of landfilled wastes from infiltration of significant amounts of precipitation. The landfill owner must protect the clay barrier layer from erosion, desiccation, and differential settlement which can affect the integrity of the clay barrier layer in the cover."*

Did the staff review the report developed by Dr. G. Fred Lee and Dr. Jones-Lee that was submitted to the staff entitled, "Overview of Landfill Post-Closure Issues,"as well as several other papers and reports included in the submitted materials which discussed the inability of a minimum Subtitle D landfill cover of the type proposed by the staff for the landfill to prevent leachate generation that will ultimately lead to groundwater pollution?

Response 1049: Dr. Lee's opinions on closure design are well known to City staff and the consulting engineers. Refer to Response 602 for a discussion of the USEPA response to the solid waste landfill design and engineering concerns of Dr. G. Fred Lee. All of the referenced materials and reports that were submitted as part of comments on the Draft SEIR were reviewed by City Planning staff. Refer to Response 713 for a discussion of the potential for desiccation cracks in the closure cap of the proposed City/County Landfill. In addition, refer to Responses 745 through 749 for discussions pertaining to the long-term settlement of solid waste landfills, potential impacts on slope stability, and how the proposed City/County Landfill will incorporate long-term landfill settlement into its design.

Comment 1050: Is the desiccation cracking of clay layers in landfill covers well known in the literature?

Response 1050: Desiccation cracking of clay covers has been reported in the literature. Several examples of final cover system designs were included as Figures 8, 9, 10, and 11 in the Draft SEIR, Appendix B-5. The Draft SEIR is not a permitting or final design document. The final cover design will be developed as part of the FCPMP, which will be implemented after the completion of the proposed project. Upon regulatory agency review and approval of the FCPMP, the detailed design of the final cover system will be completed and submitted for regulatory agency review and approval prior to any closure construction activity occurring. In addition, refer to Response 713 for a discussion of the potential for desiccation cracks in the closure cap.

Potentially significant environmental impacts associated with the future closure and postclosure maintenance of the proposed City/County Landfill have not been analyzed in the Draft SEIR or this Final SEIR. The future closure and postclosure maintenance of the proposed City/County Landfill is not part of the proposed project and would not occur until after completion of the proposed project. Mandated closure and postclosure maintenance would occur upon the completion of landfilling operations, estimated at approximately 26 years. As stated in the Draft SEIR, Section 2.15.3, Final Closure, p. 2-95:

> The following is a general description of the primary operations associated with the future closure and postclosure maintenance of the proposed City/County Landfill after its 26-year operational site life. Specific design requirements and environmental documentation (CEQA) pursuant to the final closure plan are not included in this Draft SEIR.

Potentially significant environmental impacts associated with the future closure and postclosure maintenance of the proposed City/County Landfill would be analyzed in

environmental documentation prepared in accordance with CEQA at the time the FCPMP is prepared. The development of mitigation measures for the environmental impacts associated with closure and postclosure, as well as the delineation of monitoring and enforcement responsibilities, would also occur at that time.

Comment 1051: Did the staff review the materials that were submitted on the state of Wisconsin's experience with an experimental landfill cover at the Omega Hills site which was published in a US EPA report in 1990 covering landfill covers, where in a three-year period one-half inch wide desiccation cracks occurred to a depth of over three feet in the landfill cover?

Response 1051: Refer to Response 713.

Comment 1052: Does the staff contend that visual inspection of the surface topsoil layer of a landfill that the landfill operator will be able to maintain the integrity of the cover for the closed waste management units so that the designed permeability of the cover will be maintained in perpetuity, i.e. as long as the wastes represent a threat?

Response 1052: Refer to Responses 713 and 1050.

Comment 1053: If so, how will the landfill operator be able to learn of the desiccation cracks that will occur within the first season after the landfill cover is installed since these cracks will only occur in the low permeability layer which ties below the topsoil layer and the drainage layer?

Response 1053: Refer to Response 713.

Comment 1054: Is the statement in the permit that the landfill owner must maintain the low permeability character of the cover a superficial requirement that cannot be achieved with the approaches that are normally used for cover inspection?

Response 1054: Refer to Responses 713 and 1050. The regulations contained within CCR, Title 27, govern the regulated closure and postclosure maintenance of solid waste landfills in the State of California. These regulations were created to provide for long-term environmental protection and are not considered to be "superficial."

Comment 1055: In the materials that were submitted to the staff was information that several companies have developed leak detection systems for landfill covers. It was suggested a leak detectible cover should be required in closing filled waste management units to prevent moisture from entering the landfill and thereby generating leachate that will lead to groundwater pollution.

Response 1055: Refer to Response 1050 for a discussion of the proposed final cover design to be provided in the FCPMP for the proposed City/County Landfill. A leak detection system for the landfill final cover would not be required. The final cover would be designed to provide environmental protection as long as the wastes in the landfill pose a threat to human health and the environment.

Comment 1056: Does the staff feel that it is appropriate to require that this readily available technology be specified in permits for all landfill closures that take place in the state?

Response 1056: Refer to Responses 1050 and 1055.

Comment 1057: Is it a fact that the landfill covers specified in the proposed landfill permit will not achieve Subtitle D's overall groundwater protection performance standards of preventing moisture from entering the wastes that leads to leachate generation and the impairment of groundwaters by landfill-derived constituents for as long as the wastes in the landfill will be a threat?

If not, why not?

Response 1057: Refer to Response 1050 and 1055.

Comment 1058: **Landfill Liner Organic Solvent Permeation**

Is the staff familiar with the permeation of organic chemicals through HDPE liners?

Response 1058: Yes.

Comment 1059: What is the permeation process?

Response 1059: Refer to Response 602 for a discussion of the potential for VOCs to pass through an HDPE geomembrane liner. In addition, refer to this same response for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources.

Comment 1060: Can solvents, such as those used for paint removal that can be purchased at any hardware store and that can be legally disposed of in an MSW landfill waste stream by homeowners can, when the container rusts out, pass through the wastes down to the liner and through the intact liner causing groundwater pollution?

Response 1060: Refer to Response 602 for a discussion of the potential for VOCs to pass through an HDPE geomembrane liner. In addition, refer to this same response for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources. No liquid or hazardous wastes are allowed to be disposed of at Class III nonhazardous landfills.

Comment 1061: Does staff know how much groundwater pollution above drinking water MCLs for carcinogens can occur by a half gallon of the solvents that can be purchased by homeowners and disposed of in their household waste?

Response 1061: The calculation that would hypothetically involve the direct deposit of concentrated solvent into groundwater to evaluate constituent concentrations in groundwater is a straightforward calculation, but it would not be representative of conditions at the proposed landfill. Only empty containers are allowed to be disposed of legally as municipal solid waste. Full or partially full containers must be given to a collection

center, thereby reducing the solvents present in a landfill. Refer to Response 1248 for a discussion of the potential for household hazardous waste disposal at the proposed City/County Landfill.

Comment 1062: Would the staff be surprised to learn that this could be millions of gallons of groundwater?

Response 1062: Refer to Response 1061.

Comment 1063: Is the staff aware that many of these solvents are suspected human carcinogens and are regulated as carcinogens by the US EPA?

Response 1063: Yes.

Comment 1064: A discussion was provided, in the materials that were submitted, to reference to the work of Sakti and others at the University of Wisconsin, Madison on solvent permeation of HDPE liners where it was indicated that they found that a three-inch thick HDPE liner would only retard solvents passing through the liner, which does not contain any holes, for a period of 25 years.

Response 1064: City staff are aware of the body of technical literature that exists relating to landfills and liner system technology. This paper was not specifically provided in the "material that was submitted" by the commenter. Refer to Response 602 for a discussion of the potential for VOCs to pass through an HDPE geomembrane liner. In addition, refer to this same response for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources.

Comment 1065: Does the staff have any information that would show that Sakti *et al.* as well as others' assessment of the solvent permeation situation is incorrect?

Response 1065: Refer to Response 602 for a discussion of the potential for VOCs to pass through an HDPE geomembrane liner. In addition, refer to this same response for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources.

Comment 1066: What consideration was given to the permeation of organic solvents through the HDPE liner in developing permits for the proposed landfill?

If none, why not?

Response 1066: Specific permits for the proposed liner system have not yet been prepared or issued because the proposed project has not been approved by decisionmakers. Permits for the liner system will be in accordance with applicable federal and State regulations. Refer to Response 602 for a discussion of the potential for VOCs to pass through an HDPE geomembrane liner. In addition, refer to this same response for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources.

Comment 1067: Does Subtitle D require that the staff consider whether the proposed landfill containment system will prevent groundwater pollution by the waste constituents for as long as the wastes in the landfill will be a threat?

If not, why not?

Response 1067: Subtitle D includes provisions providing for the protection of water quality for as long as the deposited wastes pose a threat to either human health or the environment (40 CFR, §258.61).

Refer to Response 965 for a discussion of the requirements for the project proponent's protection of groundwater resources during the life of the proposed project and throughout the 30-year postclosure maintenance period. In addition, refer to Response 1017 for a discussion of BFI's requirements to monitor the landfill after the 30-year postclosure maintenance period if the municipal solid waste still poses a threat to human health and the environment.

Comment 1068: Have the staff, in developing the proposed landfill permits, properly implemented Subtitle D requirements of determining whether the proposed landfill liner cover systems will protect groundwaters from pollution by waste-derived constituents for as long as the wastes are a threat?

Response 1068: Yes. Refer to Response 1066.

Comment 1069: **Appropriateness of Development of Permits for MSW Landfills**

Is it true that since Subtitle D was promulgated in 1991 that the staff have assumed that the minimum prescriptive design landfill liner and cover standards set forth in Subtitle D of a single composite liner would meet Subtitle D's overall groundwater protection performance standard of preventing impairment of use of groundwaters by waste-derived constituents for as long as the wastes in the landfill represent a threat?

Response 1069: Yes, City staff agree with this assessment.

Comment 1070: Where does it state in Subtitle D that the groundwater protection performance standard can be assumed to be achieved by constructing the minimum Subtitle D liner system at all sites where landfills could be located?

Response 1070: The regulatory requirements of Subtitle D, when implemented, provide for the protection of groundwater resources.

Comment 1071: Must the staff make a site-specific evaluation of each proposed landfill or landfill expansion to ensure that no impairment of the beneficial uses of surface water or groundwater beneath or adjacent to the landfill occurs throughout this post-closure period for as long as the wastes in the landfill represent a threat?

Response 1071: Site-specific evaluations have been performed by the project proponent and will continue to be performed and refined as part of the environmental process and eventual design documents that are required by regulatory agencies.

For additional information on this subject, refer to Responses 965 and 1017.

Comment 1072: **Breakthrough Times for Clay Liners**

Exhibit 7 is a nomograph based on a Darcy's Law calculation developed by Workman and Keeble that was discussed in the materials submitted to the staff on the technical deficiencies of the proposed permit for the landfill which shows breakthrough times for various permeabilities of clay liner systems.

Response 1072: Exhibit 7, provided by the commenter, has been reviewed by City staff, and responses to specific questions are provided below.

Comment 1073: What is the thickness of the clay in the composite liner that is recommended for the proposed landfill?

Response 1073: The proposed base liner incorporates a minimum 2-foot-thick low-permeability soil layer with a maximum saturated hydraulic conductivity of 1×10^{-7} cm/s.

Comment 1074: Is this clay liner specified to be two feet thick with a permeability of less than 1×10^{-7} cm/sec?

Response 1074: Refer to Response 1073.

Comment 1075: Based on the nomograph presented in Exhibit 7, how long would it take leachate, once it has penetrated the plastic sheeting layer, to pass through the compacted clay layer underlying the plastic sheeting layer in the composite liner?

Response 1075: The nomograph in Exhibit 7 (provided by the commenter) is based on an incorrect assumption of one-dimensional flow and a hypothetical constant head in excess of the maximum head anticipated on the liner system. Therefore, Exhibit 7 cannot be used to provide realistic estimates of breakthrough time.

Comment 1076: Does this nomograph show that leachate penetration of this clay layer through holes that develop in the plastic sheeting layer could occur within about seven years?

Response 1076: Refer to Response 1075.

Comment 1077: **Desiccation Cracking of the Clay Layer of a Composite Liner**

Is the staff familiar with the approach that is used to develop a clay liner with respect to compaction of the liner with a moisture content slightly wet of the optimum of the moisture density relationship?

Response 1077: Yes.

Comment 1078: Does the compaction of a clay liner require the addition of moisture to the clay in order to achieve optimum compaction?

Response 1078: Whether or not moisture must be added in order to achieve optimum compaction depends on the initial moisture content of the clay.

Comment 1079: Is the staff familiar with the desiccation cracking of clay layers underlying flexible membrane liners in a composite liner?

Response 1079: Yes. Refer to Responses 716 and 717 for discussions regarding the potential for desiccation cracking of the clay layer of a composite landfill liner system.

Comment 1080: Does the moisture that is used to enable optimum liner compaction leave this clay layer, through unsaturated transport, and does the drying of this layer lead to desiccation cracks in the layer?

Response 1080: Refer to Responses 716 and 717 for discussions regarding the potential for desiccation cracking of the clay layer of a composite landfill liner system.

Comment 1081: Will the desiccation cracks that occur in the clay layer underlying the flexible membrane liner provide pathways through the clay where leaks that develop in the flexible membrane liner can penetrate the clay layer in less than the predicted rate of about seven years?

Response 1081: Refer to Responses 716 and 717.

Comment 1082: Did the staff review this issue in the materials that were provided to them on the proposed deficiencies of the single composite liner recommended by the staff as being suitable for the proposed landfill?

Response 1082: Yes. Refer to Responses 1035 and 1041 for a discussion of the evaluation of the performance of landfill liners constructed in compliance with Subtitle D requirements and why the proposed City/County Landfill would not require a double composite liner system.

Comment 1083: What provisions were taken by the staff in developing their recommended permit for the proposed landfill which includes a single composite liner, to address the desiccation cracking of the clay layer underlying the flexible membrane liner in the composite liner?

Response 1083: Refer to Responses 716 and 717.

Comment 1084: **Leachate Component Attenuation**

Statements are made by landfill applicants, their consultants and regulatory agency staff who want to gain approval for a particular landfill that the clay layer in a composite liner and the natural geological strata represents additional barriers due to attenuation of constituents in the clay and the underlying geological strata.

Response 1084: Refer to Responses 757 and 1041 for a discussion of consultant objectivity during the preparation and processing of the Draft SEIR and why the proposed City/County Landfill would not require a double composite liner system.

Comment 1085: Is the staff familiar with the attenuation processes that occur for municipal landfill leachate components in clay layers?

Response 1085: Yes.

Comment 1086: Is it appropriate to assume that all municipal solid waste MSW landfill leachate components that are a threat to groundwater pollution will be attenuated, i.e. prevented from transport, in passing through the underlying clay layer in a composite liner and through the natural geological strata at the landfill site?

Response 1086: Refer to Response 602 for a discussion of the potential for VOCs to pass through an HDPE geomembrane liner. In addition, refer to this same response for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources.

Comment 1087: Are there components in municipal solid waste leachate that are not attenuated to any significant extent by clays or natural geological strata and thereby move at about the same rate as water, eventually leading to groundwater pollution by the waste-derived constituents?

Response 1087: Refer to Response 602 for a discussion of the potential for VOCs to pass through an HDPE geomembrane liner. In addition, refer to this same response for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources.

Comment 1088: Should the staff become familiar with attenuation issues for municipal landfill leachate before they advise the Board that attenuation is an important mechanism for preventing leachate-derived constituents from polluting groundwaters under the proposed landfill?

Response 1088: Refer to Response 602 for a discussion of the potential for VOCs to pass through an HDPE geomembrane liner. In addition, refer to this same response for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources.

Comment 1089: Did the staff mislead the Board in its attempt to support the permit for the proposed landfill when it stated that the leachate components that pass through the plastic sheeting liner would be attenuated and therefore would not be a threat to pollute groundwaters?

Response 1089: It is unclear what Board the commenter is referencing.

Comment 1090: **Final Questions**

Will the recommended permit for the proposed landfill comply with Subtitle D requirements of protecting groundwaters from impaired use for as long as the wastes in the landfill will be a threat?

Response 1090: Yes. The recommended permit will be issued by regulatory agencies responsible for enforcing applicable regulations, including Subtitle D. Refer to Response 965 for a discussion of the requirements for the project proponent's protection of groundwater resources during the life of the proposed project and throughout the 30-year postclosure maintenance period. In addition, refer to Response 1017 for a discussion of BFI's requirements to monitor the landfill after the 30-year postclosure maintenance period if the municipal solid waste still poses a threat to human health and the environment.

Comment 1091: Does the current regulatory approach, in which it is assumed by the staff that a minimum Subtitle D landfill liner system consisting of a thin plastic sheeting layer and two feet of clay or equivalent, provide for groundwater quality protection for as long as the wastes are a threat?

Response 1091: Yes. As previously described, the proposed City/County Landfill will be designed to provide for the protection of groundwater quality, as required by Subtitle D. Refer to Response 1041 for a discussion of why the proposed project will not require a double composite liner system.

Comment 1092: Is it appropriate to assume that a minimum Subtitle D composite liner will comply with Subtitle D's performance standards of protecting groundwaters from impaired use for as long as wastes represent threat at a site where it already has been demonstrated that groundwaters are vulnerable to pollution by landfill leachate based on the pollution of groundwaters by existing waste management units located in that area?

Response 1092: Refer to Response 965 for a discussion of the requirements for the project proponent's protection of water resources during the life of the proposed project and throughout the 30-year postclosure maintenance period. In addition, refer to Response 1017 for a discussion of the requirement for the landfill owner to monitor the landfill after the 30-year postclosure maintenance period if the municipal solid waste still poses a threat to human health and the environment.

Comment 1093: Is it appropriate to conclude that the proposed permit conditions for the landfill will protect goundwaters in the vicinity of the landfill from being polluted by landfill leachate for as long as the wastes in the landfill will be a threat?

If not, why not?

Response 1093: Refer to Response 1092.

Comment 1094: Is it appropriate to conclude that the groundwater monitoring approach proposed in the permit has a low probability of detecting leachate-polluted groundwaters at the point of compliance before pollution beyond this point occurs?

Response 1094: Refer to Responses 986 and 999 for discussions pertaining to the required spacing between groundwater monitoring wells at the point of compliance.

Comment 1095: If not, what is the expected reliability of these monitoring systems to detect leachate polluted groundwaters when it first reaches the point of compliance?

Response 1095: Refer to Responses 986 and 999 for discussions pertaining to the required spacing between groundwater monitoring wells at the point of compliance.

Comment 1096: **Professional Ethics Issues**

Exhibit 8 is a cover page for a paper that discusses the significant professional ethics problem that exists today in landfill permitting where landfill applicant consultants and in some cases regulatory agency staff do not tell the board and public the whole truth about the ability of a landfill liner system and groundwater monitoring system for a particular landfill to protect groundwaters from impaired use for as long as the wastes in the landfill will be a threat.

Do you agree that there is a significant professional ethics problem in the landfill development field today with respect to the permitting of municipal solid waste landfills?

Response 1096: This comment is noted and will be forwarded to the City decisionmakers for their review and consideration.

Comment 1097: Does the staff understand that if a consultant who normally works on behalf of landfill applicants discusses the whole truth about the inevitable failure of the landfill liner and cover systems and the, inability of the groundwater monitoring system to detect this failure in leachate-polluted groundwaters they will not obtain future work from landfill applicants?

Response 1097: This comment is noted and will be forwarded to the City decisionmakers for their review and consideration.

Comment 1098: Does the staff know that the American Society of Civil Engineers and the National Society for Professional Engineers have codes of ethics that require, with respect to matters of public health and safety, a civil engineer and a professional engineer to provide the public with the whole truth concerning the ability of a particular project, such as a landfill, to protect public health, groundwater resources and the environment from adverse impacts for as long as the wastes in the landfill will be a threat?

Response 1098: This comment is noted and will be forwarded to the City decisionmakers for their review and consideration.

Comment 1099: Do you agree that Drs. Lee and Jones-Lee's suggested approach as discussed in this paper (Exhibit 8) of requiring a full, public, independent peer review of controversial technical issues concerning a proposed landfill is an appropriate approach to follow to better ensure that future generations' groundwaters will not be polluted by landfill leachate than is being followed today in the permitting of landfills?

Response 1099: This comment is noted and will be forwarded to the City decisionmakers for their review and consideration.

Comment 1100: Does the staff feel that the independent peer review approach is an appropriate approach to take with respect to protecting public health, the environment and the public's interests?

Response 1100: Regulatory review and approval of permits and design plans are required by regulatory agencies (including City departments) prior to any development proceeding within Sunshine Canyon.

Comment 1101: Do you agree that regulatory agency staff typically understand the significant problems that exist today of permitting landfills that will not protect groundwaters from pollution by landfill leachate for as long as the wastes represent a threat?

Response 1101: Refer to Response 965 for a discussion of the requirements for the project proponent's protection of water resources during the life of the proposed City/County Landfill and throughout the 30-year postclosure maintenance period. In addition, refer to Response 1017 for a discussion of the requirement for the landfill owner to monitor the landfill after the 30-year postclosure maintenance period if the municipal solid waste still poses a threat to human health and the environment.

Comment 1102: Does this problem exist in your regulatory agency?

Response 1102: It is unclear what the commenter is referring to. The City employs competent working professionals who enforce mandatory regulations and requirements without bias. Refer to Responses 965 and 1017.

Comment 1103: Who in the agency is responsible for continuing the policy of having the staff recommend permits for landfill liners and covers and groundwater monitoring systems that, based on what is well established in the professional literature, obviously will not be protective of groundwater resources associated with the landfill for as long as the wastes represent a threat?

Response 1103: The SWFP is approved by the CIWMB and issued by the City LEA. Monitoring requirements for groundwater resources are provided by the LARWQCB. For additional information, refer to Responses 965, 1017, and 1035 for discussions pertaining to the requirements for protecting groundwater resources during the life of the proposed project and throughout its 30-year closure and postclosure maintenance period, the requirement for monitoring the landfill after the 30-year postclosure maintenance period if the municipal solid waste still poses a threat to human health and

the environment, and an evaluation of the performance of landfill liner systems constructed in compliance with Subtitle D requirements.

Comment 1104: What needs to be done to change the current landfill permitting situation so that true groundwater quality protection can be achieved in the landfilling of municipal solid wastes at the proposed landfill?

Response 1104: Refer to Responses 965, 1017, and 1035.

Comment 1105: Based on our discussions of issues, is it appropriate to require that the people who deposit wastes in the landfill pay the true cost of protecting groundwaters from impaired use for as long as the wastes in the landfill will be a threat?

Response 1105: Refer to Response 979 for a discussion of the landfill owner responsibility in the event of groundwater impacts.

Comment 1106: Will the permit that is recommended by the staff for the proposed landfill provide protection of groundwater resources from impaired use for as long as the wastes represent a threat?

Response 1106: Refer to Response 1103.

Comment 1107: The questions appearing at page 2 through 28 have been submitted at the suggestion of Dr. G. Fred Lee. Engineering experts such as Dr. Lee continue to conclude that landfill liners constitute a "flawed technological approach." Exh. 9 (copy of one of the articles cited in Exh. 1). (Exhibits 9 through 101 appear following page 45 of these comments and are incorporated herein by reference as though set forth in full in the text of these comments.) The EIR is deficient because it fails either to disclose the more recent literature on the issue, or to discuss its significance.

Response 1107: The composite liner systems proposed in the Draft SEIR represent state-of-the-art (Subtitle D requirements) technology, industry-accepted, and regulatory agency-accepted practice. These landfill liner systems are endorsed and regulated by the USEPA, CIWMB, and SWRCB. Refer to Response 602 for a discussion of the USEPA response to the solid waste landfill design and engineering concerns of Dr. G. Fred Lee. In addition, refer to Response 1041 for a discussion why the proposed City/County Landfill would not require a double composite liner system.

Comment 1108: Does the Planning Department agree with the conclusions expressed in the articles cited in Exhibit 1? If not, why not?

Response 1108: The proposed liner system design for the City/County Landfill will meet or exceed the minimum standards contained in applicable federal and State Subtitle D regulations, which were promulgated to protect human health and the environment. Refer to Response 1041.

Comment 1109: It has been reported that waste constituents are likely leaving landfills in the vapor phase in addition to or in place of the liquid phase. See Exh. 12 (Air/Water Pollution Report 1996). The EIR is deficient because it does not reveal this additional source of contamination.

Response 1109: Refer to Responses 73 and 101 for a discussion of required odor control measures to be implemented for the proposed City/County Landfill. In addition, refer to these same responses for a discussion of the historical effectiveness of odor control measures at the project site.

Comment 1110: Was the Planning Department aware at the time of the release of the EIR of the information contained in the Air/Water Pollution Report article? If not, why not?

Response 1110: Refer to Responses 73 and 101 for a discussion of required odor control measures to be implemented for the proposed City/County Landfill. In addition, refer to these same responses for a discussion of the historical effectiveness of odor control measures at the project site.

Comment 1111: Does the Planning Department agree that BFI should be required to reveal whether vapor phase is a source of landfill contamination at Sunshine Canyon? If not, why not?

Response 1111: Refer to Responses 73 and 101 for a discussion of required odor control measures to be implemented for the proposed City/County Landfill. In addition, refer to these same responses for a discussion of the historical effectiveness of odor control measures at the project site.

Comment 1112: Page B5-13 of the EIR indicates that portions of the landfill will be built over the top of existing landfill. The EIR fails to disclose that as recently as 1994, according to the industry publication World Waste:

> there are still concerns about building a new landfill on top of existing solid waste. Since the MSW settles at it biodegrades and shifts under the weight of the new waste, the former landfill's instability can threaten the integrity of the new liner system.
>
> A piggyback landfill is not recommended for existing sites with leachate and groundwater contamination problems since it would be difficult to determine whether the source of the problem was the old or the new landfill.
>
> Even as engineers develop technology to support piggyback landfills, regulators remain cautious about approving piggyback landfills due to long term performance uncertainties.

Response 1112: Proposed landfilling against the existing City Landfill will be performed in accordance with regulatory-approved design plans, which require stability analyses (that model long-term performance of the waste-on-waste liner system) so that adequate factors of safety will be maintained at all times.

Appendix B5, Potential Liner Systems for the Proposed City/County Landfill Project, p. B5-6 of the Draft SEIR states:

> When an existing landfill that has been closed or is inactive is vertically expanded, a liner system may be required on the existing landfill before new refuse is placed. The liner may be placed directly on refuse. This type of liner system will be referred to herein as a waste-on-waste liner system. Waste-on-waste liner systems may have both side-slope and base components, depending on the existing landfill configuration. Since the existing waste may experience large differential settlements, waste-on-waste liner systems should be designed and constructed to accommodate these settlements while maintaining the integrity of the liner's containment system, including both the barrier layers and the leachate collection system.

In addition, as stated in this same appendix on page B5-13:

> The main concern in the design of a waste-on-waste liner system is maintaining the integrity of the containment system when the existing waste settles differentially. There are two approaches to address this concern. The first approach is to minimize the potential for the existing waste to settle differentially. The differential settlement potential of the existing waste can be minimized by compaction of the waste (i.e., deep dynamic compaction or waste surcharge) of the waste. The second approach is to design the liner system so that its integrity is maintained when the existing waste settles. To accomplish this, the waste-on-waste liner system is typically designed with a reinforced foundation layer placed under the composite liner component. The reinforced layer may be a geogrid or geotextile reinforcing layer or a well compacted layer of buffer soil.

Waste-on-waste liner systems have been successfully designed, permitted, and constructed at the following solid waste landfill and ashfill sites: Screaming Eagle Landfill, SC; Oakridge Landfill, SC; Babylon Interim Ashfill, PA; Babylon Northern Landfill, PA; Babylon Ashfill, PA; Lanchester Sanitary Landfill, PA; Newland Park Landfill, MD; Municipal Site Landfill Overfill, PA; Countryside Landfill, IL; Medley Landfill, FL; Central Sanitary Landfill, FL; Oaks Landfill, MD; Grows Landfill, PA; and Earthmovers Landfill, IN.

In addition, refer to Responses 745 through 749 for a discussion of long-term settlement of solid waste landfills and potential impacts on slope stability. In addition, refer to these same responses for a discussion of how the proposed City/County Landfill design and engineering incorporate long-term landfill settlement.

Comment 1113: Exh. 11. The same article also indicates that existing compaction techniques to control differential settlement are effective only to a level of about 40 feet. Was the Planning Department aware at the time the EIR was released of these concerns about the "long term performance uncertainties of a piggyback or waste-on-waste landfill," such as that resulting from the shifting of old waste under new waste? If not, why not?

Response 1113: Refer to Responses 745 through 749 for a discussion of long-term settlement of solid waste landfills and potential impacts on slope stability. In addition, refer to these same responses for a discussion of how the proposed City/County Landfill design and engineering incorporate long-term landfill settlement. In addition, refer to Response 1112 for a discussion of solid waste landfill sites where waste-on-waste liner systems have been successfully designed, permitted, and constructed.

Comment 1114: Was the Planning Department aware at the time the EIR was released of these concerns about the limited effectiveness of existing compaction techniques? If not, why not?

Response 1114: Refer to Response 1113.

Comment 1115: The failure to disclose this information is an EIR deficiency. The City should require the applicant to disclose all relevant geological and engineering studies regarding these long term performance uncertainties.

Response 1115: Information related to the long-term settlement of solid waste landfills and potential impacts on slope stability was included in the Draft SEIR. Refer to Response 1113.

Comment 1116: The U.S. Geological Survey has prepared a report (No. 95-213) which states that the mountain range in which the landfill is located is particularly vulnerable to landslides. USGS 1995 (excerpt). The EIR indicates at page 4-39 that a 1995 report prepared by the U.S. Geological Survey was consulted, but the full citation is not provided, so it is not possible based on the information provided to verify its accuracy.

Response 1116: The USGS Report No. 95-213, *Inventory of Landslides Triggered by the 1994 Northridge, California Earthquake*, was included in the Draft SEIR and is referenced in both Section 4.1.4, Geologic Hazards - Seismicity, p. 4-39, and in Section 10.0, Bibliography, p. 10-10. As indicated in the Draft SEIR, this report shows no earthquake-induced landslide activity within the proposed project's landfill footprint. As further noted in the Draft SEIR, this observation (from the USGS report) is consistent with the findings of postearthquake reconnaissance surveys of the site performed by consulting engineers. Refer to Responses 361 through 369 for a discussion of potential landslide impacts at the project site.

Comment 1117: Other scientists predict that there will be future earthquakes in the area of the landfill that will be even larger (7.2 - 7.6) than the Northridge earthquake of 1994. See Exh. 12. Although the EIR rerveals that it is reasonable to expect an earthquake larger than the Northridge Earthquake, it is deficient because it fails to reasonably quantify the predicted size of the larger quake.

Response 1117: Maximum earthquake magnitudes were cited in the Draft SEIR, Table 4.1-2, and were based on the information contained in Exhibit 12 (provided by the commenter). Exhibit 12 consists of two scientific articles that appeared in the January 1995 edition of *Science*, entitled "Prospects for Larger or More Frequent Earthquakes in the Los Angeles Metropolitan Region" (Dolan, Sieh, Rockwell, Yeats, Show, Suppe, Huftile,

Gath), and "Earthquakes in the Los Angeles Metropolitan Region: A Possible Fractal Distribution of Rupture Size" (Hough). The only time the maximum magnitude was not used in the Draft SEIR was when other recent studies indicated that even larger magnitude earthquakes than those identified in Exhibit 12 should be considered.

Based on the information in Exhibit 12, the Draft SEIR considered the impact of moment magnitude (M_w) 7.4 and 7.5 earthquakes on the San Gabriel, Simi-Santa Rosa, Oakridge (onshore), Malibu Coast-Santa Monica-Raymond, and Whittier-North Elsinore fault systems. The impact of these M_w 7.4 and 7.5 seismic events is quantified in the Draft SEIR, Table 4.1-3. The M_w 7.5 earthquake on the San Gabriel Fault, capable of generating a peak horizontal ground acceleration in bedrock at the project site of 0.57 g with a significant duration of 26 seconds, is clearly identified in the Draft SEIR as one of the "governing" earthquakes (see pages 4-37 and 4-38), along with the M_w 6.9 event on the Santa Susana Fault and the M_w 8.3 event on the San Andreas Fault.

It should also be noted that at recent Southern California earthquake center workshops, the authors of Exhibit 12 have stated that the maximum magnitudes presented in this exhibit for the blind thrust faults in the Los Angeles basin are being revised downward.

Comment 1118: In April of 1997, the California Division of Mines ("DMG") and Geology stated that in assessing seismic hazards, consultants should use the latest DMG "seismic ground-motion parameter data." See Exh. 13. The EIR is deficient because it does not state whether these data were used in preparing the Sunshine Canyon EIR.

Response 1118: The latest available seismic ground motion parameter data from CDMG, Southern California Earthquake Center (SCEC), and other sources were used in preparation of the Draft SEIR. The data used are clearly and appropriately referenced in the Draft SEIR, Section 4.1.4, Geologic Hazards - Seismicity, p. 4-35. The provided analyses for both seismic and other geologic concern were based on the latest available scientific data.

Comment 1119: Does the Planning Department agree that BFI should be required to use these data? If not, why not?

Response 1119: Refer to Response 1118.

Comment 1120: Page 13 of the Static and Seismic Stability Assessment (11/96) states that "the Northridge Blind-Thrust event can be eliminated from further consideration" in part because its PGA of .71 g is less than the .81 g of the Santa Susana MCE. In fact, the Northridge Earthquake produced "maximum peak accelerations reaching 1 g" at the Van Norman Complex (see Exh. 14 (Bulletin of the Seismological Society of America (Bardet and Davis) 1996), and "peak acceleration near 1 g" at the Interstate 5/14 interchange (see Exh. 15 (Bulletin of the Seismological Society of America (Hutchings & Jarpe) 1996). The EIR is deficient because it does not reveal this information or discuss its significance.

Response 1120: The peak ground acceleration (PGA) values cited in the Draft SEIR are "bedrock" values for level-ground sites. The 1.0 g values cited (in this comment) are either soil-

site values (i.e., values for the Van Norman Complex with data cited by Bardet and Davis) or were affected by topographic amplification (i.e., the Hutchings and Jarpe values); therefore, the values are not relevant to the level-ground bedrock values that were provided in the Draft SEIR. It should be noted that, using the bedrock PGA values provided in the Draft SEIR, the seismic response analyses performed for landfill design (described in the Draft SEIR, Appendix C-15) result in PGA values at the top of the landfill in excess of 1.0 g.

Comment 1121: Was the Planning Department aware of the magnitude of the accelerations produced by the Northridge Earthquake at these two sites, both of which are in close proximity to Sunshine Canyon? If not, why not?

Response 1121: Yes. Refer to Response 1120.

Comment 1122: The EIR is deficient because it excludes from consideration relevant information about the acceleration produced by the Northridge Earthquake. We request that BFI be required to circulate a new EIR which explains why this information was not made available to the public.

Response 1122: The Draft SEIR considered extensive information pertaining to acceleration activities produced by the Northridge earthquake. The Draft SEIR, Appendix C-16, also discussed the impacts of the Northridge earthquake on existing landfills proximate to the project site. Refer also to Response 1120.

Comment 1123: Page CS-8 states that aftershock activity from the Northridge Earthquake "has been concentrated to the north and northwest of the epicenter." In fact, one of the greatest concentrations of aftershocks appears to be in an area which includes Sunshine Canyon. See, for example, Exh. 14 at page S336 (Bulletin of the Seismological Society of America (Bardet & Davis) 1996). The EIR is deficient because it does not reveal this information or discuss its significance.

Response 1123: The Draft SEIR does present this information. The aftershock zone is shown in the Draft SEIR, Appendix C8, Northridge Earthquake Information, p. C8-8. That figure depicts the "aftershock zone" that encompasses an area north of the Northridge earthquake epicenter (which includes Sunshine Canyon). This figure is consistent with the same figure on p. S336 of Exhibit 14, which also shows the aftershock zone to spread northward from the epicenter.

The Draft SEIR, p. C8-8, also indicates that the aftershock activity of the 1994 Northridge earthquake event has been concentrated to the north and northwest of the epicenter. The information in the Draft SEIR is a direct quote from the cited reference (see Exhibit 14, p. S336) and indicates that the aftershock zone spreads significantly further to the west than to the east (from due north). The engineering significance of this pattern on the design and engineering of the proposed project is minimal because it is the main shock that governs the intensity of shaking from the Northridge event. Groundshaking estimates in the Draft SEIR for future seismic events are based on the shortest distance to the causative fault.

Comment 1124: Was the Planning Department aware of where the aftershocks were concentrated at the time the EIR was released? If not, why not?

Response 1124: Refer to Response 1123.

Comment 1125: Does the Planning Department agree, after independently reviewing the evidence, that the EIR is at best inaccurate in stating that the aftershocks have been concentrated to the northwest of the epicenter? If not, why not?

Response 1125: No. Refer to Response 1123.

Comment 1126: BFI should be required to circulate a new EIR which explains the engineering significance of the concentration of the large number of Northridge Earthquake aftershocks in an area which includes Sunshine Canyon.

Response 1126: This comment is noted. Refer to Response 1123.

Comment 1127: During the hearings before the County Board of Supervisors regarding the expansion of this landfill, BFI attempted to downplay the numerous examples of its corporate misconduct and claimed that it had been, was, and would be a responsible corporate citizen. See Exh. 16. BFI's claim was false. In fact, numerous recent incidents have been reported which indicate that BFI's misconduct is continuing. For example, in 1996 BFI Services was accused of violating the Clean Water Act ("CWA") based on the improper disposal of millions of gallons of mixed raw sewage. "In many instances, [BFI services] gave the [publicly owned treatment works] false samples of waste slated for disposal... Exh. 17. This misconduct defrauded municipal sewage plants of about $1.3 million." Exh. 18. As part of a guilty plea arising out of this misconduct, BFI Services paid a $3 million fine and $1.5 million in restitution for violating the CWA. See Exh. 19.3.

Response 1127: Refer to Response 305 for a discussion of alleged violations at other BFI landfills and BFI's corporate environmental health and safety policies, as well as actions and programs designed to implement these policies.

Comment 1128: In 1995, BFI shut down and dismantled a medical waste incinerator after admitting to tampering with monitoring devices. See Exh. 20

Response 1128: The exhibit is noted. Refer to Response 305 for a discussion of alleged violations at other BFI landfills and BFI's corporate environmental health and safety policies, as well as actions and programs designed to implement these policies.

Comment 1129: In 1997, BFI was accused of illegally operating a construction and demolition debris transfer station in Florida. See Exh. 21.

Response 1129: The exhibit is noted. Refer to Response 305.

Comment 1130: In 1997, federal authorities raided a BFI medical waste disposal plant in Washington DC as part of an investigation into illegal dumping of biomedical waste. See Exh. 22.

Response 1130: The exhibit is noted. Refer to Response 305.

Comment 1131: In 1990, BFI abandoned plans to expand one of its landfills after admitting that it had suppressed reports showing potentially explosive methane gas in the landfill and garbage buried beyond the permitted area. Previously, BFI had boasted of "sound management practices and environmental protection." See Exhs. 23 & 24.

Response 1131: The exhibits are noted. Refer to Response 305.

Comment 1132: In 1990, Louisiana officials determined that BFI "continued to break the law" through landfill operating violations such as failing to apply proper cover material, illegally disposing of infectious medical waste, failing to keep litter from blowing off the site, and allowing contaminated liquid to seep from the landfill. The officials found that "the facility has a history of serious violations which are corrected but then reoccur. . . ." BFI eventually closed the landfill. See Exhs. 25-27.

Response 1132: The exhibits are noted. Refer to Response 305.

Comment 1133: Recent legal or administrative actions against BFI landfills have been filed based on issues such as garbage odor, dust and blowing debris, improper receipt of hazardous waste, liner failure, surface and ground water contamination, and adverse health impacts at landfills near San Antonio, Texas (see Exhs. 28 (garbage and sludge odors, dust and blowing debris, reported in 1996) & 29 (odors and mud spread by garbage trucks, reported in 1997)), Houston, Texas (see Exhs. 30 (air and water pollution, reported in 1995); Donna, Texas (see Exh. 31 (admitted violations by BFI at several landfills, reported in 1992)); Baltimore, Maryland (see Exh. 32 (ground water pollution, reported in 1994)); Reading, Pennsylvania (see Exh. 33 (citation for unpermitted discharge of leachate from lined landfill, reported in 1994)); Cleveland, Ohio (see Exhs. 34 (odor, reported in 1992) & 35 (noise and odor, reported in 1997)); San Mateo, California (see Exh.-36 (streambed destruction resulting from storm water overflow during landfill expansion, reported in 1993)); Pittsburgh, California (see Exh. 37 (odors and blowing dust and trash, reported in 1993)); and in Ohio, Alabama and New York (see Exh. 38 (alleged illegal burying of sludge, reported in 1991)), Louisiana (see Exhs. 39 (1,400 violations of hazardous waste regulations, reported in 1990) & 40 (odors and noise, reported in 1989 and 1993)); Illinois (see Exh. 41 (depositing waste in excess of permit limit, reported in 1997)); and Virginia (see Exh. 42 (odors, reported in 1997)).

Response 1133: The exhibits are noted. Refer to Response 305.

Comment 1134: In 1996, the federal government sued BFI for attempting to monopolize waste hauling competition in states such as Tennessee. BFI settled the lawsuit by agreeing to make changes in its contracting practices. See Exh. 43.

Response 1134: The exhibit is noted. Refer to Response 305.

Comment 1135: Additional examples of BFI's record of fines, suits and penalties prior to 1992 are set forth in the article enclosed as Exh. 44.

Response 1135: The exhibit is noted. Refer to Response 305.

Comment 1136: Were the Planning and/or Zoning Departments aware of these allegations and incidents at the time of the release of the EIR? If not, why not?

Response 1136: Refer to Response 305.

Comment 1137: Do the Planning and/or Zoning Departments agree that by diverting material away from landfills, it would reduce or eliminate the need for the City of Los Angeles to entrust the important function of waste disposal to an entity such as BFI with such a questionable record and reputation? If not, why not?

Response 1137: Refer to Response 305. The City has adopted specific policies in accordance with A.B. 939 that recognize the need for landfills and provide for at least 15 years of disposal capacity within its jurisdiction. Refer to Response 943 for a discussion of the recent closures of major Los Angeles County solid waste landfills and the projected future solid waste disposal capacity shortfall in Los Angeles County.

Comment 1138: Do the Planning and/or Zoning Departments planning staff agree that as a general rule the recycling industry has a better operating record in terms of environmental health and safety than the landfilling industry? If not, why not?

Response 1138: Refer to Response 169 for a discussion of alternative waste management technologies and strategies. BFI and its affiliates recycle more solid waste materials (by weight) than any other waste management company in the world.

Comment 1139: Do the Planning and/or Zoning Departments agree that BFI's operating record is a relevant factor in determining its suitability to conduct an important public function such as waste disposal? If not, why not?

Response 1139: Yes. Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation. In addition, refer to Response 305 for a discussion of alleged violations at other BFI landfills and BFI's corporate environmental health and safety policies, as well as actions and programs designed to implement these policies.

Comment 1140: Section 4.11 of the EIR states that the expansion of the landfill will not have an adverse effect on property values. The attached article however, states that "it is reasonable to assume that unless new landfills achieve a state of operations such that the urban housing markets view them as essentially benign, one should expect that landfills will have negative price effects." See Exh. 45.

Response 1140: The referenced article (provided by the commenter) refers to the financial effect on residential property values based on a landfill receiving up to 500 tpd of waste located in Ramsey, Minnesota. The model referenced in the article analyzed single-family

residential homes with a mean selling price of $74,318. The landfill is located on relatively flat and lightly wood terrain in Ramsey. It should be noted that the article failed to address the price effects on residential property based on recent landfills built using the most recent technologies or operated in accordance with latest federal and state standards. Additionally, refer to Response 180 for a discussion of the proposed project's potential effects on property values.

Comment 1141: The EIR also states, however, that the operator will be unable to mitigate the adverse air quality impact of operating the landfill.

Response 1141: Refer to Response 68 for a discussion of the environmental determination within the Draft SEIR, stating that the proposed project would create an unavoidably significant adverse impact on air quality, for construction and operational emissions.

Comment 1142: The EIR is defective because it fails to disclose studies which demonstrate the adverse impact of landfills on residential property values.

Response 1142: Refer to Response 180 for a discussion of the proposed project's potential effects on property values.

Comment 1143: Was the Planning Department aware of the facts and conclusions set forth in Exhibit 45 at the time the EIR was released? If not, why not?

Response 1143: The exhibit is noted. City staff were not aware of this study prior to the release of the Draft SEIR; however, as noted in Response 1140, City staff do not find this information factually relevant to the proposed project.

Comment 1144: Does the Planning Department agree with the analysis and conclusions set forth in Exhibit 45? If not, why not?

Response 1144: No. Refer to Response 1140.

Comment 1145: "It has become a common practice among major landfill operators to provide property value guarantee programs as part of the process of seeking government approval for expansion or construction of landfills." Exh. 46 (Appraisal Journal 1996 (see "Question 9"). BFI is reported to have extended or offered to extend property value guarantees with respect to several of its sites. See, for example, Exhs. 47 (Chicago Tribune 1993), 48 (Chicago Tribune 1995); 48.5 (Buffalo News 1992); 49 (Air Water Pollution Report 1995); 50 (News & Observer 1992). Property value guarantee programs offered by other landfill operators are described in Exhibits 52 (Pantagraph 1997); 53 (Chicago Tribune 1996); 54 (Post Standard 1996), 55 (Indianapolis Star 1996); 56 (Kansas City Star 1995); 57 (Leader Telegram 1993); and 58 (Tacoma News Tribune 1995). Were the Planning and/or Zoning Departments aware that it has become a common practice among major landfill operators to provide property value guarantee programs as part of the process of seeking government approval for expansion or construction of landfills? If not, why not?

Response 1145: Refer to Response 180 for a discussion of the proposed project's potential effects on property values. City staff are aware of guarantees provided under very different circumstances from those presented by the proposed landfill.

It should be noted, and as indicated on Exh. 46, p. 2, of the referenced article, the following is stated:

> In analyzing environmental risk, however, real estate appraisers must carefully bear in mind the following points. Not every use of a hazardous substance results in contamination. Not every use of a hazardous substance that does result in contamination necessarily creates an environmental risk. And not every use of a hazardous substance that results in contamination and results in environmental impact and environmental risk necessarily results in a real estate impact.
>
> Stigma, as it applies to real estate affected by environmental risk, is generally defined as an "adverse public perception about a property that is intangible or not directly quantifiable." It is an additional impact on value, over and above the cost of cleanup or remediation. Stigma can occur on sites that once contained contaminants and have been cleaned up, on sites undergoing cleanup, or sites that were never contaminated but neighbor a property that contains or contained contaminants.

Comment 1146: Do the Planning and/or Zoning Departments agree that BFI should be required to offer a property value guarantee program as a condition of obtaining a zoning change and/or a permit to operate the landfill? If not, why not?

Response 1146: Negative impacts on property values are not anticipated as a result of the proposed project development. Such a condition, if required, would have to be imposed by the City Council or Planning Commission. Refer to Response 180.

Comment 1147: Do the Planning and/or Zoning Departments agree that if the proposed landfill will have no adverse effect on property values--as BFI claims in section 4.11--BFI will have nothing to lose by offering a guarantee program? If not, why not?

Response 1147: Refer to Response 1146 with respect to this issue.

Comment 1148: The EIR claims that the landfill is needed to solve an "impending crisis" in landfill capacity. EIR p. 1-8. In fact, the crisis does not exist, as stated in Exh. 59 (Los Angeles Times 1993) and 60 (Wall Street Journal 1996).

Response 1148: The comments are noted. As stated in the Draft SEIR, Section 2.2.1, Primary Purpose and Objectives of the Proposed Project, p. 2-2:

> The primary purpose of the City/County Landfill Project is to provide **additional solid waste disposal capacity to meet the anticipated short-, mid- and long-term disposal needs within the Los Angeles region** [emphasis

added]. The development of the City/County Landfill Project would include both project-specific development and solid waste planning objectives. These objectives exist within the broader context of State-mandated policies and adopted County and City integrated solid waste management policies and goals developed by these agencies for an effective and coordinated approach to short- and long-range integrated waste management planning.

For an additional discussion of this issue, refer to Response 943 in this document, which addresses the projected future waste disposal capacity shortfall in Los Angeles County.

Comment 1149: In April of 1997--prior to the release of this EIR--the City of Los Angeles Bureau of Sanitation issued a Request for Qualifications regarding the development of "Innovative Solid Resources Management Technologies." The EIR is deficient because it does not refer to this document in the alternatives section, describe the current status of the proposal process, or provide any estimates of the extent to which these technologies will reduce the need for expansion of the landfill.

Response 1149: The referenced RFQ/RFP (i.e., alternative waste management technologies) solicited by the City's Department of Public Works would eventually fund a pilot program for an "undetermined" advanced solid waste transformation technology. With respect to that RFQ/RFP, the City received three proposals in response to that solicitation.

Any type of technology must be approved and permitted by the City and, if necessary, subsequently approved by regulatory agencies prior to implementation. It is anticipated that a facility would be constructed and operated in City jurisdiction that would transform approximately 50 to 100 tpd of City-generated waste. The development of this type of facility will not accommodate the current amount of City-generated waste (e.g., estimated at 12,000 tpd) nor would it provide the City with short-, medium-, or long-term waste disposal capacity as mandated by A.B. 939.

Also, refer to Responses 169 and 936 for a discussion of alternative waste management technologies and strategies and solid waste transformation technologies as potential alternatives to the proposed project.

Comment 1150: Was the Planning Department aware of the Request for Qualifications, or of any subsequent procedures or developments within the Department of Public Works relating to the use by the City of Los Angeles of innovative solid resources management technologies? If not, why not?

Response 1150: City Planning was aware of the City Bureau of Sanitation (BOS) RFQ/RFP solicitation. However, this "undetermined technology" will not meet the objectives of the proposed project. Refer to Responses 169 and 936.

Comment 1151: It has also been recently reported that "[m]any curbside recycling programs could face extinction by state and local governments anxious to fill space at cheap 'mega-landfills.'" See Exh. 61 (Solid Waste Report 1997). The EIR is deficient because it does not describe the extent to which the expansion of this landfill, with its artificially

low tipping fees, will jeopardize the recycling programs implemented by the City of Los Angeles.

Response 1151: The exhibit is noted. The proposed project will not jeopardize existing recycling endeavors that the City has in place and continues to support via the mandates of A.B. 939.

It is not known "what artificially low tipping fees" the commenter is referring to with respect to the operational County Landfill. Tipping fee arrangements between the City and BFI on the existing County jurisdiction operation were imposed as a result of the Settlement Agreement between these parties. Lower tipping fees reduce costs for disposal and allow the money saved to be spent on other City-sponsored activities, which may include more recycling programs.

In regard to recycling, the Draft SEIR, Section 5.9.2, Recycling, pp. 5-38 and 5-39, includes a discussion of recycling programs in the City of Los Angeles. With respect to recycling, A.B. 939 mandates that cities and counties in the State reduce the amount of waste being disposed of at landfills by 25 percent by 1995 and 50 percent by the year 2000. The City has been aggressive in implementing its programs, which are designed to recycle wastes generated by residential, commercial, and industrial sources. Waste materials targeted for diversion from landfill disposal include, but are not limited to, direct mail, bulky items (durables), film plastics, food waste, old corrugated containers, packaging materials, phone book directories, waste tires, and wood waste.

As stated in the Draft SEIR, p. 5-39:

> Additionally, the City has plans to expand existing programs for collecting and composting grass, leaves, and prunings, which represents 23.8 percent of the City's waste stream. This program became part of all new rollouts beginning in 1993, and service will eventually be expanded by the City to 720,000 households. From this program alone, the City expects to divert approximately 20 percent of the waste stream and more than 50 percent of the total yard waste generated.

Comment 1152: Was the Planning Department aware at the time the EIR was released of the study referenced in Exhibit 61? If not, why not?

Response 1152: City Planning was not aware of this study, but the study is not deemed to be relevant to the proposed project, as noted in Response 1151.

Comment 1153: Does the Planning Department agree with the conclusions reached in the study referenced in Exhibit 61? If not, why not?

Response 1153: Refer to Response 1152.

Comment 1154: A report entitled "Approaching an Integrated Solid Waste Management System for Los Angeles County, California" (Gershman, Grickner & Bratton Sept. 13, 1996) ("GBB Report") concluded that "Los Angeles County can effectively meet and exceed its AB 939 requirements without opening new landfills" by "diverting solid waste away from landfills through source reduction, recycling, and composting." See Exh. 62. The EIR is deficient because it does not disclose the existence of this report in its discussion of project alternatives.

Response 1154: The Draft SEIR, Section 5.0, Alternatives, described a wide-range of "reasonable" alternatives to the proposed City/County Landfill pursuant to the requirements of CEQA.

The GBB report was independently reviewed, verified, and refuted by the County DPW, Environmental Programs Division in its Responses to Comments on the Countywide Siting Element, Volume II-Appendix 1-D (June 1997). In regard to the GBB Report, the County stated in part:

> The report claims to demonstrate that there will not be a shortfall in landfill capacity in Los Angeles County through the year 2023 with the adoption of its recommendations. **The report has reached this conclusion through a series of assumptions that do not consider existing laws and regulations, economic impacts, or existing programs in place at various landfills in Los Angeles County to maximize use of remaining disposal capacity** [emphasis added]. These assumptions include 70 percent diversion rates, bans on Class III landfill disposal of certain materials such as biosolids and inert waste, limiting the use of Orange County's available import capacity exclusively to waste by jurisdictions in Los Angeles County, elimination of wasteshed/jurisdictional boundaries, ignoring land use permit restrictions, etc.

Moreover, the County has been critical of the assumptions and policy impact of the GBB report and prepared detailed responses to address the following issues in the GBB report:

Issue 1 - Los Angeles County Solid Waste Management Action Plan
Issue 2 - The Preliminary Draft Countywide Siting Element's waste generation projections
Issue 3 - AFIRM's waste generation projections
Issue 4 - The AFIRM disposal capacity shortfall analyses and methodology
Issue 5 - 70 percent versus 50 percent diversion rates
Issue 6 - The need and legality of in-County disposal capacity
Issue 7 - Import/export of solid waste
Issue 8 - Inert material and biosolids ban
Issue 9 - The use of foam as daily cover
Issue 10 - Implementation of biostabilization
Issue 11 - The purpose of the Integrated Waste Management Plan and the Countywide Siting Element

Comment 1155: Was the Planning Department aware of the GBB report at the time that the EIR was released? If not, why not?

Response 1155: City Planning staff are aware of this report. Refer to Response 1154 for a discussion of the County DPW analysis of the GBB report.

Comment 1156: Does the Planning Department agree with the conclusions set forth in the GBB report? If not, why not?

Response 1156: No. The City concurs with the findings of the County with respect to the GBB Report.

Comment 1157: The alternatives section of the EIR is also defective because it does not discuss the extent to which landfill capacity could be preserved by the diversion of inert wastes. Specifically, public works officials in other jurisdictions are recently reported to have predicted a diversion rate of 20 percent by disposing of inert wastes in separate landfills. See, for example, Exh. 63. Page V-18 of the GBB Report demonstrates that there is ample inert waste capacity within Los Angeles County.

Response 1157: It should be noted that the referenced article has been misquoted, which states:

> We should be able to divert 20 percent or 60 to 80 tons of trash daily from the regular landfill to here, where it's more suitable, Lilly said.

As noted, this reference **does not** [emphasis added] imply that public works officials in other jurisdictions recently reported to have predicted a diversion rate of 20 percent by disposing of inert wastes in separate landfills.

The Draft SEIR, Section 5.0, Alternatives, describes a wide range of "reasonable" alternatives to the proposed City/County Landfill. The diversion of inert wastes was described in the Draft SEIR, Section 2.10.3, Unloading Waste Materials at the Landfill Working Face, p. 2-74, which stated the following:

> At the green waste/wood waste dropoff area, customers would be asked to remove all bag(s) of green waste/wood waste materials and place them in appropriate disposal containers. Collected materials would be stored in various 40-cu.-yd. drop boxes. Collecting and recycling inert/demolition materials would utilize a similar process. Inert materials would be stockpiled and used onsite for cover material (i.e., clean dirt) or road base material (i.e., rock) for the haul road or maintenance corridors.

As indicated in the *Los Angeles County Countywide Siting Element, Volume I, The Element* (June 1997), p. 4-18:

> . . . The trend toward recycling of construction and demolition waste has and will continue to result in substantial reductions in quantities of inert waste in need of landfill disposal.

Higher tipping fees at Class III landfills compared to tipping fees at unclassified landfills have and will continue to reduce/eliminate disposal of inert waste at Class III landfills.

Based on the study conducted as part of the preparation of the County's CSE, the remaining permitted combined unclassified landfill capacity as of January 1, 1996, is estimated at approximately 53.1 million tons (35.4 million cubic yards). Table 4-3 lists permitted unclassified landfills in Los Angeles County existing in 1995, and the quantities and rates of inert waste disposed at these facilities in 1995. At the 1995 average rate of disposal of 1,770 tons per day (six days/week) at permitted unclassified landfills, this capacity would be mathematically exhausted in approximately 96 years. Additionally, in 1996 the Nu-Way Live Oak Landfill became permitted, further increasing the permitted capacity available for disposal of inert waste. As such, it is believed (as it was believed in 1990), that Los Angeles County currently has adequate permitted unclassified landfill disposal capacity, and that no inert waste capacity crisis currently exists. Based on the foregoing, the CSE's projected disposal capacity need for each year of the 15-year planning period exclude the need for unclassified landfills.

The project proponent accepts relatively small volumes of inert wastes at the operational County Landfill. These materials are reused onsite for temporary roads. To date, the project proponent has not commercially hauled dirt to the operational County Landfill.

Comment 1158: Was the Planning Department aware at the time the EIR was released about the potential for preserving MSW landfill capacity by mandating the diversion of inert waste? If not, why not?

Response 1158: Yes. Refer to Response 1157.

Comment 1159: Does Planning and/or Zoning Staff agree that MSW landfill capacity could be preserved by mandating the diversion of construction waste? If not, why not?

Response 1159: The City agrees with the commenter. As such, the City has adopted aggressive Citywide recycling programs that are designed to divert this type of waste source from Class III landfills in accordance with the requirements of A.B. 939. Refer to Response 1157 for a discussion of inert waste recycling and unclassified landfill disposal capacity (e.g., for inert waste disposal) in Los Angeles County.

Comment 1160: Under the California Environmental Quality Act ("CEQA"), the EIR must consider both primary and secondary consequences in determining whether the project may have a significant impact on the environment. Primary and direct consequences are those immediately related to the project, such as dust resulting from project construction or operations. Secondary or indirect consequences may be "several steps removed from the project in the chain of cause and effect." See CEQA Guidelines § 15064.

Response 1160: In accordance with CEQA, the Draft SEIR addressed those topical issues that have the potential to cause an effect on the environment either directly, indirectly, or cumulatively (in combination with existing and other foreseeable related projects) as a result of project development.

Comment 1161: The United States Environmental Protection Agency ("EPA") has determined that air pollutant emissions from Municipal Solid Waste landfills pose a risk to human health and the environment.

Response 1161: This comment is noted.

Comment 1162: Landfill emissions of Volatile Organic Compounds and Nitrous oxide exacerbate violations of the ambient standard for ozone; the formation of ozone in the breathable atmosphere has a broad spectrum of adverse health consequences and also causes harm to plant life.

Response 1162: Refer to Responses 767 and 772 for a discussion of ozone.

Comment 1163: Emissions of methane contribute to global warming under the greenhouse theory.

Response 1163: Methane and carbon dioxide (CO_2) in LFG are greenhouse gases. LFG is collected and combusted within the flare. Residual gases could incrementally add to global warming. However, this effect would occur whether the refuse is disposed of at the project site or at other landfills throughout the world.

Comment 1164: Emissions of substances such as vinyl chloride and benzene pose a risk of cancer and other disease.

Response 1164: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates. Refer to Response 316 for a discussion of the potential for the proposed City/County Landfill to cause acute or chronic health risks to residents in the community of Granada Hills.

Comment 1165: Unlike most sources of industrial air emissions which are periodic and which can be controlled or eliminated, landfill emissions occur continuously and cannot be adjusted. Even when control devices are operating correctly, approximately 2 percent or more of collected gasses (including significant portions of the more hazardous non-methane organic compounds) pass through the control device without being destroyed. See, for example, Exh. 37 at p. 8.

Response 1165: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates. Refer to Response 316 for a discussion of the potential for the proposed City/County Landfill to cause acute or chronic health risks to residents in the community of Granada Hills.

Comment 1166: Does the Planning Department agree that adverse impacts on human health result from landfill operations constitute at least a secondary impact within the meaning of CEQA? If not, why not?

Response 1166: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates. Refer to Response 316 for a discussion of the potential for the proposed City/County Landfill to cause acute or chronic health risks to residents in the community of Granada Hills.

Comment 1167: The EIR is also deficient because by indicating at page 4-92 that "uncollected" landfill gas consists primarily of methane, it diverts attention from the fact that in absolute (as opposed to relative) terms, landfills nationwide are reported to emit approximately 255,000 metric tons of highly toxic nonmethane organic compounds each year. See Exh. 65 (San Francisco Chronicle 1991).

Response 1167: National emissions of nonmethane organic compounds (NMOC) are not an impact associated with the proposed project. Exhibit 65, which is provided by the commenter, is dated 1991. This exhibit refers to the USEPA proposal to require gas collection and disposal for major landfills located throughout the United States. It should be noted that the SCAQMD had a program in place well before it was considered at the federal level. The proposed project's generation of NMOC emissions is much less than the federal average per unit ton landfilled because the LFG collection system has been installed and NMOC generation rates in Southern California's dry climate are much slower than in wetter portions of the country.

Comment 1168: The EIR is also deficient because it does not reveal the fact that technology exists to neutralize the odors that emanate from landfills. See Exh. 66.

Response 1168: The injection of air into a composting system as noted in Exhibit 66 does indeed maintain low-odor aerobic conditions instead of high-odor anaerobic conditions. The referenced system in this exhibit is being used on a pilot-plant composting station without gas recovery. However, injection of air into a landfill with an operating LFG collection and flaring system would create a potential fire hazard.

Comment 1169: Was the Planning Department aware of the existence of this technology at the time the EIR was released? If not, why not?

Response 1169: Yes. Refer to Response 1168.

Comment 1170: The particulate matter (PM-10) that landfills also generate has severe health consequences. The adverse affects of landfills on public health have been documented. Support for the statements made in this paragraph are found in publications such as: US EPA, "Air Emissions from Municipal Solid Waste Landfills--Background Information for Proposed Standards and Guidelines" p. 2-1 through 2-33 (1991) (Exh. 67 (excerpt)); David H. Minott, "Landfill Environmental Emissions--Regulatory Progress and Gaps" (1994) (Exh. 68); Donald L. Gill, "Landfill Gas Emissions: A Study of Two Landfills

in Prince George's County, Maryland" (1995) (Exh. 64); Kay H. Jones, "Comparing Air Emissions From Landfills and WTE Plants," Solid Waste Technologies (March/April 1994) at p. 30 (Exh. 69); D.W. Dockery and C.A. Pope III, "Acute Respiratory Effects of Particulate Air Pollution," 15 Ann. Rev. Pub. Health 107 (1994) (Exh. 70).

Response 1170: Refer to Response 254 for a discussion of the inhalation of particulate matter and potential health implications.

Comment 1171: Was the Planning Department aware of the facts set forth in the articles attached as Exhibits 64 through 70? If not, why not?

Response 1171: City Planning staff are aware of the findings in Exhibits 64 through 70.

Comment 1172: Does the Planning Department agree with the conclusions expressed in the articles attached as Exhibits 64 through 70? If not, why not?

Response 1172: The conclusions expressed in the referenced exhibits do not specifically relate to the proposed project. These studies were conducted in other environments, on other locations, with different climatic conditions and in areas with less-stringent regulatory requirements for landfill emissions. Refer to Response 254 for a discussion of the inhalation of particulate matter and potential health implications.

Comment 1173: The EIR is deficient because it minimizes and fails to adequately analyze these secondary environmental consequences.

Response 1173: Refer to Response 254 for a discussion of the inhalation of particulate matter and potential health implications.

Comment 1174: The EIR is also deficient because it fails to provide emissions estimates for the entire life of the landfill,

Response 1174: Refer to Response 68 for a discussion of the environmental determination within the Draft SEIR, stating that the proposed project would create an unavoidably significant adverse impact on air quality, for construction and operational emissions.

Comment 1175: and fail to disclose the extent to which the landfill flares or incinerators will generate a visible plume, or contribute to haze, or have other visibility impacts.

Response 1175: Haze and diminished visibility are regional effects relative to the SCAB that will be incrementally affected by project implementation. A visible vapor plume from the flare already exists at the project site; project implementation may slightly increase plume dimension in response to greater volumes of LFG flared.

Comment 1176: The EIR is also deficient because the analysis of dioxin emissions is inadequate, and the mitigation analysis for NO_x and CO is inadequate.

Response 1176: Dioxin emissions from LFG combustion are at levels below the detection limit of conventional laboratory instrumentation. Exhibit 69, which is provided by the commenter, notes that, "dioxin emissions data from controlled landfills in the United States is nonexistent." A discussion by City Planning staff of dioxin in the absence of any relevant data would be speculative. Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates. Refer to Response 316 for a discussion of the potential for the proposed City/County Landfill to cause acute or chronic health risks to residents in the community of Granada Hills.

Comment 1177: As a preferable alternative to flares/incineration, the landfill could use energy recovery technology, such as reciprocating engine or gas turbine with zeolite catalysts installed to reduce NO_x emissions. See Exhs. 71 & 72.

Response 1177: Power generation from landfills requires LFG pretreatment, a large capital investment, and extensive regulatory involvement. The NO_x emissions from IC engines and gas turbines are two to three times more than the NO_x emissions from the flares proposed for this project. In addition, the constituents in the exhaust streams of these units sometimes poison the catalysts that may be used on the IC engines or gas turbines. It is for these reasons, and the fact that these facilities are uneconomical unless tax credits are available, that make their operations infeasible at many landfill sites. Refer to Response 217 for a discussion of the potential for a future gas-to-energy system at the project site.

Comment 1178: Was the Planning Department aware of the existence of this technology at the time the EIR was released? If not, why not?

Response 1178: City Planning staff are aware of the existence of this technology. Refer to Response 1177.

Comment 1179: Does the Planning Department agree that the technology described in Power Magazine is superior to landfill gas flaring/incineration? If not, why not?

Response 1179: Refer to Response 1177 regarding the feasibility of landfill energy recovery technology.

Comment 1180: Does the Planning and/or Zoning Departments agree that in view of the health impacts described above, (1) any mitigation should include enforcement by the City of Los Angeles of the zoning condition regarding a health study and require BFI to fund a study, to be supervised by a major university and/or an independent agency of the federal government prior to construction, . . .

Response 1180: The City Planning Department does not agree with the commenter. The Draft SEIR adequately addresses potential impacts associated with potential health risks at the proposed City/County Landfill project site. Refer to Responses 183 and 184 for discussions pertaining to human health surveys.

The Draft SEIR, Section 4.9, Risk of Upset, pp. 4-314 through 4-317, discussed the issue of potential human health risks. The Draft SEIR indicated that the health risk assessment prepared for the prior FEIR demonstrated that potential environmental impacts on human health would be less than significant, based on established threshold criteria of regulatory agencies.

In addition, the results of the low-level air quality health risk assessment prepared for the proposed project (see Draft SEIR, Section 4.2, Air Quality, pp. 4-74 through 4-76) and specific discussions with epidemiological professionals indicate that the proposed project would not create risks to human health if the proposed landfill is operated, monitored, and maintained in accordance with applicable regulatory requirements of the SCAQMD, LARWQCB, and City LEA; therefore, additional health studies are not necessary.

Comment 1181: . . . to assess the health impacts of landfills that have already been sited (including closed landfills) and other undesirable land uses on the residents of the impacted area, and. . .

Response 1181: Refer to Response 1180. It is not known what landfills are being referenced by the commenter. Refer to Responses 183 and 184 for a discussion of human health surveys.

Comment 1182: (2) BFI should be required to fund ongoing health surveys in the area on a periodic basis throughout the life of the landfill and the closure period.

Response 1182: The comment is noted. Refer to Responses 183 and 184 for discussions pertaining to human health surveys.

Comment 1183: Page 4-316 of the SEIR states that an epidemiological study would not be warranted because area residents are "concern[ed]" about "health issues." If this were a valid consideration in determining whether to conduct a health study of a facility such as a landfill, because as shown above most people who live near a landfill are legitimately concerned about health issues. But in fact, health studies have been designed and conducted regarding the health effects of municipal solid waste landfills. See, for example, Exh. 73 (Archives of Environmental Health 1995); see also Exh. 74 (NIEHS Press Release 1997 (describing health study of residents living near landfill that accepted both household and hazardous waste).

Response 1183: The findings of these exhibits focus on landfills located in Canada and New Jersey, which have different landfill operations, climatic conditions, and LFG generation rates. In addition, atmospheric dispersion conditions at these landfills cannot be generalized to the project site. Epidemiological studies have been conducted at Southern California landfills (e.g., BKK Landfill), and when other co-factors were eliminated, neither cancer clusters nor low birth weights were recorded.

Refer to Response 316 for a discussion of the relationship between the proposed project and potential human health risks. The Draft SEIR, Section 9.5, Human Health, pp. 4-

315 and 4-316, states the following with respect to human health issues raised during the precirculation period:

> . . . City staff conducted these meetings to discuss human health issues relative to the proposed project. Based on the review of existing information and the advice of these leading authorities, City staff concluded that an epidemiological study or a human health survey was not warranted for the proposed project.
>
> . . . Results of the low-level air quality health risk assessment, prepared for the proposed project (refer to Section 4.2, Air Quality), and discussions with epidemiological professionals such as Dr. Papanek and Dr. Mack indicate that the proposed project would not create risks to human health if the proposed facility is operated and monitored in accordance with regulatory requirements of various public agencies (i.e., SCAQMD, LARWQCB, City of Los Angeles, etc.).

Meeting minutes and correspondence between the City and these epidemiological professionals are included in the project's administrative record, which is available for review at the Department of City Planning.

Comment 1184: Does the Planning Department agree that people who live near landfills have legitimate concerns about health issues? If not, why not?

Response 1184: Refer to Response 1183.

Comment 1185: Was the Planning Department aware, at the time the EIR was released, that health studies have been conducted of persons living near landfills accepting municipal solid waste? If not, why not?

Response 1185: The existence of health studies of individuals living near landfills accepting municipal solid waste is known by City Planning staff. It should be noted that the findings of the majority of these studies indicate that no statistically significant health effects due to landfill proximity can be detected. The USC study of the cancer distribution around the now closed BKK Landfill in West Covina (a former Class I Landfill that accepted hazardous waste) concluded that there was minimal evidence that this landfill created any potentially significant health impacts.

Comment 1186: Does the Planning Department agree that, in view of the essential similarity of the constituents of the leachate from a municipal solid waste landfill and the leachate from a hazardous waste landfill (see Exh. 98), a health study of residents living near a municipal solid waste landfill will be as valid as a health study of persons living near a hazardous waste landfill? If not, why not?

Response 1186: After reviewing Exhibit 98, City Planning staff have determined that a health risk study pertaining to leachate considerations would not be expected to provide any significant new information or change the already stated findings provided in the Draft SEIR.

Comment 1187: The EIR also fails to consider the cumulative impact of the polluting effects of the landfill. For example, the Northeast San Fernando Valley are already burdened with a large number of undesirable land uses, including landfills.

Response 1187: Cumulative impacts associated with the proposed project and 33 related projects (including the now operational County Landfill and the potential Elsmere Canyon and Towsley Canyon Landfills) were analyzed in the Draft SEIR. The related projects list was approved by the LADOT and City Planning prior to its use in the Draft SEIR.

In addition, the Draft SEIR comprehensively addresses 19 separate topical subjects (see Draft SEIR, Sections 4.1 through 4.19). The cumulative effects described in the Draft SEIR address specific changes to the existing environment that would result from the proposed City/County Landfill in addition to those effects that would result from recently constructed, planned, or reasonably foreseeable future projects located within a 5-mile radius of the project site.

Comment 1188: Examples of landfills and other undesirable land uses are believed to exist in the impacted area at this time, or sufficiently near to the impacted area to cause adverse health effects to the community: Bradley Landfill (East), Bradley Landfill (West), Lopez Canyon Landfill, Strathern Landfill, Valley Reclamation Landfill, CalMat Landfill, Community Recycling (aka DeGarmo St. Dump), Sheldon/Arleta Landfill (closed), Skyview Terrace Landfill (closed), Elsmere Canyon Landfill (proposed), and Chiquita Canyon Landfill. See also Exh. 75. Many of these landfills have a record of causing health problems. See "Has Landfill at Lopez Canyon Had Its Fill?", Los Angeles Times (Feb. 17, 1995) (statement of administrator of residence facility for senior citizens) (Exh. 76).

Response 1188: The majority of the facilities noted are located at least 10 miles from the project site.

The commenter has misrepresented the article entitled, "Has Landfill at Lopez Canyon Had Its Fill?" The referenced article refers to suggestions by the City Bureau of Sanitation to the City Council to consider operating the Lopez Canyon Landfill through the year 2000 instead of adopting an alternative method of trash disposal because Lopez Canyon Landfill was scheduled to close in early 1996 (and actually did close in July 1996). Proponents of the extension claimed that the City would save about $75 million because the facility was claimed to be one of the best-operated landfills in the State, and remaining disposal capacity at the landfill would have allowed for continued operations for at least another 5 years.

Comment 1189: Government officials are on record as stating that it was a mistake to cluster so many garbage dumps near the area to be impacted by this landfill. See "The Enemy Below L.A.", Los Angeles Daily News (statement of Regional Water Quality Control Board administrator that "with today's knowledge . . . you wouldn't have seen that many landfills in that area.") (Exh. 77).

Response 1189: The referenced exhibit by the commenter refers to currently inactive landfill facilities located in the North Hollywood-Sun Valley area, which is over 10 miles from the

project site. As indicated, most of these landfills reached disposal capacity and closed in the 1970s, and these facilities were developed as a result of sand mining areas that were eventually filled with refuse.

In addition, and as stated in Exhibit 77:

> The regulations were nothing near as stringent as they are today, said John L. Lewis, the water quality board's enforcement officer. Plus, there was little or no enforcement of the regulations at that time.

Comment 1190: The siting of this landfill in this impacted area, near a community that is heavily populated by members of minority groups, is inconsistent with the principles of environmental justice.

Response 1190: The proposed project is not located in the North Hollywood-Sun Valley area as indicated by the commenter, and the ethnic composition of the project site area relative to the North Hollywood-Sun Valley is different. In regard to ethnic composition, refer to the Draft SEIR, Appendix C7, p. C7-2, which states in part:

> In general, the majority of the ethnic composition within the Granada Hills-Knollwood Community Planning area can be classified as non-Hispanic White. This ethnic distribution is further defined as 72.2 percent non-Hispanic White, 11.8 percent Hispanic, 2.3 percent Black, and 13.7 percent Asian/other based on 1990 Census information. The population within the Granada Hills-Knollwood community is comprised of 56,352 residents (or 1.6 percent of the City's total population of 3.5 million residents).[46] This compares with a Citywide population distribution of 37.3 percent non-Hispanic White, 39.9 percent Hispanic, 13.0 percent Black, and 10.3 percent Asian/other.[47]

As indicated in this Draft SEIR, the ethnic composition within the Granada Hills-Knollwood Community Planning area is 72.2 percent non-Hispanic White, as compared with the Citywide population distribution of 37.3 percent non-Hispanic White.

In addition, the specific issue of impacts on minorities and low-income communities, relative to environmental justice, was addressed in the Draft SEIR, Appendix C7. Also, Executive Orders (12898 and 12948), signed by President Clinton, were included in their entirety in the Draft SEIR, along with an analysis of these Executive Orders in relation to the proposed project. As indicated in the Draft SEIR, p. C7-3:

> Implementation of the proposed City/County Landfill Project is not expected to result in any disproportionate adverse burden of incompatible or undesirable

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[46]/ *Granada Hills-Knollwood District Plan Revision Final EIR*, Final Volume 1, City of Los Angeles Department of City Planning, p. 2.9-1. November 1994.

[47]/ Ibid., p. 2.9-2.

land uses on minorities and/or low-income populations in the area(s) of the project site.

Comment 1191: Were the Planning and/or Zoning Departments aware of the reported statement by the Water Quality Control Board administrator at the time the EIR was released? If not, why not?

Response 1191: City staff are now aware of Exhibit 77 and agree with the LARWQCB official statement, which indicates that regulations at past operating landfills are not nearly as stringent as they are today for existing and proposed landfills.

Comment 1192: Does the Planning and/or Zoning Department agree that the Northeast San Fernando Valley has been forced the assume the burden of a disproportionate share of landfills in relation to the rest of the City of Los Angeles? If not, why not?

Response 1192: Currently, the Bradley West Landfill, located in the community of Sun Valley, is the only major solid waste landfill operating within the City of Los Angeles. The anticipated closure date for this landfill is in the year 2000. Refer to Responses 1187 through 1189.

Comment 1193: The courts are holding that the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. Section 9601 ("CERCLA"), imposes liability on local governments that arrange for the disposal of municipal solid waste in landfills.

Response 1193: This comment is noted.

Comment 1194: Examples of such decisions are B.F. Goodrich Co. v. Murtha, 958 F.2d 1192 (2d Cir. 1992)(Exh. 78) and Transportation Leasing Co. v. State of California, 861 F. Supp. 931 (C.D. Cal. 1993)(Exh 79). The Murtha case recognizes that even if it is assumed that municipal solid waste contains a low concentration of hazardous substances (p. 1197), a municipality may be subject to CERCLA liability if "that waste contains a hazardous substance, found in <u>any amount</u>" at a landfill (p. 1206 (emphasis added)). The Transportation Leasing case held that Los Angeles County could be subject to CERCLA liability for arranging for the disposal of residential waste in a landfill later found to contain toxic substances (p. 947-48). The existence of toxic substances in municipal landfills occurs because municipal solid waste either (1) contains hazardous waste, or (2) decomposes and transforms into hazardous waste when deposited in a landfill. See, for example, Debra R. Reinhart, "A Review Of Recent Studies On The Sources Of Hazardous Compounds Emitted From Solid Waste Landfills," 11 Waste Management & Research (July 1993) at p. 257 (Exh. 80); Steven Ferrey, The Toxic Time Bomb: Municipal Liability for the Cleanup of Hazardous Waste, 57 George Washington Law Review 197, 200-10 (1988) (Exh. 81).

Response 1194: This comment is noted.

Comment 1195: Dr. Kirk W. Brown, of Texas A&M University has concluded that the waste streams disposed of in municipal landfills contain hazardous wastes; his methodology has been determined to be admissible in a federal court case. See Exh. 82 (excerpt).

Response 1195: Refer to Response 1248 for a discussion of the potential for household hazardous waste disposal at the proposed City/County Landfill.

Comment 1196: The EIR is deficient because it does not reveal or analyze the information set forth in Exhibits 75 through 82.

Response 1196: The Draft SEIR addressed the relevant information that has been provided by the commenter with respect to Exhibits 75 through 82. Specifically, waste sources that would be disposed of at the landfill were described, the collection of wastes was identified, the implementation of a comprehensive load checking program by the project proponent was provided, actions that would be taken if hazardous waste is detected at the project were identified, and the monitoring and enforcement actions were described. Collectively, these issues were addressed in the Draft SEIR.

Comment 1197: Was the Planning Department aware of the conclusions set forth in Exhs. 75 through 82 at the time the EIR was released? If not, why not?

Response 1197: City Planning staff are aware of the information presented in Exhibits 75 through 82.

Comment 1198: Does the Planning Department agree with the facts and conclusions set forth in Exhibits 75 through 82? If not, why not?

Response 1198: City Planning staff do not agree with the facts and conclusions in Exhibits 75 through 82. Refer to Response 1196 regarding the relevancy of this information.

Comment 1199: The courts are also holding that the adverse impacts from landfill operations are a "basis for inverse condemnation." See "Expansion of Dump is a Taking By County," California Environmental Insider (July 13, 1995) at p. 9 (Exh. 83).

Response 1199: Although it is beyond the scope of this document to analyze the legal issues raised in this comment, it should be noted that the case discussed in the referenced 1995 article was decided by a Superior Court judge in San Diego; thus, it has no precedential weight relative to the requested entitlements from the City or County of Los Angeles. Refer to Response 180 for a discussion of the proposed project's potential effects on property values.

Comment 1200: Was the Planning Department aware of the City's exposure to liability as a result of using municipal landfills to dispose of waste? If not, why not?

Response 1200: Refer to Response 1193.

Comment 1201: Instead of exposing the City (and its citizens) to economically catastrophic landfill liability, the officials of this City should be using alternative methods for the disposal of discarded materials. The economic and environmental feasibility of these alternatives has been demonstrated. See, for example, Victor Dricks, "Community Profits From Its Waste," Phoenix Gazette (Aug. 29, 1994) (Exh. 84); Richard Gilbert, "Finances of Incineration and Landfill Facilities" (1995) (Exh. 85); Southern California Edison, "Edison Advanced Integrated Recycling (AIR) Project Description (1993) (Exh. 86).

Response 1201: Refer to Response 169 for a discussion of alternative waste management technologies and strategies. In addition, refer to Response 936 for a discussion of solid waste transformation technologies (e.g., waste-to-energy, composting) as potential alternatives to the proposed project.

Comment 1202: The EIR is deficient because it does not reveal or analyze the information set forth in available materials such as those included in Exhibits 83 through 86.

Response 1202: Refer to Response 169 for a discussion of alternative waste management technologies and strategies. In addition, refer to Response 936 for a discussion of solid waste transformation technologies (e.g., waste-to-energy, composting) as potential alternatives to the proposed project.

Comment 1203: Was the Planning Department aware of the facts and conclusions appearing in Exhibits 83 through 86? If not, why not?

Response 1203: City Planning staff are aware of the conclusions reached in these exhibits. The conclusions reached in these exhibits are not directly relevant to the proposed project.

Comment 1204: Does the Planning Department agree with the facts and conclusions set forth in Exhibits 83 through 86. If not, why not? se or similar articles at the time the EIR was released? If not, why not?

Response 1204: Refer to Response 1203.

Comment 1205: Does Planning and/or Zoning Staff agree with the conclusions set forth in these articles? If not, why not?

Response 1205: Refer to Response 1203.

Comment 1206: The EIR does not adequately reflect that the proposed landfill is itself a "source" which must obtain an NSR permit and that the proposed landfill gas collection and flare system merely represents the air pollution control equipment proposed by the applicant to control its landfill gas emissions. This comment is based on the relevant provisions of the Clean Air Act ("CAA") and implementing EPA regulations and guidance, which the SCAQMD is responsible for implementing in Los Angeles County pursuant to CAA § 173 and the California State Implementation Plan.

Response 1206: The SCAQMD has incorporated by reference the New Source Performance Standards promulgated by the Federal Clean Air Act §111 into Regulation IX-New Source Performance Standards and has incorporated the provisions of 40 CFR Part WWW into its rule for Control of Gaseous Emissions from Municipal Solid Waste Landfills (Rule 1150.1). These regulations incorporated the federal rules from 40 CFR Part 60, Subpart WWW, and are the only ambient air rules covering the operation of municipal solid waste landfills in the SCAB.

The SCAQMD issues permits for equipment that emits or controls air pollutants. Therefore, landfills do not receive an NSR permit under SCAQMD rules. The gas collection system and existing flare station in the City are already permitted, and the flare is emitting lower levels of emissions than currently allowed under its existing Permit to Operate from the SCAQMD. No additional NSR permitting requirements are required at this time.

Comment 1207: Specifically, as buried waste decomposes in the landfill, landfill gas will be generated and emitted to the atmosphere. Landfill gas consists of methane, carbon dioxide and various reactive organic compounds. As such, landfill gas (and each of its constituents) is an "air pollutant" as that term is defined by CAA Section 302(g), 42 U.S.C. § 7202(g)("air pollutant" is "any air pollution agent or combination of such agents, including any physical, chemical . . . substance or matter which is emitted into or otherwise enters the ambient air").

Response 1207: The requirement to construct LFG collection systems and disposal facilities is stated within SCAQMD Rule 1150.1, which is specifically designed to control air pollutants from municipal solid waste landfills. The generated LFG is collected and disposed of through the flare system.

Comment 1208: Because it will emit air pollutants, the landfill is a "stationary source" for CAA purposes. See CAA § 302(z), 42 U.S.C. § 7602(z)("'stationary source'" is "generally any source of an air pollutant except those emissions resulting from an internal combustion engine for transportation purposes or from a nonroad engine or nonroad vehicle . . ."); CAA § 111(a)(3), 42 U.S.C. § 7411(a)(3) (" 'stationary source' means any building, structure, facility, or installation which emits or may emit air pollutant"); 56 Fed. Reg. 24468, 24475 (May 30, 1991) (the "facility" is the "entire landfill," which is "the total landfill property designated for solid waste disposal . . .").

Response 1208: The proposed landfill is not considered a stationary source that requires an air pollution permit under SCAQMD rules and regulations. The USEPA has reviewed permits issued for equipment at landfills in the SCAQMD and has not taken the position that the landfill itself must be permitted. These definitions cited do not trigger any regulatory requirements not already implied in the SCAQMD Rules 1150.1, 401, 402, 403, and other applicable rules and regulations.

Comment 1209: The discussion of the applicable air quality rules should make it clear that preconstruction review of the landfill's air emissions must occur before the landfill is constructed, rather than at the time the applicant chooses to install its proposed air

pollution control equipment. An attorney who advises the waste industry is reported to have stated that under the Clean Air Act:

> In building a new landfill, managers must figure out the site's potential to emit certain pollutants. "It's not what you actually emit, . . . You have to calculate your worst case scenario.

See Exh. 87.

Response 1209: Refer to Response 97 for a discussion of data that have been changed in the Draft SEIR air quality assessment to reflect the maximum permitted emissions from five flares.

Comment 1210: The air quality section of the EIR is deficient because it is based on actual emissions, rather than the worst case scenario required under the Clean Air Act.

Response 1210: Refer to Response 97 for a discussion of data that have been changed in the Draft SEIR air quality assessment to reflect the maximum permitted emissions from five flares.

Comment 1211: Does Planning and/or Zoning Staff agree that BFI should have made worst case scenario calculations? If not, why not?

Response 1211: Refer to Response 97 for a discussion of data that have been changed in the Draft SEIR air quality assessment to reflect the maximum permitted emissions from five flares.

Comment 1212: The information provided in the EIR regarding the efficiency of the landfill gas collection system is inadequate.

Response 1212: Refer to Response 97 for a discussion of data that have been changed in the Draft SEIR air quality assessment to reflect the maximum permitted emissions from five flares.

Comment 1213: The relevant EPA guidance on landfill gas emissions and NSR requires that an applicant assume that its gas collection system will be "designed to maximize, to the greatest extent possible, the capture of landfill gas from the landfill". See Exhs. 88 (copy of the EPA guidance memorandum); 89 (copy of article from Waste Age discussing the implications of the EPA guidance memorandum).

Response 1213: Compliance with SCAQMD Rule 1150.1 includes USEPA's guidance on LFG collection efficiency. Refer to Response 1214.

Comment 1214: The current benchmark for the maximum collection efficiency for gas collection systems at new landfills is 90 to 100%. A collection efficiency of over 90% was recently proposed for the Campo Landfill in San Diego County. Exh. 90 (excerpt). Further support for a 90-100% efficiency is found in a recent BFI application submitted by BFI in Pennsylvania. See Exh. 91.

Response 1214: The USEPA New Source Performance Standard for Municipal Solid Waste Landfills 60 CFR, Part WWW, does not contain requirements for collection efficiency based on

percentage of gas collected. Rather, the USEPA like the SCAQMD, considers a properly sized and operated gas collection system to be capable of maintaining surface emissions at less than 500 ppm. The existing gas collection system at the project site meets this requirement. In addition, the gas collection system for the proposed City/County Landfill will also meet this requirement. Refer to Response 97 for a discussion of data that have been changed in the Draft SEIR air quality assessment to reflect the maximum permitted emissions from five flares.

Comment 1215: Was the Planning Department aware of of the possible efficiency levels of landfill gas collection systems? If not, why not?

Response 1215: Yes. Refer to Response 1214.

Comment 1216: Will the Planning Department require BFI to explain why it proposed 90-100% efficiency at its Pennsylvania facility, but will not do so at Sunshine Canyon? If not, why not? A 90 to 100 percent efficiency should be required as part of the LAER determination.

Response 1216: Refer to Response 1214.

Comment 1217: Various emissions calculations and ambient air quality modeling analyses will have to be adjusted to reflect this higher collection efficiency.

Response 1217: Refer to Response 1214.

Comment 1218: Because the higher collection efficiency will result in increased NO_x emissions, even more offsets will be required from the Priority Reserve or elsewhere, if the landfill is to be permitted.

Response 1218: Emissions are anticipated to remain within current SCAQMD-permitted levels; therefore, the Priority Reserve as mentioned by the commenter would not be used.

Comment 1219: But the EIR does not adequately address whether the SCAQMD has sufficient emission reduction credits in its Priority Reserve to offset the emissions generated by the Sunshine Canyon landfill, let alone other landfill projects currently pending in the SCAQMD which will be making claims on the priority reserve in the same time frame.

Response 1219: Refer to Response 1218.

Comment 1220: Does the Planning Department agree with the conclusions set forth in this paragraph? If not, why not?

Response 1220: City Planning staff agree that the proposed project would not be used to offset emission credits in the Priority Reserve.

Comment 1221: The estimates for fugitive dust are well below comparable projections made for the smaller Chiquita Canyon landfill.

Response 1221: This comment is noted.

Comment 1222: Specifically, at 10,000 tpd, Chiquita Canyon Landfill is estimated to have onsite fugitive PM_{10} emissions of 638.9 pounds per day (Final EIR, Chiquita Canyon Landfill Table 4.G-8 at p. IV-85).

Response 1222: This comment is noted.

Comment 1223: By contrast, operations at Sunshine Canyon--where wind conditions are more severe--are assumed to produce no more than 102.5 pounds per day (Sunshine Canyon EIR Table 4.2.8).

Response 1223: Refer to Response 63 for a discussion of the use of 1995 AP-42 emission factors to calculate fugitive dust emissions.

Comment 1224: The EIR is deficient because it does not provide a full explanation for this discrepancy.

Response 1224: Refer to Response 63 for a discussion of the use of 1995 AP-42 emission factors to calculate fugitive dust emissions.

Comment 1225: Will the Planning Department require BFI to explain the reasons for this discrepancy? If not, why not?

Response 1225: Refer to Response 63 for a discussion of the use of 1995 AP-42 emission factors to calculate fugitive dust emissions.

Comment 1226: Because the landfill is located in a non-attainment area, the amount of carbon monoxide emissions from the landfill expansion will result in a major modification to a stationary source, requiring use of Best Available Control Technology.

Response 1226: The only permitted source of CO emissions is from the flare stations. All flares will be permitted, operated, and maintained in accordance with SCAQMD rules and regulations, which require BACT.

Comment 1227: The EIR should therefore evaluate a carbon monoxide catalyst as a control technology.

Response 1227: LFG flares are considered BACT for LFG disposal when operated within required permit conditions (e.g., burner temperature, retention time, excess air, etc.). Catalytic oxidation has not been demonstrated to be BACT when reliability, maintenance, durability, cost, and other operating factors are considered in making a BACT finding. The use of catalytic oxidation to remove CO from LFG exhaust is not a reasonable and feasible control technology at this time.

Comment 1228: It has been reported that fuel cell technology is available that would convert landfill gas into less harmful compounds, remove its odor causing components, avoid the need for flaring, and produce electricity. Exh. 91.5.

Response 1228: As noted in the Draft SEIR, when the landfill produces sufficient LFG of a quality suitable for commercial use, options for gas-to-energy conversion will be explored by the project proponent.

In addition, fuel cells require a very "clean" input fuel stream void of the impurities found in "raw" LFG. In order to use LFG in fuel cells, it would first require extensive preconditioning. When the costs of a pretreatment plant, fuel cell acquisition and maintenance, electrical generation gear, transformers, and power lines are considered, this technology would not be cost competitive with other electrical generation resources. With a deregulated electricity market, the most expensive generating options would be the least purchased resource. If the regulatory climate changes, electrical generating options to replace waste gas flare combustion will be considered. For an additional discussion of the potential for a future gas-to-energy system at the project site, refer to Response 217.

Comment 1229: The EIR is deficient because it does not reveal the existence of this control technology.

Response 1229: Refer to Response 1228.

Comment 1230: Were the Planning and/or Zoning Departments aware of the existence of this technology at the time that the EIR was release? If not, why not?

Response 1230: Yes. Refer to Response 1228.

Comment 1231: Will the Planning Department require BFI to explain why it has failed to consider the use of this technology? If not, why not?

Response 1231: Refer to Response 1228.

Comment 1232: The EIR does not contain an adequate analysis for mitigation measures for pollution sources other than vehicles.

Response 1232: The statement by the commenter is inaccurate. This information was included in the Draft SEIR, Section 4.2.13, Odor Impacts, Mitigation Measures, pp. 4-94 through 4-96. In addition, refer to Appendix D2, Revisions to Draft SEIR, Section 4.2, Air Quality, within this document.

Comment 1233: At a minimum, the EIR should analyze selective or non-selective catalyst reduction technology.

Response 1233: While selective catalytic reduction is not specified in the Draft SEIR, other types of engine modifications are provided. The CARB indicates that catalytic reduction for diesels can lower both ROG and the soluble organic fraction portion of particulates.

Because the project proponent would only install these devices on certain pieces of onsite heavy equipment, only a small fraction of the total emissions would be reduced. The application of this type of reduction technology would meet with only very limited success and would not reduce the overall impact of emissions generated by the proposed project.

Comment 1234: In addition, a bag house should be required to reduce PM_{10} emissions.

Response 1234: The greatest source of PM_{10} emissions would be from the onsite soil movement from heavy equipment and vehicular travel. There is no feasible method to collect these types of emission sources in a baghouse. The PM_{10} emissions associated with the flare stations would not be substantially reduced if they were run through a baghouse and would not reduce the overall impact of emissions generated by the proposed project.

Comment 1235: The EIR is also deficient because it does not adequately analyze the regulatory and health implications of the emission of benzene from the landfill.

Response 1235: The regulatory and health effects associated with benzene exposure are included in the health risk assessment prepared for the proposed project. Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates. In addition, refer to Response 316 for a discussion of the potential for the proposed City/County Landfill to cause acute or chronic health risks to residents in the community of Granada Hills.

Comment 1236: The EIR is also deficient because it fails to recognize the federal requirements for the developments of "best available control measures" to reduce the amount of fugitive dust and corresponding PM_{10} emissions from a variety of sources in the district. Exh. 92; 42 U.S.C. § 7513(b)(1).

Response 1236: Refer to Topical Issue 3 for a listing of proposed fugitive dust control mitigation measures. This list includes all mitigation measures that are reasonable and feasible for this landfill project. Many of the mitigation measures go beyond those provided in the *SCAQMD CEQA Air Quality Handbook.* SCAQMD Rule 403 was amended in February 1997 to control emissions of fugitive dust. In addition, refer to Response 245 for a discussion of SCAB exceedance of State and federal ambient air quality standards. In addition, if a project is located within the SCAB and the project results in emissions in excess of a CEQA significance level, the project has not violated State or federal law.

Comment 1237: Does the Planning Department agree with the conclusions set forth in this paragraph? If not, why not.

Response 1237: Refer to Response 1236. City Planning staff believe that the recommended mitigation measures are reasonable and feasible for the proposed City/County Landfill.

Comment 1238: Specifically, does the Planning Department agree that the authorities cited above require BFI to use best available control methods to control PM_{10} emissions? If not, why not?

Response 1238: BFI will use all mitigation measures that are reasonable and feasible for the proposed project to control PM_{10} emissions. The recommended mitigation measures provided in the Draft SEIR are reasonable and feasible and exceed measures provided in the *SCAQMD CEQA Air Quality Handbook.*

Comment 1239: According to Los Angeles County Traffic/Access guidelines, traffic count data should not be over 1-1/2 years old. Exh. 93 Wolfe Letter 1995. Does Planning and/or Zoning Staff agree that the traffic analysis criteria set forth in Exhibit 93 are valid? If not, why not?

Response 1239: The traffic study is based on existing 1992/1993 traffic count data. At the time the Traffic Impact Study was prepared (1995), traffic volumes adjacent to the project site were much lower than the prior 1992/1993 traffic count data. Given the decrease in volumes from 1992 to 1995, the LADOT agreed for the traffic engineers to use the prior 1992/1993 traffic counts as the baseline data for the traffic impact analysis (e.g., worst case).

The LADOT is satisfied with the Traffic Impact Study and the proposed conceptual mitigation measures being proposed. The LADOT has not required that new traffic counts be collected or that a new traffic study be prepared. The findings of the traffic study would not significantly change (i.e., increase) if a new traffic study was prepared. Rather, because several large-scale projects such as the potential Towsley and Elsmere Canyon Landfill could be dropped from consideration, cumulative traffic impacts would in fact be lessened.

Comment 1240: The EIR states that BFI may use alternative daily cover on the landfill. Does the Planning Department agree that under current law, alternative daily cover may include green waste? If not, why not?

Response 1240: Refer to Response 195 for a discussion of the potential environmental impacts associated with the use of alternative daily cover (ADC) materials at the proposed City/County Landfill.

Comment 1241: There is evidence that the use of green organics for ADC will increase the organic fraction of landfills, increase the production of landfill gas, . . .

Response 1241: In regard to the exhibit provided by the commenter, the author is referring to the use of green organic material being composted prior to use as ADCMs and then the instability of this type of material for ADCMs. Specific to the project site, composting is not being considered as part of the proposed project. The information included in this exhibit has little relevancy to the proposed City/County Landfill project.

Comment 1242: . . . increase the migration of landfill gas, and promote landfill fires; for this and other reasons twenty-three states have banned green waste from landfills. Exh. 94.

Response 1242: Refer to Response 1241.

Comment 1243: The City Manager of Glendale, Arizona is reported to have stated that that city wants to encourage the diversion of green waste from landfills because that will result in a reduction in landfill gas production. Exh. 95.

Response 1243: Refer to Response 1241.

Comment 1244: A spokesperson for the operator of the waste collection system for Villa Park, California is reported to have stated that depositing green waste into landfills would "produc[e] methane gas, which adds to the global warming." Exh. 96; see also Exh. 97.

Response 1244: The individual referenced in Exhibit 97 is the director of corporate communications for Taormina Industries located in Anaheim, California. After reviewing this exhibit, City Planning staff have assumed that this individual is not a leading authority on the issue of global warming.

Comment 1245: The EIR is deficient because it does not reveal the harmful effects of using green waste as daily cover.

Response 1245: Refer to Responses 1240 and 1241.

Comment 1246: Was the Planning Department aware at the time of the release of the EIR of the reported harmful environmental effects of using green waste as daily cover? If not, why not?

Response 1246: Refer to Responses 1240 and 1241.

Comment 1247: Does the Planning Department agree with the points made regarding green waste in Exhibits 92 through 97? If not, why not?

Response 1247: The exhibits are not relevant to the proposed project in regard to the application of ADCMs.

Comment 1248: The EIR is deficient because it does not reveal that, according to an article in the Journal of Environmental Health, surveys have been conducted which indicated that even where cities have programs to encourage residents to remove household hazardous waste ("HHW") from the municipal waste stream significant, "quantities of HHW are being improperly disposed of." Exh. 98 (Journal of Environmental Health 1997).

Response 1248: In reference to household hazardous materials, mitigation measures are provided in the Draft SEIR, Section 4.9.1, Hazardous Materials, 4-297. These measures, once implemented by the project proponent, would mitigate potential impacts associated with the inadvertent acceptance of hazardous materials at the proposed City/County Landfill to a level of less than significant.

In addition, the Draft SEIR, Section 4.9.1, Hazardous Materials, pp. 4-289 through 4-290, states the following:

> The Resource Conservation and Recovery Act (RCRA) was enacted in 1976 as an amendment to the Solid Waste Disposal Act. The primary objectives of RCRA are to protect human health and the environment and to conserve valuable material and energy resources. The most important aspect of RCRA is its establishment of "cradle-to-grave" management and tracking of hazardous waste from generator to transporter to treatment, storage, and disposal.
>
> According to RCRA, a substance is hazardous if it demonstrates one of the following characteristics: (1) ignitability/flammability - produces fire under certain conditions, (2) corrosivity - eats away materials and can destroy living tissue or steel surfaces by chemical reaction, (3) reactivity - creates an explosion or violent chemical reaction that may produce deadly vapors or excessive heat, or (4) toxicity - capable of producing injury, illness, or damage to humans, domestic animals, or wildlife through ingestion, inhalation, or absorption through any body surface.[48] The acceptance of hazardous, radioactive, or infectious medical wastes at solid waste landfills has the potential to result in serious injury/illness to facility workers through inhalation or dermal exposure or cause significant impacts on surface and groundwaters associated with spills. Hazardous waste load-checking programs and radiation-detecting devices are the primary methods for ensuring that hazardous wastes are not disposed of in solid waste landfills.
>
> Household hazardous waste (HHW) means any hazardous waste generated incidental to owning or maintaining a place of residence. HHW does not include any waste generated in the course of operating a business concern at a residence. Although HHWs are generated in much smaller quantities at their source than commercial or industrial hazardous wastes (e.g., hand-held containers/cans versus 55-gallon drums) and contain significantly less risk overall (e.g., concentrations of chemicals in HHW are ordinarily far less ignitable/flammable, corrosive, reactive, or toxic than commercial and industrial hazardous wastes), these materials still create concerns for environmental regulatory agencies and landfill operators.

As stated in Section 4.9.1, Hazardous Materials, p. 4-290, of the Draft SEIR:

> HHW includes materials such as paints, stains, thinners, varnishes, glues, lighter fluid, kerosene, rug/upholstery cleaners, pesticides (house and garden), herbicides (garden), bleaches, drain looseners, aerosol cans, pool acid, oven cleaners, toilet bowl cleaners, auto/furniture polish, latex and oil-based paint, used motor oil, used oil filters, antifreeze, and car and household batteries.

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[48]/ *Los Angeles County Household Hazardous Waste Element*, Los Angeles County, Department of Public Works, Waste Management Division, p. 1. August 1993.

> **These materials can be improperly disposed of in the residential solid waste stream by an uninformed public** [emphasis added].

A.B. 939 requires that all cities and counties in California prepare a Household Hazardous Waste Element (HHWE) and reduce the amount of HHW generated by each jurisdiction. The City and County have prepared HHWEs to reduce the amount of HHW sent to landfills through such programs as 1-day collection events, mobile collection units, public information, and education.

In addition, as stated within Section 4.9.1, Hazardous Materials, p. 4-294, of the Draft SEIR:

> It is expected that **small volumes** [emphasis added] of HHWs would remain undetected and be disposed of at the proposed landfill. These wastes are generally inadvertently mixed in with residential solid wastes by residential customers. However, it should be noted that approximately 46 percent of all refuse entering the project site would be delivered via transfer trucks. These transfer trucks would haul residual (i.e., nonrecyclable) waste materials from transfer stations/materials recovery facilities (MRFs). All transfer stations/ MRFs have existing load-checking programs in-place. At these facilities, HHW, if found, is manually sorted and picked out of the waste stream and disposed of properly. In some cases, this material can be recycled.

For those HHWs that are landfilled, environmental protection and control systems (e.g., landfill liner, leachate collection and removal, and leachate treatment) would reduce this potential risk-of-upset impact to a less than significant level.

Comment 1249: Was the Planning Department aware of the existence of these surveys at the time the EIR was released? If not, why not?

Response 1249: City Planning staff are aware of HHW surveys. Refer to Response 1248.

Comment 1250: According to the same article, the California Air Resources Board concluded that "the overall composition of landfill gases from hazardous and non-hazardous sites appear to be similar," and that "non-hazardous landfills may contain concentrations of toxic gases equal to or exceeding those of hazardous landfills."

Response 1250: The existence of CARB findings is well known and used as reference material by City Planning staff. The conclusion is somewhat misleading because the CARB report also states:

> We did not observe consistent data pattern from hazardous waste sites from which we could draw firm conclusions and compare with non-hazardous waste sites.

Comment 1251: Was the Planning Department aware of the existence of the Air Resources Board's findings at the time the EIR was released? If not, why not?

Response 1251: City staff are aware of CARB reports. Refer to Response 1250.

Comment 1252: Does the Planning Department agree with the Air Resource's Board's findings and conclusions with respect to this issue? If not, why not?

Response 1252: The CARB findings were inclusive as stated in Response 1250. However, City staff agree with the validity of the study.

Comment 1253: According to the same article (Exh. 98), "[r]ecent data indicate that volatile organic compounds commonly found in landfill leachate can rapidly migrate through synthetic liners . . ."

Response 1253: Refer to Response 602 for a discussion of the potential for VOCs to pass through an HDPE geomembrane liner. In addition, refer to this same response for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources.

Comment 1254: Was the Planning Department aware of the existence of this recent data at the time the EIR was released? If not, why not?

Response 1254: City staff are aware of this information. Refer to Response 602 for a discussion of the potential for VOCs to pass through an HDPE geomembrane liner. In addition, refer to this same response for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources.

Comment 1255: Does the Planning Department agree that there is recent data showing that VOC's can migrate through synthetic liners? If not, why not?

Response 1255: Refer to Response 602 for a discussion of the potential for VOCs to pass through an HDPE geomembrane liner. In addition, refer to this same response for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources. In addition, refer to Response 974 for a discussion of the long-term viability of HDPE as a containment material.

Comment 1256: The EIR is deficient because it does not discuss the additional mitigation measures that are needed to deal with the problems discussed in this paragraph.

Response 1256: Refer to Response 602 for a discussion of the potential for VOCs to pass through an HDPE geomembrane liner. In addition, refer to this same response for a discussion of barriers and systems that prohibit leachate from impacting groundwater resources.

Comment 1257: Page 2-86 of the EIR states that the landfill will be "operational 16 hours per day," Monday through Saturday. Page 1-60 of the EIR states that "landfill operations shall be limited to the hours of 6:00 p.m. to 6:00 p.m.," Monday through Friday, and 7:00

a.m. to 2:00 p.m. on Saturday. A distinction should be made between landfilling operations and the acceptance of waste.

Response 1257: Refer to the Draft SEIR, Table 2.12-1, Operational Hours, p. 2-89, which includes the operational hours of all areas of the landfill. The distinction of landfilling versus the acceptance of waste is included in Section 2.12, Proposed Hours of Operation.

Comment 1258: At the very least, it should be made clear that waste will not be accepted at the landfill 16 hours per day.

Response 1258: Waste would only be accepted during the hours of operation identified in the Draft SEIR, Table 2.12-1, Operational Hours.

Comment 1259: The EIR states that the locations of transfer stations "ha[ve] not been identified" (p. 1-14), but also states that transfer trucks will constitute most of the traffic to the landfill site. BFI should be required to identify the transfer stations that will be used.

Response 1259: The page being referenced by the commenter refers to alternatives to the proposed project. However, BFI has identified MRFs and transfer stations that would support the proposed project. That information is identified in the Draft SEIR, Section 4.13, Transportation and Circulation. In addition, the locations of the transfer stations and MRFs were identified in the Draft SEIR, Section 2.9, Waste Types Accepted at the Proposed City/County Landfill Facility, p. 2-72:

> The primary form of refuse transport (i.e., vehicle) to the project site would be transfer trucks from existing transfer stations/MRFs that are either owned, operated, or leased by the project proponent. These facilities (i.e., BFI/ Advance Recycling and Transfer Station, Central Los Angeles Recycling and Transfer Station, Falcon Refuse Center) are located in the Los Angeles region. In addition to that traffic flow, wastes would be transported by municipal and private refuse-hauling vehicles collecting solid waste from various incorporated jurisdictions and unincorporated communities.

Comment 1260: If trucks smaller than transfer trucks will in fact constitute most of the traffic to the landfill site, the only reasonable conclusion to be drawn is that there will be more truck traffic, and BFI should be required to submit new traffic estimates based on the increased truck traffic.

Response 1260: City Planning and the LADOT have determined that the Draft SEIR adequately analyzed the project and cumulative project traffic impacts associated with the proposed project.

As indicated in the Draft SEIR, Section 4.13, Transportation and Circulation, Table 4.13-4, p. 4-347, the proposed project is anticipated to generate a total of 1,180 trip ends (TEs) (one-half arriving and one-half departing) on a daily basis, with 1,110 of the TEs being truck trips (i.e., transfer trucks and collection vehicles). The project is further anticipated to generate 129 trips during the a.m. peak hour and 150 trips during the p.m.

peak hour. This forecast is based on the maximum daily intake tonnage of 5,500 tpd. This projection represents the "worst-case" analysis for the City portion of Sunshine Canyon. In addition, the number of PCEs generated by the project was presented in Table 4.13-4, and based on PCE factors, the project is forecasted to generate a total PCE of 2,260 TEs, with 245 PCE trips generated during the a.m. peak hour and 285 PCE trips generated during the p.m. peak hour.

Also, as indicated in the Draft SEIR, the scope and methodology for the traffic study were developed by LADOT and City Planning staff in coordination with consulting traffic engineers. Caltrans was also formally consulted regarding the scope of the proposed traffic study prior to its preparation by consulting traffic engineers.

City Planning and LADOT staff have reviewed, commented on, and authorized the completion of this traffic study prior to its inclusion in the Draft SEIR. Both City Planning and the LADOT have determined that a new traffic study is not warranted.

Comment 1261: Why was the EIR sent directly to homeowner organizations located several miles from the landfill, but not sent directly to (1) the North Valley Coalition, (2) the Community Advisory Committee for the County Portion of the Sunshine Canyon Landfill?

Response 1261: The Draft SEIR was distributed to 62 homeowner associations, improvement associations, and local cities by the City. In addition, 14 libraries received copies of the Draft SEIR, and three of those libraries are located in the immediate area of the project site. The Notice of Completion and Availability (NOCA) for the Draft SEIR was sent to 184 homeowner associations, local cities, and other interested parties by City Planning staff.

Since the North Valley Coalition is not a recognized homeowner or improvement association in the City, it is not included on the City's existing mailing list for environmental documents. However, several members of the NVC received a NOCA because of their attendance at the proposed project's scoping meeting or because the NOCA was sent to over 8,855 owners/residents located within a 2½-mile radius of the project site. Public noticing for the proposed project was published in *The Signal*, *Saugus Enterprise*, *Los Angeles Daily News*, and *Los Angeles Times* as part of the City's notification process.

Comment 1262: Why did Planning Staff refuse to honor requests from representatives of the North Valley Coalition and the Community Advisory Committee for copies of the EIR?

Response 1262: City Planning staff have not refused requests of the NVC pertaining to this project. Copies of the Draft SEIR were provided by City Planning staff at public depository for public use or through the direct purchase of the Draft SEIR. Like other members of the general public, members of the NVC may have decided not to purchase a copy of the Draft SEIR.

Comment 1263: Why wasn't the EIR made available in an electronic format?

Response 1263: City Planning staff do not have the financial resources to generally provide environmental documents online.

Comment 1264: Was the Planning Department aware that the time the EIR was released that environmental impact reports are now being made available electronically (see Exh. 99)? If not, why not?

Response 1264: City Planning staff are aware of a limited number of EIRs that are available to the public online.

Comment 1265: Does the Planning Department agree that the policy of encouraging community responses to environmental impact reports is disserved by limiting the distribution of copies of the reports, or by refusing legitimate requests for copies of the documents? If not, why not?

Response 1265: To ensure adequate noticing and availability for the Draft SEIR, the dissemination of that document goes beyond CEQA statutory requirements and the City's EIR Preparation Manual guidelines and procedures.

Comment 1266: Does the Planning Department agree that making the EIR electronically available would facilitate greater community participation in the EIR review process? If not, why not?

Response 1266: City Planning staff agree with the commenter. Unfortunately, due to City Planning fiscal constraints, an electronic format for general use is unavailable at this time.

Comment 1267: Does Planning and/or Zoning Staff agree that BFI received numerous extensions from the City of Los Angeles during the process of preparing the EIR? If not, why not?

Response 1267: Project extensions were filed by the project proponent and agreed upon by City Planning staff because of ongoing litigation between the City and County over the approved County Landfill. Project extensions were noted in the Draft SEIR, Section 1.6.5, CEQA Time Extensions, p. 1-10:

> Several CEQA time extensions on the Draft SEIR have been granted by the City due to outstanding litigation in connection with the approval of the FEIR by the Board. Granted extensions are listed in Appendix A15. Refer to Appendix C3 for an overview of the litigation proceedings in connection with the County Landfill.

In addition, each requested CEQA extension, its date, and other relevant information were provided in the Draft SEIR, Appendix A15. The proposed project's administrative record also contains numerous references to meetings held between the City and the environmental consultant that detail the discussions pertaining to the ongoing litigation filed on the County Landfill.

Comment 1268: Does Planning and/or Zoning Staff agree that BFI continued to receive such extensions even after litigation relating to the expansion of the County portion of the landfill was resolved? If not, why not?

Response 1268: City Planning staff have been actively involved in the preparation and processing of the Draft SEIR since 1991 including periods during and after County Landfill litigation was resolved between the City and County. Since 1991, three databases on the proposed project have been prepared, extensively reviewed, and critiqued by City staff prior to the Draft SEIR being disseminated for public review. It should be noted that the time period undertaken by City Planning staff and other City departments to prepare the Draft SEIR and consult with responsible agencies is not uncommon due to the complexity of the proposed project.

Comment 1269: If Planning and/or Zoning Staff agrees that BFI received several such extensions, why did it refuse the 90 day extension requested by Councilmember Hal Bernson, as discussed in the letter from Mary Edwards to Con Howe attached as Exhibit 100 (a response to Exhibit 100, if not already provided, is again requested).

Response 1269: The issues referenced by the commenter pertain to two separate processes. One item refers to the extensions of time authorized by City Planning staff under its adopted CEQA Guidelines for the completion of drafts that included the ongoing participation of various City departments while the other refers to a request for extending the public review period for the completed Draft SEIR beyond the statutory requirements of CEQA. In regard to time extensions for document preparation, refer to Response 1267.

With respect to the public review period, in July 1997, the Governor's Office of Planning and Research (OPR) acknowledged receipt of the City's Notice of Completion (NOC) for the Draft SEIR. OPR's receipt commenced a 90-day public review period on the Draft SEIR. The review period was supposed to conclude on October 31, 1997; however, because of Councilman Bernson's request, the review period was extended by City Planning staff until December 5, 1997. Therefore, the public was afforded 132 days to review the Draft SEIR.

In regard to review periods on an EIR, State CEQA Guidelines, §15205(d), state that the normal review period is 45 days for EIRs submitted to the OPR. However, review periods may be longer than 90 days only in unusual circumstances (State CEQA Guidelines, §15097[c]). City Planning staff determined that an adequate review period had been afforded the public.

Comment 1270: According to a draft letter on Planning Department letterhead dated December 20, 1995 and prepared for Ms. Shigeta's signature, and obtained through a request for public records, as of 1995 ERS staff was concerned that a data base submitted by BFI on June 19, 1995 created a false sense of urgency which avoided a careful analysis of alternatives to the Sunshine Canyon Landfill. In that, the data base was inclined to advocate for the proposed project by stating that all other alternatives had greater impacts than the proposed landfill.

Response 1270: After the referenced letter was released, meetings were held with City Planning staff and the environmental consultant, resulting in a determination by City Planning staff that the information relating to project alternatives had been incorrectly stated by the City's EIR project coordinator. Due to this project's complexity, the City subsequently assigned senior-level City planning personnel to the proposed project.

Comment 1271: Exh. 101. Please set forth in detail the facts which caused the ERS staff to conclude that BFI's database created a false sense of urgency,

Response 1271: Refer to Response 1270 in regard to City Planning staff's conclusion on the databases prepared for the proposed project.

Comment 1272: . . . identify any corrections or revisions made to the data base which resulted in a conclusion that the data base no longer created a false sense of urgency, . . .

Response 1272: Refer to Response 1270. Working databases are internal working documents that are initially prepared by the environmental consultant and subsequently refined by City Planning staff prior to the dissemination of the Draft SEIR to the public for review and comment. These three databases are part of the proposed project's administrative record and can be reviewed by the public.

Comment 1273: . . . and identify all persons involved in the decision to conclude that the data base no longer created a false sense of urgency.

Response 1273: Refer to Response 1270. All persons involved with preparation of the Draft SEIR are listed in the Draft SEIR, Section 9.0, SEIR Preparers and Contributors.

Comment 1274: **Zone Plans And Policies**
For many of us who attended hearings and provided comments to the Granada Hills-Knollwood District plan, the current proposal to remove hundreds of acres of land designated as "open space" and to redesignate it as "heavy industrial" seems to be in direct conflict with the goal that we helped draft as a guide for the development of our community.

Response 1274: Prior to filing project applications for the proposed City/County Landfill, the project proponent was informed by the City Zoning Administrator that, for the landfill being proposed, the consideration of a GPA/ZC for the entire ±494 acre project site within City jurisdiction would be preferable to the variance process that had entitled the prior operational City Landfill. The City did not propose the GPA/ZC; it simply determined that such an entitlement process would be superior to the previous zone variance.

The City's Granada Hills-Knollwood Community Plan designates the project site as "Open Space." Development of the project would require a GPA to "Heavy Industrial" to maintain consistency with existing and proposed uses as well as the proposed ZC. The proposed ZC would change the existing zoning designation from A1-1-O (Agricultural, Height District 1, Oil Drilling District Overlay designation) to M3-1-O (Heavy Industrial, Height District 1, Oil Drilling District Overlay designation) pursuant

to the City Planning and Zoning Code (PZC) §11.5.8 and §12.32. The requested ZC would also authorize the development, operation, and maintenance of proposed uses in the City.

Under the City's PZC, §12.20.37(I), the M3 zone permits landfilling uses. As further defined under that section, "None of those uses which may be obnoxious or offensive by reason of emission of odor, dust, smoke, gas, noise, vibration and the like . . . shall be located nearer than 500 feet to a more restricted zone." In this regard, although the property would be adjacent to the more restrictive zoning designations of A1, OS, PF, and RMP the landfill footprint would be located more than 500 feet from these zones. (Refer to Section 2.0, Revisions and/or Additions to Draft SEIR.) The proposed landfill footprint would be approximately 1,700 feet from the nearest residential unit within the Granada Hills area. In addition, the ±100 acre open-space area is located south of the perimeter ridgeline, between the proposed uses (i.e., landfill and ancillary facilities) and the residential areas in Granada Hills.

Implementation of the ZC would remedy existing zoning inconsistencies that relate to the inactive landfill's closure and postclosure maintenance requirements. The corresponding ZC to M3 will include restrictive conditions (i.e., qualified classification ["Q"]) and would reflect the proposed and existing uses onsite. In addition, with the Q classification provisions may be adopted by the City so that the subject property would not be used for all uses ordinarily permitted in that particular zone classification, or the development of the site would conform to certain specified standards if such limitations are deemed necessary by the City to secure appropriate development consistent with the objectives of the City's General Plan.

It should also be noted that throughout the Community Plan Amendment process for the Granada Hills-Knollwood Community Plan, BFI extensively participated and commented (e.g., comments on the Draft EIR and FEIR, correspondence to the Planning Commission, verbal testimony before the Hearing Officer and Planning Commission, and meetings with City Planning Staff-Valley District, Neighborhood Planning Division) on the proposed Community Plan land use designation and corresponding zoning designation for the property. Participation by BFI included the following:

June 11, 1993	Correspondence from Rob Katherman (consultant to BFI) to Frank Fielding, City of Los Angeles Neighborhood Planning Division - RE: Sunshine Canyon Landfill. This letter presented a formal request by BFI to redesignate its property within the City portion of Sunshine Canyon to Heavy Industrial use as part of the City's process of amending the Granada Hills-Knollwood District Plan.
July 13, 1993	Correspondence from Dean Wise, District Manager of BFI to Frank Fielding, City of Los Angeles Neighborhood Planning Division - RE: Sunshine Canyon Landfill.

This letter requested that all property owned by BFI within the City portion of Sunshine Canyon be designated for Heavy Industrial use as part of the City's process of amending the Granada Hills-Knollwood District Plan.

September 30, 1993 — A meeting was held with City Planning Neighborhood Planning Valley Office staff to discuss the Granada Hills-Knollwood District Plan. Relevant issues included (1) an overview of the proposed project and revisions to the Granada Hills-Knollwood District Plan, (2) discussions of how BFI's request to City Planning for rezoning and changes to the present land use designation for the project site would affect the Plan, (3) incorporation of the proposed Sunshine Canyon Landfill project as a viable alternative, (4) the Plan's inconsistency with adopted City and County Solid Waste Management Plans, and (5) the Plan's inconsistency with distinguishing between public facilities and open space land use designations.

May 25, 1994 — Letter from Linda J. Bozung, Atty. (counsel to BFI) to Con Howe, Director of Planning for the City of Los Angeles - RE: Granada Hills-Knollwood Community Plan - CPC No. 23571 GPA; CF 85-1234; EIR No. 94041027. This letter was also presented as public testimony and described below.

May 25, 1994 — Testimony presented by Linda J. Bozung, Atty., at the Granada Hills-Knollwood Community Plan public hearing requesting that the Sunshine Canyon Landfill site be amended to a "Heavy Industrial" general plan designation. Ms. Bozung stated that Planning staff's preliminary recommendation of "Open Space" was inconsistent with the use of the property for the next 30 years. Also, the Draft EIR ignored that the landfill is an industrial use. Los Angeles County had approved the landfill adjacent to the City; however, the Draft EIR incorrectly identified the area as undeveloped. BFI planned to submit a ZC and GPA to the City to use the property within the City boundary for heavy industrial use.

Ms. Bozung also stated that there were three CEQA violations regarding the project site (owned by BFI) with respect to the revised Community Plan. The Draft EIR for the Community Plan did not examine the existing use of the site, the use that is approved, and the proposed use.

June 27, 1994 — Letter from E. William Hutton, Regional Counsel, BFI to Los Angeles City Planning Department - RE: Comments on the

City of Los Angeles Granada Hills-Knollwood District Plan Revision Draft EIR (April 1994).

This letter responded to the City's Granada Hills-Knollwood District Plan Revision Draft EIR. This letter addressed several key issues and specifically addressed the objection to the redesignation of BFI's project site to an open space land use designation.

December 8, 1994

Letter from John C. Funk, Esq. (counsel to BFI) to the Honorable City Planning Commission - RE: Granada Hills-Knollwood Community Plan Revision; City Plan Case No. 94-0356 CPR (ZC); December 8 Agenda Item No. 9.

This letter indicated that the proposed Plan, the Plan EIR, and the related staff report do not provide either adequate factual information or sufficient planning justification for this proposed change in land use for Sunshine Canyon. The letter provided information discussing the unique circumstances of BFI's property that warrant retaining the current land use designation for landfill-related activities currently occurring on the subject property, landfill closure and postclosure activities mandated to occur on the property in the future, previous City actions and planning decisions regarding the property, County approval of a landfill on the abutting property owned by BFI in the County portion of Sunshine Canyon, and a pending application for City approval of a GPA/ZC for future landfilling on the subject property.

December 8, 1994

Testimony by John C. Funk, Esq., before the Planning Commission regarding the Sunshine Canyon Landfill project site and the proposed revision to the Granada Hills-Knollwood Community Plan.

January 12, 1995

Memorandum from John C. Funk, Esq., to R. Nicholas Brown and Madhu Kumar, City of Los Angeles - RE: Post-Closure Restrictions on Landfill Property Land Uses.

The purpose of this memorandum was to respond to the City staff's request to provide additional support for the positions expressed in Mr. Funk's December 8, 1994, letter, which opposed an "Open Space" designation for Sunshine Canyon and that during the closure/postclosure period of a landfill, most land uses other than landfill-related activities would be prohibited.

The memorandum summarized the basic State and federal statutes and regulations that control the closure and postclosure activities on landfill property, as well as the administrative restrictions and liabilities typically imposed upon the property owner relative to closure and postclosure requirements.

June 24, 1995 — Letter from John C. Funk, Esq., to George Lefcoe, President of the City Planning Commission - RE: General Plan Framework Element.

The purpose of this letter was to request the commission to correct several of the Framework Element EIR maps, which contained designations that were inconsistent and incorrect regarding the Sunshine Canyon Landfill area.

As a result of the BFI's participation in the community plan process, a footnote was added to the Granada Hills-Knollwood Community Plan Land Use map that referenced the historical operation of the City Landfill and its pending closure. However, the mandated 30-year closure and postclosure maintenance of the inactive City Landfill or the operating County Landfill adjacent to proposed project was not referenced. Both of these uses are not compatible or consistent with the existing Open Space land use designation approved by the City in regard to the Granada Hills-Knollwood Community Plan.

Comment 1275: One of the adopted objectives of the plan was "to encourage open space for recreation uses and to promote the preservation of views, natural character and topography of mountainous parts of the district for the enjoyment of both local residents and persons throughout the Los Angeles region."

This resolve is repeated again as a stated objective "To encourage open space for recreation uses, and to promote the preservation of views, natural character and topography of mountainous parts of the District . . ."

Response 1275: The objective (Objective 10) mentioned by the commenter is from the Granada Hills-Knollwood Community Plan. This objective is discussed in the Draft SEIR, Section 4.7, Land Use, pp. 4-236 through 4-244. Specific to that objective, designated open space areas in the Granada Hills-Knollwood CPA are considered for wildlife refuge or preservation areas. Both the inactive landfill and other industrial uses, such as the Aliso Canyon Oil Fields and The Gas Company site, are located in open space designations. These uses collectively comprise over ±900 acres (or 9.3 percent of the total land area in the Community Planning Area [CPA]). These parcels are privately owned and support various industrial operations. Additionally, public uses within designated open space areas include the MWD Joseph Jensen Filtration Plan, DWP Los Angeles Aqueduct, and the Sylmar Converter Station. Development of the proposed project would be consistent with this objective. As stated in the Draft SEIR, Section 4.7, Land Use, p. 4-244:

Landfill activities would avoid development along the perimeter ridgelines of the project site. The natural character and topography of those landforms would be preserved. Along the southern perimeter of the project site, a ±100 acre open space buffer area is provided and enhanced with vegetation as a result of onsite revegetation programs.

In addition, the current industrial uses associated with the operational County Landfill and mandated closure and postclosure maintenance for the inactive City Landfill would reduce the value of the project site as desirable open space. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR.

Comment 1276: In the Policy Statements we find the "conservation of open space" as a stated goal.

Response 1276: Refer to Response 1275.

Comment 1277: We feel that the proposed landfill, that will remove hundreds of acres of open space from the Community Plan, is in direct conflict with the goals and policies of that plan, and a betrayal of the efforts of the community that prepared it.

Response 1277: As stated in Response 1275, existing uses on and adjacent to the project site would not be considered desirable open space in the near future. The ±100 acre open-space area would remain undeveloped, except for uses necessary for landfill operation. In addition, ±426 acres have been dedicated as permanent open space within East Canyon, and the project proponent is in the process of dedicating ±480 acres in upper Bee Canyon as a result of County Landfill approval.

Comment 1278: **Buffer Zone**

The Granada Hills-Knollwood Plan calls for the "separation of incompatible uses and more particularly residential from industrial."

Response 1278: The proposed landfill footprint would be approximately 1,700 feet from the nearest residential home in the Granada Hills area. This distance (⅓ mile) is separated by the ±100 acre open-space area and the intervening perimeter ridgeline that provides permanent open space between the proposed uses and existing residential areas in Granada Hills. The separation of these areas will ensure that zoning compatibility with the surrounding residential property is afforded.

The so-called "buffer zone" referred to in the comment is a 100-acre open space area located directly south of the existing perimeter ridgeline and the existing inactive City Landfill. This area was set aside in the early 1980s by the project proponent and serves as an onsite mitigation area. A small portion of this area supports leased oil wells and ancillary facilities. Within the open-space area, a voluntary tree-planting program was initiated by the project proponent, and today a wide diversity of native and nonnative trees is established. Currently, over 11,000 trees have been planted, including over 1,000 coast live oak trees.

Moreover, it should also be noted that several industrial uses, such as the MWD Joseph Jensen Filtration Plant, DWP Balboa Distribution station, and warehouses, are located in closer proximity to existing residential uses in Granada Hills than the project site. Some of these uses are directly across the street from residential uses. In addition, an M1 zone is located adjacent to the A1 zone and lies directly north of the I-5 Freeway and San Fernando Road. Within this area, several industrial buildings have been built.

Comment 1279: A covenant agreement, executed 17 February 1958 under Civil Code section 1468, precludes the owner from using or permitting the buffer zone to be used "for or in connection with said cut and fill dumping operations or for any noxious or dangerous trade or business."

Response 1279: The covenant agreement referenced by the commenter is between Sunshine Canyon Inc. (owners) of the Valley Land Development Corporation (lessee) of Lot 9 of Tract 10422, Mr. and Mrs. O'Melveny (owners) of Lot 8 of Tract 10422, and Saint Vincent de Paul Society of Los Angeles (owners) of portions of the southeast quarter of Section 25 and the northeast quarter of Section 36 in Township 3. This agreement was executed before BFI purchased the Sunshine Canyon Landfill site in 1978.

The agreement also notes that landfilling would occur within Lot 9, along with drilling or the production of oil or gas or other hydrocarbon substances. These uses would not be injurious to the other properties owned by either the O'Melvenys or the Saint Vincent de Paul Society.

In 1958, the property owners (noted above) along with Bob Hope and James Cagney, owned the majority of property in and around the Sunshine Canyon area and residential uses in this area were not developed. This information is documented in the correspondence dated June 17, 1957, by John O'Melveny, which states:

> The ranch is comprised of around 1,000 acres, if measures as a flat property, but it is, of course, quite hilly, and there is probably twice as much grazing land on it. We raise cattle and grapefruit on it at the present time, but its real value is an possible residential property in the future.

The existing inactive City Landfill operation in 1958 consisted of 45 acres granted to the North Valley Land Development Company on the subject property, under ZA Case No. 14544 in March 1958, for a 10-year period. Extant Case No. ZA 17804, granted in April 1966, superceded the earlier case for an expanded 300-acre site. The 1966 variance expired in 1991.

Comment 1280: This would preclude the uses that are allowed in the M-3 zone. The applicant is now requesting a change of zone.

Response 1280: Refer to Response 1274 for a discussion of uses in the M3 zone. The corresponding ZC to M3 would include respective conditions (i.e., qualified classification [Q]) that would reflect proposed and existing uses onsite. The Q classification provisions would be adopted by the City so that the subject property would not be used for all types of industrial uses that could be permitted in an M3 zone. In addition, development of the

project site would conform to certain specified standards if such limitations are deemed necessary to secure an appropriate development consistent with the objectives of the General Plan.

Comment 1281: Why is the applicant allowed to use this area for a condensate treatment facility? The covenant on this land states: ". . . their successors and assigns will not use, nor permit the use of any of the following described portions of said lot 8 (similar wording for a portion of lot 9) "of tract 10422 for or in connection with a cut and fill garbage or rubbish disposal operation or in connection with any noxious or dangerous trade or business."

Response 1281: This area is not being used for condensate treatment.

Comment 1282: Surely this is an operation in "connection" with the disposal operation.

Response 1282: Refer to Response 1281.

Comment 1283: The SEIR refers to: *"a 100-acre permanent open space buffer from the nearest residential area to the south."* Mr. Funk also makes reference the open space buffer zone that separates the dump from the homes in his testimony.

Response 1283: Refer to Response 1278. The so-called "buffer zone" referred to in the comment is a ±100 acre open-space area located directly south of the existing perimeter ridgeline and the inactive landfill.

Comment 1284: In reality, the buffer zone itself is nothing more than an oil and gas production area with many active wells and storage tanks. Tanker trucks service this area on a regular basis. At times, enormous drilling rigs have been erected that light up the night sky for weeks while new oil exploration is in progress.

Response 1284: Only a small portion of this area supports leased oil wells and ancillary landfill facilities. These leases date back to the 1930s. Refer to Response 1278.

Comment 1285: In addition, this area illegally contains the condensate treatment plant that treats the toxic gas condensate before discharge into the sewer.

Response 1285: This area is not being used for condensate treatment.

Comment 1286: This area also has an unsightly communications tower.

Response 1286: The communication tower referenced by the commenter is permitted and authorized by the City and was constructed prior to the 1984 Summer Olympics.

Comment 1287: The buffer zone was once described by Mr. Wise, BFI's site manager, as: *"a green belt buffer zone to isolate the landfill . . . covered with natural vegetation and will never be developed."* This was an obvious misrepresentation. The Buffer zone is, for the most

part, a vertical slope; the rest has been leased with no thought to the environment or the residential character of the neighborhood.

Response 1287: Refer to Responses 1278 and 1279.

Comment 1288: We are bitter that greed, alone, has dictated the destruction of this area and that BFI is allowed to refer to it as a mitigation.

Response 1288: Refer to Responses 1278 and 1279.

Comment 1289: We need to have BFI purchase the property between Sesnon and the buffer zone, to buffer us from the current activities in the buffer zone. Will this be done?

Response 1289: Activities permitted in the ±100 acre open-space area have not resulted in any adverse impacts on residential land uses in the community of Granada Hills; therefore, the purchase of residential homes between Sesnon and the open-space buffer zone by the project proponent would not be warranted.

Comment 1290: Under no circumstances should the buffer zone be allowed an M-3 designation, which would allow the most undesirable uses of this area adjacent to a residential community.

Response 1290: Refer to Responses 1274 and 1280 for discussions pertaining to the ZC, M3 restrictive conditions, and proposed uses in the M3 zone. It should be noted that even in an M3 zone, subject to City Council approval, the open-space area will have specific Q conditions that would limit the uses within this area.

Comment 1291: **The Dumps Zoning History**

The dump started as an illegal operation in the mid fifties when the objection of neighbors forced the operators to legalize their facility. The North Valley Land Corporation made application for a CUP in 1957. Certain actions by the proponents in the notification process were irregular and "fraudulent" according to John O'Melveny, founder of O'Melveny and Meyers and himself owner of a large ranch. (please see attached letter).

Response 1291: The information referred to by the commenter is prior to BFI's ownership of the project site. In 1957, BFI did not own the project site or conduct business with the North Valley Land Development Company.

The City Landfill began on 45 acres of land originally granted to the North Valley Land Development Company under ZA Case No. 14544 in March 1958, and thereafter, Extant Case No. ZA 17804 was granted in April 1966 to expand landfill operations to a 300-acre site.

Comment 1292: The City Planning Commission on June 5,1957 DISAPPROVED the application for a CUP stating, in part, that "The proposed M3 zone would actually constitute a license

to utilize the property for numerous obnoxious uses because of the unrestricted nature of the zone classification." (see attached findings).

Response 1292: Refer to Response 1291. With reference to the June 1957 correspondence provided by the commenter, it states:

> The City Planning Commission, on June 6, 1957, disapproved your request for a change a zone from Zone A1 to Zone M3 on an L-shaped parcel of land having a frontage of approximately 175 feet and an over-all depth of 2000 feet lying on the southwesterly side of San Fernando Road 1665 feet southerly of Ferncliff Court in the Sylmar District."

The proposed zone change by a Mr. Visco, who was the previous owner of the Sunshine Canyon Landfill (in 1957), would affect 41.9 acres of the approximate 600 acres owned by the project applicant. It was also noted by the Commission:

> The Commission was of the opinion that there are no factors which could justify approval of the establishment of the proposed M3 district based upon considerations of public necessity, good zoning practice, or in the interests of public welfare or convenience.

Additionally, in December 1957, the City Planning Commission was informed that the project applicant (Mr. Visco) proposed to file a zone variance application with the Zoning Administrator, requesting permission to use the subject property for a land reclamation project.

Comment 1293: In the Commission report, the Air Pollution Control District stated prophetically: "We believe that the location of an area of M3 zoning in this vicinity would have highly adverse effects upon large portions of the San Fernando Valley from the standpoint of air pollution, and hence, is not desirable."

Response 1293: This comment cannot be responded to because the Commission report referenced by the commenter has not been provided to the City.

Comment 1294: The matter was appealed to Council and the report of the Planning Commission upheld.

Response 1294: As stated in December 1957, the report of the Planning Commission was adopted, not upheld as referenced by the commenter.

Comment 1295: The Planning Commission suggested the applicant seek a zone variance, rather than a zone change. This was done and in 1958, under ZA case 14544, the variance was granted over the objection of neighbors living directly across from the project for a period of ten years.

Response 1295: Refer to Response 1292 regarding the views of the Planning Commission and request of the project applicant in 1958. It should be noted that the neighbors referenced by the

commenter included only one large property owner (Mr. O'Melveny). No residential tract homes proximate to the project site had been developed in 1958.

Comment 1296: Condition 20 of that variance reads: "That, at the expiration of this grant the premises shall be left in a neat and orderly manner with no uncovered materials or waste products on the premises, and shall be maintained in a park like appearance. Further, that upon completion of the landfill reclamation project, the property involved be made available to the City or County Department of Recreation and Parks for possible recreational purposes, if found desirable for such purposes, or if the property is used, it be devoted to permitted agricultural uses or some private recreational use if approved.

Response 1296: The currently applicable condition regarding this topic is Condition No. 14 of ZA Case No.17804, granted in 1966, which states:

> That at the expiration of this grant or the completion of the land reclamation operations, the premises shall be left in a neat and orderly manner with no uncovered material, debris or waste products left on the premises. Further, upon the completion of the project, the applicant or owners shall advise the City and County Recreation and Parks Department that the property is available for recreational purposes.

The project proponent submitted correspondence to both City and County recreation departments informing them that Condition No. 14 would be complied with once closure and postclosure maintenance activities on the inactive landfill in the City cease (a minimum 30-year period, as mandated by State law). The 30-year period would normally commence upon the initiation of postclosure maintenance activities after the completion of closure construction. However, for the inactive City Landfill, it should be noted that under the City/County Landfill proposal, a significant portion of the inactive City Landfill would be utilized, thereby precluding its use for recreational purposes until such time as the City/County Landfill has ceased operation (at least 26 years) and the mandatory closure/postclosure period has been completed (at least 30 years after the completion of closure construction).

In a letter from James Ward, Principal Grounds Maintenance Supervisor, City of Los Angeles Department of Recreation and Parks, Valley Region, to Joe Maturino, Registered Environmental Health Sanitarian, City of Los Angeles, Department of Environmental Affairs, dated March 3, 1998, Mr. Ward stated:

> On Wednesday, February 4, 1998, I accompanied Mr. Tseng, yourself and a member of the City Council office on a helicopter ride to inspect the area surrounding Sunshine Canyon, Porter Ridge and O'Melveny Park to determine if it is possible to design a mountain bike trail, hiking/horse trail, on Browning-Ferris Industries owned property (known as Sunshine Canyon Landfill). Our findings are as follows: (1) unsafe due to severe slopes; (2) additional staff needed; (3) fire clearance maintenance; (4) maintenance of trails; (5) materials costs, soil erosion due to heavy rain; (6) trails dead-end, trails would not serve a purpose to the community.

> On Tuesday, February 10, 1998, I met with you, David Thompson, and Eugene Tseng, in my office at the Valley Region Headquarters to discuss all the possibilities to construct a recreational trail. Our Department concluded, that the recreational trail would not be practical at this time.

In addition, in a letter from Leonard Levine, Associate Zoning Administrator, City of Los Angeles Department of City Planning, Office of Zoning Administration, to Joe Maturino, Registered Environmental Health Sanitarian, City of Los Angeles, Department of Environmental Affairs, dated May 8, 1998, Mr. Levine stated in reference to the February 4, 1998, letter from Mr. Ward to Mr. Maturino:

> I understand the reason for these findings at the present time, and concur that a recreational trail that is unsafe would not be appropriate. Implicit in any recreational use of the property is the understanding that it be undertaken only if it is safe to do so.

The correspondence also states:

> For the purposes of the current closure of the City portion of the Sunshine Canyon Landfill, Condition no. 14 of ZA Case No. 17804 may be considered conditionally satisfied at this time but only until such time as a reevaluation of the site for the provision of recreational opportunities is conducted during the postclosure maintenance period.

Refer to Appendix D8, City of Los Angeles Correspondences (March 3, 1998 and May 8, 1998), of this document to review copies of the above-referenced letters in their entirety.

Comment 1297: In 1961 the owners returned to request a modification of the zone variance to include accepting wrapped garbage collected by the City and not allowed under the conditions of the existing variance. This condition was granted, however the report that accompanies the variance request (ZA case 15925) notes: "Inspection of the records and property discloses that numerous conditions involving the methods of operations have not been complied with."

Response 1297: BFI was not the owner of the Sunshine Canyon Landfill site in 1961. The project site in 1961 was owned by the North Valley Development Corporation, which is not affiliated with the current property owner, BFI. BFI became the legal owner of the Sunshine Canyon Landfill site in 1978.

Comment 1298: In 1966 the operator applied for and was granted variance. From the testimony of the Zoning Administrator on May 17, 1966 at the appeals hearing (page 32 BZA case 1672) we learn that the early application for an expanded site was due to the fact that the operators had exceeded their permitted elevations.

Response 1298: Refer to Response 1297. BFI was not the owner of the Sunshine Canyon Landfill site in 1966.

Comment 1299: Pages of testimony related to the hardships experienced by the residents living directly across from the landfill exist in this record.

Response 1299: It is assumed that the commenter is referring to the City's record in 1966. This testimony was not provided to the City. In addition, the area surrounding the Sunshine Canyon Landfill site in 1966 was still relatively undeveloped. As noted, BFI was not the owner of the Sunshine Canyon Landfill site in 1966.

Comment 1300: In testimony at the ZA hearing on October 29.1965 the proponent testified that "when the fill has been completed a golf course or recreational area is proposed on portions of the filled area".

Response 1300: BFI was not the owner of the Sunshine Canyon Landfill site in 1965. Refer to Responses 1298 and 1299 regarding BFI's ownership.

Comment 1301: One of the conditions of this variance (17804 #14 issued April 18, 1966) reads: ". . . Further upon completion of the project the applicant or owners shall advise the City and County Recreation and Parks Department that the property is available for recreational purposes."

Response 1301: Refer to Response 1296 regarding ZA Case No.17804, Condition No. 14, and BFI's compliance with Condition No. 14.

Comment 1302: Although the aggrieved residents living across the street from the site vigorously protested, the dump was issued a 25 year variance. The City ignored their complaints of odors, dust and litter and promised them a valuable recreational area in 25 years. This residential community was gradually replaced by mixed industry and salvage operations.

Response 1302: Refer to Response 1296. No residential areas within Granada Hills that are proximate to the project site have been replaced with mixed industry and salvage operations.

Comment 1303: In 1978 BFI bought out the smaller dump and began taking far more trash than the amount indicated in their operating permit (3000 cyd) and violated the operating hours, set forth on the permit.

Response 1303: Landfilling operations by BFI were authorized under its SWFP. The City does not have evidence that BFI violated its SWFP, received excess waste in violation of its operating permit, or violated operating hours. Neither the City LEA nor the CIWMB issued permit violations in regard to the issues presented by the commenter.

Comment 1304: BFI exceeded their elevations and went beyond their boundaries into the Significant Ecological Area. In so doing, they removed an oak woodlands, again without a permit. BFI encroached into the primary watercourse with trash and compromised federally protected wetlands.

Response 1304: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1305: In 1988, because of these violations and in response to the many complaints from residents living near the landfill, Councilman Bernson filed a revocation action.

Response 1305: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1306: At the hearing scores of aggrieved residents told about their experience with blowing dust trash in their trees and parks and foul odors that clung in their entries.

Response 1306: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1307: The Zoning Administrator ruled in a decision, dated September 1, 1988, that the landfill had violated its permit in the following ways:

Response 1307: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1308: The landfill was causing conditions that were materially detrimental to the surrounding community.

Response 1308: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1309: The landfill had exceeded its proscribed elevations.

Response 1309: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1310: The landfill had placed its haul road and trash beyond the variance line.

Response 1310: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1311: The landfill had come too close to the water course and Bradley Ave.

Response 1311: The City record does not indicate that BFI violated its zone variance conditions in regard to the City Landfill footprint being too close to a watercourse or Bradley Avenue. Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1312: The landfill was operating too close to the ridgeline.

Response 1312: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1313: Through the ZA's ruling and in the appeal process new conditions were added to the permit, in an attempt to cure the violations and BFI was ordered to request a curative variance (the only one ever given by the City) to encompass the land that they had illegally used.

Response 1313: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1314: In addition, BFI was ordered to move operations to a canyon further from the residential area nearer the I-5 freeway.

Response 1314: Findings of the Zoning Administrator do not reflect that BFI was ordered to move its landfilling operations to an area of Sunshine Canyon farther from the residential areas and nearer to the I-5 freeway. Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1315: The violations were upheld through appeals to City Council and BFI significantly reduced the amount of trash taken in the two year period that proceeded the dumps closure with the expiration of their variance in 1991.

Response 1315: BFI did not reduce the amount of refuse being disposed of within the City Landfill prior to this landfill's closure as a condition of the revocation action. Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1316: Many of the mitigations ordered by the zoning administrator were not complied with, so that, when the variance expired, BFI could walk away from them.

Response 1316: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1317: Some of these important conditions were:

The health study, ordered by John Parker in the Revocation Findings, Sept. 1, 1988.

Response 1317: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation. In addition, refer to Responses 183 and 184 for a discussion of human health surveys.

Comment 1318: Restoration of the water course, ordered under ZA case 17804 (PAD) Nov. 2, 1988, Condition 2 c.

Response 1318: The City record does not indicate that BFI was requested to restore a watercourse within Sunshine Canyon. Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1319: Replacing oaks in the north canyon, ordered under BZA case #4336 & 4337.

Response 1319: The City record does not indicate that BFI was requested to replace oak trees within the north canyon area of Sunshine Canyon. As stated in the Zoning Administrator decision in December 1990:

> The issue of prior oak tree removal was raised at the public hearing. Inasmuch as no violation with respect to oak trees was found in the July, 1989 action of the City council and the issue was not mentioned in the hearing notice, it is not properly a consideration within the instant curative variance and prior oak tree removal will not be dealt with.

Comment 1320: Hiring an inspector to oversee closure, BZA case 4484, Dec. 19, 1991, Condition #2.

Response 1320: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation. In addition, refer to Response 356 for a discussion of the status of the Final Closure and Postclosure Maintenance Plan (FCPMP) for the required closure of the existing inactive City Landfill.

Comment 1321: Providing an accurate survey, ZA89-1129.

Response 1321: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1322: Offering the land to the Dept. of Parks and Recreation, ZA case 17804.

Response 1322: Refer to Responses 205 and 1296 for a discussion of land use at the project site after the completion of 30-year postclosure maintenance.

Comment 1323: **Introduction**

The community's efforts to properly respond to this confusing SEIR have been frustrated by incomplete and misleading information.

Response 1323: The Draft SEIR thoroughly addresses the environmental impacts associated with development of the proposed project in accordance with the requirements of CEQA and the State CEQA Guidelines. The Draft SEIR will be augmented by the responses to comments and related information to comprise the Final SEIR. Prior to circulating the Draft SEIR, City staff determined that the format and content of the Draft SEIR met City guidelines for the preparation of environmental documents.

Comment 1324: In the first place, the quantity of waste that would be permitted to enter the landfill daily is never accurately discussed.

Response 1324: Refer to Response 1 for a discussion of proposed project peak and average daily waste intake rates.

Comment 1325: The lack of this information makes it impossible to accurately access the important traffic impacts, and air quality impacts.

Response 1325: The Draft SEIR thoroughly analyzes traffic and air quality impacts associated with a 12,100-tpd waste intake rate. Technical information was prepared in accordance with the requirements of CEQA and the State CEQA Guidelines.

Comment 1326: The proponent currently has a State-issued Solid Waste Facilities Permit (see attached) to accept 9000 tpd. This permit gives a top daily limit of 6,600 of buried waste and the additional is made up of exempt waste. Whatever this waste is comprised of, the fact remains that 9000 tpd can currently enter without any additional permits. If then, the proponent is requesting a permit from the City to receive an additional 5,500 tpd, the possible total could be 14,500 tpd. This is a huge difference from the 11,000 tpd mentioned so often in the SEIR.

Response 1326: Refer to Response 1 for a discussion of proposed project peak and average daily waste intake rates.

Comment 1327: We realize that weekly averages are somewhat lower, due to lack of commercial inflow on Saturday, but the real possibility exists that weekday inflow could regularly reach 14,500 tpd.

Response 1327: Refer to Response 1 for a discussion of proposed project peak and average daily waste intake rates.

Comment 1328: Secondly, we find that the changes that are seemingly occurring between the County EIR and the City SEIR are never made clear. Since the information in all volumes is included by reference, you would expect it to agree on specifies.

Response 1328: Changes to the certified FEIR prepared for the County Landfill were addressed in the Draft SEIR. As indicated in the Draft SEIR, Section 1.3, Purpose of the Draft SEIR, p. 1-2:

> The City, as the Lead Agency for the proposed City/County Landfill, determined (in 1991) that new background information was available and specific studies relevant to the proposed project were required. That information, combined with prior technical information contained within the *Final Environmental Impact Report, Sunshine Canyon Landfill Extension* (herein FEIR), State Clearinghouse Number 89071210, comprises this Draft SEIR. The Draft SEIR provides specific information about how the City/ County Landfill Project would be designed, engineered, constructed, operated, and monitored throughout its estimated site life, and how closure and postclosure maintenance and monitoring would be conducted in accordance with regulatory standards and requirements.

In addition, an overview of project development in the County is provided in the Draft SEIR, Section 2.0, Project Description.

Comment 1329: In one place it states that oak trees will be monitored for three years; in another place it says five.

Response 1329: A 3-year monitoring and maintenance program would be implemented for those oak trees removed as a result of project development within the City. Moreover, this information is stated in the Draft SEIR, Section 4.4.3, Native and Nonnative Tree Resources, p. 4-198:

> To assure successful establishment and survival of the mitigation trees, a 3-year monitoring and maintenance program shall be implemented. Each year, the mitigation planting shall be monitored for growth and survival.

Comment 1330: In one place it says graded slopes will be 1.5 to 1, or 2 to 1; in another it says 3 to 1.

Response 1330: Refer to Response 744 for a discussion of 2H:1V (horizontal:vertical) refuse slope gradient that will be utilized for the proposed project versus a more conservative 3H:1V.

Comment 1331: In one place in these documents we are told that final cover will be 15 feet deep, and in another we are told it will be three feet deep.

Response 1331: Refer to Response 1050 for a discussion of the proposed final cover design to be provided in the Final Closure and Postclosure Maintenance Plan (FCPMP), which will be implemented after completion of the proposed project.

Comment 1332: In several places are told the working face will be kept to a small 3 to 5 acres in area, and then we are told that it will reach 10 acres in another section of the SEIR.

Response 1332: Refer to Response 493 for a discussion of the proposed City/County Landfill active working face area of disturbance.

Comment 1333: These are just a few of the discrepancies. The proponents need to list the changes they propose for the City landfill. The public cannot possibly know what they are proposing without this information.

Response 1333: The Draft SEIR analyzed the development, operation, maintenance, and monitoring of a Class III nonhazardous landfill in the City and County in accordance with the requirements of CEQA and the State CEQA Guidelines. Modifications that were proposed since filing project applications and during processing of the proposed project were identified in the Draft SEIR, Section 1.6.4, Modifications to the Proposed Project, pp. 1-9 and 1-10.

Comment 1334: Thirdly the information is hopelessly outdated. We attempted to contact one of the two Doctors, who were quoted as having said that a health survey was unneeded. We found that he had apparently commented five years ago, and had left the County employ several years ago. The other doctor who was quoted said he knew nothing about the project and could only comment on the difficulties involved in doing cancer studies.

Response 1334: In accordance with CEQA and the State CEQA Guidelines, the Draft SEIR need only provide new background information and update previous technical information provided in the certified FEIR where necessary or appropriate.

In regard to human health issues, the Draft SEIR, Section 4.9.5, Human Health, p. 4-315, states:

> Based on the review of existing information and the advice of these leading authorities, City staff concluded that an epidemiological study or a human health survey was not warranted for the proposed project.

It is the view of the City staff that these opinions of the epidemiological experts are still valid. Information pertaining to meetings that City Planning staff held with the environmental consultant and the epidemiological experts is contained in the project's administrative file.

Comment 1335: Neither of these doctors could have been aware five years ago of many studies that now show the grave impact pm10's and diesel-generated particulates have on human health. Inclusion of this sort of dated material has no substance.

Response 1335: As indicated in the Draft SEIR, both doctors are noted public health officials recognized by medical professionals in the practice of epidemiology in the Southern California area. For example, Dr. Thomas Mack established the University of Southern California's Cancer Database Registry for Los Angeles County, and Dr. Papanek was the head epidemiologist for the County of Los Angeles. The City reasonably assumes that these doctors were aware of professional studies in their respective field of practice when the Draft SEIR was being prepared. Refer to Response 316 for a discussion of the potential for the proposed City/County Landfill to cause acute or chronic health risks to residents in the community of Granada Hills.

Comment 1336: Since health issues were identified as an important issue to the community, this section needs to be completely redone, analyzing the effects of these emissions on health.

Response 1336: Refer to Response 316 for a discussion of the potential for the proposed City/County Landfill to cause acute or chronic health risks to residents in the community of Granada Hills.

Comment 1337: Traffic, housing, demographics and many other areas are similarly outdated.

Response 1337: In regard to traffic, the technical information provided in the Draft SEIR complies with applicable LADOT requirements. Refer to Response 154 for a discussion of the Draft SEIR transportation/circulation study potentially containing old or outdated information.

As noted in the Draft SEIR, Initial Study and Checklist, housing was determined not to be a significant issue; however, information relative to property valuation and the proposed project's effect on housing was addressed in the Draft SEIR. It should also

be noted that only the most relevant and current demographic information was used in the Draft SEIR.

Comment 1338: **The City's Responsibility**

Even though it is obvious that BFI's hired consultant prepared this document, the City must share some of the responsibility for this disorganized and inaccurate SEIR.

Response 1338: The information included in the Draft SEIR reflects the City's independent judgment and evaluation of the potential impacts associated with the proposed project in accordance with CEQA, the State CEQA Guidelines, and the City's EIR Preparation Manual. Three databases were prepared for the proposed project, each of which was reviewed by City Planning staff and various City departments.

Comment 1339: We implore the City to independently run the modeling programs to check their accuracy. The community does not have the capability to verify the results and assumptions.

Response 1339: The City has independently verified the information included in the Draft SEIR and this Final SEIR.

Comment 1340: Instead of meeting with BFI's hire consultants, and being smoozed into accepting their biased interpretations, it is incumbent upon the City to independently review this SEIR and give it the highest level of scrutiny. A project this large and complex deserves nothing less.

Response 1340: Since 1991, the preparation of this document has been a collaborative effort between the City and the environmental consultant. There have been over 50 meetings held between City Planning staff and the environmental consultant. All of these meetings have been documented, and meeting minutes are included in the project's administrative record.

Comment 1341: **1. 6. 5**

If BFI was offered extension after extension in the preparation of this SEIR, why was the public's request for an additional 180 days for response refused?

Response 1341: Refer to Response 344 for a discussion of the length of the CEQA public review period for the Draft SEIR and the public's opportunity to comment.

Comment 1342: The public is at a considerable disadvantage. They are presented with two huge disorganized volumes, and referred to over a dozen more volumes, and forced to review them at libraries after work, or on Saturdays.

Response 1342: Refer to Response 342 for a discussion of the availability of the County FEIR and Draft SEIR and Technical Appendices during the Draft SEIR public review period.

Comment 1343: **5. 9. 5**

We are concerned about the possible use of ADCMs. We believe that they will not be sufficient to control surface gas omissions.

Response 1343: Refer to Response 195 for a discussion of the potential environmental impacts associated with the use of ADCMs at the proposed City/County Landfill. The proposed City/County Landfill would be subject to regulatory requirements to control LFG surface emissions, whether or not ADCMs are used.

Comment 1344: This section states: "Well-compacted soil is still regarded as the superior daily cover material because of its ability to retard odors and reduce vector intrusion." In view of this, will soil then be the cover material used on this project?

Response 1344: Refer to Response 195 for a discussion of the potential environmental impacts associated with the use of alternative daily cover materials (ADCMs) at the proposed City/County Landfill.

Comment 1345: **2. 15. 1, End Use of Site**

It was always the intention of those who granted the original variance to have the land used for recreational purposes when the dump closed its doors. Since BFI seems to now feel that this is too dangerous, and the project will not to be complete for thirty years, the public will again wait. The thirty years began in 1991 and by 2021 nature will have reclaimed it and our grandchildren will again have open space. But we must have BFI's assurance that this will happen.

Response 1345: Refer to Responses 205 and 1296 for a discussion of land use at the project site after the completion of 30-year postclosure maintenance.

Comment 1346: The County states in its Findings that: "The Project site will ultimately provide additional permanent open space for the County when the landfill has reached final capacity and the facilities closure plan is completed. The completed landfill surface will be revegetated with substantial trees and vegetation as described in the FEIR Response to Comments Volume A Topical response 15) The site will be maintained by the permittee until the time that its final use is determined by State and County, however it is expected that ultimately it will be made available to the public at no additional cost to the agency designated to receive the land." Do we have BFI's assurance that they will turn the City site over to the City at no additional cost?

Response 1346: Refer to Responses 205 and 1296 for a discussion of land use at the project site after the completion of 30-year postclosure maintenance.

Comment 1347: Why is the land that is to be dedicated in upper Bee canyon not shown or mentioned?

Response 1347: Figure 4.14-3, Parks Location Map, p. 4-408, identifies the proposed Bee Canyon dedication area. In addition, the Draft SEIR, Section 4.14.4, Parks and Recreational Resources, pp. 4-422 and 4-425, stated:

> Additionally, the project proponent is in the process of obtaining parcels (over 480 acres) located along the northerly and westerly boundaries of Upper Bee Canyon (shown on **Figure 4.14-3**) for wildlife preservation and recreational use in this area. This acreage will become part of the Santa Clarita Woodlands Park. This transfer of private lands into the public domain is expected to decrease the Countywide open space and parkland deficiency.[49]

Comment 1348: This purchase is required under the County C.U.P.

Response 1348: BFI has been working with County Counsel and the owners of these parcels in regard to acquisition of property located in Bee Canyon. Offers to purchase were made by BFI and the County independently. These offers were declined. The County is now in the process of condemnation.

With respect to the County Landfill, CUP Condition 15(d), the following is stated:

> Within thirty days of the effective date of this grant and before commencement of disposal operations at the landfill under the terms of this grant, the permittee shall commence negotiations for the acquisition as public open space of the real property located in Upper Bee Canyon consisting of (1) the entirety of Parcels 335 and 337 on the submitted one half mile ownership map of file, and (2) the portion of Parcel 336 on that same map which lies easterly of the road commonly known as the East Canyon Motorway (hereafter collectively designated as open space parcels). After acquisition of open space parcels, the permittee shall dedicate the parcels to the County or such other public agency acceptable to the County. Within three months from the effective date of this grant, or before commencement of disposal operations, whichever event occurs sooner, and in the event permittee is **unable to obtain the open space parcels, permittee shall enter into an off-site acquisition agreement with the County** [emphasis added]. Said agreement shall provide, among other things, that all acquisition costs and expenses are to be paid by permittee. Said agreement shall be in substantial conformity with the terms and form of the standard off-site acquisition agreement utilized by the County Department of Public Works.

Comment 1349: **Alternatives**

Although a viable alternative with a projected capacity of 70 million tons exists in the County, the SEIR does not include a full discussion of a County-only alternative.

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[49]/ *East Canyon Offer of Dedication and Agreement*, November 1993, and Joan Rupert, Department Facilities Planner I, County of Los Angeles, Department of Parks and Recreation. Letter. October 20, 1992.

Response 1349 Refer to Response 165 for a discussion of the No Project Alternative and the potential for future development of a 70-million-ton landfill in the County.

Comment 1350: The conclusions drawn from both the no-project and reduced volume alternatives do not recognize that either choice would, in all likelihood, lead to a 70 million expansion in the County.

Response 1350: Refer to Response 165 for a discussion of the No Project Alternative and the potential for future development of a 70-million-ton landfill in the County. In addition, refer to Response 910 for an environmental comparison between the proposed project and the Reduced Volume Alternative.

Comment 1351: The County findings clearly allow BFI to make that application. In this case all the arguments about the negative aspects of transporting waste or loosing County bucks are moot. I'm intrigued by the argument that if the project was approved in a reduced form, dust and "litter generation would occur at these other facilities." This creative little jewel is at least good for a laugh in the midst of this depressing cross between *Mine Kampf and The Prince.*

Response 1351: As noted in the Draft SEIR, in comparison to the proposed project, the Reduced Volume Alternative would lessen site-specific impacts on the environment. However, due to a shortened site life in Sunshine Canyon, regional impacts would be more significant because the waste stream would be shifted to other landfills within or outside of the Los Angeles region. For that reason, significant regional impacts would occur because the burden of providing additional landfill disposal capacity would be placed on more distant in-County/out-of-County landfill facilities, or even remote landfill locations.

Comment 1352: The only substantive issue in a County expansion would be the loss of biota. This would amount to 799 additional oaks (1363, minus the 564 saved in the City).

Response 1352: This information has been changed. In regard to the extension of landfilling into upper reaches of Sunshine Canyon, approximately 3,200 oak trees would need to be removed. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR. In addition, significant biological resources in the upper reaches of Sunshine Canyon have the potential to be affected by this development, whereas the proposed project's development would occur in areas that are primarily disturbed due to nearly 40 years of prior landfilling activities.

Comment 1353: When we inquired of Mr. Richard Fraser, then with the County Regional Planning Dept. at the time of the County zone changes, as to the reason the whole 70+ acres were being removed from the SEA designation, rather than just the footprint, Mr. Fraser said that the whole area would be severely impacted by the landfill operations, particularly since the main stream that fed the canyon was being graded to bedrock.

Response 1353: The City cannot verify the statements made by Mr. Frazier because he is retired from County service. In regard to the project site within County jurisdiction, when the Board of Supervisors approved the General Plan Amendment for the County Landfill, it deleted ±542 acres of designated SEA No. 20.

Comment 1354: Where is the analysis of the map presented in 1991 (attached)? This map was represented to be the City expansion proposal and made part of the County EIR. We can only believe that it was not submitted, in the belief that, since the City would probably cut back the configuration, it represents what the proponent sees as a fall-back position.

Response 1354: The Draft SEIR, Section 1.6.4, Modifications to the Proposed Project, pp. 1-9 and 1-10, discussed all modifications to the proposed project during processing of the Draft SEIR. It is not unusual for conceptual site plans to be modified throughout this process. City Planning staff are aware of the modifications to the original project application.

Comment 1355: The County requested that BFI seek a minimum expansion of 20 million capacity. Why is BFI seeking so much more?

Response 1355: The project proponent is not restricted to a specified waste capacity amount by adopted County Landfill CUP conditions; rather, only a minimum was prescribed. From an engineering perspective, the design that properly connects the existing County Landfill with the existing inactive City Landfill would provide for an estimated 90 million tons of disposal capacity in both jurisdictions.

Comment 1356: **Page 1-14 & 5.9 Alternative Waste Management Technologies & Strategies.**

Anything that would reduce the amount of trash going into landfills must be given careful evaluation. We believe you have dismissed these options too lightly.

Response 1356: Refer to Response 169 for a discussion of alternative waste management technologies and strategies. In addition, refer to Response 936 for a discussion of solid waste transformation technologies (e.g., waste-to-energy, composting) as potential alternatives to the proposed project.

Comment 1357: The City has issued an RFP for new and innovative technology projects.

Response 1357: Refer to Response 169 for a discussion of the City BOS RFQ/RFP for a new alternative solid waste technology/transformation project.

Comment 1358: Why were no inert landfills included in the study? Couldn't directing all inert loads to these facilities reduce the need for class III landfills?

Response 1358: Refer to Response 1157 for a discussion of inert waste recycling and unclassified landfill disposal capacity (e.g., for inert waste disposal) in Los Angeles County.

Comment 1359: **Working Face**

One of the mitigations offered and repeated, again and again, in these volumes was that the working face was to remain small, 3 to 5 acres. Now this document is talking about an eventual 10 acre working face. This flies in the face of what the community was

promised. The smaller working face with the rest receiving either temporary or final revegetation was, and is, an essential part of the mitigation program.

Response 1359: Refer to Response 493 for a discussion of the proposed City/County Landfill active working face area of disturbance.

Comment 1360: **Slope Gradient**

In the County's Finding of Facts we read: "The final maximum refuse slope gradient at the site will be no steeper than 3 horizontal to 1 vertical for the landfill extension."

Why is a lesser standard, i.e. 1.5 to 1, or 2 to 1 being applied to the City Project?

Response 1360: The 3:1 slope gradient refers to the County Landfill. Due to existing steep gradients of the County Landfill, factors of safety could not be achieved with steeper inclinations for the final face. Within the City, the landfill base grade is flatter, thereby facilitating steeper slopes for the final face. As part of liner design for the various phases of landfill construction, static and seismic stability analyses will be conducted to demonstrate that adequate factors of safety can be achieved using waste grading plans that incorporate final slopes at gradients steeper than 3:1. Refer to Response 744 for a discussion of 2H:1V (horizontal:vertical) refuse slope gradient that will be utilized for the proposed project versus a more conservative 3H:1V.

Comment 1361: **Figure 2.4.2**

Why isn't the land that is currently being acquired in upper Bee canyon shown or discussed? The County directed as follows: "The applicant is further required to arrange for the acquisition as public open space of approximately 450 additional acres along the southwest boundary of the landfill within upper Bee Canyon."

Response 1361: Refer to Responses 1347 and 1348 for a discussion of the status of BFI's purchasing of acreage in upper Bee Canyon for wildlife preservation and recreational use.

Comment 1362: What is the status of this acquisition?

Response 1362: Refer to Responses 1347 and 1348 for a discussion of the status of BFI's purchasing of acreage in upper Bee Canyon for wildlife preservation and recreational use.

Comment 1363: **1. 6. 2, Public Scoping Meeting**

The public has never had the opportunity to address the SEIR. The scoping meeting was held over five years before the release of this document. It was held on the night of the LA riots, when people were being cautioned to stay at home. Only a few ventured out, disregarding the advice broadcast on their radios and TV. This was not a full hearing of the issues.

Response 1363: In regard to the public's opportunity to comment on the Draft SEIR, refer to Responses 344 and 1269. As discussed in the Draft SEIR, Section 1.6.2, Public Scoping Meeting, p. 1-8:

> A public scoping meeting, coordinated by City planning staff and facilitated by an independent consultant, was held on April 29, 1992, at John F. Kennedy High School in Granada Hills, California.[50] The intent of the meeting was to describe the proposed project, define the environmental review process, and solicit input from the general public concerning relevant environmental issues.

The Los Angeles riots did occur on the day of the public scoping meeting. However, because 10,000 residents in the Granada Hills and Sylmar communities had been notified of this meeting, in addition to numerous responsible agencies and organizations, and notification of the meeting had been advertised in local area newspapers, City Planning staff decided to hold the meeting. As noted in the Draft SEIR, more than 100 individuals attended this scoping meeting.

Comment 1364: **1. 6. 3, Post Scoping Meeting**

We would assume that City staff met regularly with the consultant and the proponent. What makes this meeting so different?

Response 1364: The purpose of the postscoping meeting, held between the City and environmental consultant, as defined in the City's EIR Preparation Manual, Section 4.3.1, was to:

> . . . determine the scope of the EIR with respect to critical issues. This may include an expanded or more defined scope of work than was indicated in the Initial Study or discussed at the prescoping meeting; or it may include a reduced or less defined scope of work.

Information pertaining to the postscoping meeting, which included City Planning staff, the environmental consultant, and project proponent, was presented in the Draft SEIR, Section 1.6.3, Postscoping Meeting, p. 1-9, and Appendix A9.

As indicated the Draft SEIR, additional environmental issues were identified by City staff and presented at the postscoping meeting in response to public testimony received at the scoping meeting, written comments received from internal City departments and Responsible Agencies during the NOP/Initial Study, and comments received from public agencies and companies in response to the NOEC.

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[50]/ The public scoping meeting on this proposed project was held on Wednesday, April 29, 1992, from 7:00 to 10:00 p.m. Approximately 100 persons attended the meeting, and 21 people provided comments on the proposed project to City staff. Environmental issues raised during this public scoping meeting are incorporated into Volume II, Appendices A10 and A11, of this Draft SEIR.

Comment 1365: Who on the city staff independently reviewed this document?

Response 1365: In regard to the postscoping meeting, no document was reviewed by City Planning staff; however, a summary matrix of topical issues that identified issues to be addressed in the Draft SEIR was prepared by City Planning staff. That matrix was provided in the Draft SEIR, Appendix A8, Sunshine Canyon Landfill Scoping Meeting Agenda and Minutes. In regard to the Draft SEIR, numerous City departments have independently reviewed the Draft SEIR during its preparation (i.e., Databases 1, 2, and 3).

Comment 1366: **Maps and Graphics**

Elevations on some maps are, for the most part, unreadable. Please correct.

Response 1366: It is unknown which figures in the Draft SEIR the commenter is referencing; however, all figures included in the Draft SEIR have been reviewed for clarity.

Comment 1367: Photographs showing the projected height of landfill in relationship to the existing contours were omitted from this document.

Response 1367: Figure 3.1-1, Aerial View and Key Elevations of the Project Area, in the Draft SEIR depicts existing elevations within and immediately adjacent to the project site, and Figure 2.5-4, Waste Disposal Area, Sequence 1-1' (not a photograph), depicts both City and County areas proposed for landfill development.

Comment 1368: The elevations and design have changed since the original DEIR was prepared and those older view sheds are no longer accurate.

Response 1368: Views of the project site are included in the Draft SEIR, Section 4.18 Aesthetics/Views, Figures 4.18-3 through 4.18-9. Photographs of the project site, included within these figures, were taken as recently as February 1997.

Comment 1369: No map seems to exist that shows the approved County elevations and how they will connect with the proposed new county acreage and then to the City.

Response 1369: Refer to Figure 2.5-1, which depicts the County Landfill (with elevations) and new areas proposed for landfill development within both the County and City. Figure 2.5-1 also includes the ±42 acres (shaded on figure) within the County proposed for landfill development.

Comment 1370: The maps attached to the County approvals and the Phase 11 Stability Report in the appendix are too small to read. We understand the originals have been revised to promote stability. Please provide an updated map.

Response 1370: The Phase II grading plan approved by the County is the same plan shown in the Draft SEIR.

Comment 1371: **Recycling**

The City has embarked on an ambitious program of recycling that is not only meant to satisfy the goals of AB 939, but to save precious resources. Siting more landfills that are cheap and close in provides a strong economic incentive for the City to abandon its commitment to recycling to provide short-time savings at the expense of long term solutions.

Response 1371: The City has complied with all requirements of A.B. 939 since its adoption by the City. As stated in the Draft SEIR, Section 5.9, Waste Management Technologies and Strategies, p. 5-36:

> A.B. 939 established a hierarchy of waste management practices, placing source reduction as the first and best method of handling solid wastes, followed by recycling and composting, and finally landfilling or transformation. Within the context of this hierarchy, increased source reduction, recycling, and composting are considered a means to extending the life of landfills. Second, local jurisdictions should efficiently utilize the disposal capacity at existing landfills. **Third, local jurisdictions should site a new landfill in-County** [emphasis added]. Finally, jurisdictions may seek and establish either short- or long-term agreements for waste exportation to other jurisdictions.
>
> Although these options are feasible elements of an integrated waste management solution, and necessary for reducing and diverting the amount of waste disposed of in landfills, these technologies and strategies cannot resolve the need for available disposal capacity required to ensure adequate public health and safety.

Comment 1372: If the City, or other cities, attempt to claim the green waste that is used for daily cover as "recycled" in order to meet the goals of AB 939 the recycling effort will be further undermined. Will the City attempt to do this?

Response 1372: At this time, the project proponent anticipates using geosynthetic blankets as the primary ADCM for the proposed City/County Landfill. It is anticipated that recycled green wastes would be used at the project site for mulch, landscaping, and revegetation purposes.

Comment 1373: Various places in the document give different descriptions of the on-site recycling program. It is, at times, referred to as a composting program (see appendix).

Response 1373: Refer to Response 88 for a discussion of green waste/wood waste unloading, length of storage, and onsite uses for tub-grinded materials. In addition, refer to Response 190 for a discussion of the reason why the public buyback center is no longer being considered as part of the proposed project.

Comment 1374: The County volumes describe an ambitious program for corrugated materials, wood processing etc.

Response 1374: Corrugated materials (e.g., cardboard) would not be recycled at the proposed City/County Landfill. Haulers carrying segregated wood waste loads would be directed by BFI personnel to the green waste/wood waste unloading area.

Comment 1375: Exactly what will be processed at the facility proposed for the berm?

Response 1375: No ancillary facilities are being proposed on or near the southern berm area of the project site.

Comment 1376: Why was the facility relocated from the site originally proposed near the I-5 freeway?

Response 1376: It is assumed that the commenter is referring to ancillary areas such as the wood waste/green waste area that was originally proposed to be located closer to the entrance of the project site. The location of this area was changed because of conflicting safety and environmental concerns.

Comment 1377: This type of facility can have significant impacts. Please prepare a separate environmental document for this facility describing, in detail, the process and equipment to be used and dealing with the effects of noise, odor, air pollution etc. upon the residents adjacent to the facility.

Response 1377: In regard to the proposed green waste/wood facility, this ancillary use was thoroughly addressed in the Draft SEIR with respect to air quality, noise, and land use. Refer to the Draft SEIR, Sections 2.0, Project Description; 4.2, Air Quality; 4.5, Noise; and 4.7, Land Use.

Comment 1378: How close will the nearest residents be to the facility?

Response 1378: The nearest residential area in Granada Hills is located approximately 1,700 feet from the proposed City/County Landfill footprint boundary.

Comment 1379: What do the studies of green waste used as daily cover show in terms of outgassing and other potential problems.

Response 1379: Refer to Response 195 for a discussion of the potential environmental impacts associated with the use of alternative daily cover materials (ADCMs) at the proposed City/County Landfill.

Comment 1380: **page 4-338**

The traffic studies referred to are far to old to be accurate. Will you provide recent ones?

Response 1380: Refer to Response 154 for a discussion of the Draft SEIR transportation/circulation study potentially containing old or outdated information.

Comment 1381: The January 1995 counts were not accurate, since San Fernando Road and Foothill were still impacted by the overpass repair taking place following the earthquake the previous year and commuters were choosing alternate routes.

Response 1381: Refer to Response 154 for a discussion of the Draft SEIR transportation/circulation study potentially containing old or outdated information.

Comment 1382: The January 1995 mini-study is still more than two years old.

Response 1382: Refer to Response 154. City Planning and LADOT staff have reviewed, commented on, and authorized the completion of this traffic study prior to its inclusion in the Draft SEIR. Both City Planning and LADOT staff have determined that a new traffic study for the proposed project is not warranted.

Comment 1383: **Page 4-372**

Please describe exactly which roadways will be "widened," which "reconfigured," and where additional lanes be will provided?

Response 1383: Refer to the Draft SEIR, Section 4.13, Transportation/Circulation, Table 4.13-9, which describes the project-specific mitigation measure by key intersection and the required mitigation measure, and refer to Figure 4.13-18, which shows each key intersection and the proposed improvement (reconfiguration).

Based on the preliminary design of the recommended improvements, only one intersection will require widening as part of implementing the project mitigation measures (e.g., San Fernando Road/Project Entrance). The improvements recommended at the other impacted intersections such as Roxford Street at the I-5 Freeway, Roxford Street at Encinitas/I-5 Freeway, and San Fernando Road at Sierra Highway can be implemented through the restriping of the existing paved roadway widths.

It should also be noted that a signal and restriping improvements on San Fernando Road near the landfill entrance are now being implemented and that these improvements will be completed by the end of July 1998.

Comment 1384: Hasn't some of the restriping already been done, as a mitigation for the County project?

Response 1384: Improvements for the County Landfill have occurred at the landfill entrance and along the access roadway. These improvements were approved in March 1996 by the City BOE, which authorized a "B" permit for their development. Improvements included constructing a right-turn lane at the landfill entrance for traffic merging onto San Fernando Road and restriping. Internal access road improvements were implemented in the summer of 1996 in response to the City's approval of a grading permit. Those

improvements included installing drainage improvements, grinding and removing the existing asphalt road, importing aggregate subbase material, and importing asphalt for resurfacing of the access roadway consistent with project specifications.

It should also be noted that the improved roadway through Sunshine Canyon to the City/ County jurisdictional boundary is approximately 1 mile long and provides a ROW of 160 feet, with easements for berming and drainage. For an additional discussion of these improvements, refer to the Draft SEIR, Section 4.13.5, Access Roadway in Sunshine Canyon, pp. 4-380 through 4-382.

Comment 1385: We need to know exactly which additional mitigations will be done.

Response 1385: In regard to traffic mitigation, refer to either the Draft SEIR, Table 4.13-9, Project Specific Mitigation Measures, or Table 1.10-1, Summary Matrix of Potential Environmental Impacts, Mitigation Measures, Net Unmitigated Adverse Impacts, Mitigation Compliance Responsibility, and Monitoring Phasing and Enforcement Program. Both of these tables list the traffic-related mitigation measures being recommended for the proposed project.

Comment 1386: If the addition of traffic from the landfill raises the intersection levels to LOS F, why doesn't the City consider that significant?

Response 1386: Traffic impacts at the landfill entrance and San Fernando Road are considered significant without the implementation of mitigation measures. Improvements will be required to mitigate project traffic impacts at this location. For the proposed City/County Landfill, no unavoidably significant adverse impacts would occur to transportation/circulation after the implementation of mitigation measures.

Comment 1387: How many 60 foot transfer trucks could be accommodated on a freeway offramp?

Response 1387: The Traffic Impact Study, Table 6, p. 41, summarized the results of a queuing analysis prepared for the proposed project. The I-5 Freeway southbound ramp to Roxford Avenue has approximately 1,050 feet of storage, the I-5 Freeway northbound offramp to Roxford has approximately 1,000 feet of storage, and the I-5 Freeway northbound ramp to Encinitas/Roxford has roughly 1,200 feet of storage. The queuing analysis indicated that sufficient storage is available to accommodate forecasted traffic volumes. Approximately 17 trucks could queue on each of the ramps (mentioned above) at any one time.

Comment 1388: If most of the transfer trucks arrive from the south, won't this cause the offramp at Roxford to back up?

Response 1388: Adequate queue space is provided on the Roxford Avenue offramp to accommodate 17 trucks; no traffic backup on the I-5 Freeway is anticipated.

Comment 1389: You seem to be using a factor of .64 to figure trucks which you note as being "passenger cars times two." In that case, using a worse case scenario, the 14,500 tpd would generate 9280 truck trips, or 4640 passenger trips. This number is clearly over the level of significance.

Response 1389: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates. In addition, refer to Response 153 for a discussion of project-generated truck trips.

Comment 1390: Since the SEIR for this project was published less than a year after the opening of the County landfill, it is necessary to evaluate all the traffic impacts of both County and City, or be guilty of seeking incremental approvals in violation of the requirements of CEQA.

Response 1390: Refer to Response 156 for a discussion of the cumulative traffic analysis included in the Draft SEIR.

Comment 1391: **page 4-379**

You have provided conflicting information about the incidence of accidents in the vicinity of the landfill. On this page you indicate "no unusual safety problems" from your search of records (1982 through 1987). This is in direct conflict with the report to the Regional Planning Commission given by the County Dept. of Public works and contained in Vol A of the Response to Comments which states: "in addition, the traffic studies indicate a higher than average accident rate at intersections of city streets with current volumes which are 5,000 to 6,000 tpd" (1989).

Response 1391: The Draft SEIR does not provide conflicting information relative to potential traffic accidents in the vicinity of the landfill. As indicated in the updated traffic impact analysis (1997), which does not rely on the older impact analysis provided in the FEIR (1989), findings showed that potential safety problems at the landfill entrance would not occur because numerous mitigation measures would be implemented to alleviate potential significant effects.

The commenter is referencing the FEIR, Responses to Comments Volume A, Sunshine Canyon Landfill Extension (July 1989), Appendix 11, Report of Needed Future Landfill Capacity for Los Angeles County, pp. 6 and 7. This report was prepared in 1989 by County DPW staff and was directed to the County Regional Planning Commissioners. It was intended to update information concerning the need for future landfill capacity to meet the long-term solid waste disposal needs of Los Angeles County.

No increases in traffic accidents have been noted at the Project Driveway/San Fernando Road intersection since the opening of the County Landfill in August 1996. Since the opening of the County Landfill, two accidents (both involving refuse vehicles) have occurred. Prior to this time, approximately one to two accidents per year were occurring near this intersection during the period when the site was not accepting solid waste materials (October 1991 through July 1996).

Intersection improvements have been made to the landfill entrance (adjacent to San Fernando Road) as a result of developing the County Landfill. These improvements were required pursuant to the CUP adopted for the County Landfill. Improvements were also authorized under a "B" permit granted by the City BOE. In addition, a signal and associated restriping on San Fernando Road near the landfill entrance should be completed by the end of July 1998.

Comment 1392: In view of this discrepancy, please provide accident figures for the appropriate intersections and the landfill entrance.

Response 1392: For the reasons noted in Response 1391, additional information is not required by either City Planning or the LADOT.

Comment 1393: Neighbors who use San Fernando Rd. report that the driveway entrance to the landfill is dangerous and has been the scene of several accidents. We don't know if any were serious enough to be reported, but we feel that intersection should have a signal, even if no further expansion is granted.

Response 1393: The project proponent recently sought an interim change authorization to the "B" permit, and that authorization has been received from the City. It is anticipated that a signal at San Fernando Road and the landfill entrance will be installed by the end of July 1998. Refer to Responses 138 and 207 for a discussion of interim and ultimate traffic improvements at San Fernando Road/Project Entrance.

Additionally, intersection improvements have been made to the landfill entrance, which is adjacent to San Fernando Road, as a result of developing the County Landfill. These improvements were required pursuant to the CUP adopted for the County Landfill, and improvements were also authorized under a "B" permit granted by the City BOE. Refer to Response 1384 for a discussion of those improvements.

Comment 1394: Have you considered designating the right turns from San Fernando Rd. and Foothill on to Balboa as carpool-only turns at peek hours in the AM, and left turns as carpool-only turns at peek hours in the PM ? This would effectively reduce the dangerous traffic on San Fernando Rd. and encourage carpooling.

Response 1394: The redesignation of traffic lanes on San Fernando Road, Foothill Boulevard, and Balboa Boulevard is not warranted by the projected a.m. and p.m. peak hour traffic. Any lane restrictions, such as carpool-only lanes, will require review and approval by the LADOT.

Comment 1395: **Biota, Section 4.4**

We were not able to find the field survey referred to in section 1.4.4 conducted by Dole and Fisher, 1978, covering 1.560 acres. In which referenced volume can we find a copy of that survey?

Response 1395: Refer to the FEIR Sunshine Canyon Landfill Extension, Volume IIA, Appendix C, Biological Reports. This FEIR volume incorporates the work of Drs. Dole and Fisler. As indicated in Appendix C, during May and June 1978, the entire Sunshine Canyon area and adjacent lands in East Canyon owned by BFI (±1,560 acres) was surveyed by Drs. Dole and Fisler, consulting biologists. Their assessment documented plant and animal life in Sunshine Canyon.

The technical assessment conducted for the Draft SEIR included the project site in the City (±494 acres) and the proposed development within the County (±42).

Comment 1396: Will you incorporate it into your appendix?

Response 1396: It is not necessary to incorporate this information into the Final SEIR's technical appendix because the field study information provided in 1978 was updated and included in the Draft SEIR. However, this information has been incorporated by reference within the Draft SEIR, and the commenter is referred to the Draft SEIR, Section 4.4, Biological Resources, FEIR Documentation, pp. 4-139 and 4-140, which includes the specific citation.

Comment 1397: Page 4-187 says that a field survey determined that there was 4.20 acres of wetlands and 5 acres of riparian habitat in the city. Why do you appear to be planning mitigation based on a 2.95 loss? (page 4-189)

Response 1397: As stated in the Draft SEIR, Section, 4.4.2, Wetlands and Riparian Habitat, p. 4-187:

> The 1995 field survey findings determined that the potential jurisdictional waters of the United States and wetlands in the City portion of the Sunshine Canyon project area **totaled approximately 4.20 acres** [emphasis added].

This total would include approximately 1.25 acres of disturbance associated with closure of the existing inactive City Landfill and approximately 2.95 acres of disturbance associated with the proposed City/County Landfill.

As stated in the Draft SEIR, Impacts Resulting from Closure Activities at the Existing Inactive Landfill, p. 4-188:

> As a result of these closure activities, an approximately 41-acre-foot sediment basin (refer to Figure 2.5-1) will be constructed near the landfill entrance, and drainage through the City will require major modifications (i.e., surface water improvement channels) for its distance upstream. Therefore, prior to City/County Landfill development, closure implementation **will result in the loss of ±1.25 acres of streamzone area within the City portion of the Sunshine Canyon** [emphasis added].

As further stated in the Draft SEIR, Impacts Resulting from Proposed City/County Landfill Development, p. 4-188:

> Additionally, development of the proposed City/County Landfill would result in unavoidable and direct long-term impacts on streamzones, wetlands, and riparian habitats. Impacts on these resources would include the removal of **±2.95 acres of jurisdictional waters, wetlands, and riparian habitat** [emphasis added]. Impacts on these resources would occur as a result of project development; specifically, the construction and excavation for the landfill footprint, ancillary facilities, and environmental control features. Construction grading would occur in sequences, necessitated as new landfill areas are developed within the proposed landfill footprint. Because the streamzone within project site would be excavated and filled in, impacts on the streamzone areas would be considered significant and adverse since the landfill would remain indefinitely. Habitats (i.e., wetlands and riparian) will not be reestablished within this area.

Regarding riparian habitat, as stated in the Draft SEIR, Section, 4.4.2, Wetlands and Riparian Habitat, p. 4-187:

> Based on the 1995 field surveys, it was determined that the total extent of riparian habitat remaining within the **City portion of the Sunshine Canyon project area is approximately ±5.0 acres** [emphasis added].

Comment 1398: **page 4-188 Impacts Resulting from Closure**

According to the staff of the Environmental Affairs Department that is overseeing BFI's closure of the existing City landfill and the staff of the State Integrated Waste Management Board nothing in their requirements, or in engineering practice, necessitates constructing surface water "improvement channels". When we ask the Environmental Affairs staff why this was being done, they said "because BFI wants to."

Response 1398: Surface water management system improvements have not been unilaterally proposed by BFI; rather, they have been developed using industry-accepted and regulatory agency-accepted standards of practice in accordance with CCR, Title 27, closure plan regulations.

Surface water management system improvements are required for closure of the existing City Landfill. Proposed surface water management system improvements originally contained in the *1994 Addendum to the Final Closure and Post-Closure Maintenance Plans for the Sunshine Canyon City Landfill* were updated in the *1997 Addendum to the Final Closure and Post-Closure Maintenance Plans for the Sunshine Canyon City Landfill*. The proposed improvements were reviewed and found to be necessary and sufficiently sized by the LEA, CIWMB, and RWQCB. The approved surface water management system improvements include the installation of a corrugated metal pipe to improve the conveyance of surface waters along the "S"-turn area of the access road and to stabilize the adjacent, steep canyon slopes where native material has sloughed and has partially blocked the natural drainage course. Other surface water management system improvements approved as part of final closure include the

construction of a lined conveyance channel along the access road and a sedimentation basin near the site entrance.

Comment 1399: Does the 2.95 acres referred to in the next paragraph include the 1.25 acres that may be removed at closure?

Response 1399: Refer to Response 1397.

Comment 1400: Will the proponent guarantee that the wetlands mitigation will be carried out in the vicinity of the project?

Response 1400: As stated in the Draft SEIR, potential candidate mitigation sites have been identified by the project proponent in conjunction with resource agencies for consideration to compensate for impacts on riparian and wetland resources as a result of project development. These sites include Bull Creek, Bee Canyon, and East Canyon, which are all located proximate to the project site. The final selection of any potential mitigation sites or mitigation programs will be determined by the resource agencies such as the CDFG, Corps, SWRCB, other regulatory agencies, City Planning staff, and the project proponent. In addition, refer to Topical Issue 12.

Comment 1401: **page 4-198**

Why is the City requiring only a 3 year monitoring program for the oaks, instead of the 5 year program demanded by the County?

Response 1401: The monitoring requirements provided in the Draft SEIR are in accordance with the City's adopted Oak Tree Ordinance. Mitigation measures have been recommended to compensate for the loss of oak trees in Sunshine Canyon and are described in the Draft SEIR, Section 4.4.3, Native and Nonnative Tree Resources, pp. 4-197 through 4-201. The City requirements on the size of replacement trees exceed those of the County.

Comment 1402: Will the period over which the trees are monitored begin when the tree has reached the required 1 [number] inch in diameter when measured 1 foot above the ground? This is not clear.

Response 1402: The monitoring period for an oak tree begins when the tree has reached the minimum 1-inch diameter, measured 1 foot above the ground.

Comment 1403: **Page 4-194, Cumulative Impacts**

Will the "phased restoration" be implemented as described by Mr. Osterling in his Revegetation Plan contained in volume A ?

Response 1403: The phased revegetation plan referenced by the commenter was for the County Landfill project, not the proposed project.

Comment 1404: Were any heritage oaks identified in the surveys? The chart in the index shows diameters up to 52 inches.

Response 1404: The adopted City Oak Tree Ordinance or oak tree reporting requirements (Ordinance 153,478; Article 6, Chapter IV) neither define heritage trees nor require the identification of these trees.

Comment 1405: How many of these large oaks were found and how will their loss be mitigated.

Response 1405: As noted in the Draft SEIR, Section 4.4, Biological Resource, there are 60 oak trees that measure 24 to 29 inches in diameter and 24 oak trees larger than 30 inches in diameter. All removed oak trees will be mitigated at ratios specified in the oak tree mitigation plan and defined by the requirements of the City's Oak Tree Ordinance.

Comment 1406: The first sentence in paragraph under City Mitigation Measures on page 4-194 that starts "A total of 100---" doesn't make sense. Please clarify. We cannot comment on this reduction until that sentence explained.

Response 1406: This information from the Draft SEIR has been changed. This mitigation measure now reads:

> A total of 100 24-inch box and 25 36-inch box size Coast live oak trees shall be planted in areas identified by the City. These trees shall be natural in form. The total mitigation tree count obtained using the 5:1 replacement ratio shall be reduced by 125 trees to account for the inclusion of these larger trees.

Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, in this document.

Comment 1407: Topical Response #14 incorporated by reference on page 4-139 of this DEIR states that the rare big cone fir will be replaced at a five to one ratio and monitored for five years after reaching a diameter of one inch. We feel that this is an acceptable mitigation.

Response 1407: This comment is noted.

Comment 1408: What performance guarantee is being placed on the important mitigation for the Biota?

Response 1408: The mitigation program has a specified time and size criteria that each planted tree must meet before mitigation is deemed completed.

For all biological mitigation measures being proposed, a monitoring phase, monitoring agency, and enforcement agency were identified on Table 1.10 in the Draft SEIR.

Comment 1409: What field verification of the mitigation program will take place?

Response 1409: Field verification either authorized under a specific permit or as part of mitigation would be verified by the monitoring agency or enforcement agency that has jurisdiction by law over the particular resource.

Comment 1410: When will this happen, in relationship to the annual report?

Response 1410: It is assumed that the commenter is referencing the annual monitoring report that would be prepared and submitted to the City Department of Public Works, Street Tree Division, by the project proponent in regard to oak trees. Specific to that report, the growth and survival record for each mitigation tree planted would be included, and the report would provide an accounting of the number of trees required for mitigation versus the number of qualifying trees planted. Maintenance recommendations would also be included in the annual report. The submittal dates and other requirements will be specified in the Oak Tree Permit.

Comment 1411: Will a forester from a public agency be on hand to verify the accuracy of the field study, as required by the County permit?

Response 1411: Mitigation pertaining to oak trees within the City would be under the direction of the City Department of Public Works, Street Tree Division. This division includes arborists.

Comment 1412: The County maps, showing the Significant Ecological areas, show SEA 20 extending into the city. Why is that area not shown on the map presented?

Response 1412: County SEAs are located in the unincorporated areas of the County of Los Angeles and not the City of Los Angeles. In regard to the project site within County jurisdiction, when the Board of Supervisors approved the General Plan Amendment for the County Landfill, it deleted ±542 acres of designated SEA No. 20.

With respect to the County Landfill and the adopted Statement of Overriding Considerations by the Los Angeles County Board of Supervisors, this statement acknowledges that the FEIR prepared for the County Landfill Extension identified and discussed significant effects that would occur as a result of developing an approximate 17-million ton landfill within Sunshine Canyon. The statement acknowledged that even with the implementation of mitigation measures, certain biotic effects could not be mitigated to a level of insignificance. The County Board of Supervisors also found that all other environmental effects could be mitigated to a level of less than significant with the implementation of mitigation measures (Refer to the Draft SEIR, Appendix C16, County Landfill Findings of Face and Statement of Overriding Considerations, and Conditions of Project Approval).

Regarding the Board of Supervisors' decision to adopt the Statement of Overriding Considerations, it determined that the benefits of the project outweighed potential impacts for these reasons:

1. The project will provide needed landfill capacity available to both public and private entities within the County.

2. 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 it is expected to

accommodate a substantial portion of the County's waste disposal needs well into the 21st century.

3. Additional disposal capacity caused by the development of this project will allow a number of existing landfills to close in compliance with their permitted closure plans and will avoid the potential adverse effects associated with using these facilities beyond their design capacities should it become necessary.

4. The project is designated as both a planned potential Class III landfill site in the County Solid Waste Management Plan (CoSWMP) and as a major planned extension of an existing landfill facility in the County's Solid Waste Management Action Plan.

5. The project constitutes an extension of an existing solid waste landfill facility located at Sunshine Canyon, and directly adjacent City of Los Angeles land.

6. The County Board has adopted a project that will substantially lessen the environmental effects of the originally proposed project and meet the primary objectives of the project proponent and the County.

7. The project would provide an opportunity to implement various waste diversion, recovery, and recycling measures through an agreement(s) entered into between the County and the project proponent to contribute to the County's efforts to comply with the requirements of A.B. 939.

8. The project site is located in an area in proximity to the majority of waste sources in the County. The CoSWMP has not identified any future waste disposal sites as close to the current waste sources that could serve the communities currently served by the Sunshine Canyon Landfill. The project's implementation may reduce overall vehicle emissions by reducing the travel distances from waste material sources to new landfills that may be located farther from these sources.

9. The County will receive 15 percent of the gross tipping fees collected by BFI.

10. 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 proponent, for use as public open space in perpetuity.

11. An approximate 100-acre open space area on the southern boundary of the project site will be maintained by the project proponent as a nature preserve and as a buffer area. Additional acreage on the northern perimeter of the project site will also be maintained by the project proponent in its natural state.

12. The project proponent will provide for riding and hiking trails within the limits of the area to be dedicated. BFI will further work with the Department of Parks and Recreation to identify, relocate (where appropriate), and dedicate the necessary

rights-of-way for public use of the East Canyon, Bee Canyon, and O'Melveny and Weldon Trails.

13. BFI will finance studies pertaining to the remaining Significant Ecological Areas.

14. BFI will plant oak trees in and around the project site well in excess of the County's Oak Tree Ordinance, which requires a 2:1 replacement ratio for removed trees. BFI will provide a 5:1 replacement ratio for big-cone Douglas fir trees at locations in the immediate vicinity of the site. BFI will guarantee and maintain survival for 5 years after reaching count caliber size.

15. BFI will enter into a contract with Cal Poly University, Pomona, or an institution of similar capabilities acceptable to the County Forester and Fire Warden, to engage in a study of Los Angeles County's hardwood forest resources and reforestation needs.

16. BFI will fund 50 percent of the cost of up to six hazardous waste roundups for the area surrounding the landfill, provided that the Board authorizes such roundups and at least 50 percent of the funding is provided by the County and/or other public agencies.

17. The project will ultimately provide additional 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.

In this regard, the County Board of Supervisors concurred that the foregoing benefits to the public through approval and implementation of the project outweighed the identified significant biotic effects that could not be mitigated.

Comment 1413: Figure 4.4-1 shows this area as greatly disturbed. Since this land was outside of the variance line, as shown on all city maps, please explain why the oak woodlands shown on the vegetation map outside of the variance line was removed? The map prepared by Ultrasystems and labeled number 3, that is a part of the original EIR, shows many communities of oak woodlands in the City and outside of the variance line that now seem to have disappeared. Please explain?

Response 1413: City records indicate that no oak trees were removed from City jurisdiction unless authorized by the City. The vegetation map used for the Draft SEIR (see Figure 4.4-1, Existing Vegetation Communities, p. 4-145) was compiled as a result of the most recent field surveys by L&L Environmental on October 4 and December 4, 1996, and March 27, 1997. That figure updated the 1992 vegetation map prepared by P&D Environmental Services and the referenced map by the commenter that was included in the FEIR, Appendices, Volume IIA (Ultrasystems Engineers and Constructors, Inc., April 1989).

Comment 1414: Was the City ever compensated for the loss of these oaks under the City Oak tree ordinance?

Response 1414: Refer to Response 1413.

Comment 1415: In BZA case 4336 & 4337 Exhibit #B-1 condition #5 which approved the curative variance reads:

> "Oak trees. No oak tree shall be removed from within the area of the variance, except in the northern fill area. Oak trees within that area shall be counted prior to displacement and replaced at a ratio of two trees for every one removed in strict compliance with the oak tree regulations of Section 17.05-R of the Los Angeles Municipal Code."

Why was this never done?

Response 1415: Refer to Response 1319. As noted, BFI was not requested by the City to replace oak trees within the north canyon area of Sunshine Canyon.

Comment 1416: **Risks, Section 4.9. 1**

Sections of referenced materials should be reprinted and circulated with the current documents.

Response 1416: The reference materials mentioned by the commenter are prior FEIR citations that provided background information and technical analysis relevant to the topic of hazardous materials. Five environmental documents were referenced in the Draft SEIR, Section 4.9.1, Hazardous Materials. These documents along with the Draft SEIR were provided to local area libraries for public review.

Comment 1417: Parts of the EIR were circulated eight years ago and the original volumes are not available at all listed libraries and certainly all referenced material should have been provided to the decision makers.

Response 1417: As mentioned by the commenter, the County FEIR was originally circulated for public review and comment in April 1989. However, all volumes of the County FEIR (including all technical appendices) were distributed to 14 libraries in the greater Los Angeles region. These libraries were public depositories for these documents during the public review period for the Draft SEIR.

Comment 1418: Will BFI fund half of additional hazardous waste roundups in the City, as it has been required to do in the County? Will it be, at least, in the same ratio, i.e. 6 for each 17,000,000 tons of permitted capacity.

Response 1418: No mitigation measure in regard to hazardous waste roundup is being recommended for the proposed project. However, the operational County Landfill CUP requires that BFI fund 50 percent of six hazardous waste roundups for the area surrounding the landfill,

provided that the County Board of Supervisors authorizes these roundups, and that the balance of the required funding be provided by the County or other public agencies.

It should be noted that the Draft SEIR includes numerous mitigation measures relative to the degree of impact in regard to hazardous waste. Recommended mitigation measures are listed in the Draft SEIR, Section 4.9.1, Hazardous Materials, pp. 4-296 through 4-298. Any requirement for funding of hazardous waste roundups must be imposed by the City Council and/or Planning Commission and be consistent with City policies regarding hazardous materials handling and reduction.

Comment 1419: What percentage of HHW generated is being properly disposed of at these roundups?

Response 1419: As indicated in the Draft SEIR, the City currently holds up to 10 HHW roundups per year. Because each HHW roundup is located in a different area of the City, the type and quantity of materials brought to each roundup will vary; therefore, each roundup will provide different information in regard to the percentage of HHW generated.

Comment 1420: Based on the City figures of .7% of their waste stream being hazardous, and subtracting what is now being properly disposed of at roundups, how much hazardous waste will eventually be put into the landfill at capacity, using a worst case scenario.

Response 1420: As referenced in the Draft SEIR, Section 4.9.1, Hazardous Materials, p. 4-290, the estimated percentage of HHW in the City's residential waste stream is 0.7 percent. This figure is a broad Citywide estimate used for planning purposes and was derived by City BOS. Actual field measurements of HHW recovered at the County Landfill (e.g., recovered by BFI spotters at the landfill working face area and during load checks) from January 1997 through March 1998 show that HHW represents approximately 0.15 percent of the solid waste stream. Therefore, current field conditions at the County Landfill show a much lower HHW percentage than the City BOS planning projections. Refer to Response 1248 for a discussion of the potential for HHW disposal at the proposed City/County Landfill.

Comment 1421: The EIR states that a waste-load inspection will be conducted for every 1000 tons received. The current County permit requires that 6 waste-load checks be conducted daily, regardless of the amount of inflow. Why is the City requiring a lesser standard?

Response 1421: Refer to Response 222. As indicated in that response, this mitigation measure will be revised, and waste load checks at the proposed project will be increased to 1.5 load checks per 1,000 tons of waste received at the landfill for the first year of operation. However, after the first year of operation, BFI may request that the City LEA decrease the required load-checking frequency to one load check per 1,000 tons of waste received at the proposed project.

Comment 1422: A City inspector should be present at, and conduct, all waste-load checks, since very little of the HHW is being found at the current inspections or at the working face.

Response 1422: As indicated in Response 203, BFI landfill personnel, not LEA inspectors, will be required to randomly select loads and inspect them for hazardous waste. The LEA will monitor implementation of this load check program by landfill personnel.

Comment 1423: For example, BFI reported in February of this year an inflow of 58,961+ tons or 117,992,000 pounds, but they recovered through examination of the working face only approximately 115 pounds of prohibited waste. Using City figures 0.7 percent of their waste, or 825,000 pounds, could be expected to be hazardous.

Response 1423: Refer to Response 1420.

Comment 1424: The SEIR refers to "sensors for detecting volatile organic compounds". These sensors are not being used at the scale house and, in fact, have never been used. When we inquired why this was not done, we were told by Mr. Hanson of the County Health Dept. that "it (the detector)" would go off in every load." Why then, if BFI is conducting the required 144 load checks monthly, and monitoring the working face, are they finding only 23 items (as occurred in February) and similarly small numbers in other months?

Response 1424: The referenced information from the Draft SEIR has been changed. VOC detectors are no longer being considered as part of the proposed project. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR.

Comment 1425: Has anyone, over the years since BFI first started operating the site in 1978, been fined, or punished in any way for bringing in prohibited waste? When and how?

Response 1425: Refer to Topical Issue 16.

Comment 1426: The SEIR states a "Full time inspectors shall be employed on site for the inspection of waste materials." Will those inspectors will be employed by the City, and the City reimbursed by BFI for his (her) salary, as is the case with the County inspector at the County site?

Response 1426: Refer to Response 1422.

Comment 1427: It is imperative that any inspector not have direct ties with BFI, but be a City employee.

Response 1427: Refer to Response 1422.

Comment 1428: If it takes one full-time inspector to monitor the disposition of Trash in the County trash will at least one full-time inspector more be employed, so that the dump will ultimately have at least two full-time inspectors on site?

Response 1428: Refer to Response 1422. In addition, refer to Response 188 for a discussion of the requirement for some form of agreement between the City and County to authorize common power over the entire project site.

Comment 1429: The SEIR states on page 4-299 that . . . "all waste materials brought to the site would be unloaded at an active working face area, compacted with at least 9 inches of clean, compacted soil by the end of the working day." This is a departure from County practice and seems to conflict with other portions of this document.

Response 1429: This information has been changed. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR. Waste materials brought to the site would be unloaded at the active working face area and covered with at least 6 inches of clean, compacted soil by the end of the working day or with approved alternative daily cover materials (ADCMs). Refer to Response 195 for a discussion of the potential environmental impacts associated with the use of ADCMs at the proposed City/County Landfill.

Comment 1430: Can we rely on this use of dirt as cover?

Response 1430: Refer to Response 1429.

Comment 1431: The current system of requiring tarping at the present landfill is not working. Many of the smaller trucks that use neighborhood streets and drop litter arrive at the dump without cover of any kind. The landfill workers may issue a "warning," but there is no practical way of keeping track of repeat offenders and thus far no fines have been imposed.

Response 1431: The project proponent is presently working with the County LEA to encourage small haulers to use proper tarping. Currently, the project proponent provides cleanup along San Fernando Road and the frontage road to the Roxford Street exit of the I-5 Freeway, Balboa Boulevard to Sesnon Boulevard, and within O'Melveny Park.

As noted in Topical Issue 18, small haulers (e.g., landscapers) with uncovered waste loads are informed at the scale house area by BFI personnel that all future waste loads must be tarped and covered. If a specific refuse hauler continues to bring solid waste to the project site in vehicles that are not fully covered, then BFI has the option to refuse acceptance of the load.

Additionally, the California Vehicle Code (CVC), §23114(a), requires that no vehicle shall be driven or moved on any highway unless the vehicle is constructed, covered, or loaded to prevent any of its contents from dropping, shifting, leaking, blowing, spilling, or otherwise escaping from the vehicle. In addition, CVC §23115 states that no vehicle loaded with garbage, swill, cans, bottles, wastepapers, ashes, refuse, trash, or rubbish; or any noisome, nauseous, or offensive matter; or anything transported to a dump site for disposal shall be driven or moved upon any highway unless the load is totally covered in a manner that will prevent any part of the load from spilling from the vehicle.

Comment 1432: We, therefore, recommend that a five dollar additional charge be imposed, similar to that imposed at Puente Hills, on all trucks arriving uncovered and that the revenue from that charge be donated to the beautification of the community in the immediate vicinity of the landfill.

Response 1432: This comment is noted.

Comment 1433: The landfill is now operating in the lower elevations of the canyon and taking far less trash than the daily limit, nevertheless neighbors have complained about trash from the dump in O'Melveny Park.

Response 1433: BFI has not been informed or cited by either the County or City LEA for having fugitive litter in O'Melveny Park. Since the County Landfill became operational in August 1996, mitigation measures implemented by the project proponent have eliminated any fugitive litter from migrating into O'Melveny Park or the community of Granada Hills. Currently, the project proponent implements an extensive litter control program that includes specific preventive and response measures to control windblown litter and debris both onsite and offsite. These measures include having a working face area as small in size as operationally practical, using proper landfill compaction techniques, using daily cover material or ADCMs, using portable litter fences near the operating area, and installing secondary litter fencing.

As mentioned in Topical Issue 18, the project proponent provides cleanup along San Fernando Road and its frontage road to the Roxford Street exit of the I-5 Freeway, Balboa Boulevard to Sesnon Boulevard, and within O'Melveny Park.

In addition, landfill employees inspect the areas immediately adjacent to the landfill site to pick up litter, if necessary. Enforcement of litter control practices at the operational County Landfill is under the authority of the County LEA. For a listing of litter mitigation measures, refer to the Draft SEIR, Section 4.9.3, Litter, pp. 4-305 and 4-306.

Comment 1434: An observation of the on-sight inspector for the current operation reads: "I did observe plastic bags and papers blowing approximately 100 feet but confined within the perimeter of the canyon." How will this be controlled when the dump is operating only 50 feet below the ridgeline, as they propose.

Response 1434: Refer to Response 1433 and Topical Issue 18.

Comment 1435: How have the conditions that resulted in two safety violations being issued by OSHA, concerning the death of a worker, been corrected?

Response 1435: Two general violations were issued from the three citations made by OSHA. One citation was dropped on the grounds that the condition cited did not pose an immediate threat to the health and safety of any employee. The other two citations were each reduced to a general violation on the grounds that it could not be established that the elements requisite for a serious classification for either citation existed. OSHA and BFI have both stipulated that the terms and conditions agreed upon are not intended to be, and shall not be construed by anyone and any proceeding, as an admission of negligence, fault, or wrongdoing whatsoever by BFI.

Comment 1436: Would the citizens advisory committee be funded to conduct health surveys?

Response 1436: The City has not determined whether a citizens advisory committee is necessary. This will be determined by the City Council or Planning Commission as would the level of funding to be borne by the project proponent. However, if the committee is required, it is anticipated that certain technical advisor(s) may be used to assist the citizens advisory committee in regard to health-related concerns. The City would then be responsible for determining which independent consultant may be used as an advisor, what capacity the advisors will assist the citizens advisory committee, and the level of funding. Refer to Response 917.

Comment 1437: Why does this document refer to the incinerators as flares? The community was corrected on this point by the engineers at AQMD.

Response 1437: The terms "flare" and "incinerators" are interchangeable, and the SCAQMD has chosen to use the term "flare" to refer to the LFG incineration devices. Incineration is by definition the destruction of a waste material by the application of heat. A flare handling LFG does not require the external application of heat because LFG is the fuel source.

Generally, an incinerator is a furnace or other closed fire chamber used to burn waste and heat recovery is often attached to these units.

Comment 1438: Is this a euphemism intended to make incinerators seem more benign, and mislead the public?

Response 1438: Refer to Response 1437.

Comment 1439: You say that "as an example of how the system operated during the Northridge earthquake on January 17, 1994, the system" (gas collection) "successfully shut down, effectively reducing the risk-of-upset." Isn't it a bit like saying: "On the morning of the earthquake I was successfully propelled from my bed, thus effectively reducing the risk of dying in bed?"

Response 1439: The quote by the commenter in reference to risk of upset conditions has been taken out of context. The Draft SEIR, Section 4.9, Risk of Upset, states the following:

> During a significant seismic event, the LFG collection and flaring system could malfunction and cause an explosion. The proposed system would be similar to the existing LFG collection and flaring system for the existing inactive landfill. As an example of how that system operated during the Northridge earthquake on January 17, 1994, the system successfully shut down, effectively reducing any potential for a risk-of-upset situation. The existing system sustained no damage and was in operation 2 days after that earthquake. The proposed LFG collection and flaring system would have similar shutoff controls to reduce any potential for LFG-related explosions. No significant impacts are anticipated as a result of project development.

The Draft SEIR indicates that the potential exists for a malfunction or an explosion during a significant seismic event. The existing LFG collection and flaring system indicates that during the Northridge earthquake, these systems successfully shut down and reduced the potential for a risk-of-upset condition to occur at the project site. Information relevant to this issue was included in the Draft SEIR, Section 4.1, Earth Resources, which stated:

> The performance of Class III nonhazardous landfills affected by the earthquake was excellent. Several landfill facilities were subjected to peak bedrock accelerations of 0.2 to over 0.5 g. No landfills affected by the Northridge earthquake showed any physical signs of major instability, although several facilities experienced minor levels of lateral deformation and/or cracking. Additionally, **many landfills** [emphasis added] experienced a temporary shutdown of their gas flare systems due to the loss of power after the earthquake.

As noted in the Draft SEIR, the City Landfill was not the only landfill that experienced a temporary shutdown of its LFG flare stations.

Comment 1440: Didn't the incinerators shut down, do to the lack of electrical power, just like everything else in the neighborhood?

Response 1440: The flare station's fail/safe system shut down the flare safely before the loss of electricity. There were no other reported damages to the equipment, and the flare was back online 2 days after the earthquake occurred.

Comment 1441: Has the system had any other shutdowns due to lack of electrical power on other days of high usage? If so, please document.

Response 1441: Reportedly, other shutdowns due to electrical outages have occurred, but they have been short term (i.e., several hours) in duration. Each time, the flare was safely shut down to prevent the escape of LFG to the atmosphere. These short-duration electrical outages reportedly occur only once or twice per year (about the same frequency as the residential area proximate to the landfill).

Comment 1442: Will you purchase a generator to provide back-up power in emergencies?

Response 1442: As indicated in Response 211, the existing LFG flare station in the City does not have a backup generator because the project site is currently served by two independent electrical service purveyors (i.e., DWP and SCE). The proposed project would be serviced by both purveyors that would provide all onsite power needs. In the event that one of the service purveyor's onsite power lines are damaged during a major earthquake, the other purveyor would provide service until necessary repairs can be performed. After the January 1994 Northridge earthquake, the project site was without power for approximately 48 hours. At that time, DWP was the only electrical service purveyor to the site. SCE began providing electrical service to the project site in August 1996.

Comment 1443: The Dept of Water Resources worries (letter to Rodney Nelson, July 1997) that shear strengths based on an analyses of the OII landfill were not correct because they believe it is probable that the OII landfill had a "higher component of soil in the waste" than other landfills.

Response 1443: Shear strength testing was performed at the OII Landfill and included samples composed entirely of solid waste, with no soil. The results of this testing indicated that these samples had higher strengths than soil-rich waste samples. Refer to Response 520 for a discussion of how using ADCMs could potentially affect the design and engineering of the proposed City/County Landfill.

Comment 1444: Since BFI is not now using soil as daily cover in the County portion, how will that impact shear strength analysis if this practice continues in the City?

Response 1444: Refer to Response 520 for a discussion of how using ADCMs could potentially affect the design and engineering of the proposed City/County Landfill.

Comment 1445: Did the stability analysis for the City consider this as a factor. Do you intend to continue to use ADC'S? Other parts of this document indicate you will be using soil.

Response 1445: Refer to Responses 195 and 520 for discussions pertaining to potential impacts associated with the use of ADCMs, regulatory requirements for their use at the proposed City/County Landfill, and how using ADCMs could potentially affect the design and engineering of the proposed City/County Landfill.

Comment 1446: If you use an ADC, will you request a change in the CUP to reflect this important operational change.

Response 1446: The use of ADCM in the City will not require a CUP; its use will be reflected in the SWFP. As noted in Response 195, the project proponent would use ADCMs at the proposed City/County Landfill only if approved by the City LEA in accordance with the requirements of CCR, Title 27, §20690.

Comment 1447: **Appendix**

The Appendix volume is not paginated and is a hodge podge of relevant and irrelevant information.

Response 1447: The purpose of the Draft SEIR's technical appendices is to provide the technical studies and other information relative to the analysis provided in the Draft SEIR. The Draft SEIR's Volume II included a table of contents wherein each assessment, study, report, or portion of information was noted. In this regard, each section (e.g., Initial Study/Notice of Preparation, Technical Reports, and Background Information) is separately divided, indexed, and individually tabbed for reference, and each item of information was given a specific reference number (i.e, A1, A2, A3, etc.), paginated if possible, and separated by a colored sheet of paper.

Comment 1448: For example, the spring and stream information should be accompanied by a map showings where the samples were taken. Without this they are meaningless.

Response 1448: The referenced spring and stream information is provided in the Draft SEIR, Volume II, Appendix C18, Sunshine Canyon Surface Water and Groundwater Monitoring Data.

Refer to Response 592 for a discussion of locations onsite where surface water samples are collected and constituents that have been discovered in the surface water samples.

Comment 1449: The obviously less important items like the photo copies of the speakers' cards should not have been interspersed with comments from responding agencies. The reader gets the feeling that the preparer is trying to create an SEIR of such size and so confusing and conflicting in content that the reader will be intimidated.

Response 1449: The format of the Draft SEIR and its technical appendices is consistent with the City's adopted EIR Preparation Manual. The size of the Draft SEIR is in relationship to the significant issues addressed, level of controversy the project has invoked, and the complexity surrounding a proposed landfill project.

Comment 1450: Many of the resource documents in Appendix are over 5 years old. Will these be updated?

Response 1450: The information provided in the Draft SEIR's technical appendices is intended to provide background information relative to the technical analyses presented in the Draft SEIR. City Planning staff have reviewed the information included in the technical appendices and have determined that it does not need to be updated because it appropriately supports the existing analyses provided in the Draft SEIR.

Comment 1451: **Traffic from the Appendix**

The traffic analysis is yet another glaring example of incremental approval being sought by the proponent. By splitting the project into stages the analysis of the impacts of the entire project remain unknown.

Response 1451: The proposed project addresses the "whole of the action," both City and County portions of the project, as required by CEQA. The project has not been split in stages as noted by the commenter; rather, the Draft SEIR has addressed the effects of project development within both City and County jurisdiction as required by CEQA.

In addition, the traffic impact study prepared by registered traffic engineers and included in the Draft SEIR has been deemed complete and acceptable by both City Planning staff and LADOT staff.

Comment 1452: In less than a year after opening, BFI is back with another proposal to expand. The original document attempted to consider the larger project but when these projections exceeded a level of significance (see Response to Comment Volume A pg.592) traffic calculations were reduced to include only the County portion.

Response 1452: BFI was required by the County Landfill CUP to submit its project application to the City for the development of its project within the City. As noted by the commenter, the certified FEIR prepared for the County Landfill analyzed impacts attributable to a 17,500-tpd landfill that would be developed in both County and City jurisdictions. Traffic mitigation as noted in the FEIR was never reduced even though the original project was refined, and an approximate 17-million-ton landfill facility was eventually approved by the County Board of Supervisors. Approval of the County Landfill included the implementation of traffic mitigation measures recommended for a 17,500-tpd landfill facility, not a reduction of mitigation as noted by the commenter. In addition, refer to Response 577 for a discussion of the County Landfill project history.

Comment 1453: Now the County impacts are being excluded.

Response 1453: The Draft SEIR for the proposed City/County Landfill analyzed impacts attributable to a maximum 12,100-tpd waste intake rate. This maximum rate includes the operational County Landfill.

Comment 1454: This is clearly an attempt to minimize the impacts of the entire project as required by CEQA.

Response 1454: Refer to Response 510 for a discussion of alleged project "piecemealing" and "incremental approval."

Comment 1455: The County Dept. of Public Works said in their report to the County Regional Planning in 1989: "The traffic studies set forth in the EIR, combined with the lack of a dedicated freeway access, suggest that negative impacts of traffic volumes associated with more than 6000-10,000 tpd may not be mitigated by the traffic mitigation measures."

Response 1455: Refer to Response 1391.

Comment 1456: BFI now has a permit that limits its daily tonnage inflow to 9000 tpd (see SWFP at page 11) and is requesting another 5,500 tpd. This amount clearly is significantly over the tonnage that the County believed would cause negative impacts.

Response 1456: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 1457: In that same report, the County also stated that: "The traffic studies indicate a higher than average accident rate at intersections of city streets with current volumes which are 5000 to 6000 tpd." Since BFI has implemented its traffic improvements and the landfill is currently operating at well under its permitted inflow, please provide the 1997 accident reports identifying the same comparisons used by the County to reach their conclusions.

Response 1457: Refer to Response 1391.

Comment 1458: The Linscott, Law & Greenspan report on traffic does not factor in the exempt waste that is not counted toward tonnage requirements but must be considered in any traffic analysis.

Response 1458: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 1459: They conclude that the 6,600 TPD maximum County plus the 5,500 TPD maximum City would result in a 12,100 TPD limit. This however is erroneous, since the State issued SWFP for the County allows a gross tonnage of 9000 TPD, including exempt waste. This means that the real impacts should be calculated on the basis of 14,500 TPD.

Response 1459: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 1460: The LADOT should be required to follow its own guidelines on providing recent traffic data ((i.e., data should not be over two years old).

Response 1460: Refer to Response 154 for a discussion of the Draft SEIR transportation/circulation study potentially containing old or outdated information.

Comment 1461: In the Linscott study they say they were allowed to use 1992 and 1993 data and refer to it as 1995 data (page 8). How can this company justify this misleading and unscientific presentation? They go on to say that they base this on the belief that the January 1995 data showed lower volumes at two intersections.

Response 1461: Refer to Response 154 for a discussion of the Draft SEIR transportation/circulation study potentially containing old or outdated information.

Comment 1462: Interestingly these areas were still undergoing construction modifications from the 1994 earthquake and data taken at that time could in no way reflect the current impacts.

Response 1462: The Draft SEIR, Section 4.13, Transportation and Circulation, examined 13 key intersections and the landfill entrance within the study area. The majority of the intersections in the study area are currently stop-sign controlled. Existing a.m. and p.m. peak-hour operating conditions for the 13 key intersections were investigated according to the critical movement analysis (CMA) methodology as required by the LADOT. In addition, none of the13 key intersections analyzed underwent construction modifications as a result of the 1994 Northridge earthquake, as mentioned by the commenter.

Comment 1463: Even the Jan. 1995 data exceeded the two year proscription by eight months and it fails to include the traffic generated since the landfill in the county opened in August of 96. Certainly new counts must be made.

Response 1463: Refer to Response 154 for a discussion of the Draft SEIR transportation/circulation study potentially containing old or outdated information. In addition, refer to Response 156 for a discussion of the cumulative traffic analysis included in the Draft SEIR.

Comment 1464: We have trouble seeing why the trip generation rates based on the "daily counts taken at the landfill entrance" (page 15) are not more accurate than the speculative estimates provided by BFI. BFI is required to keep daily records of the weight of all trucks entering the landfill. The projections should be based on the actual data.

Response 1464: At the time the traffic impact study was being prepared, the County Landfill was not operational. However, as indicated in the Draft SEIR, daily traffic forecasts for the project were based on expected operations of the landfill facility (maximum intake tonnage) and traffic rates developed from information provided by the project proponent. The peak-hour traffic forecast was also based on the calculated peak-hour percentage rates, which were used in the County Landfill FEIR.

Also, as indicated in Response 153; the Draft SEIR, Table 4.13-4, Project Traffic Generation Forecast within the City, p. 4-347, and Appendix B1, Traffic Impact Study Report, Table 5, Project Traffic Generation Forecast, p. 17, the trip generation forecast for the proposed project in the City is summarized and provides information on the number of "truck trips" and "vehicular trips" that the proposed project would generate on both daily and peak hour (a.m./p.m.) basis.

Comment 1465: The SEIR states that transfer trucks (or even transfer stations) were not used in 1985-1985" (page 15). We believe this to be erroneous since transfer trucks from Santa Monica arrived daily at the landfill during the eighties.

Response 1465: The information presented in the traffic impact study is accurate and correct. From 1985 through 1986, traffic counts were performed at the City Landfill (when it was operational); however, those counts did not consider transfer truck traffic. Traffic counts reflected collection vehicles only.

The reference by the commenter is from Appendix B1 of the traffic impact study from the Draft SEIR. Specifically, that study indicated:

> According to BFI, transfer trucks (or even transfer stations) were not used in 1985-1986 when the daily traffic counts were taken at the landfill entrance. The majority of the materials brought into the site were delivered by curb-side collection trucks in 1985. Hence, the rates developed from these counts, if used, will overestimate the trip generation potential of the proposed Sunshine Canyon Landfill project.

As indicated in the Draft SEIR, project traffic generation forecasted within the City considered not only transfer station vehicles but also curbside collection trucks, local deliveries, and employee traffic.

Comment 1466: It is incumbent for BFI to consistently use figures that reflect fact.

Response 1466: Project traffic generation information reflected in the Draft SEIR has been verified and approved by both the LADOT and City Planning staffs.

Comment 1467: BFI records the weight of every vehicle entering the landfill on a daily basis. Please require them to make at least the last few months of these records a part of this record so that the weight-to-volume ratios can be verified.

Response 1467: BFI is required to record the weight of every vehicle entering the County Landfill in accordance with the approved County Landfill CUP and SWFP. BFI is required to submit these records to the County LEA.

Comment 1468: The traffic Impact Report in Volume II at "i" states; "The proposed City Landfill would have a net airspace volume of approximately 31 tons . . ." This figure does not agree with the proposal. Why?

Response 1468: The information being referenced by the commenter is estimated net airspace. Conceptual design plans have been modified, and airspace capacity within the City portion of Sunshine Canyon was adjusted to reflect additional capacity. (See Draft SEIR, Section 1.6.4, Modifications to the Proposed Project, p. 1-9.) With respect to the estimated net disposal capacity, the Draft SEIR, Section 1.2, Overview, p. 1-1, states the following:

> The City of Los Angeles (City) is evaluating a proposal that consists of the development, operation, maintenance, and monitoring of a Class III, nonhazardous solid waste landfill (herein, City/County Landfill or proposed project). A portion of the proposed City/County Landfill footprint is located on ±194 acres within the City portion of Sunshine Canyon and provides an estimated net airspace disposal capacity of 55 million tons within the City.

Comment 1469: The landfill has now been operating for over one year, although this has been at a smaller than permitted volume. Has there been any increase in traffic accidents in the vicinity of the analyzed intersections in that period and did any involve garbage trucks?

Response 1469: Refer to Response 1391 for a discussion of traffic safety conditions at San Fernando Road/Project Entrance.

Comment 1470: Will all trucks, not servicing the neighborhood, that are over the current weight restriction be precluded from using Balboa Blvd?

Response 1470: Yes. Existing weight limitations are already in place along Balboa Boulevard. Balboa Boulevard is currently posted by the City, and trucks in excess of 6,000 pounds are restricted from using that street.

Comment 1471: **Appendix Liner Section**

This section describes several different liners. Which one will be used on the new site?

Response 1471: Figure 2.7-1, Preferred Base Liner; Figure 2.7-2, Preferred Side Slope Liner; and Figure 2.7-3, Preferred Waste-on-Waste Liner illustrate the liner designs proposed for the City/County Landfill project. Each area to be lined, including the native side slopes, base areas, or the landfilled side slopes, will use the "preferred liner" design being proposed and as illustrated in the Draft SEIR. Figure 2.7-3 has been changed. Refer to Section 2.0, Revisions and/or Additions to Draft SEIR, Figures 2.7-3a (Revised) and 2.7-3b (Revised), in this document.

Comment 1472: Will uniform construction be used throughout on side slopes, as well as underneath the waste pile.

Response 1472: Refer to Response 744 for a discussion of 2H:1V (horizontal:vertical) refuse slope gradient that will be utilized for the proposed project versus a more conservative 3H:1V.

Comment 1473: How will the chosen liner accommodate the differential subsidence, if the liner is placed on existing trash?

Response 1473: Refer to Responses 745 through 749 for a discussion of long-term settlement of solid waste landfills and potential impacts on slope stability. In addition, refer to these same responses for a discussion of how the proposed City/County Landfill design and engineering incorporate long-term landfill settlement.

Comment 1474: During the '94 earthquake did any other landfill in the affected area have a liner placed over waste? If so, how did it perform?

Response 1474: There are no landfills located in the vicinity of the affected area of the 1994 Northridge earthquake that use a waste-on-waste liner system. However, as a requirement for regulatory approval, both static and seismic stability analyses will be performed and submitted to regulatory agencies for review prior to construction. These analyses must demonstrate that the liner system is designed to adequately resist the maximum credible earthquake (MCE) for the project site. Refer to Topical Issues 1 and 2 for a discussion of seismicity and landfill stability during the Northridge earthquake. In addition, refer to Response 1112 for a discussion of solid waste landfill sites where waste-on-waste liner systems have been successfully designed, permitted, and constructed.

Comment 1475: Please explain diagrams #6, #7 and #8. It appears that the liner will be placed on intermediate cover. Since the landfill is closed, won't the final cover be in place? If not, why not?

Response 1475: Figure 6, Waste Containment Systems, Appendix B5 of the Draft SEIR, illustrates a waste-on-waste liner system and includes a geogrid reinforcement within the underlying soil layer. An alternative to using geogrid is illustrated on Figure 7. Also on Figure 7, the geogrid is replaced with additional compacted soil. Figure 8 shows the prescriptive

final cover system or the minimum standard for Class III landfills in accordance with CCR, Title 27, and CFR, Title 40, Section 258 (Subtitle D).

Comment 1476: What is the permeability of the buffer soil? What is the sub-base made of?

Response 1476: The subbase layer is comprised of a layer of clean, compacted soil that provides a uniform surface for placement of the low-permeability liner. There is no hydraulic conductivity requirement for the compacted buffer soil because this soil is not intended to act as a hydraulic barrier.

Comment 1477: Will this be used on all side slopes?

Response 1477: Side slopes will be constructed in either native cut slope areas or in compacted fill material within the limits of the landfill footprint area.

Comment 1478: In #8 you show a vegetation layer of 1 foot. Your revegetation plan prepared by Mr. Osterling calls for 15 feet of final cover. Which is accurate?

Response 1478: Refer to Response 210 for a discussion of the proposed "monolithic" alternative final cover design and vegetative layer for the closure of the existing inactive City Landfill.

Comment 1479: Will you be using the revegetation described in the program included in the Appendix and in the topical response in Vol. A of the Response to Comments?

Response 1479: No. Refer to Response 210 for a discussion of the proposed "monolithic" alternative final cover design and vegetative layer for the closure of the existing inactive City Landfill.

Comment 1480: **Appendix C7**

Why did you not give as much statistical analysis and consideration to the population of Sylmar as you did to Granada Hills-Knollwood in your analysis of minority and socioeconomic impacts?

Response 1480: Population and ethnic makeup within a 2-mile radius of the project site were addressed in the Draft SEIR, Table C7-1, Hispanic Population Distribution within 2-Mile Radius of the Sunshine Canyon Landfill, p. C7-2. This 2-mile radius included portions of the community of Sylmar. In addition, portions of the *Granada Hills-Knollwood District Plan Revision Final Environmental Impact Report* were excerpted for demographic information regarding the Granada Hills community. Refer to Response 1190 for a discussion of environmental justice.

Comment 1481: The address of the dump is Sylmar and, according to your own data, identical in proximity to the dump. Will you combine these statistics to give a more realistic picture of the affected communities.

Response 1481: The population of Hispanics (i.e., the dominant minority in the project area) and their total population were presented in the Draft SEIR, Table C7-2, for those communities located within 5 miles of project site. That distance includes areas of Sylmar. Refer to Response 1190 for a discussion of environmental justice.

Comment 1482: It is inaccurate to use 2 miles as a distance for either of these communities; the trash will be much closer than the entrance.

Response 1482: The information used in the Draft SEIR presents population and ethnic composition ranging from 1.5 to 5 miles from the project site. Because these tables (i.e., C7-1 and C7-2) present a population summary and not the closest distance to the project site, these data represent general population characteristics. Refer to Response 1190 for a discussion of environmental justice.

Comment 1483: Your maps show ancillary facilities within 600 yards of homes.

Response 1483: The location of proposed landfill operations within 1,700 feet of residential areas to the south (within the community of Granada Hills) was analyzed throughout the Draft SEIR, Section 4.0, Environmental Impact Analysis. As referenced throughout Section 4.0 of the Draft SEIR, a ±100 acre open-space area and perimeter ridgeline are located between the proposed landfill use and residential areas.

Comment 1484: The demographics have changed dramatically since the last census in 1990.

Response 1484: The demographics within the communities of Sylmar and Granada Hills have not changed dramatically since the last census in 1990. It should be noted that the statistics used in the Draft SEIR were derived from the City's approved Granada Hills-Knollwood District Plan Revision Final EIR (November 1994), and 1993 estimates were based on 1990 census data. The information contained in the Draft SEIR, Table C7-2, Hispanic Population Distribution by Communities in Proximity to the Project Site, was based on the most current census data available to both the City and City of San Fernando at the time the document was prepared. Revisions to these data would not affect the findings presented in the Draft SEIR. Refer to Response 1190 for a discussion of environmental justice.

Comment 1485: The declining home prices have caused many changes. Will you do a more recent study to provide an accurate basis for your conclusions?

Response 1485: Refer to Response 180 for a discussion of the proposed project's potential effects on property values.

Comment 1486: Because of problems with dust violations, the AQMD required BFI to install an anemometer to record wind speed on the old landfill. Will you please include these site-specific records from the last years of the City operation and those from the current operation.

Response 1486: Refer to Response 400 for a discussion of wind directions, speeds, and windroses that have been recorded at the project site.

Comment 1487: The anemometer readings in the appendix are not usable because no location is indicated.

Response 1487: Refer to Response 400 for a discussion of wind directions, speeds, and windroses that have been recorded at the project site.

Comment 1488: The readings from the city berm must be included.

Response 1488: Refer to Response 400 for a discussion of wind directions, speeds, and windroses that have been recorded at the project site.

Comment 1489: **Biota, Appendix B2, section 5, page 5-1**

Mitigation measures are recommended for each of the following where "significant impacts are identified": Arroyo willow series, southern willow scrub, coast live oak woodland, Venturan coastal sage scrub, slender mariposa lily and the San Diego horned lizard. With the exception of the coast live oak, we cannot find the mitigation proposals for the other communities. Where can we find them?

Response 1489: The commenter is referred to the Draft SEIR, Section 4.4.1, Vegetation and Wildlife Habitat Assessment, and both City and County mitigation measures for sensitive habitats and wildlife were identified on pp. 4-179 through 4-181.

Comment 1490: Will the suggested mitigations for the mariposa lily be carried out as recommended by the consultant on page 5-2?

Response 1490: Yes. As identified in the Draft SEIR, Section 4.4.1, Vegetation and Wildlife Habitat Assessment, p. 4-180, that plan will be implemented by the project proponent and supervised by Responsible Agencies, including the City, during a 5-year monitoring program.

Comment 1491: It is said that impacts on this species will remain significant if transplantation fails. What measures are being used to insure that failure does not occur?

Response 1491: As stated in the Draft SEIR, Section 4.4.1 Vegetation and Wildlife Habitat Assessment, p. 4-180, the following mitigation measures are proposed to ensure the successful transplanting and reestablishment of the slender mariposa lily:

- A conceptual mitigation plan for transplanting relocated lilies shall be developed by consulting biologists. That plan shall describe transplantation techniques and monitoring, and provide data required by Responsible Agencies during a 5-year monitoring period.

If it is not possible to preserve the lily habitat onsite, the following mitigation shall apply:

- A conceptual restoration plan for transplanting lily bulbs shall be developed. The plan shall include soil types, transplantation techniques, site maintenance, and a 5-year monitoring program.

The adequacy of these mitigation measures will be monitored and enforced by the City Planning Department in conjunction with the USFWS.

Comment 1492: **Appendix A6**

The Conservancy biologist seems to believe that pumping ground water, needed for landfill operations, will pose a strong possibility of altering important ecological resources related to existing soil and substrate moisture regimes. The Conservancy states that "if a lack of significant adverse impacts cannot be conclusively demonstrated then the ultimate burden of such proof should be considered as a project requirement prior to any subsequent level of government approval." Where in this document is this issue discussed, and what proof is offered?

Response 1492: The proposed City/County Landfill would not result in the pumping of groundwater for landfill operations. Water for landfill operations, primarily for dust control, would be provided by the DWP.

Comment 1493: **Appendix C 5-3, Litter**

The problem of litter is still with us, even after the dump has been closed since 1991. After the heavy rains of the last two winters, hikers in O'Melveny Park have observed a great deal plastic debris washed down from the dump into the side canyons. Again hikers in the far reaches of the canyons report wind blown trash from the current opperation in the County.

Response 1493: Refer to Response 1433 for a discussion of the potential for litter migration into O'Melveny Park and the community of Granada Hills.

Comment 1494: The upper reaches of the steep cliffs and dense sections of underbrush in this wilderness park have been virtually impossible to clean, once fouled by litter. Fortunately, most of the paper has degraded over time, but the plastic, washed down into the canyons, remains a problem.

Response 1494: Refer to Response 1433 for a discussion of the potential for litter migration into O'Melveny Park and the community of Granada Hills.

Comment 1495: In 1987, an inspection by the Dept of Sanitation showed:

"On several occasions the ridges and hillsides, contiguous to the landfill in O'Melveny Park, have been searched for windblown litter, in an effort to determine the extent of

this problem. Although litter crews of 3 or 4 people have been observed successfully policing the park entrance, the grassy picnic areas, and the immediate trail and stream areas, there is a great deal of windblown paper and plastic bags, littering the hillsides and ridges. It has been determined that the sole source of this litter is Sunshine Canyon Landfill."

Response 1495: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation. In addition, refer to Response 1433 for a discussion of the potential for litter migration into O'Melveny Park and the community of Granada Hills.

Comment 1496: For years, the community was forced to pluck plastic bags out of their trees and pick up papers from remote areas of the County. The wind blown trash contained income tax returns and business records from a firm in Santa Monica; we knew how much a man in Beverly hills paid for his dental crowns; we gathered up medical records and read about the very private medical problems of unsuspecting strangers. Trash burst out of the dump and went high in the sky, plastic bags and long streams of computer paper were carried aloft.

Response 1496: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation. In addition, refer to Response 1433 for a discussion of the potential for litter migration into O'Melveny Park and the community of Granada Hills.

Comment 1497: Of rubbish blowing from the dump, the City Zoning Administrator, John Parker, said: "This is a definite problem involving a violation of condition 13"

Response 1497: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1498: The community fears the return of this nuisance.

Response 1498: Refer to Topical Issue 18 and Response 1433. In addition, the Draft SEIR, Section 4.9.3, Litter, pp. 4-305 and 4-306, lists the proposed mitigation measures for potential litter impacts resulting from project development. As stated in the Draft SEIR, with the incorporation of mitigation measures, no adverse litter impacts are anticipated to occur.

Comment 1499: **Appendix C5-3, Dust**

This was, and will be, a problem with ominous health implications. Fugitive dust pollution, according to the A.Q.M.D., is responsible for 60,000 deaths nationally and 1,600 in the Southland.

Response 1499: The commenter fails to include a reference or citation for this information; therefore, it is impossible for City Planning staff to confirm this information. However, the comment is noted.

Comment 1500: When the dump was operating full tilt, and in the southern canyon, we breathed the dust-we ate the dust. Fire Department records will show you how many times they responded to calls in the area, only to find out that there was no fire. All of the intense smoke reported was not a forest fire, only dust from the dump! We have had guests take their children home, from fear for their health. We watched sadly, as old friends and neighbors moved to escape. We listened to our children cough and wheeze. How can you possibly consider inflicting this community with these problems again?

Response 1500: Refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Comment 1501: The proponent continues to ignore the fact that the existing landfill and the expansion are in a wind tunnel and that as the landfill rises the "sheltered" places will no longer exist.

Response 1501: Refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Comment 1502: **Violations**

The Zoning Administrator put conditions on the dump, as did the AQMD. BFI protested at every juncture. At first BFI refused to accept AQMD's mitigations.

Response 1502: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1503: On July 7, 1988 the AQMD District Council testified:

> As I said earlier the District attempted to negotiate some additional variance conditions which would help to alleviate any future dust problems. In light of the fact that the petitioner" (BFI) "has told us at our prior meeting this morning that, I believe, they intend to not adopt any variance conditions dealing with dust. We have no choice but to oppose the granting of this variance. . .

BFI, rather than loose their variance, capitulated and reluctantly adopted AQMD's conditions. This was an action forced upon them and only reluctantly accepted.

Response 1503: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1504: Excerpts from the AQMD hearings show how duplicitous BFI was, in representing their project before the AQMD Hearing Board. As John Parker said,

> The administrator concludes that there were violations of the extant grant, probably inadvertent initially, but exacerbated by lack of candor and aggressive attempts to cure on the part of the operator.

Response 1504: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1505: The AQMD did not cite the dump, when they concluded that they were "doing what was required and the winds were over 25 miles an hour."

The Enforcement Manager of the Air Toxics Control Branch of the AQMD testified as follows at the AQMD Hearing on July 7,1988:

> Since the beginning of the year through the end of June we have investigated 83 dust complaints from the surrounding neighborhood and in many of those cases District inspectors were able to confirm that there was dust in the neighborhood and that they could see that it was from the landfill property. However we did not issue a 403 violation because it was our feeling, it was District Staff feeling, that the landfill was taking every precaution to prevent fugitive dust emissions. Those were very high wind conditions . . . And so no notices of Violation resulted although there was a dust problem from the landfill in the residential neighborhood.

Response 1505: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1506: As a result of this hearing, the AQMD attached more conditions in the hope of lessening the problem. There was now at least a greater effort made to control dust although the problems continued.

Response 1506: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1507: We believe that this law, that protected the dump from receiving citations, explains why there were so few issued, in view of the enormous problem.

Response 1507: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1508: As you can see, strong winds are not an aberration, but normal in the area. How can we believe that these same conditions, that did not protect us before, will protect us in the future?

Response 1508: Refer to Topical Issue 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Comment 1509: When the Zoning Administrator said that the landfill was in the wrong place, it was to these conditions, for which there are no mitigations, that he referred.

Response 1509: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1510: **Appendix C 5-2, Odors**

Here again, this document would lead you to believe that the community was imagining odors. Since, according to the AQMD inspectors, the human nose is the most sensitive instrument for detecting odor, we were at last not put at a disadvantage, by someone claiming to have more sophisticated instrumentation! There was a long period of time in the eighties, when BFI was taking lots of garbage, that the dump emitted really foul odors. Things got better when the new incinerator was installed. We have always challenged the statement that the odors came from the gas fields, or seeps in O'Melveny Park, as this document states. We believe they came from the dump.

Response 1510: Refer to Response 73 for a discussion of the historical effectiveness of odor control measures at the project site.

Comment 1511: If the odors come from the oil well and gas injection storage areas that BFI owns and leases isn't BFI still responsible for the nuisance created?

Response 1511: Refer to Response 73 for a discussion of the historical effectiveness of odor control measures at the project site.

Comment 1512: We are worried that if the dump expands, we will face a return of odor in the form of outgassing, since not all gas can be collected. This gas contains several cancer causing hydrocarbons and teratogens.

Response 1512: Refer to Topical Issue 4 for a discussion of the odor control program and mitigation measures for the proposed City/County Landfill. In addition, refer to Response 316 for a discussion of the potential for the proposed City/County Landfill to cause acute or chronic health risks to residents in the community of Granada Hills.

Comment 1513: **Appendix C 5-4, Aesthetics**

Although the area of the berm above the oil production area has been landscaped, the slopes of the City landfill remain an eyesore, even though it's been over six years since the landfill closed its gates. The existing slopes have insufficient cover and have not been properly closed as required by law.

Response 1513: Refer to Response 210 for a discussion of the proposed "monolithic" alternative final cover design and vegetative layer for the closure of the existing inactive City Landfill.

Comment 1514: The City and the AQMD tried to get BFI to revegetate on numerous occasions. After 33 years in operation this is how successful the revegetation plan has been (show photo)

Response 1514: Refer to Response 210 for a discussion of the proposed "monolithic" alternative final cover design and vegetative layer for the closure of the existing inactive City Landfill. Revegetation has been provided within the ±100 acre open-space area. This area currently supports a variety of wildlife and over 11,000 trees planted by BFI, including 1,367 coast live oak trees.

Comment 1515: From the I-5 the 210 freeway and the residential community of Sylmar the dump is an ugly blot on the landscape.

Response 1515: Existing views of the project site and visual impacts resulting from the proposed project are discussed in the Draft SEIR, Section 4.18, Aesthetics/Views, pp. 4-457 through 4-476. In addition, the Draft SEIR acknowledges that landfilling operations in the canyon would be visible from greater distances to the southeast, within areas of Sylmar, and from the westbound lanes of the I-210 Freeway. However, the Draft SEIR concludes that views of landfill operations would not result in a significant aesthetic impact due to the distance of the project site from the Sylmar area and the limited duration of views from the I-210 Freeway. The major unvegetated area visible from I-5 and I-210 Freeways is the Caltrans freeway cut slope on the outside ridge of Sunshine Canyon that faces the I-5 Freeway. In addition, there are several existing industrial uses near the project site, such as the Joseph Jensen Filtration Plant, Los Angeles Aqueduct, Balboa Distribution Station, and warehouses, which have a greater visual impact due to the size of these facilities and viewing duration of travelers on the I-5 and I-210 Freeways.

Comment 1516: Even the new County portion is without the intermediate cover required in the CUP.

Response 1516: All required County portions have been hydromulched and the seed mixture modified in the fall of 1997 to better match the soil and promote better seed germination. Adequate vegetation coverage has been established on all areas inactive for 180 days as required by the County CUP.

Comment 1517: What extra measures, soil amendments, consultants etc. will be used to insure success?

Response 1517: Refer to Response 210 for a discussion of the proposed "monolithic" alternative final cover design and vegetative layer for the closure of the existing inactive City Landfill.

Comment 1518: Will BFI post a bond in an amount sufficient to hire another company to revegetate, if they continue to be unsuccessful in their attempts to revegetate?

Response 1518: Refer to Response 210 for a discussion of the proposed "monolithic" alternative final cover design and vegetative layer for the closure of the existing inactive City Landfill.

In addition, refer to Response 356 for a discussion of the status of the Final Closure and Postclosure Maintenance Plan (FCPMP) for the required closure of the existing inactive City Landfill.

Comment 1519: Page C 5-5 of the 1,367 coast live oaks planted in the buffer zone, how many have survived? I believe this to be an inaccurate number, since most of the trees in the buffer appear to be eucalyptus.

Response 1519: Revegetation has been provided within the ±100 acre open-space area. This area currently supports a variety of wildlife and over 11,000 trees planted by BFI, including 1,367 coast live oak trees.

Comment 1520: **Appendix Page C5-5, Conditions**

For dates of conditions, see "The Dump's Zoning History"

BFI operated acres and acres beyond its boundaries and, in the process, destroyed a wetland and scores of protected oaks without a permit.

Response 1520: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1521: They illegally destroyed that portion of SEA 20 that extended into the City.

Response 1521: Refer to Responses 1352 and 1412 for a discussion of deleting the SEA 20 designation at the project site, as associated with the approval of the County Landfill.

Comment 1522: When applying for the expansion they placed a misleading map in the EIR, on which the City SEA had been completely erased.

Response 1522: Refer to Responses 1352 and 1412 for a discussion of the deletion of the Significant Ecological Area (SEA) 20 designation at the project site, as associated with the approval of the County Landfill.

Comment 1523: The original map from the 1966 variance shows the destroyed wetlands clearly beyond the variance line. The only confusion that ever existed sprang from BFI's refusal to conduct a proper survey, in an attempt to cover their misdeeds. Instead of admitting, simply, that they goofed, the landfill boundaries started to mysteriously expand.

Response 1523: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1524: The City surveyors drew a map that showed the landfill to be out of compliance.

Response 1524: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1525: The NVC always accepted the City's work, but a complete survey was needed because the city survey had only involved three fourths of the dump. BFI was ordered by the Zoning Appeals Board to pay for a survey, done by a surveyor that was mutually acceptable to BFI and the Councilman's office. BFI appealed this condition, claiming that it was "too expensive". They have violated yet another condition of the Variance by putting off doing this survey.

Response 1525: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1526: By exceeding their elevations, another violation for which BFI was convicted, BFI exacerbated the dust conditions and created an unnatural appearing ridge line.

Response 1526: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1527: BFI violated their permit by ignoring a condition that prohibited them from coming within 50 feet of the ridgeline.

Response 1527: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1528: BFI violated a condition of their permit, by not restoring the wetlands, in cooperation with the Dept of Fish & Game, as ordered.

Response 1528: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation. Records indicate that BFI has never been issued a notice of violation by the CDFG with respect to wetland impact at the project site. Additionally, BFI has reportedly complied with applicable permit requirements for the County Landfill since the CDFG issued Streambed Alternation Agreement No. 5-445-91. BFI has never been issued violations by the CDFG at the project site.

Comment 1529: BFI violated a condition of their permit, by not replacing the oaks removed in the north canyon, two to one, as ordered.

Response 1529: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1530: BFI has now refused to comply with City Zoning conditions that were ordered to correct past violations. BFI claims that the City no longer has jurisdiction.

Response 1530: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1531: This was the issue at the last City hearing. Is it any wonder that the Chairman of the Zoning Appeals Board said of BFI at that hearing; "The disingenuousness on the part

of the proprietary sector has made fools of us and made the people distrustful of the process."

Response 1531: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1532: **Appendix C5**

BFI's violations of their permit were appealed and sustained through all levels of zoning review and finally to the full City Council. These are proven violations and their record must be considered before assuming that they will comply with conditions of any permit the City is considering.

Response 1532: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1533: It is appaling that the City is even being approached for this expansion considering the proponent's dismal past record.

Response 1533: This comment is noted.

Comment 1534: The community is afraid that it will soon again have to go through hearings when BFI has again violated their permit.

Response 1534: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation. Records indicate that BFI has not violated any permit requirements imposed by regulatory agencies with respect to the operation of the County Landfill since it began operation in August 1996.

Comment 1535: In 1989 the Zoning Administrator found:

> Pursuant to section 12.27-B,5 of the Municipal code, the Administrator finds that certain conditions of the variance have not been complied with, and pursuant to Condition 13 of extant Case No.17804, that certain activities on the property have proven to be materially detrimental to the occupants of surrounding property.

Response 1535: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1536: The hours of testimony from the community, plus the photos of blowing dust and trash convinced the Zoning Administrator, and those at various levels of appeal, that the landfill was causing conditions that were detrimental to the community.

Response 1536: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1537: The Administrator found permit violations in boundaries, elevations, ridgelines, and degradation of the water course.

Response 1537: Refer to Response 182 for a discussion of the compliance record for the previous City Landfill operation.

Comment 1538: Similar conditions will exist in any future permit. Why will BFI now comply when they have cavalierly ignored their permit conditions in the past?

Response 1538: Refer to Response 336 for a discussion of federal, State, regional, County, and City regulations and monitoring agencies with enforcement power over the proposed City/County Landfill and assurance of project proponent compliance with these regulations.

Comment 1539: The City joined the lawsuit against BFI's expansion into the County. Why would the City now consider allowing BFI to return?

Response 1539: The City is the designated Lead Agency for the proposed project and is responsible for reviewing, approving, or disapproving the proposed project in accordance with the requirements of the CEQA and State CEQA Guidelines. In addition, the County Landfill CUP required BFI to diligently pursue an application with the City to extend landfilling back into the City portion of Sunshine Canyon.

In regard to the litigation that ensued following County Landfill approval, that information is documented in the Draft SEIR, Appendix C3, Overview of Litigation Proceedings in Connection with the County Landfill.

Comment 1540: **p. 4-139**

1. The reference to "numerous biological assessments and reports". How many does "numerous" exactly refer to?

Response 1540: All assessments performed by consulting biologists were identified in the Draft SEIR, Section 4.4.1, Vegetation and Wildlife Habitat Assessment, pp. 4-140 through 4-142. Information pertaining to prior and recent reconnaissance field surveys conducted in Sunshine Canyon was included in the Draft SEIR in addition to information about the focused field surveys performed onsite.

Comment 1541:

2. Did the consulting firms ask for any support information from environmentally-conscious groups such as the Sierra Club, groups that have an active interest in protecting the current ecosystem?

Response 1541: It is unknown what consulting firms the commenter is referencing. However, the Sierra Club's Los Angeles Chapter was notified (e.g., Notice of Preparation, Public Scoping Meeting, and Notice of Completion) of the proposed project by the City during the processing of the project. Other environmental groups or organizations that were notified but did not respond include the Santa Clarita Oak Conservancy, Environmental

Defense Fund, Friends of Sunshine Forest, and Oak Tree Coalition. (Refer to the Draft SEIR, Appendices, A6, A7, and A13.)

In addition, input on the Draft SEIR and related project entitlements was received from the USFWS, the CDFG, the Santa Monica Mountains Conservancy (SMMC), the California Native Plant Society (CNPS), and the Natural Resources Defense Council (NRDC).

Comment 1542: 3. Regarding data from the previous FEIR that has been "previously addressed", how do we know that those previous determinations are still relevant and not out-of-date? Ecosystems are constantly changing.

Response 1542: It is assumed that the commenter is referring to prior biological data prepared for the County FEIR. The data included in the certified County FEIR have been updated. The technical data included in the Draft SEIR are the most current and relevant to the project site. In this regard, historical data begin in 1986 and continued until the Draft SEIR was published in the summer of 1997. These data on Sunshine Canyon provide a well-documented biological assessment of the project site. In addition, the newer data provide an opportunity to monitor biota changes in Sunshine Canyon that have occurred over the past 10 years.

Comment 1543: 4. As ecosystems are constantly changing, why does the EIR use information from 1989, over eight years ago? These assessments and reports should be made in 1997 so they are totally current- this area has changed considerably over the last eight years with, among other things, large urban development and a major earthquake.

Response 1543: Refer to Response 1542. The Draft SEIR used the most current information available. Refer to the Draft SEIR, Section 4.4, Biological Resources, pp. 4-139 and 4-140.

Prior information was included in the Draft SEIR so that the changes in vegetation communities, habitats, and surrounding developments could be noted.

Comment 1544: 5. Who approved the biological consultants that were used in this report? Was it BFI? If so, then their reports are invalid as they represent an interested party. Who paid their fees?

Response 1544: The City, working with the environmental consultant, approved the biological consultants used for the preparation of the Draft SEIR. Both the City and project proponent are obligated by the respective regulatory agencies (CDFG and Corps) to provide credible, adequate biological assessments of the project site because these assessments will eventually become part of future project entitlements. In addition, the City as Lead Agency is responsible for ensuring that the technical information included in the Draft SEIR is unbiased and technically adequate in accordance with the requirements of CEQA.

Comment 1545: **p. 4-140**

1. As ecosystems change, what is the relevance of reports from 1978 and 1985-86? Surely these are out-of- date?

Response 1545: Refer to Response 1542. Previous biological report information was provided in the Draft SEIR to validate existing conditions and provide background information relative to the project site. These prior biological reports provide a historical linkage in regard to the project site in 1986 versus 1997 and the changes that have occurred and were recorded by professional biologists with respect to vegetation and animal life.

Comment 1546:

2. Shouldn't any relevant studies be performed today before a proper determination can be made of environmental impact on the animal life?

Response 1546: Current biological field studies were performed and are included in the Draft SEIR. These studies addressed site conditions including vegetation communities, wildlife habitats, and animal life. The most recent surveys were conducted by professional biologists in October and December of 1996 and in March 1997.

Comment 1547: **p. 4-141**

1. How can a field reconnaissance survey be valid that did no examination between October and June, totally avoiding the impact of Winter on the area? This is in reference to the study by P&D Services.

Response 1547: Biological field surveys of the project site were conducted in June, July, August, and October 1992, during spring and early fall seasons. In addition, subsequent field surveys were conducted by biologists in February 1995, and the most recent field surveys were conducted in October and December 1996, and March 1997, in the winter and spring months. These field surveys updated and supplemented existing technical information about Sunshine Canyons biological conditions, which was provided in prior biological assessments.

Comment 1548: **p. 4-149**

1. On p.2-84, there is reference to prevention of ponding of surface water to prevent insect breeding and the attracting of vectors. On p. 4-149, there is reference to freshwater marsh habitats occurring onsite and, as the EIR says:

   "Amphibians require moisture for at least a portion of their life cycle, requiring standing or flowing or flowing water for reproduction."

So if ponds are prevented, won't this result in the destruction of amphibian pond life? Won't this upset the natural ecological balance in this area?

Response 1548: The small ponds and pools found onsite are intermittent. The removal of this riparian habitat was discussed in the Draft SEIR and will be mitigated in accordance with the Corps, USFWS, and CDFG regulations. (Refer to the Draft SEIR, Section 4.4.2, Wetlands and Riparian Habitats, pp. 4-189 through 4-191.) Recommended mitigation for riparian habitat impacts will be provided proximate to the project site. Mitigation

will also be approved prior to its implementation by the regulatory agencies (noted above).

Comment 1549: 2. If ponds are allowed to develop, doesn't this raise the likelihood of insect proliferation and, therefore, the transmission of waste out of the dump area?

Response 1549: Refer to Response 1548. Ponds will not be allowed to develop onsite. In addition, the creation of riparian habitat will take place offsite proximate to the project site, not onsite.

Comment 1550: 3. If "terrestrial amphibians avoid dessication by burrowing underground", what is to prevent them eating/burrowing into the waste and then carrying waste residue out of the dump area? Surely they will also effect the removal of waste from the dump area in their faeces? Surely this spreads the impact of the dump far beyond its established limits? Is there any realistic way to prevent this while still maintaining the balance of the ecosystem?

Response 1550: Terrestrial amphibians have never been a problem at the existing inactive City Landfill or the County Landfill. Although terrestrial amphibians do use underground burrows, they are not expected to burrow into disposed refuse due to the compaction of daily cover. Terrestrial amphibians are not highly mobile or known to scavenge refuse. For these reasons, terrestrial amphibians are not expected to carry refuse out of the landfill.

Comment 1551: **p. 4-150**

1. What is to prevent birds carrying off waste, including dead carcasses and rotting food, and depositing it over the protected recreational area of O'Melveny park where children play or over the housing areas? I often find dead mice in my pool dropped by passing birds.

Response 1551: Refer to Topical Issue 17 and Response 84 for a discussion of vector prevention and control measures.

Comment 1552: 2. What is to prevent birds carrying waste over a wide area in their excrement?

Response 1552: Refer to Topical Issue 17 and Response 84 for a discussion of vector prevention and control measures.

Comment 1553: 3. The EIR says "The existing inactive landfill" contains " minimal animal habitat suitable for supporting a diverse number of bird species." What does "minimal" mean and who made this determination? Was it someone paid by BFI? "Minimal" still allows that there will be some impact, so what is this impact exactly?

Response 1553: The word "minimal" applies to describing the habitat's ability to support a self-sustaining level of productivity and genetic makeup in an ecological context.

Comment 1554: **p. 4-151**

1. The EIR states that several raptor species have been observed foraging onsite. What will be done to prevent this?

Response 1554: Raptor species will not be prevented from foraging onsite within areas of nonactive landfill use. Raptor species are currently using open space and nonactive landfill areas onsite for foraging to their benefit.

Comment 1555: 2. Why is there no reference to the presence of coyotes and mountain lions in this area? Won't they be attracted to the waste area, bringing them closer to the housing areas? Won't they carry waste beyond the dump limits?

Response 1555: The mountainous areas around the project site provide habitat for mountain lions and coyotes, and local residents have reported sighting them. However, these animals are not expected to be attracted to the project site due to the level of human activity that occurs during operating hours. In addition, mountain lions and coyotes are generally not scavengers; therefore, these animals are not expected to be attracted to the landfill as a potential food source.

Comment 1556: 3. Has there been a current 1997 survey to determine whether any of the wildlife are protected or endangered species? I see no evidence of this, but surely this should take place and that the EIR should not rely on old, possibly out-of-date studies?

Response 1556: Yes. Biological field studies were performed in 1997 and included in the Draft SEIR. The field survey information was cross-referenced with a CNDDB listing of all threatened and endangered species that are expected within the project area. All threatened and endangered species that may be present onsite were listed and included within the Draft SEIR, Section 4.4.1, Vegetation and Wildlife Habitat Assessment. Specific information was also presented in Table 4.4-4, Sensitive Status Wildlife Species Potentially Occurring at Sunshine Canyon.

Comment 1557: **p. 4-153**

1. The EIR accepts that site conditions are attractive to the California Condor, an endangered species. The EIR then says that the likelihood of its prescence here is low. But surely "low" accepts that there is a possibility? What does "low" exactly mean? Who made this determination?

Response 1557: There is suitable habitat onsite to provide forging for the California condor. It should be noted that California condor pairs were released into the wild at Sespe Condor Sanctuary in Ventura County and at Lion Canyon in Santa Barbara County. As the Draft SEIR notes, it is not anticipated that the California condor would stray from the release areas of the Los Padres National Forrest because this site is part of a protected foraging range. Therefore, the probability is low that the condor would use the project site for foraging.

In addition, the California condor was included as an endangered species in the Draft SEIR because it is a listed species that may use this region for foraging activities. This

species was also included in the Draft SEIR because appropriate habitat exists onsite. It should also be noted that the California condor has not been observed by consulting biologists either onsite or within the immediate area.

Comment 1558: 2. Regarding the condor, the EIR states that the Condor has never been observed onsite by consulting biologists. But how long were their studies? Have they made a study recently? I see no evidence of this and we must remember there are only 13 individuals in the current condor population.

Response 1558: Refer to Response 1557. Consulting biologists conducted wildlife field surveys as late as March 1997. Field surveys were conducted during daylight hours, and no evidence existed relating to condor activity. In addition, the presence of condors was not been noted on previous field surveys performed by consulting biologists.

Comment 1559: 3. The EIR admits that the decline in the population of the Coastal california Gnatcatcher is attributed to the loss of coastal sage scrub habitat through development. The gnatcatcher is federally listed as threatened. Surely the dump would constitute such "development" that would threaten this species?

Response 1559: No coastal California gnatcatchers have been observed by consulting biologists within the project site, and all coastal sage scrub habitat that will be disturbed due to project development will be mitigated through replacement programs by the project proponent.

Comment 1560: 4. The last survey on the gnatcatcher was 1995. Surely one should be done for 1997?

Response 1560: The latest focused field survey for the coastal California gnatcatcher was conducted by consulting biologists in May and June 1995 in accordance with USFWS protocol procedures. This species was not observed or found onsite. As indicated in the Draft SEIR, Section 4.4.1, Vegetation and Wildlife Habitat Assessment, p. 4-180, prior to landfill development into coastal sage scrub habitat, another field survey will be conducted by consulting biologists following set USFWS protocol procedures. The findings of that focused field survey will be made available to the City, regulatory agencies, and the public.

Comment 1561: 5. Regarding table 4.4-4, the analysis of local wildlife, why is there no mention of coyotes or mountain lions, both which are frequently observed in these areas?

Response 1561: Refer to Response 1555 regarding mountain lions and coyotes. Table 4.4-4, Sensitive Status Wildlife Species Potentially Occurring at Sunshine Canyon Landfill, does not reference coyotes or mountain lions because this table includes only those sensitive wildlife species that may occur onsite. The sensitive status is recognized by regulatory agencies such as the USFWS, CDFG, and as well as the CNDDB. A brief discussion of mountain lions is however provided in the Draft SEIR, Section 4.4.1, Vegetation and Wildlife Habitat Assessment, p. 4-165.

Comment 1562: **p. 4-165**

1. A Golden Eagle, protected by the Federal Bald Eagle Act, was observed onsite during a previous study. Why was no extra effort made to determine whether it was nesting in this area? Surely a 1997 survey should be made to determine whether it has nested in this area?

Response 1562: Consulting biologists did observe a golden eagle perching within the project site; however, biologists did not observe golden eagles nesting within the woodland habitat that exists onsite. In this regard, a raptor nesting survey will be conducted by consulting biologists prior to any landfill development occurring onsite.

Comment 1563: 2. These same questions apply with respect to the White -Tailed Kite, another fully protected species?

Response 1563: As indicated in the Draft SEIR, several raptors were either observed foraging or perching onsite or within the project area. As indicated in Response 1562, a raptor nesting survey will be conducted by consulting biologists prior to landfill development.

Comment 1564: 3. Why is the EIR quoting information obtained during a telephone conversation? Surely this should have been documented and validated? (re. Rick Farris conversation)

Response 1564: The telephone conversation with Rick Farris was quoted in the Draft SEIR, Section 4.4.1, Vegetation and Wildlife Habitat Assessment, p. 4-165, and additional reference information was gathered to validate this telephone conversation. With respect to wildlife movement near Sunshine Canyon, no signs of wildlife movement were observed during the 1996 and 1997 surveys conducted by biologists in the areas discussed with Mr. Farris.

Comment 1565: **p. 4-146**

1. If the mountain lion is a "passage Species" and "there is no evidence that wildlife use Sunshine Canyon for local or regional movement" into local mountains, then why do we frequently see lions and coyotes in this area ? Surely this information is wrong?

Response 1565: Mountain lions are evident in mountainous terrain that surrounds Sunshine Canyon. However, even though Sunshine Canyon provides habitat for mountain lions and coyotes, current data and field observations by consulting biologists confirm that Sunshine Canyon is not a viable wildlife movement corridor used by these animals because the habitat is isolated. This information is provided in the Draft SEIR, Section 4.4.1, Vegetation and Wildlife Habitat Assessment, pp. 4-165 and 4-166.

Comment 1566: **p. 4-172**

1. The EIR admits that there will be a loss of animal life within the project site, upsetting the balance of the ecosystem. Will this not have a resulting effect on the ecosystem on a much larger scale causing permanent damage to the wild life population?

Response 1566: No significant environmental impact will occur as a result of landfill development within Sunshine Canyon because numerous mitigation measures designed to mitigate or compensate for the loss of onsite biological resources will be implemented.

Comment 1567: 2. By displacing the more mobile wildlife species, will animals such as coyotes and mountain lions not be forced down into housing areas?

Response 1567: No. Mountain lions and coyotes have not been observed within the project site by consulting biologists. In this regard, mountain lions and coyotes may be potentially displaced or have their home range reduced. However, these species are not expected to migrate into residential areas because the area surrounding Sunshine Canyon provides adequate habitat for these animals to migrate into. Generally, housing developments do not provide an attractive foraging habitat for these species.

Comment 1568: 3. The EIR admits that there will be adverse indirect effects on wildlife such as the threat from increased vehicular traffic and the introduction of noise, litter, dust and other human debris into the habitat areas. Who has determined that these impacts are not significant? How did they come to this conclusion? When was this study made? What models were used in coming to this determination?

Response 1568: Biological impacts associated with project development are not considered significant in accordance with CEQA and State CEQA Guidelines. Specifically, Appendix G of the State CEQA Guidelines indicates that a development has a significant impact if any of the following occur:

- Substantially affects a rare or endangered species of plant or animal or the habitat of such species,
- Interferes substantially with the movement of any resident or migratory fish or wildlife species, or
- Substantially diminishes habitat for fish, wildlife, or plants.

The proposed landfill development will not have a significant impact on the region because of the surrounding open space areas available to species, the absence of a significant wildlife movement corridors onsite, and the current degraded nature of the project area that is being proposed for landfill development.

For discussions that address the prior reconnaissance field studies conducted within Sunshine Canyon, the most recent field surveys, and focused field surveys, refer to the Draft SEIR, Section 4.4, Biological Resources, pp. 4-140 through 4-142.

Comment 1569: **p. 4-174**

1. What mitigation will be effected if raptor nests are removed?..These are protected under the CA Fish and Game Code. Is there a model for the success of any mitigation plans?

Response 1569: As stated in the Draft SEIR, Section 4.4.1, Vegetation and Wildlife Habitat Assessment, p. 4-181:

- If habitat removal is proposed during the raptor breeding season (i.e., March to July), a survey shall be conducted for active nesting areas. If active nests are found, no construction activity shall take place within 500 feet of an active nest until the young have fledged. The 500-foot perimeter around each active nest shall be fenced. Trees containing nests shall only be removed during the nonbreeding season.

This mitigation method is used to protect nesting raptors and is often required by the regulatory agencies (USFWS and CDFG) that maintain jurisdiction over these resources.

Comment 1570: 2. When was the most recent study to see if California gnatcatchers occupy the site?

Response 1570: The latest focused protocol coastal California gnatcatcher surveys were conducted in May and June 1995 by consulting biologists.

Comment 1571: 3. Whose opinion is it that the impact on many species is considered "adverse, but not significant"? Is this based on a factual model or just a random opinion?

Response 1571: The opinion that the impact on species from this development is not significant has been determined by consulting biologists in accordance with CEQA and the State CEQA Guidelines regarding environmental impact. Refer to Response 1568.

Comment 1572: **p. 4-178**

1. It is stated that there will be no impact on any wildlife corridor, but does this take into account the attraction of food waste for predators in the area? There is no mention of this.

Response 1572: Current information by consulting biologists indicates that Sunshine Canyon is not used as a movement corridor linking otherwise isolated habitats. Landfill development is not expected to attract predators into Sunshine Canyon due to the high level of human activity during landfill operating hours and operational techniques (such as compaction of refuse, daily cover, etc.) that would be used by the project proponent.

Comment 1573: It seems that we should make a strong effort to contact ornithologists and Nature societies. If we could find evidence of nesting by the California Condor or the Coastal California gnatcatcher or the Golden Eagle, then it could be very, very helpful to us!!!

Response 1573: As indicated in the Draft SEIR, Section 4.4.1, Vegetation and Wildlife Habitat Assessment, the likelihood that the California condor would use the project site for foraging is low because this species has never been observed onsite by consulting biologists and because of the low number of condors that exist in the wild (refer to p. 4-153). In regard to the golden eagle, because of the large amount of available foraging habitat, the impact from landfill development would be considered less than significant

(refer to p. 4-178). As noted in Response 1569, the following mitigation measure is recommended in the Draft SEIR to reduce potential impacts on raptor nests:

- If habitat removal is proposed during the raptor breeding season (i.e., March to July), a survey shall be conducted for active nesting areas. If active nests are found, no construction activity shall take place within 500 feet of an active nest until the young have fledged. The 500-foot perimeter around each active nest shall be fenced. Trees containing nests shall only be removed during the nonbreeding season.

Regarding the California gnatcatcher, the Draft SEIR, p. 4-180, includes the following mitigation measure:

- Surveys shall be conducted for California gnatcatchers prior to obtaining grading permits to determine the status of this species within proposed development areas. Surveys shall be conducted in accordance with USFWS protocol, and if present, a Section 10(a) permit from the USFWS would be obtained by the project proponent. If grading activities occur during the nesting season (i.e., March through July), a federally permitted biologist will survey areas of project development to determine if the species is present. If California gnatcatchers are present, onsite grading activities shall cease until USFWS officials are notified. Either additional coastal sage scrub restoration or the purchase of suitable offsite habitat will be required if California gnatcatchers are found onsite.

Dr. Stanley P. Sander
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Jet Propulsion Laboratory

Letter 3.8-28

Comment 1574: **Section 4.2.9 Health Risk Analysis.** The entire health risk analysis as summarized in section 4.2.9 and detailed in appendix B6 is of very poor quality. It contains numerous unjustified assumptions, uses unscientific sampling methods and contains at least one serious arithmetic error which gives a value for the cancer risk which is too low by a factor of 10. This section should be completely revised using better emissions data, a much more sophisticated source-receptor model, and the results should be checked independently by SCAQMD staff.

Response 1574: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates. In addition, refer to Appendix D3, Revisions to Draft SEIR, Appendix B6, Low-Level Health Risk Assessment.

Comment 1575: Given the poor quality of this section of the SEIR and the lack of independent detailed model verification by SCAQMD, the comment period for analysis of this section is believed to be too short. The comment period provided for future versions of the SEIR should be long enough to allow for detailed analysis of the work that has been performed by BFI. Detailed comments on this section are given below:

Response 1575: Refer to Response 344 for a discussion of the length of the CEQA public review period for the Draft SEIR and the public's opportunity to comment.

Comment 1576: **Comments refer to Appendix B6**

p. 2: The SCREEN2 model is not appropriate for the complex terrain in the Sunshine Canyon area. The assumption was made that the SCREEN2 results would provide a worst-case analysis which would provide an initial screening. There is no justification or reference to relevant literature upon which to base the conclusion that that SCREEN2 provides a worst-case estimate.

Response 1576: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates. In addition, refer to Appendix D3, Revisions to Draft SEIR, Appendix B6, Low-Level Health Risk Assessment.

Comment 1577: In addition, the arithmetic error in the cancer risk calculation discussed below puts the overall cancer risk within a factor of 5 of significance which is well within the uncertainty of SCREEN2. A more sophisticated model must be used to model the complex terrain and micrometeorology encountered in the project area.

Response 1577: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare

emission estimates. In addition, refer to Appendix D3, Revisions to Draft SEIR, Appendix B6, Low-Level Health Risk Assessment.

Comment 1578: The model calculations are based on flare emissions data from only one day, i.e. August 3, 1995. The use of only one day's sampling data on which to base the health risk analysis for the entire project is ludicrous and highly unscientific. It is well known that the emission rates of toxic contaminants in landfill gas is highly variable and depends on factors such as temperature, moisture, age of the fill, fill composition and a number of other factors. The sampling should have been based on a much larger number of samples (at least two per month) taken over a time period of a year or more to simulate the effect of varying soil moisture and temperature on the trace gas emission rate. The samples should be collected and analyzed by an independent testing laboratory which is not employed by BFI. These results need to be presented along with a credible statistical analysis which makes it clear what the worst-case emissions rates will be.

Response 1578: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates. In addition, refer to Appendix D3, Revisions to Draft SEIR, Appendix B6, Low-Level Health Risk Assessment.

Comment 1579: In addition to variability in the composition of landfill gas, the test results are subject to additional uncertainties associated with sample handling and analysis procedures. There is no discussion in the SEIR of the details of the sampling procedures, i.e. type of flasks, preparation of the flasks, the chain of custody of the samples and the analytical techniques employed.

Response 1579: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates. In addition, refer to Appendix D3, Revisions to Draft SEIR, Appendix B6, Low-Level Health Risk Assessment.

Comment 1580: **p. 3:** The meaning of the "less than" symbols for the benzyl chloride and chlorobenzene emission rates should be clarified. Does this mean that these TACs are below the detection limit? If so, the detection limits for all the TACs should be clearly stated so that the quality of the measurement techniques can be assessed.

Response 1580: The "less than" symbol reflects the laboratory's practical quantification limit (PQL) with established EPA laboratory procedures and the instrument being used. The PQL is a multiple of the method detection limit (MDL), which is the absolute lowest detection limit for that procedure and instrument. If results are repeated below the PQL, they are established as "estimated" or "J-values." This means that it is probable that the analyte is present but cannot be determined reliably, thus the estimated value. If no estimated values are shown, they are determined to be below the MDL and not present.

Comment 1581: The health risk analysis does not take into consideration the emissions from the landfill which are not captured by the landfill gas system. It is well known that landfill gas recovery systems do not capture all of the landfill gas due to cracks and diffusion

through the soil. These emissions are called "uncontrolled emissions" because they bypass the flare and are therefore released into the atmosphere untreated. Estimates of recovery efficiencies in the literature vary from 10-50%. If the flare combustion efficiency is 99%, then in the best case (assuming 50% recovery) then the emission rate of toxic air contaminants from the entire project will be a factor of fifty larger than the emissions rates from the flare exhaust, yet these emissions are completely ignored in the health risk analysis. Models such as BEEST-X contain area source algorithms that can estimate the increase in exposure due to these uncontrolled emissions. This is another reason why the SCREEN2 model is inappropriate for use in this project.

Response 1581: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates. In addition, refer to Appendix D3, Revisions to Draft SEIR, Appendix B6, Low-Level Health Risk Assessment.

Comment 1582: Some of the values in Table I (TAC emission rates) are difficult to understand. It is assumed that the "less than" sign means that the emission rates are below the analytical detection limit. If so, why for example are the upper limits for the inlet and outlet rates for carbon tetrachloride different? If they are both below the detection limit, the values should be the same, i.e. the rate corresponding to the detection limit of the measurement.

Response 1582: The inlet concentration was evaluated using a less sensitive gas chromatographic column than the outlet gases because the inlet gas obviously contained much higher levels of hydrocarbons that may have contaminated a more sensitive column. Their detection limits differ because the analysis protocols differ, depending on whether a high or low toxic chromatographic column was used.

Comment 1583: Also, how is it possible for the inlet rate for chloroform to be below the detection limit but the outlet rate to be measurable?

Response 1583: The inlet concentration was below the inlet concentration detection limit, but the outlet measurement, using a more sensitive gas chromatographic column, was measurable.

Comment 1584: Why are the combustion efficiencies for trichloroethylene and vinyl chloride so different from one another given that these compounds are chemically quite similar?

Response 1584: The difference in combustion efficiencies for these two compounds is not considered significant.

Comment 1585: These obvious questions detract from the credibility of the values presented in Table I and provide additional justification for a far more extensive sampling data base than the single set of samples provided here.

Response 1585: The laboratory that analyzed the samples used to develop Table 1 is one of the most respected atmospheric analytical laboratories in California. All objective indications

are that their work is credible, and air quality agencies such as the SCAQMD and the State Air Resources Board continually use the services of this laboratory.

Comment 1586: **p. 6**: In order to estimate exposures the analysis uses a plume model called the "hybrid configuration". No justification is given for the derivation of this "hybrid configuration". It appears to be an arbitrary hand-drawn curve which ties between the "flat terrain" and "zero plume rise" models shown in Figure 1. Since the hybrid configuration curve is arbitrary, the point labelled "maximum" corresponding to the "worst-case" concentration is also arbitrary and could a factor of 10 or more larger.

Response 1586: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates. In addition, refer to Appendix D3, Revisions to Draft SEIR, Appendix B6, Low-Level Health Risk Assessment.

Comment 1587: The use of what amounts to a completely downwind concentration profile curve shows clearly that the model employed in this analysis is far too simplistic and calls for a much more sophisticated analysis which takes into account the actual terrain and wind conditions.

Response 1587: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates. In addition, refer to Appendix D3, Revisions to Draft SEIR, Appendix B6, Low-Level Health Risk Assessment.

Comment 1588: **Table 3:** There is a serious arithmetic mistake in Table 3. The formula used to calculate the downwind concentrations given in Table 3 is:

Concentration ($\mu g/m^3$)=EMFAC($\mu g/s$)*(normalized plume concentration)/(normalization factor)

where EMFAC = emission rate of toxic compound from the flare stack
normalized plume concentration = .02138 $\mu g/M3$
normalization factor = 0.001 g/s = 1000 $\mu g/s$

For benzene, for example the value derived using this formula is 1.13×10^{-4} $\mu g/m^3$ but the value in Table 3 is given as 113.4×10^{-6} $\mu g/m^3$ which is a factor of 10 smaller than the correct value. This mistake is made for every entry in Table 3. The correct value for the risk total is 1.82×10^{-7} which is a factor of 10 larger than the value in the table. While this is still below the significance level of 1×10^{-6}, it is lies sufficiently close to the significance level to trigger a much more detailed analysis.

Response 1588: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates. In addition, refer to Appendix D3, Revisions to Draft SEIR, Appendix B6, Low-Level Health Risk Assessment.

Comment 1589: For the contractor to make an arithmetic mistake of this magnitude shows that this work has not been reviewed carefully by the contractor or the SCAQMD.

Response 1589: Refer to Response 70 for a discussion of data that have been changed in the Draft SEIR air quality health risk assessment due to the use of the ISCST3 model and revised flare emission estimates. In addition, refer to Appendix D3, Revisions to Draft SEIR, Appendix B6, Low-Level Health Risk Assessment.

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Letter 3.8-29

Comment 1590: General questions regarding the Proposed Sunshine Canyon Landfill. Please respond with specificity to the following concerns:

1. How will the air pollution created by the proposed Landfill impact the health of local residents?

Response 1590: Refer to Response 316 for a discussion of the potential for the proposed City/County Landfill to cause acute or chronic health risks to residents in the community of Granada Hills.

Comment 1591: 2. Why have no epidemiological studies been done in this area?

Response 1591: Refer to Response 316. Epidemiological studies were determined to not be warranted by City Planning staff after a thorough investigation was conducted, including discussions with leading epidemiological professionals (Drs. Papanek and Mack), who indicated that the proposed landfill project would not create risks to human health if the proposed landfill is operated and monitored in accordance with regulatory requirements of various public agencies such as the SCAQMD, LARWQCB, and the City.

Comment 1592: 3. What will the impact of air and noise pollution have on property values in the area? How will local home owners be compensated?

Response 1592: Refer to Response 180 for a discussion of the proposed project's potential effects on property values.

Comment 1593: 4. What effect will the airborne contaminates caused by the project have on the LA Water Treatment Plant off Balboa? What is the methodology used to determine impact and all supporting data?

Response 1593: Refer to Response 157 for a discussion of allegations that the previous City Landfill operation caused contaminated particulates to enter the Los Angeles Reservoir and other water treatment and storage systems.

Comment 1594: 5. Why is the EIR accepted as an objective document when the preparers were hired and obviously influenced by BFI and its commercial interests?

Response 1594: The City is responsible for the content of the Draft SEIR, not the environmental consultant. City Planning staff have been engaged with the environmental consultant in the preparation of the Draft SEIR since project applications were filed by the project proponent in July 1991. For an additional discussion of this issue, refer to Response 757.

Comment 1595: 6. Why is a Landfill that will have significant negative impact on the health and well being of local residents and school children even being considered?

Response 1595: In regard to human health issues specific to local area residents and school children, refer to Responses 254 through 258.

Comment 1596: 7. Exactly who stands to profit by this landfill at the expense of Granada Hills and Sylmar residents?

Response 1596: Economic considerations regarding who will profit from the development of the proposed project are beyond the scope of the Draft SEIR. However, environmental impacts on the communities of Granada Hills and Sylmar were analyzed throughout the Draft SEIR, Section 4.0, Environmental Impact Analysis.

Comment 1597: 8. Why isn't the waste being trucked to a non-populated area far from homes and schools?

Response 1597: Refer to Responses 751 through 753 for a discussion of the methodology used for selecting and analyzing alternatives to the proposed project.

Comment 1598: Specific Comments on EIR Noise Section:

1. According to Noise Ordinance No. 144,331 of the City of Los Angeles General Plan Noise Element, (as sited on page 4-206), all residential zone noise should remain within the following parameters: 50 decibels during the day (7 AM to 10 PM) and 40 decibels during the night (10 PM to 7 AM).

   If the zoning for the Sunshine Canyon Landfill area is changed to heavy industrial, (as is proposed), 75 decibels will be allowed, twenty-four hours a day. Please respond to the above comment.

Response 1598: City Planning staff have assumed that these comments refer to the General Plan Amendment and whether approval of the amendment by the City will allow greater noise levels at local receptor locations. The General Plan Amendment would not change the proposed project's necessity to restrict noise at local receptor sites. While the majority of the landfill footprint is located within the City and the majority of local receptors are located in the City, the project proponent will comply with the County's Noise Ordinance, which is more stringent than the City's. As noted in Los Angeles County Noise Ordinance, Section 12.08.390, subsection C:

> If the measurement location is on a boundary property between two different zones, the exterior noise level utilized in subsection B of this section to determine the exterior standard shall be the arithmetic mean of the exterior noise levels in subsection A of the subject zones. Except as provided for above in this subsection C, when an intruding noise source originates on an industrial property and is impacting another noise zone, the applicable exterior noise level as designated in subsection A shall be the daytime exterior noise level for the subject receptor property.

It should be noted that the County Noise Ordinance restricts residential noise to 50 dBA from 7:00 a.m. to 10:00 p.m. and 45 dBA from 10:00 p.m. to 7:00 a.m. While the analysis in the Draft SEIR indicates that noise at the most proximate receptor locations would be as high as 54 dBA, the Draft SEIR also indicates that this value is based on line-of-sight; however, the intervening berm and ±100 acre open space area would provide additional noise attenuation. Therefore, receptor noise will not increase above allowable residential levels (as stated in the Noise Ordinance) at proximate residential locations as a result of project implementation.

Comment 1599: 2. My observations are not in agreement with the statement on page 4-207, 3rd paragraph from the bottom..that "the intervening north ridge line within Sunshine Canyon and the extended distance between the project site and these receptors serve as an effective buffer and shield these units from any potential noise impacts originating from landfill operations.

- What is the source of this assumption?
- Where is the supporting data?
- If the assumption cannot be supported, it should be revised and impacts reassessed.

Response 1599: Figure 3.1-2 in the Draft SEIR illustrates the ridgeline to the north (shown on the right side of the illustration). The extended distance to proximate receptors to the northeast is approximately 5,000 feet and was determined through a "windshield survey" as well as scaling distances (from the most current Thomas Brothers Guide map book) onto the existing conceptual site plan to determine distance. As indicated in the Draft SEIR:

> Noise at this location is further masked by existing noise sources from the freeway and other nonlandfill-related urban noise sources.

However, even in the absence of the perimeter ridgeline and its masking effect, the noise level projected at a distance of 5,000 feet from the landfill footprint is projected at 41 dBA. This result is well below regulatory limits imposed by the Noise Ordinance.

Comment 1600: 3. Has BFI officially agreed to 1 - 5 in second paragraph from bottom on page 4-205? Who will enforce and monitor this?

Response 1600: The provisions set forth in the second paragraph of p. 4-205 are presented in the Draft EIR and outline the general policies included in the City General Plan Noise Element. In this regard, the Draft EIR indicates that:

> The following policies from the City of Los Angeles General Plan Noise Element may be applicable to the proposed project.

Specific to that, Policy (4) enforcement of the limitations on hours for construction activity in the City's noise ordinance does not apply to the project site because it is not

located within 500 feet of a residential area. The mitigation measures, as well as both the City and County Municipal Code Noise Ordinances, are legally binding on the project proponent and will ensure conformance with the remaining policies.

The enforcement and monitoring of noise are described in the Draft SEIR, Appendix C9, FEIR Mitigation Monitoring and Reporting Summary, p. 32.

Comment 1601: Comments On Traffic Section

Refer to section 4.13 transportation circulation. Page 4-346, passenger car equivalents under Traffic Generation Criteria.

The EIR states that one transfer truck has approx the same impact on normal traffic operations as three passenger cars and one curb side collection trash truck is equivalent to two passenger cars.

- My observations are not in agreement with these assumptions
- Please substantiate assumptions with concrete data or remove from EIR
- Provide supporting data that shows that the assumptions apply to each of the analyzed intersections
- Comment on the fact that the impact of a truck varies depending on road and traffic conditions. Example: Multiple trucks at an intersection or section of road can create much greater impact than an equal number of trucks evenly spaced out in traffic
- If the assumptions cannot be fully supported by data they should be revised and the impact should be recalculated

Response 1601: Refer to Response 735 for a discussion of truck traffic conversion to passenger car equivalents (PCEs).

Comment 1602: Refer to page 4-372, table 4.13-9 (Project mitigation measures). The second paragraph.

The EIR states that no specific mitigation is assured regarding the San Fernando Road at Balboa intersection. Mitigation is a required part of a project proposal, so why is this omission being overlooked or accepted?

Response 1602: Refer to Response 141.

Comment 1603:
- If there is no guarantee that the mitigation will be provided, this section should be removed.

Response 1603: Refer to Response 141.

Comment 1604: Refer to section 4.13.1 Traffic top of page 4-334

Traffic studies can't be more than two years old. This a 2 ½ year old study. Also, at the time of the May 22, 1995 study, San Fernando Road was blocked...Normal traffic had not resumed due to earth quake damage.

- Please respond to the above objection.

Response 1604: Refer to Response 154 for a discussion of the Draft SEIR transportation/circulation study potentially containing old or outdated information.

Comment 1605: General Comments Regarding Traffic:

BFI is now applying for an inflow of 14,250 tpd, resulting in 4531 truck trip ends. Even if this amount is reduced by the 937 average trips at the former dump, we are left with 3594 trip ends, clearly over the Districts level of significance. This figure does not even include the employee vehicles or the additional trucks that would be used to haul away recycled material. Furthermore the SWFP allows inflow to reach 17,500 tpd without further District review. These actions point to incremental approvals, in violation of C.E.Q.A.

Please respond to the above comment.

Response 1605: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 1606: Please state exactly how many transfer trucks will be used per day. (Not are being used but will be used, if the proposed landfill is in full operation.)

Response 1606: Refer to Response 153 for a discussion of project-generated truck trips.

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Letter 3.8-30

Comment 1607: I. PROJECT DESCRIPTION

A. OPERATION WITHIN LOS ANGELES COUNTY, VIA CITY ACCESS

Sunshine Canyon Landfill is a Class III landfill accepting non-hazardous solid waste which is wholly owned and operated by Browning-Ferris Industries of California, Inc., 14747 San Fernando Road, Sylmar, California 91342. It straddles the Los Angeles City-County line, but its current operations are wholly within the County and have a permitted capacity of 16.9 million tons. Its Operating Permit was issued by the County Department of Health Services Solid Waste Management Program on November 17, 1994 and expires November 17, 1999. Its wasteshed is Countywide, but out-of-County waste has previously been taken.

Response 1607: The commenter's characterization of the project description is noted; however, exceptions to the project description include the following. In regard to the County Landfill, its footprint does not "straddle" any jurisdictional boundary; it is located within County jurisdiction. The County Landfill does not have an operating permit; rather, it has an approved SWFP, which was received by the CIWMB in January 1992, concurred by same agency in February 1992, and reviewed and issued by the County LEA in November 1994. This permit does not "expire" in November 1999; rather, the permit will be reviewed in November 1999.

Comment 1608: An amended Conditional Use and Oak Tree Permit approved by the County Board of Supervisors on November 30, 1993 will terminate whenever the County fill design level of 1885 feet mean sea level has been reached. Daily and weekly tonnage limits, however, vary according to the following complex schedule:

1. A 6,600 daily net tonnage limit and a weekly net tonnage limit of 36,000 tons are in effect until the County Board of Supervisors approves a revised CUP.

Response 1608: In regard to the County Landfill Extension CUP, this in not an "amended" CUP; rather, the subject CUP in final form was approved by the County Board of Supervisors in November 1993.

Comment 1609: 2. This revised CUP is to allow 8,800 daily net tons and a weekly net tonnage limit of 48,000 tons.

Response 1609: In regard to the County Landfill CUP, refer to specific CUP Conditions 10(e) and 10(f) with respect to daily and weekly net tonnage. In addition, refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 1610: 3. A "cap" of 9,000 tons per day of solid waste (defined as exempt waste, or asphalt, concrete, soil, rock, wood chips and green wastes, which are not to be disposed of at the working face of the landfill, but are to be otherwise used at the site or transported off for reuse; plus refuse to be landfilled) to be referred to as the Gross Tonnage Limit until such time as the City of Los Angeles has certified that various traffic improvements have been made on San Fernando Road, such as widening and/or restriping and installation of traffic signals at the landfill entrance; restriping turn lanes at the intersection of Balboa Boulevard; and installing various traffic control signs and markers.

Response 1610: Refer to Response 339 for a discussion of the permitted daily and weekly waste intake rates at the County Landfill.

Comment 1611: 4. After the above traffic improvements have been made, the daily Gross Tonnage Limit would be allowed to reach a maximum of 17,500 tons of solid waste.

Response 1611: Refer to Response 339 for a discussion of the permitted daily and weekly waste intake rates at the County Landfill.

Comment 1612: With such a complex schedule for implementing daily tonnages, the question must be asked about what the present daily/weekly limit is.

Response 1612: Refer to Response 339 for a discussion of the permitted daily and weekly waste intake rates at the County Landfill.

Comment 1613: Further, if the improvements listed in Item 3 above are made as part of the City CUP, does that automatically allow the operator to apply to the County for permission to take in 17,500 tons per day of solid waste?

Response 1613: Refer to Response 339 for a discussion of the permitted daily and weekly waste intake rates at the County Landfill.

Comment 1614: B. PROPOSED CITY/COUNTY EXPANSION (THE PROJECT)

A previously operating landfill within the City portion stopped accepting waste when its Operating Permit expired in September, 1991. Negotiations with the Local Enforcement Agency over a Final Cover began before then, however, and only now appear to be finalizing. This "Cover" will also serve as a partial liner for the proposed expansion within the City.

Response 1614: Refer to Response 210 for a discussion of the proposed "monolithic" alternative final cover design and vegetative layer for the closure of the existing inactive City Landfill. In addition, refer to Response 356 for a discussion of the status of the Final Closure and Postclosure Maintenance Plan (FCPMP) for the required closure of the existing inactive City Landfill.

Comment 1615: BFI is proposing to come back into some 194 acres of its City land to construct a 5, 000 ton per day landfill with a final elevation of 2,000 feet mean Sea Level. This is to connect with a 42-acre vacant parcel in the County which abuts the City/County line. Development of this parcel would allow another 6,000 tons per day in the County, for a total of 11,999 tons per day.

Response 1615: As stated in the Draft SEIR, Section 1.0, Summary, p. 1-1, a portion of the proposed City/County Landfill footprint is located on ±194 acres in the City portion of Sunshine Canyon. In order to facilitate the design of the City/County Landfill Project, an area of approximately 42 acres within the County portion of Sunshine Canyon would be developed. This acreage would be engineered to ultimately connect, both vertically and horizontally, to the operational County Landfill. Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 1616: The County's Conditional Use and Oak Tree Permit has predicated the use of the 42-acre parcel, in Condition 10b. on the requirement that the City allow further development of its land. This was done in order to allow a set-aside of vacant land in the western portion of the County land for preservation of trees.

Response 1616: Refer to Response 165 for a discussion of the No Project Alternative and the potential for future development of a 70-million-ton landfill in the County.

Comment 1617: If the City does not allow development to at least 20 million tons capacity, then, according to Condition 10d., the City is to be excluded from utilizing any portion of the landfill within the County. This exclusion is to be in effect until such time as the City approves a permit.

Response 1617: Refer to Response 731 for a discussion of BFI's current refuse contract with the City.

Comment 1618: The proposed enlarged landfill would allow a daily intake of about 11,000 tons per day of waste, for a total capacity of 90 million tons. The combined landfill configuration would occupy about 451 acres in both the City and County.

Response 1618: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 1619: While BFI must receive separate approvals from the City and County, it is also seeking permission to combine landfill operations, using one working face, about 18 to 24 months after obtaining permits from the City.

Response 1619: In regard to project entitlements and discretionary actions being requested, refer to the Draft SEIR, Table 2.16-1, Summary of Regulatory Permits and Discretionary Actions Required for the Proposed City/County Landfill Project.

Comment 1620: BFI estimates that the landfill should be operational for about 26 years, and that total grading would involve about 10,044,500 cubic yards of earth material, all of which would be utilized on site. At first, earth for daily cover would be stockpiled within the

northern portion of the existing landfill, but would later be relocated as necessary. The existing access road is to be relocated to the north and east of the present winding road. Generally, it would run along the rim of the proposed eastern landfill border and stop just before entering County land.

Response 1620: Refer to Response 3 for a discussion of the anticipated volume of material to be excavated for the proposed City/County Landfill. Refer to Response 5 for a discussion of existing and anticipated soil stockpile areas. In addition, refer to Response 191 for a discussion of onsite ancillary facilities, length and width of the access road, and the future relocation of the access road and scales.

Comment 1621: The closed portion of the existing landfill would be used to house a wood and green waste recycling facility, a public drop-off area, a tree nursery and a gas flare station. Currently, a 100,000-gallon water tank and a flare station serving the old landfill are located to its immediate south. Two additional water tanks, each with a capacity of 265,000 gallons, are proposed, for a total capacity of 630,000 gallons of on-site storage. An educational center is proposed near the present landfill entry area.

Response 1621: Refer to Response 88 for a discussion of green waste/wood waste unloading, length of storage, and onsite uses for tub-grinded materials. Refer to Response 190 for a discussion of the reason why the public buyback center is no longer being considered as part of the proposed project. In addition, refer to the Draft SEIR, Section 4.16.4, Water, pp. 4-447 and 4-448, for a discussion of existing and future water storage tanks at the project site.

Comment 1622: Generally, the southern portion of the applicant's land within the City is bordered by O'Melveny Park and a residential area of Granada Hills. There is a 100-acre "buffer zone," in the southeastern portion of the property adjacent to some of the residences; it has a restrictive covenant limiting the use of the land to non-industrial uses, with the exception of oil drilling. A portion of the Cascades Oil Field is located there and is leased out by the applicant.

Response 1622: Refer to Response 1279 regarding an agreement dated February 17, 1958, which was executed between Sunshine Canyon Inc. (the property owners at that time); the North Valley Land Development Corporation, the lessee of the property known as Lot 9 of Tract 10422; Mr. and Mrs. O'Melveny, owners of Lot 8 of Tract 10422; and Saint Vincent de Paul Society of Los Angeles, owners of portions of the southeast quarter of Section 25 and the northeast quarter of Section 36 in Township 3. As noted in Response 1279, the agreement states that landfilling would occur within Lot 9, along with drilling or the production of oil or gas or other hydrocarbon substances.

It should be noted that in 1958, BFI was not the owner of the Sunshine Canyon project site. At that time, the legal owner was Sunshine Canyon Inc.

Comment 1623: II. SIMULTANEOUS PROCESSING OF EIR CERTIFICATION AND ZONE REQUEST

Along with certification of the Subsequent Environmental Impact Report, the applicant is seeking a General Plan amendment from the current "Agricultural" land use shown in the Granada Hills-Knollwoods Community Plan to a "Heavy Industrial" use. This would result in a Zone Charge from Al-1-O to M3-1-O. All previous approvals within the City were for a variance for a nonconforming use within the Al Zone.

Response 1623: Prior to filing project applications for the proposed City/County Landfill, the project proponent was informed by the City Zoning Administrator that a General Plan Amendment/Zone Change (GPA/ZC) for the entire ±494 acre project site would be the most appropriate form of project entitlement rather than a variance, which had been approved for the City Landfill in 1966 and expired in 1991. Development of the proposed project would require a GPA from "Open Space" to "Heavy Industrial," consistent with existing and proposed uses. In addition, the proposed ZC would change the zoning designation from A1-1-O (Agricultural, Height District 1, Oil Drilling District Overlay designation) to M3-1-O (Heavy Industrial, Height District 1, Oil Drilling District Overlay designation), pursuant to the City Planning and Zoning Code (PZC) §11.5.8 and §12.32.

It should be noted that in December 1990, John Parker, the City's Associate Zoning Administrator, indicated the following with reference to this issue:

> In the opinion of the Administrator, no future entitlements with respect to Sunshine Canyon Landfill should be considered under a zone variance process. The findings for a zone variance do not speak to the merits of the project, but more directly to hardships, special circumstances and property rights, which are arguably not the most appropriate findings for this type of case. Two other avenues for seeking discretionary entitlements would be more appropriate: 1) a change of both the zone and General Plan designation of the property (e.g., to the (Q) M3 Zone limited solely to landfill uses, and to a community plan designation with a landfill symbol and/or heavy industry land use; or 2) a conditional use application to the City Planning Commission under LAMC Section 12.24-B,1(k); "Public utilities and public service uses or structures." The benefit of either a zone change/plan amendment or conditional use approaches is that solid waste disposal is clearly a regional issue invested with a public interest, which deserves both a large arena of discussion and a coherent policy voice. A zone change/plan amendment would go to both the City Planning Commission and City Council; a conditional use would go to the City Planning Commission, and to the Council under appeal. On the other hand, a use variance goes to a Zoning Administrator and on appeal to the Board of Zoning Appeals (from which an appeal to the City Council would occur only if the BZA approves the variance in some form). Cases of this caliber should not have the potential for going to disparate bodies which may perceive merit in different ways (and arguably must, since the variance finding address merit far less than do either conditional use or zone change findings)." (Source: City of

Los Angeles Correspondence RE: Case No. ZA 89-1129(ZV), December 31, 1990.)

Under the City's Planning and Zoning Code, §12.20.37(I), the M3 zone permits landfilling and ancillary uses similar to the proposed project. As further demonstrated with that section,

> None of those uses which may be obnoxious or offensive by reason of emission of odor, dust, smoke, gas, noise, vibration and the like . . . shall be located nearer than 500 feet to a more restricted zone.

In this regard, the landfill footprint would be located more than 500 feet of the more restrictive zoning designations of A1, OS, PF, and RMP. (Refer to Section 2.0, Revisions and/or Additions to Draft SEIR.) The proposed landfill footprint would be located ±1,700 feet from the nearest residential area in the community of Granada Hills located south of the project site. In addition, the ±100 acre open space area provides additional separation between the proposed uses (i.e., landfill and ancillary facilities) and the residential areas located within Granada Hills. Approval of the requested ZC to M3 and corresponding Community Plan designation of Heavy Industrial would remedy existing zoning and land use designation inconsistencies between the existing A1 and Open Space designations and the existing inactive City Landfill's closure and postclosure maintenance requirements, as well as permit development of the proposed project.

Comment 1624: The Planning Commission is empowered to certify environmental documentation and approve or disapprove zone change requests and general Plan amendments simultaneously. However, the zone change request and General Plan Amendment are to be tracked separately from the SEIR; at one point they even were on a different timetable. However, the Department acceded to a request by the Council office to have both the zoning and environmental document comments due on December 5, for which LASER is appreciative.

Response 1624: In regard to the proposed City/County Landfill, City Planning will assign specific personnel to process the GPA/ZC application and coordinate their work effort with the City's Environmental Review Section EIR Coordinator, who is currently processing the Final SEIR.

In regard to BFI's pending GPA/ZC application, once the application is deemed complete by the Planning Department, the application processing will begin with the Planning Commission's formal initiation of an amendment of the General Plan so that the amendment, along with the proposed ZC, will be considered by the Planning Department, the City's General Plan Advisory Board, a Hearing Examiner, the Planning Commission, the Mayor, the Planning and Land Use Management Committee (PLUM), and, finally, the City Council. The City's processing steps for the GPA/ZC include the following:

1. General Plan Advisory Board consideration of the proposed amendment, pursuant to Los Angeles Municipal Code (LAMC) §11.5.4 and §22.178 of the Los Angeles Administrative Code;

2. a noticed public hearing conducted by a Hearing Examiner for the Planning Commission pursuant to LAMC, §11.5.6B;

3. Hearing Examiner's preparation of a report and recommendation to the Planning Commission pursuant to LAMC, §11.5.6B;

4. a publicly noticed visit to the operational County Landfill and the proposed extension site by the Planning Commission;

5. a public hearing conducted by the Planning Commission, to result in a report and recommendation to the City Council on the GPA/ZC;

6. submittal of the GPA, together with the Commission's report and recommendation, to the Mayor for his review and recommendation to the City Council, pursuant to LAMC, §11.5.6C;

7. submittal of the recommendations of the Commission and the Mayor to the City Council's PLUM Committee;

8. a public hearing held by the PLUM Committee, to result in a report and recommendation to the City Council; and

9. a public hearing held by the City Council, after which the Council may either deny the subject GPA/ZC application or adopt a resolution amending the City's General Plan and an ordinance changing the zone on the property, pursuant to LAMC, §11.5.6D.

10. The City Council can adopt the GPA by majority vote if it is not contrary to the recommendations of either the Planning Commission or Mayor. However, a two-thirds vote is required for adoption if the amendment is contrary to the recommendation of either the Commission or Mayor, and a three-fourths vote is required if the action of the Council is contrary to the recommendations of both the Commission and the Mayor (LAMC §11.5.6F).

The extension of the Key Group Meeting comment period for the GPA/ZC to December 5, 1997, was at the request of City Planning in order for the end of that period to coincide with the close of the comment period for the Draft SEIR.

Comment 1625: Unfortunately, the general public does not understand the nature of this "bifurcated" process, even though the recent "key group" community meeting held by the applicant supposedly attempted to explain it. Because the printed material and the presentations largely dealt with environmental issues, confusion still abounds.

Response 1625: Refer to Response 1624 with respect to processing of the GPA/ZC. In regard to the GPA/ZC Key Group Meeting/Open House held on November 18, 1997, printed material and the presentations at that meeting largely dealt with environmental issues because this information directly relates to either the GPA or ZC for the proposed project.

It should be noted that all individuals or organizations that have taken the time to comment on either the Draft SEIR or the requested GPA/ZC will have their comments reviewed and responded to by City Planning staff. City staff, in addition to the City decisionmakers (e.g., City Planning Commission and City Council), will consider all comments received on this proposed project.

Comments on the Draft SEIR and responses by City staff will be included in the Final SEIR, and comments received during the Key Group Meeting and responses thereto have already been included in the General Plan Amendment/Zone Change Report for the Sunshine Canyon Landfill Project (February 1998). In addition, the City is required under its own adopted guidelines to review all documents prepared by consultants. For example, copies of documents (in draft or final form) prepared by the environmental consultant will become part of the project's administrative record. Additionally, City Planning sections, such as the Environmental Review Section, Zoning Administrator, and Community Planning, work closely together to ensure that all aspects of a proposed project are properly coordinated for review and comment by all departments within the City.

Comment 1626: Therefore, LASER requests that whenever zoning matters appear in community comments to the Draft Subsequent EIR, the response from the developer's consultant, Ultrasystems Environmental, Inc., state that because the matter addresses the proposed Zone Change request, the concern is being forwarded to the Hearing Examiners to be considered in their recommendations to the Commission. In addition, the City is reminded that Section 15204 (e) of the California Environmental Quality Act states that:

> "This section shall not be used to restrict the ability of reviewers to comment on broader issues and on the general adequacy of a document or to reject comments not focused as recommended [by CEQA] . . ."

For the future, the dual-track process needs to be clarified and response times synchronized at the time environmental documents are distributed. The letter stating the time comments must be received by the Planning Department should state the section of the Department to which all zoning issues are to be sent.

Response 1626: In regard to responses to comments received either at the Key Group Meeting/Open House or on the Draft SEIR, City staff will independently review and evaluate such responses. For additional information on the City's independent review process, refer to Response 1338.

In regard to processing the Draft SEIR or the GPA/ZC, notification for the receipt of comments is specifically sent to the Department of City Planning (i.e., Environmental Review Section or Hearing Examiner).

Comment 1627: III. COMMENTS ON THE DSEIR SHOULD BE REPRODUCED IN THEIR ENTIRETY

CEQA, Section 15132, does allow discretion in how comments and recommendations received on the draft document are to be handled, by stating they can appear in the Final EIR "either verbatim or in summary." However, it is possible when summarizing comments in order to respond to them to lose the meaning of an individual comment. Therefore, LASER requests that all comments be reproduced by Xerox in their entirety and that the consultant indicate responses by numbers which appear immediately following each letter.

Response 1627: The City has included copies of each letter received. All comments are included in the Final SEIR appendix, and Section 3.0 of the Final SEIR includes each comment verbatim.

Comment 1628: IV. BACKGROUND OF THE PRESENT PROPOSAL

Landfills at this time are necessarily an important part of any solid waste management program. Nonetheless, it should be remembered that they have severe, inherent environmental problems which at best can only be mitigated in part.

Response 1628: The commenter is encouraged to review the environmental effects associated with project development, which are presented in Sections 4.1 through 4.19 of the Draft SEIR.

Comment 1629: The greatest environmental danger from landfills comes from the amount of air pollution they produce. Recent studies by the National Aeronautics and Space Administration identified the composition of "greenhouse gas" in part to be 55 percent carbon dioxide and 15 percent methane. Methane usually comprises more than half the components of landfill gas and carbon dioxide almost as much. It is not surprising, therefore, that landfills rank sixth in the creation of greenhouse gases (*MSW Management*, December, 1994).

Response 1629: Refer to Topical Response 4 for a discussion of the odor control program and mitigation measures for the proposed City/County Landfill.

Comment 1630: A. FULL EXTENT OF SUNSHINE CANYON LANDFILL PROPOSAL

The proposal for Sunshine Canyon Landfill expansion, for 5,000 tons per day in the City portion, cannot be separated from what the County is allowing and in fact encouraging by its 1993 Conditional Use Permit and the Solid Waste Facilities Permit of 1995. The County portion of the landfill has a maximum 1,885 foot mean sea level elevation, but ultimately will allow 17,500 tons per day of rubbish and other material, including green waste, to enter.

Response 1630: Refer to Response 339 for a discussion of the permitted daily and weekly waste intake rates at the County Landfill.

Comment 1631: If the City grants in full the tonnage Browning-Ferris Industries is requesting, then Sunshine Canyon Landfill would be permitted to accept 22,500 tons per day.

Response 1631: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 1632: Further, because the proposed City expansion proposes to extend to a 2,000 foot mean sea level elevation, there is little doubt that the proponent would soon be requesting the County to allow a similar rise in elevation within its jurisdiction.

Response 1632: City staff are informed that the project proponent has no intention of requesting this type of change to its approved County Landfill CUP, nor does the subject landfill design accommodate such a request As indicated in the Draft SEIR, Section 2.6.3, City/County Landfill Design, p. 2-45:

> The proposed City/County Landfill would ultimately allow for a canyon-fill, cut-and-cover, 90-million-ton landfill in Sunshine Canyon. The maximum vertical height of the landfill footprint at buildout would result in a final fill elevation (at its top deck area) of 2,000 feet MSL. At this elevation located near the City/County boundary, the proposed project would descend westerly (1,885 feet MSL) to encompass land within the County portion of Sunshine Canyon and connect vertically and horizontally with the approved County Landfill footprint.

Comment 1633: Thus it should be realized that Canyon Landfill would allow more daily tonnage than the projects now being planned for remote desert areas. These landfills would accept no more than 20,000 tons per day, although they each would have enough total capacity to last between 50 and 100 years.

Response 1633: Refer to Response 893 for a discussion of an environmental comparison between the proposed project and waste-by-rail landfill alternatives.

Comment 1634: Make no mistake: Browning-Ferris Industries and Los Angeles County intend for Sunshine Canyon to be a large, regional landfill. And, lest we forget, all material to be dumped or used on site can only enter through a City access road, off San Fernando Road, which is also within the City limits.

Response 1634: The City/County Landfill is being proposed as a Class III nonhazardous solid waste landfill that would facilitate both local and regional efforts toward attaining the solid wastes objectives of both the City and County. The access roadway to the operational County Landfill is located on private property, not public property as implied by the commenter; however, it is located in the City area of Sunshine Canyon.

Comment 1635: B. ARRANGEMENTS COVERED BY SETTLEMENT AGREEMENTS

The existing landfill area within the City was closed in 1991 when its permits expired. Browning-Ferris Industries next applied to the County for landfilling within the County; its plan was similar to what is now being proposed for the County-City landfill. Access

was to be through the City. Litigation by both the City and a Granada Hills community group to prevent use of the City access followed. The City action resulted in two tri-party settlements.

Response 1635: In regard to the City Landfill, it ceased operation due to the expiration of its zone variance; however, existing zone variance conditions are still in effect for this landfill, and the landfill's SWFP is still in effect until closure and postclosure monitoring and maintenance have been deemed complete (a mandatory minimum 30-year period).

As stated in the Draft SEIR, Section 1.5.1, Prior Environmental Record Pertaining to the Proposed City/County Landfill Project and Existing Inactive Landfill, p. 1-4:

> As indicated in the FEIR, development of the County/City Landfill was to commence in the upper reaches of the canyon area (in the County) and then proceed downgradient toward the mouth of the canyon, extending back into the lower reaches of Sunshine Canyon (in the City). Conceptual planning of this proposed project began in 1984. Its project application was submitted by the project proponent to the County in 1986.

As noted in the Draft SEIR, the project proponent began conceptual planning of a County/City Landfill within Sunshine Canyon in 1984, not after 1991 as mentioned by the commenter.

In regard to "similarity of plans," the Draft SEIR, Section 1.5, Project Background, indicates the prior history of the County/City Landfill project. With respect to "litigation," following the approval of the County Landfill by the County Board of Supervisors in February 1991, the North Valley Coalition of Concerned Citizens (NVC) and the City filed separate lawsuits in March 1991 in Superior Court against the County and BFI, challenging the approved project entitlements, the legal sufficiency of the FEIR, and the amendments to the County's General Plan. These lawsuits were eventually consolidated by the court, and the trial on this matter commenced in October 1991. The Draft SEIR, Appendix C3, Overview of Litigation Proceedings in Connection with the County Landfill, provides an overview of litigation.

In regard to "two tri-party settlements," City actions did not result in a "settlement agreement." Rather, settlement occurred as a result all parties, including the County, City, and BFI, desiring to satisfy and settle claims between themselves.

Comment 1636: 1. AGREEMENT I. Signed in 1994, the first agreement provided for Browning-Ferris Industries to compensate Los Angeles for the problems associated with having a landfill at its borders. BFI agreed to contribute a sum totalling $4,500,000 into the General Fund and into a Trust Fund for community improvements, starting 90 days after disposal operations began in the County. (These operations began in July, 1996.) Payments would be completed into the Trust Fund in 1999.

Response 1636: Specific to the settlement agreement, BFI, the City, and County entered into an initial settlement agreement on October 25, 1994, which is known as the first settlement

agreement. That agreement related to various matters concerning BFI's development and operation of its approved County Landfill, which was planned to be constructed in the County portion of Sunshine Canyon.

Another agreement was reached between BFI and the City on December 8, 1995. That agreement required BFI and the City to settle the outstanding claims alleged in the lawsuit and settle all disputes in regard to the access roadway. With respect to the opinion of the commenter regarding "the first agreement provided for Browning-Ferris Industries to compensate Los Angeles for the problems associated with having a landfill at its borders," such an objective does not appear to have been a specific purpose or intent of the settlement agreement.

However, as part of the first settlement agreement, BFI did agree to pay $500,000 into the general fund of the City upon commencement of disposal operations at the County Landfill and $1,000,000 into a trust fund of the City for community improvements subject to specific conditions. (Disposal operations at the County Landfill began in August 1996, not July 1996, as stated by the commenter.)

It is unknown what the commenter is referencing with respect to "[p]ayments would be completed into the Trust Fund in 1999." Certain items prescribed in the first settlement agreement have specific funding mechanisms and specified periods for funding such applications.

Comment 1637: In addition, BFI agreed to pay $1,100,000 for a "City environmental program," which would also begin with the onset of County landfill operations. These monies would be paid into the City's Environmental Affairs Fund; for the first five years payments would be $55,000 per year, followed by a ten-year period of payments in the amount of $82,500 per year. The environmental fund would be for the creation and expansion of riparian and wetland habitat, and oak and other native plant restoration activities, as well as recycling activities and public information.

Response 1637: With respect to the first settlement agreement, BFI agreed to the following:

> BFI will fund City environmental programs by paying (a) $550,000 within 90 days of commencement of disposal operations at the County Landfill, (b) paying $27,500 per annum upon commencement of disposal operations and continuing for a period of five years or until the termination of disposal operations, whichever first occurs, and (c) $41,250 for years six to 15 or until termination of disposal operations, whichever occurs.

It should be noted that several of the original conditions in the first settlement agreement were modified in December 1995, with the execution of the second settlement agreement between the City and BFI. The fund amounts mentioned by the commenter are inconsistent with the second settlement agreement.

Comment 1638: In this regard, it should be noted that the County landfill, located in upper Sunshine Canyon, destroyed about 8,500 oak trees and many other varieties as well. For this reason, BFI also agreed to donate 500 oak trees for replanting by the City, provided that the City foot the cost for planting and in turn agreed to a careful monitoring program.

Response 1638: In regard to removing oak trees within Sunshine Canyon, 3,610 oak trees have been approved by the County Forester for removal within the canyon. To compensate for this removal, BFI to date has planted 8,610 oak trees in authorized mitigation sites within Sunshine Canyon. These oak trees are required to be monitored for 5 years.

In regard to the settlement agreement and the specific condition regarding additional oak trees, it was agreed by both the City and BFI that BFI would incur the initial expense of growing and maintaining the oak trees (prior to donating the trees to the City), and the City would be responsible for ensuring survivability and growth with respect to monitoring these trees.

It should be noted that with respect to BFI's agreement to provide oak trees, the following is acknowledged:

> In addition, BFI agreed to provide upon request and at no cost to the City a total of 500 oak trees planted in 15-gallon containers for replanting by the City in City territory at the City's sole cost and expense; provided, however, that prior to providing such oak trees, the City shall provide to BFI an acceptable post-planting monitoring system to reasonably ensure oak tree survivability and growth.

Comment 1639: In return, the City agreed "to expeditiously process BFI's application" for a Zone Variance for an access road through the applicant's land within the City to the County. BFI also agreed to careful controls on its landfill liner in the County, and to request the County to remove the restriction against the City using the County landfill.

Response 1639: The City did agree to expeditiously process BFI's application with respect to the access roadway as a result of the settlement agreement. In regard to the landfill liner, it was agreed that:

> The landfill liner will be designed and constructed as approved by the Regional Water Quality Control Board ("RWQCB"). This design will take into consideration, as may be required by the RWQCB, any additional data developed as a result of the Northridge earthquake in January 1994.

Comment 1640: 2. AGREEMENT II. Signed on December 8, 1995, this agreement provided for ministerial processing of permits for the access road after the Zoning Administrator granted the Zone Variance allowing a non-conforming use within the Al Zone. BFI was also granted the consideration of "Parcel B for future alignment of the access roadway.

Response 1640: "Agreement II," as noted by the commenter, is another settlement agreement between the City and BFI. The reported intention of this agreement was to settle the claims

alleged in the lawsuit and all disputes between these parties regarding the use of the access roadway.

In regard to Case No. ZA 94-0753 (ZV), the City Zoning Administrator approved this zone variance in January 1995 and stated the following:

> A variance to permit the use of an existing privately-owned access road (Parcel "A") in the A1 Zone for the driving of vehicles across said road for access from San Fernando Road to the Sunshine Canyon County Landfill for refuse disposal, landfill maintenance and monitoring, and construction-related activities related to that Landfill, and vehicular access from the Sunshine Canyon County Landfill to the San Fernando Road for closure and post-closure purposes of the City and County Landfill, as well as the use of Parcel "B" for the future alignment of such roadway.

Regarding the approval, the Zoning Administrator never granted a zone variance for a nonconforming use within the A-1 zone as mentioned by the commenter.

Comment 1641: BFI additionally agreed not to accept any out-of-County waste for 90 months (7 1/2 years) following the opening of the County portion of the landfill, provided that the City agreed to dispose "not less" than an average of 1,250 tons per day of municipal solid waste. This would allow the City to pay a special low rate of $16.00 per ton plus tax tipping fee during the same period, which could increase annually only as much as the Consumer Price Index, but not more than three percent per year. If the City wishes to dump more waste, in excess of 2,500 tons per day, it would pay the lowest tipping fee BFI charges to its larger contract clients. This is the price that will also prevail if the City wishes to continue using the landfill after 90 months.

Response 1641: This comment is noted. Refer to Response 731 for a discussion of BFI's refuse contract with the City.

Comment 1642: This Agreement also modified the payment schedule for BFI's contribution to the City's environmental fund. The present agreement is for an initial payment of $550,000 within three months of County landfill operations beginning, plus $27,500 per year for the first five years. For the next 10 years, the payments will be $41,250 per year. It should be noted that some of this funding and oak trees have recently been used for a restoration project within the Arroyo Seco.

Response 1642: Refer to Response 1637 in regard to the BFI's funding of City environmental programs pursuant to the terms and conditions of the settlement agreement. BFI has never used funding sources from the City's environmental programs to fund restoration improvements within the Lower Arroyo Seco area of the City of Pasadena.

In addition, the Lower Arroyo Seco Project was fully described in the Draft SEIR, Section 4.4.2, Wetlands and Riparian Habitat, p. 4-184.

Comment 1643: It should be noted that other than agreeing to consider the relocation of the present access road to County land, the City has no legal obligation to approve the present proposal for a 5,000 ton per day expansion of the BFI landfill within the City portion of the proponent's land.

Response 1643: Approval of the proposed project will be at the discretion of the City decisionmakers. Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 1644: V. WHY THE NECESSITY FOR A 22,500 TON PER DAY LANDFILL ABOVE GRANADA HILLS

Condition 10 (b) of the County's Permit, stating that BFI cannot use the 42 acres of land between the existing landfill unless the City also allows landfilling once again on the BFI land within its jurisdiction, is supposed to have been imposed in order to save the trees within East Canyon, which would become a protected area. However, the County itself removed the status of its own Significant Ecological Area No. 20 from much of these lands in order to permit the existing landfill.

Response 1644: Refer to Responses 1352 and 1412 for a discussion of deleting the Significant Ecological Area (SEA) 20 designation for the project site associated with the approval of the County Landfill. The East Canyon Dedication Area is not zoned for landfill expansion or planned for any activities pertaining to landfill development. This canyon was dedicated by the project proponent to the County for open space and recreational purposes in accordance with County Landfill CUP Condition 15.

Regarding the BFI dedication of acreage in East Canyon, the Draft SEIR, Section 4.14.4, Parks and Recreational Resources, pp. 4-421 through 4-422, states:

> As part of County Landfill development, the project proponent was required to dedicate lands to the County for open space. Prior to the opening of the County Landfill, the project proponent dedicated over 426 acres within East Canyon for open space and recreational purposes and is arranging for additional dedication of road and trail easement areas. The total dedication within East Canyon will encompass approximately 507 acres. This acreage has become part of the Santa Clarita Woodlands Park.

Comment 1645: Therefore, it may be concluded that other matters are fueling the desire to create a major regional landfill capable of receiving 22,500 tons of waste and "exempt" materials per day on land that is adjacent to O'Melveny Park in the City and close by single-family residences.

Response 1645: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 1646: A. LOS ANGELES COUNTY COUNTYWIDE SITING ELEMENT

The Draft Subsequent Environmental Impact Report does include information on the Los Angeles County *Countywide Siting Element*, taking information from the January, 1996 Preliminary Draft. This document, while presenting data on landfill capacities, states that it is County policy to have excess daily disposal capacity equivalent to the largest daily tonnage permitted within the County. To date, this is the Puente Hills Landfill, which is permitted through 2004 for a daily limit of 13,200 tons. No municipally collected refuse from the City is accepted at this landfill, although some may inadvertently come from transfer stations. The *Siting Element* shows that in 1995, an average of 10,341 tpd were being deposited at Puente Hills (Table 3-1).

Response 1646: With respect to the Countywide Siting Element, refer to the Draft SEIR, Appendix C13, Regulatory Overview of State-, County-, and City-Enacted Waste Management Acts; the Countywide Siting Element is discussed on p. C13-3. The *Los Angeles County Countywide Siting Element, Volume I, The Element* (June 1997), p. 3-28, states that the Puente Hills Landfill has a maximum permitted disposal capacity of 13,200 tpd and 72,000 tons per week. The Puente Hills Landfill CUP expires on November 1, 2003.

Comment 1647: The County also defines a "garbage crisis" as existing when there is " . . . a comparison of the projected date of daily permitted disposal capacity shortfall with the date additional daily capacity can be permitted." *(Siting Element,* page 4-18.) By County definition, we will be in a "garbage crisis" by 1999 (Table 4-5). However, because a number of landfills have closed since the date of the draft document, it is safe to say that the County now considers itself in a garbage crisis.

Response 1647: Refer to Response 943 for a discussion of the recent closures of major Los Angeles County solid waste landfills and the projected future solid waste disposal capacity shortfall in Los Angeles County.

Comment 1648: Within the City's sphere of landfills, Lopez Canyon Landfill, the last City owned and operated landfill, closed in July, 1996--just as the County portion of Sunshine Canyon Landfill was opening. Mission-Rustic-Sullivan Landfill and Towsley have been removed from consideration. Land for the Elsmere Canyon landfill is now also owned by BFI and its future as a landfill is in doubt. Only Chiquita Canyon Landfill in Newhall is open and has recently been permitted for twice its 1995 daily tonnage, going from about 5,000 tpd to 10,000 tpd. In the Northwest County area, only Sunshine and Chiquita are operational.

Response 1648: Refer to Response 124 for a discussion of the status of the proposed Elsmere Solid Waste Management Facility. Refer to Response 172 for a discussion of the status of the Chiquita Canyon Landfill expansion final approval.

Comment 1649: B. NORTHWESTERN COUNTY PROJECTED GROWTH: FATAL FLAW OF THE SDEIR

While the Draft SEIR does discuss the *Countywide Siting Element,* it remains totally silent on a critical issue: approved and proposed new development in Santa Clarita and the Newhall Ranch and Land Company. No figures for growth are mentioned, nor is the increase in the area's waste stream caused by this growth.

Response 1649: The related projects compiled for cumulative analysis for the Draft SEIR, Section 3.2, Related Projects, p. 3-18, included projects that were recently approved, pending approval, or under construction (but not occupied). The related projects list, Draft SEIR, Table 3.2-1, includes projects located within a 5-mile radius of the project site. The related project list was approved by both City Planning staff and the LADOT in January 1995.

In regard to the proposed project, all City procedures were followed. The determination of the related projects boundaries is under the direction of the LADOT, and the geographic boundaries were defined by the LADOT with the concurrence of City Planning. Acceptance of those boundaries was adhered to throughout the processing of the Draft SEIR.

The Newhall Ranch Project includes approximately 25,000 dwelling units on 12,000 acres. However, the closest portion of that project is located more than 6 miles from the landfill project site; therefore, this residential project was not included as a related project in accordance with established City and CEQA standards.

Correspondence between the LADOT, City Planning staff, and the environmental consultant regarding development of the related projects list was included in the Draft SEIR, Appendix B1, LADOT/City Planning Staff Correspondence and Traffic Impact Study Report. The related projects list approved in January 1995 was subsequently used as the cumulative project basis for the Traffic Impact Study Report prepared by the consulting traffic engineers.

Consistency with regional growth forecasts for the San Fernando Valley subarea, Los Angeles City subregion in the City, Santa Clarita subarea, and North Los Angeles subregion in the County is described under the Regional Comprehensive Plan and Guide Growth Management Chapter in the Draft SEIR, Section 4.2.10, Project Consistency with Applicable Plans, pp. 4-80 and 4-81.

In furtherance of countywide waste generation, the *Los Angeles County Countywide Siting Element, Volume I, The Element* (June 1997), pp. 4-11 through 4-13 states:

> A number of alternatives were considered for use in projecting countywide waste generation for the 1996-2010 planning period. These include use of the waste generation growth factors from each jurisdiction's SRRE, an adaptation of the CIWMB's Adjustment Methodology, and waste generation growth rates based on population growth projections.

The use of growth factors from each jurisdiction's SRRE were not selected because of the complexity involved in projecting waste generation for 89 individual jurisdictions. In many instances, the jurisdiction's projections were based on jurisdiction-specific population and economic growth projections which are either difficult to emulate or which may now be outdated.

Other methodologies, such as the projection of per capita waste generation in conjunction with population trends, were not used because of their failure to take into consideration the impact that changes in economic conditions has on waste generation. As discussed later in this Section, nearly three fifths of all solid waste generated in Los Angeles County can be attributed to economic activity (i.e., about 58 percent of all waste generated in the County was generated by commercial/industrial sources). Major changes in economic activity would have a significant impact on waste generation, however, population-based methods do not take into account this important factor. For example, linearly projecting the per capita waste generation data for 1990 through 1994 (a recessionary period) and using the projected per capita waste generation figures to project total waste generation, incorrectly assumes that the recession of the early 1990s would continue into the future without any economic recovery.

The use of growth rates based on population growth projections was considered for use since population projections are available from the State Department of Finance through the year 2010. However, projections based on population growth would not be able to account for economic downturns or a resumption of strong economic growth in the Los Angeles area in the next few years, which may have a significant effect on solid waste generation. Therefore, this alternative was not selected.

The projection methodology selected for use in the CSE consists of projecting solid waste generation using the CIWMB's Adjustment Methodology. The CIWMB-approved Adjustment Methodology measures how increases or decreases in population, employment, inflation-adjustable taxes sales and special events (such as natural disasters) affect waste generation amounts. The Adjustment Methodology provides jurisdictions with a valuable tool for more accurately measuring their progress in reducing solid waste disposal, as well as for estimating future disposal quantities.

The adjustment formula uses a combination of ratios of base year to target year population, employment, and taxable sales to calculate target year solid waste generation, and maximum allowable disposal amounts based on established diversion goals. Since population, employment, and taxable sales influence residential waste generation rates differently than waste generated by non-residential sectors (i.e., commercial, industrial, etc.), the formula also provides correction factors to address these variances. As such, residential waste quantities are calculated separately from non-residential solid waste and then combined.

It can be seen that the adjustment formula predicts that increases/decreases in employment and taxable sales would have an impact on non-residential waste generation and, to a lesser extent, residential waste generation. Also, it can be seen that increases in population would have an impact on residential waste generation only. This does not mean however, that changes in population would have no effect on non-residential waste generation, since employment and taxable sales are intrinsically related to population.

It should be noted that when jurisdiction-specific data is not available, or when state-supplied data is not considered to be truly representative of a jurisdiction's situation, the method allows the jurisdiction to develop and use locally-developed alternative data or the use of countywide or other data which the jurisdiction deems representative of its situation.

The Adjustment Methodology was field-tested in spring 1994 by 47 jurisdictions in the State. Based on the test results and independent scientific review, the accuracy of the method is considered to be generally very good.

Comment 1650: Consequently, the traffic analysis contained in the SDEIR does not disclose this projected increase, much of it to be in place well before the end of the 26-year life span of the proposed City-County landfill in Sunshine Canyon.

Response 1650: Refer to Response 1649 for a discussion of regional growth projections and solid waste generation projections.

Comment 1651: David Oeffling, intern for Councilmember Hal Bernson, was requested to research this information. His information determined that about 40,000 additional dwelling units have been approved by the City of Santa Clarita within the past several years, some of them not far from Elsmere Canyon. The proposed development of the Newhall Ranch land is to include about 24,000 dwelling units. This means that between them the Chiquita and Sunshine Canyon Landfills, as the only two landfills in the Northwestern County area, will need to accommodate about 64,000 additional dwelling units plus the commercial development they will require.

Response 1651: Refer to Response 1649 for a discussion of regional growth projections and solid waste generation projections. In regard to proposed dwelling units located in northwestern Los Angeles County, this area is outside of the geographic radius area approved by the LADOT and City Planning as it relates to the related projects list.

Comment 1652: Industrial development is also occurring in this area.

Response 1652: This comment is noted.

Comment 1653: In what may be described as the fatal flaw of the Subsequent Draft EIR, the failure to disclose or analyze the impacts of this additional development means that there are inadequacies in discussing many of the environmental impacts as they pertain to the expansion of the Sunshine Canyon Landfill.

Response 1653: Refer to Response 1649. The Draft SEIR discusses the approach to cumulative project impacts in accordance with State CEQA Guidelines, §15130 (a)(b)(c). Specifically, the Draft SEIR, Section 3.2, Related Projects, described CEQA's requirements, the geographic boundaries of the related-project radius determined by the City, and the related projects, which were discussed in Table 3.2-1. As mentioned, the City has adopted procedures for determining the geographical boundaries for related projects that eventually result in the related projects list for a project.

Comment 1654: 1. WASTE STREAM ANALYSIS REQUESTED. The proponent is requested to provide an analysis of the existing waste stream for the City of Santa Clarita. Within the unicorporated County area, the communities of Val Verde, Castaic Junction, Stevenson Ranch, Del Valle, and the Newhall Ranch need to be analyzed as well.

Response 1654: As a requirement of A.B. 939, each incorporated city within Los Angeles County was required to analyze its own solid waste stream. These data were then obtained by the County of Los Angeles Department of Public Works, Environmental Programs Division, and incorporated into the *Summary Plan of the Los Angeles County Countywide Integrated Waste Management Plan (June 1997).*

Comment 1655: All approved growth and proposed development needs to be listed and discussed in terms f its waste stream.

Response 1655: Refer to Response 1649.

Comment 1656: 2. TRAFFIC ANALYSIS OF THE I-5 FREEWAY. The traffic study by Linscott, Law and Greenspan analyzes only intersections which, with one or two exceptions, includes only the City of Los Angeles.

Response 1656: Refer to the Draft SEIR, Appendix B1, LADOT/City Planning Staff Correspondence. The memorandum issued from the LADOT was included in this appendix and specifies those critical intersections determined by the LADOT to be analyzed as part of the traffic study report for the proposed project.

Comment 1657: However, the Golden State Freeway contains most of the traffic from these areas southbound to and from the City. Its present Level of Service during peak periods and the impact from the projected development need to be analyzed and included in the SEIR. The California Department of Transportation (CalTrans) should be able to provide these igures.

Response 1657: Based on the results of the CMP mainline freeway analysis, the proposed project will not have a significant impact on either the I-5 or I-405 Freeways. Refer to Responses 26 and 27 for an additional discussion regarding CMP analysis.

Comment 1658: Also, the present and future traffic along The Old Road between the Stevenson Ranch and the Sierra Highway should be analyzed, because together these two roads are the nly routes through the San Fernando Pass.

Response 1658: In regard to the traffic analysis for the proposed project, based on established criteria, the LADOT did not require that the Old Road between Stevenson Ranch and Sierra Highway be investigated.

Comment 1659: Not until these figures are provided for future ambient conditions can there be a true analysis of the landfill traffic.

Response 1659: The traffic impact study report for the proposed City/County Landfill Project was prepared in accordance with the LADOT Traffic Study Policies and Procedures. The methodology for the traffic impact analysis was deemed adequate by the LADOT as indicated in its memorandum dated March 12, 1996, which was included in the Draft SEIR, Appendix B1, LADOT/City Planning Staff Correspondence.

Comment 1660: 3. EMERGENCY FIRE RESPONSE FROM COUNTY. The SEIR should take into account the projected growth from the North County area as it discusses the adequacy of fire and emergency medical response times from relief facilities in Santa Clarita.

Response 1660: Projected population growth in the Los Angeles County Fire Department service area boundaries and the adequacy of fire protection within that area were discussed in the Draft SEIR, Section 4.14.1, Fire and Emergency Medical Services, p. 4-398. It states that:

> Some related projects would be exposed to greater fire hazards than others because development would occur on or adjacent to natural hillside areas. It is anticipated that development of the proposed project in conjunction with related projects would place greater demands on fire protection services. Cumulatively, these developments would result in the need for increased staffing at existing facilities, additional fire facilities, and the potential relocation of existing fire facilities . . . [T]he City and County fire department would continually monitor development activity within their respective jurisdictions to assess the adequacy of existing levels of service. These preventative measures would reduce the cumulative impacts to a less than significant level.

Additionally, the first-due response would be provided by the City of Los Angeles Fire Department Station Number 18, which is approximately 2.5 miles from the project site.

Comment 1661: The SDEIR, pages 4-391 and 4-392 refer to Los Angeles County Fire Station No. 124 on Pico Canyon Road in Valencia, which is able to provide backup fire and paramedic relief. This is about 6 miles from Sunshine Canyon Landfill. According to the SDEIR, response time is about 4 to 5 minutes.

Response 1661: Response times and distances are approximations based on information provided by John P. Harris, Battalion Chief, Los Angeles County Fire Department Station 73, on February 12, 1997. The LACFD was notified about the proposed project and has not foreseen an impact. Refer specifically to Appendix A6, Notice of Preparation and Initial Study Distribution List; Appendix A7, Comments Received on Notice of Preparation/Initial

Study; and Appendix A13, Notice of Preparation Mailing List. In addition, as indicated in the Draft SEIR, Section 4.14.1, Fire and Emergency Medical Services, p. 4-396:

> Impact on LACFD services has been previously analyzed as part of the FEIR prepared for the County landfill. LACFD recommendations were incorporated as conditions of project approval. Under the proposed City/County Landfill project, landfill operations would occur in ±42 acres in the County, and development would not create additional impacts on LACFD beyond those previously analyzed in the FEIR.

Comment 1662: County Fire Station 73 on North San Fernando Road in Newhall, about 6.25 miles from the landfill, has a response time of about 11 minutes.

Response 1662: Refer to Responses 1660 and 1661.

Comment 1663: Fire Station 76 on Henry Mayo Drive in Valencia has easy access to the divided expressway State Route 126, which is close to the I-5. In addition to fire fighting capability, it maintains a 5-person hazardous materials squad. It is about 11 miles from the landfill, and its present response time is about 10 minutes, according to the SDEIR, page 4-392.

Response 1663: Refer to Responses 1660 and 1661.

Comment 1664: However, a glance at the *Thomas Guide* for Los Angeles County, shows that in addition to serving Santa Clarita, all these stations are also needed for the nearby Six Flags Magic Mountain recreation facility. Are additional fire and paramedic stations needed to serve the expected growth in the area? Will they be able to continue serving the landfill with the same response times?

Response 1664: Refer to Responses 1660 and 1661. Mitigation measures applicable to the operational County Landfill and required by the LACFD are included in the Draft SEIR, Appendix C9, FEIR Mitigation Monitoring and Reporting Summary, pp. 36 and 37.

Comment 1665: It is clear from the above discussion that it is the projected growth for the immediate area of the County that is fueling the need for a large, regional landfill. The *Countywide Siting Element* contains a largely theoretical analysis of County-wide landfill capacities, as well as County-wide projections of the solid waste stream. The reality, however, is that most of the growth within the County is occurring in the Northwestern County area-precisely the area to be serviced by Chiquita and Sunshine Canyon Landfills. Failure to consider this aspect of future needs means the Draft SEIR is grossly inadequate.

Response 1665: Refer to Response 1649.

Comment 1666: VI. BACKGROUND: STATUS OF CITY'S SOLID WASTE PROGRAMS

A. SOLID WASTE STREAM ANALYSIS

1. 1990 BASE YEAR FIGURES. According to the 1994 City of Los Angeles *Solid Waste Management Policy Plan*, in 1990, the City's total waste stream was officially estimated to have been about 4,782,761 tons. Known as the "Base Year Figure," this is the amount from which all else must be calculated for the purpose of the State's Integrated Waste Management Act of 1989, referred to as "AB 939." By 1995, about 25 percent of this figure was to have been diverted from landfills, and by the year 2000 fully 50 percent is to be diverted. Failure to achieve these diversion rates can result in fines by the California Integrated Waste Management Board of up to $10,000 per day. (To date, no fines have been levied by the State Board.) AB 939 is the State's basic recycling law, enacted by the Legislature in response to a perceived national and State shortage of landfill space.

Response 1666: This comment is noted.

Comment 1667: It has since been recognized that the "landfill crisis" was one of cost rather than a true lack of space, especially in the East, where landfill tipping fees in excess of $100 per ton were thought to be conceivable. It is as well a crisis of "permitted" landfill space, because landfills are universally acknowledged to be a "Locally Undesirable Land Use" and thereby difficult to site. Here in Southern California, tipping fees now range from just over $20 per ton to more than $30.

Response 1667: This comment is noted.

Comment 1668: *The Solid Waste Management Policy Plan* breaks down the Base Year Figure further: Of the 4,782,761 tons comprising the total City-generated waste stream, about 3,798,662 tons of solid waste were disposed in permitted landfills, corresponding to approximately 12,000 tons per day. Of this amount, about 40.1 percent was collected by the Bureau of Sanitation, and comprised both the residential curbside collection from 720,000 single-family houses and small apartments under five units, as well as material from City departments.

Response 1668: This comment is noted.

Comment 1669: About 984,099 tons were diverted from landfills, discounting "inerts" such as asphalt, biosolids (sewage sludge), and scrap metals. This amounted to about 20.1 percent of the waste stream being diverted. The relatively small, privately collected industrial sector led the way in recycling; 59.3 percent of its waste stream was diverted. The privately-collected commercial sector recycled about 20.7 percent. About 130 haulers were involved in private collection. The City-collected waste recycled but 9.9 percent because the curbside recycling program was still in its pilot stage at this time, with but 19,000 tons being diverted.

Response 1669: This comment is noted.

Comment 1670: 2. 1995 WASTE STREAM FIGURES. According to the Draft *Annual Update,* at present being approved by the City, the largest change in reporting diversion rates in 1995 was that the responsibility shifted from cities to counties. Counties are allowed to report data based on landfill disposal figures.

Response 1670: This comment is noted.

Comment 1671: The City of Los Angeles, however, elected to continue its previous calculations because it believed the knowledge gained from the results would allow its excellent tracking record of targeted materials and industries to remain focused and subject to rigorous monitoring. The County has objected to this, but as of this date the CIWMB is accepting the City's calculations. In actuality, the County's disposal figures differed by only 0.3 percent, according to the Draft *Annual Report,* page 1-5.

Response 1671: This comment is noted.

Comment 1672: The City's calculations showed that some 3,365,000 tons of the total 5,854,372 generated tons were disposed of at landfills in 1995, down about 11 percent from 1990 (page 1-4). Thus, even though the total generated waste stream was up by 18 percent from 1990, the City showed a reduction in diversion.

Response 1672: This comment is noted.

Comment 1673: The most prevalent materials disposed in landfills Citywide were food and paper goods of all kinds, especially kraft and "remainder" paper. Unlike 1990, yard trimmings were greatly diminished in quantity, because these were an early "targeted" material by the City's Integrated Solid Waste Management Office.

Response 1673: This comment is noted.

Comment 1674: Private haulers, in 1995 numbering close to 150, disposed of 54 percent of the City's waste stream, about the same as in 1990. Their disposal quantities decreased from 2.08 million tons in 1990 to 1.81 million tons in 1995, a decrease of 13 percent, according to the *Annual Report,* page 1-5. Self -hauled,waste to landfills was estimated by gate surveys at landfills to comprise about 10 percent of the total disposed tonnage (page 1-7).

Response 1674: This comment is noted.

Comment 1675: Various City agencies controlled only 39.5 percent of the total disposed waste, lower than the 44.6 percent tallied in 1990. The decrease is believed to be due to extensive recycling efforts.

Response 1675: This comment is noted.

Comment 1676: 3. EFFORTS SINCE 1995. The City is making extensive efforts, as a result of the numbers found in the 1995 *Annual Report,* to target City government-generated

waste and through ordinances to have various departments purchase recycled materials.

Response 1676: This comment is noted.

Comment 1677: Extremely little yard waste is delivered to landfills from the City's separate automated yard waste collection, except from contaminated containers or other special situations. This is because the City has adopted a policy of re-use for all such waste. In February of this year, the BOS reported that 98 percent of all yard trimmings were being recycled, mostly as part of an out-of-town composting program. The materials are first dropped off at wood chipping facilities and then transported to the facilities. Some is being done at a Valley composting facility.

Response 1677: This comment is noted.

Comment 1678: Food waste composting programs are being instituted in the Downtown Produce Mart, according to the ISWMO. A two-year Citywide automated "blue bin" recycling program has recently begun in the West San Fernando Valley, replacing the complex "yellow bin" semi-automated program. It is hoped this single-stream recycling program will make it easier to recycle all clean paper and other materials, which under the old program had resulted in low rates of recycling of about 7 percent, according to the Bureau of Sanitation. Even the West Valley and the Westside, the two highest recycling areas of the City, had recycling rates of about 11 to 14 percent in 1996.

Response 1678: This comment is noted.

Comment 1679: Nonetheless, the City has concluded that it has achieved an AB 939 diversion rate of 44.5 percent in 1995. All earthquake debris has been excluded from this figure. However, the City's debris removal program recycling rates were so successful that the State has used it as a model for similar disaster planning. The City collected over 1 million tons of earthquake debris; it disposed of 330,890 tons and recycled 785,727 tons under special contracts. Unfortunately, according to the *Annual Report,* the construction industry did not continue its recycling practices when allowed to revert back to free market conditions. More effort is needed in this area.

Response 1679: This comment is noted.

Comment 1680: B. LANDFILL DISPOSAL STATUS

Since the publication of the *Countywide Siting Element* and the completion of calculations for the City's AB 939 waste generation figures for the *Annual Report* for 1995, conditions for disposal of Los Angeles's solid waste have changed dramatically. Lopez Canyon Landfill, the last City owned and operated landfill, closed in July, 1996 as the County portion of Sunshine Canyon Landfill was beginning its operations.

Response 1680: In addition to the closure of the Lopez Canyon Landfill, BKK Landfill and Azusa Landfill have also closed since the preparation of the Los Angeles County Countywide Siting Element Preliminary Draft in January 1996.

Comment 1681: While the amount of material being taken to landfills is generally less than it was a few years ago, the City now has contracts with two privately owned land-fills: Bradley West, owned and operated by Waste Management, is under contract to the City through 2001. The City has contracted through 1999 with BFI to accept about 1,250 tons per day, as per the tri-party Agreements. According to the Bureau of Sanitation, about 1,000 tons per day are going to Sunshine. The West Valley and West Los Angeles west of the 405 Freeway are sending their trash to Calabasas Landfill, because it is within its stipulated wasteshed. The old BKK landfill closed in September, 1997, and waste going to this landfill, from about 3,500 to 4,250 tons per month, is now being divided between the other three.

Response 1681: This comment is noted.

Comment 1682: As of June, Sunshine was receiving about 24,657 tons per month direct haul. Some material from the BLT transfer station in Downtown Los Angeles was also transported to Sunshine, but most went to Bradley West. In June, that landfill received about 9,130 tons direct haul. BLT received 33,165 tons. Calabasas received about 2,400 tons to 3,700 tons per month direct haul.

Response 1682: This comment is noted.

Comment 1683: Through June, 1997, according to BOS reports, the City disposed a total of 437,911 tons at landfills. That roughly corresponds to an annual rate of 875,822 tons. It should be noted that at present, because of contractual arrangements, Bradley West is receiving most of the transfer trailers, while Sunshine is receiving most of the direct hauled material.

Response 1683: This comment is noted.

Comment 1684: C. PROGRAMS FOR THE FUTURE

In addition to the AB 939 goal of achieving a 50 percent reduction of the 1990 waste stream diversions, which the City in 1995 was well on the way towards achieving, the City's *Solid Waste Management Policy Plan* sets a further goal: a 70 percent reduction by the year 2020. To achieve this, in light of the fact that by that time the total amount of solid waste generated within the City will most likely be higher than it is now, will take considerable effort. The 18 percent rise in the total waste stream evidenced in 1995 is just an example which will keep repeating.

Response 1684: This comment is noted.

Comment 1685: Having available a close, inexpensive landfill will, of course deflect the City from this goal. The City's massive investment in its residential recycling program will be lost if too much capacity is made available. Yet, there is a place for landfilling in the City's future. Not all materials can be re-used, and the City's natural population increase and rise in business activity assures higher generation rates. Future programs must, therefore, focus on Citywide source reduction as well as landfill diversion. Until then, the Bureau of Sanitation is looking at three programs:

Response 1685: The City is required to meet the goals and objectives of A.B. 939 including its adopted residential recycling program. Having the proposed project near a regional waste stream will not deflect the City from its recycling goals. Rather, the development of the landfill will provide necessary short-, mid-, and long-term disposal capacity to both the City and County.

Comment 1686: 1. SHORT-TERM: THREE TO FIVE YEARS. Within the next six months, the Bureau. will be sending out Requests for Proposals for an unlimited timeframe in order to develop a new landfill disposal program. The RFP will be sent to government entities and private waste haulers alike. Only landfills that are permitted and operating will be considered as final disposal sites.

Response 1686: This comment is noted.

Comment 1687: 2. MEDIUM-TERM: FIVE YEARS. The Bureau is currently seeking to upgrade its District Yards at a cost of $19 million. More importantly, the BOS is seeking to purchase two sites, the existing BLT Transfer Station in Downtown Los Angeles, at a cost of $261 million, and a new site adjacent to Bradley West in the East Valley for $231 million. Both would become City-owned transfer stations and/or partial Materials Recovery Facilities. The savings over the present use of privately owned facilities is claimed to be $208 million. The plus side is that the City would then be able to exercise more control over disposal and recycling; the down side of this is that it is almost a one-half billion dollar program.

Response 1687: This comment is noted.

Comment 1688: 3. LONG-TERM: FIVE YEAR PLUS. Two programs are planned. The first is to awarded an RFP for alternative disposal programs. As a result of the closure of Lopez Canyon Landfill in 1996, the City believes it needs to seek out innovative technologies to landfilling. However, the reality is setting in as it now seeks to award the RFP. The technologies are not fully tested for large-scale municipal solid waste, or they involve the use of yard trimmings, which are not now sent to landfills. Then too, their size is about 100 tpd, which would be equivalent to the amount now sent to a small landfill.

Response 1688: This comment is noted.

Comment 1689: 4. LONG-TERM: Another RFP for landfill disposal, this time perhaps to include rail long-haul to desert areas of the State. The problems are the reliability of the railroad and the cost of transportation added to the tipping fee and possible County host fee.

Response 1689: This comment is noted.

Comment 1690: VII. THE SDEIR IN LIGHT OF THE CITY'S PLANS

Two areas of the SDEIR are of particular concern to LASER in light of the City's plans and the previous discussions of this response. The first is the traffic study and the second is the totally unrealistic discussion of alternatives.

Response 1690: The traffic impact study report for the proposed City/County Landfill project was prepared in accordance with the LADOT Traffic Study Policies and Procedures. The methodology for the traffic impact analysis was deemed adequate by the LADOT as indicated in its memorandum dated March 12, 1996, which was included in the Draft SEIR, Appendix B1, LADOT/City Planning Staff Correspondence. Refer to Response 151 for a discussion of the methodology utilized in preparation of the Draft SEIR traffic study. Alternatives were discussed in the Draft SEIR in accordance with both CEQA and the State CEQA Guidelines. Refer to Responses 751 through 753 for a discussion of the methodology used for selecting and analyzing alternatives to the proposed project.

Comment 1691: A. SDEIR TRAFFIC STUDY

1. Outdated Traffic Studies. Because this document has been held in abeyance, traffic projections for future construction within the City and for the impact the landfill expansion proposal would have on them appear to be outdated. 1995 is the year given for "Existing Conditions" and 1998 for Conditions at the time the project comes on line. The problem with this timeframe is that it is now almost 1998 and the project is nowhere near ready to come on line. Table 4.13.3 and 4.13.7 are specifically references. LASER requests that these tables be updated to 1998.

Response 1691: Refer to Response 154 for a discussion of the Draft SEIR transportation/circulation study potentially containing old or outdated information.

Comment 1692: Considering that this is a landfill to be operational for 26 years, these are totally inadequate. A minimum spread of five years would be more in keeping with the landfill development. It takes a long time to move over 10 million cubic yards of earth, even if it is on site. At what date would the City portion plus the 42 acres in the County become operational if construction begins in 1999--a likely scenario, if over-optimistic. The date operation begins is the date that traffic projections should be considering, not a date that is upon us as the response period of the Draft document ends.

Response 1692: Refer to Response 154 for a discussion of the Draft SEIR transportation/circulation study potentially containing old or outdated information.

Comment 1693: 2. Ambient Growth Rate. Linscott, Law and Greenspan reports in both volumes refer to a 1-percent ambient growth rate within the City for their projections. The full report in the Appendices mentions an additional equation in conjunction with the one percent rate. Yet, according to Allyn Riskin of the Los Angeles Department of Transportation, the Department has for years used 2 percent as its ambient annual growth rate.

Response 1693: The 1-percent ambient growth rate used to forecast background traffic conditions in the conjunction with project traffic and related projects was approved for use by the LADOT staff. Prior to the ambient growth rate being confirmed by the LADOT staff, field verification (i.e., traffic counts at key intersections) was performed.

Comment 1694: Linscott, Law and Greenspan used this 2 percent rate for its traffic study of the proposed Constellation Place office tower in Century City (DEIR Appendix, page 49 of the traffic study.) This was in October, 1996. The traffic study for the Draft EIR for the Elsmere Solid Waste Management Facility, prepared in January, 1995 by Dames and Moore, states plainly that, using CalTrans calculations, a 3.7 ambient growth rate was used in its study (Volume I, page 13-8).

Response 1694: Refer to Response 1693.

Comment 1695: In addition, the City is reminded that the County Department of Public Works is at the very least a Responsible Agency under CEQA. It must be forthcoming with the additional information requested earlier in this response on future growth and development within the Northwestern County area.

Response 1695: As a Responsible Agency, the County DPW reviewed and commented on the Draft SEIR. Refer to Letters 3.5-2 and 3.5-3 in this document. In addition, refer to Response 1649.

Comment 1696: B. PROJECT ALTERNATIVES

It is most unfortunate that the discussion of project alternatives, with the exception of the "No Project" and the "Reduced Volume" alternative-although this is problematic--has almost nothing to do with the reality of proposed City programs. The City is intending to issue an RFP not for a specific landfill, but most likely for a private hauler to take the trash to whatever existing landfill or landfills have space to accommodate the City. By overlying on the County's theoretical discussion of landfills in its *Siting Element,* an inaccurate picture is presented. It should be remembered that the City will be requiring the the landfill or landfills be fully permitted and operational. The hauler will bear the responsibility of determining which landfill to use.

Response 1696: Refer to Responses 751 through 753 for discussions pertaining to the methodology used for selecting and analyzing alternatives to the proposed project.

Comment 1697: A check with Southern California landfills is a better way to determine what is presently available as an alternative. In the first place, no rail long haul landfill in California is fully permitted and operational at this time. The Mesquite landfill project, operated by U.S.A. Waste, is perhaps the closest to coming on line, but it will not qualify for discussion in any RFP the City sends out within the next few months. La Paz Landfill in Arizona is owned and operated by the applicant. It would only be an alternative if Sunshine Canyon is not available to the City. However, considering the legal issues binding the City to Sunshine, this is unlikely to occur for the foreseeable future.

Response 1697: Refer to Response 893 for an environmental comparison of the proposed project and waste-by-rail landfill alternatives.

Comment 1698: El Sobrante Landfill in Riverside County, owned and operated by U.S.A. Waste, has yet to receive permission to expand, although the County expects a decision by June, 1998. If this occurs, then U.S.A. Waste will determine the terms of disposal, which must include a host fee. Only U.S.A. vehicles will be allowed to enter the landfill with out-of-County trash.

Response 1698: An environmental comparison between the proposed City/County Landfill and the proposed El Sobrante Landfill expansion was included in the Draft SEIR, Section 5.8, Out-Of-County Landfill Site Alternative, pp. 5-31 through 5-36, and Table 5.3-1, pp. 5-72 through 5-94.

Comment 1699: Chiquita Canyon Landfill has recently been allowed to expand from about 5,000 tpd to 10,000 tpd. It too is and operated by U.S.A. Waste at this time. This landfill has conveniently been "overlooked" in the discussion of alternatives; however, if U.S.A. Waste does respond to the City's RFP, this is the likely short-term landfill it will propose.

Response 1699: Refer to Response 172 for a discussion of the status of the Chiquita Canyon Landfill expansion final approval.

Comment 1700: Orange County has two landfills which also may be considered. Olinda is the closest, especially to the BLT transfer station. However, there is currently a problem with access through Brea, according to the County. It is served by various private haulers. The Frank M. Bowerman landfill in Bee Canyon near the El Toro Airbase is also available under the same terms. Tipping fees are in the low twenty-dollar per ton range. Neither of these are mentioned as alternatives, although they are likely candidates for an RFP response.

Response 1700: Refer to Response 170 for a discussion of Orange County landfills and their acceptance of Los Angeles County-generated solid wastes. Also, refer to this same response for a discussion of limitations placed on these landfills in terms of the amount of out-of-county waste that can be accepted.

Comment 1701: Alternate technologies and strategies are not at this time true alternatives to Sunshine as proposed. The use of Alternate Daily Cover materials is not an alternative to a landfill. The City is proud of its present policy of not sending any Yard Trimmings to landfills, not for disposal, and not for "exposed disposal" as ADC. The use of foam or old, chipped tires for ADC has not been proven to be environmentally sound, even though allowed by the CIWMB. LASER opposes the use of ADC, with the possible use of tarps in conjunction with frequent cover soil applications. The City and the County disagree once again on this policy. With the present rate of diversion in Los Angeles, it does not need this excuse to artificially inflate its figures.

Response 1701: Refer to Response 195 for a discussion of the potential environmental impacts associated with the use of alternative daily cover materials (ADCMs) at the proposed City/County Landfill.

Comment 1702: Blind Canyon and Elsmere may still appear in the *Countywide Siting Element*, but they are remote possibilities at this time.

Response 1702: Refer to Responses 751 through 753 for discussions pertaining to the methodology used for selecting and analyzing alternatives to the proposed project.

Comment 1703: VIII. ADDITIONAL CONCERNS

The question of whether to allow the project as proposed has been answered. The close proximity of the landfill to sensitive areas such as a park and single-family residential areas must be taken into account. The Granada Hills community has borne the brunt of this landfill for many years. The answers for the City portion are clear; it is not the responsibility of the City to accept the severe negative impacts of landfill dust on frequent windy days, nor of greenhouse gasses, nor of high traffic counts, nor of decreased property values that come from having to disclose the landfill's existence, in order to accommodate the high rate of North County growth and its impacts on solid waste generation. That responsibility lies squarely with the County. If landfill space cannot be found then either growth must be controlled or alternatives must be found which are environmentally sound. LASER believes landfills and people simply do not mix.

Response 1703: Refer to Topical Response 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions. Refer to Response 153 for a discussion of project-generated truck trips. In addition, refer to Response 180 for a discussion of the proposed project's potential effects on property values.

Comment 1704: The needs of the City with regard to landfill space are seen with the present rate of disposal. Permitting a 5,000 tpd landfill when then City has little need for such disposal would be harmful to the interests of the City. It would discourage competition, which is vital if a monopoly on waste disposal is to be avoided. Alternatives to landfills can

never develop unless the economics of the marketplace will allow them. Keeping the tipping fees low to entice the City discourages their development, and discourages recycling and source reduction as well.

Response 1704: Refer to Response 943 for a discussion of the recent closures of major Los Angeles County solid waste landfills and the projected future solid waste disposal capacity shortfall in Los Angeles County.

Comment 1705: As has been shown earlier in this response, this is not merely a request for a 5,000 tpd facility--or of even an 11,000 tpd facility, as BFI would have us believe. Rather, approving the project as proposed is in reality allowing a facility of up to 22,500 tpd.

Response 1705: Refer to Responses 1 and 186 for a discussion of proposed project peak and average daily waste intake rates.

Comment 1706: If the applicant has made, or is about to make, the required traffic improvements along San Fernando Road, this can become a reality. Therefore, BFI is requested to clarify where it stands on the status of these traffic improvements.

Response 1706: Refer to Responses 138 and 207 for a discussion of interim and ultimate traffic improvements at San Fernando Road/Project Entrance.

Charlotte Rodrigues
13301 Constable Avenue
Granada Hills, CA 91344

Letter 3.8-31

Comment 1707: I am a resident adjacent to the proposed extension into the City of Los Angeles of the Sunshine Canyon Landfill Project. I am writing to comment on the SEIR and oppose the project.

Response 1707: This comment is noted.

Comment 1708: Browning Ferris Industries owns property within Los Angeles County called the East Canyon Dedication Area that is already zoned for the expansion of landfill activities and I feel that it is unnecessary to change the Open Space zoning to allow the proposed landfill to come within 2500 feet of our homes. I bought my property in June 1990 based on the knowledge that the landfill would soon be closing and moving further west into the county area. I feel that it is unfair to expect the residents to accept the Open Space zoning to be changed just so BFI can make more money.

Response 1708: The East Canyon Dedication Area is not zoned for landfill expansion or planned for any activities pertaining to landfill development. This canyon was dedicated by the project proponent to the County for open space and recreational purposes in accordance with County Landfill CUP Condition 15. The area of dedication consists of ±426 acres.

In addition, BFI is also arranging for additional acreage to be dedicated for road and trail easements in East Canyon. The total East Canyon dedication by BFI will consist of ±507 acres.

Intervening ridgelines and a ±100 acre open space area separate the proposed landfill footprint area from residential uses in Granada Hills. For an additional discussion of why a GPA/ZC is being requested for the proposed project, refer to Response 1623.

Comment 1709: By the Granada Hills-Knollwood Community Plan this property is zoned Open Space which is to "be preserved and conserved from encroachment by inconsistent uses" refer to page 4-230. I can't think of a more inconsistent use than heavy industrial which is being requested. This area was declared Open Space in an agreement with the City of Los Angeles when they operated from 1966 to 1991. On page 4-249 of their SEIR they admit they are creating land use conflicts with the residential use in the area.

Response 1709: Refer to Response 1274 for a discussion of the proposed City/County Landfill relationship to the Granada Hills-Knollwood District Plan.

Comment 1710: We all can understand the need for landfill sites, BFI has planned to continue landfill operations into the County area. They own additional property which is not being proposed to be used in this 25 year plan.

Response 1710: Refer to Response 165 for a discussion of the No Project Alternative and the potential for future development of a 70-million-ton landfill in the County.

Comment 1711: One of the reasons they say they do not went to expand into the 215 acre East Canyon Dedication Area is that it would require removal of 1363 oaks trees, yet in their attachment they would be removing 865 oak trees which they claim they already have a permit for. How did they get a permit to remove oak tress in Open Space ?

Response 1711: Refer to Response 165 for a discussion of the No Project Alternative and the potential for future development of a 70-million-ton landfill in the County.

Comment 1712: We live in an area that is extremely windy. I am very concerned that they are proposing to alter the elevation of the Open Space area from the current 1450 feet to 2000 feet elevation. This would make the 192 acres in the City almost the same elevation as the ridge line. I feel this will greatly alter the wind patterns that come from the north. Now the ridge acts as a wall to block the wind, with them filling this area up it will direct all of the wind over the ridge.

Response 1712: Refer to Topical Response 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Comment 1713: On page 4-47 of their SEIR they greatly miss discussing the heavy wind speeds in our area. They generalize with a discussion of the wind throughout the City. They claim the wind only blows from 11 am to 5 pm and admit that the measurement of 45 mph for one hour does not include high Santa Ana conditions!

Response 1713: Refer to Topical Response 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Comment 1714: So what is the maximum wind speeds they have seen ? They claim to measure it and also admit that several times a year they have to shut down due to heavy winds. Why did they arbitrarily use 45 mph ?

Response 1714: Refer to Response 400 for a discussion of wind directions, speeds, and windroses that have been recorded at the project site.

Comment 1715: How is their operations contributing to the dust in our area?

Response 1715: Refer to Topical Response 3 for a discussion of wind conditions at the project site, the potential for fugitive dust migration beyond the project boundary, a discussion of SCAQMD Rules 402 and 403, and a discussion of how soil sealant, hydromulch, and seeding will be used for the proposed City/County Landfill and their effectiveness in limiting fugitive dust emissions.

Comment 1716: On the EIR Summary Sheet and page 1-7 they admit that there are unavoidable adverse impacts due to the dust in the area.

Response 1716: Refer to Response 68 for a discussion of the environmental determination within the Draft SEIR, stating that the proposed project would create an unavoidably significant adverse impact on air quality, for construction and operational emissions.

Comment 1717: There will also be exposure to odors from the landfill and "noise levels adversely impacting adjacent residential areas".

Response 1717: Refer to Topical Response 4 for a discussion of the odor control program and mitigation measures for the proposed City/County Landfill. The project would not result in any unavoidably significant adverse noise impacts.

Comment 1718: Yet they claim this will not affect our property value.

Response 1718: Refer to Response 180 for a discussion of the proposed project's potential effects on property values.

Comment 1719: On page 6 of the addendum they state "since the landfill is situated away from major population centers on the City, there are limited environmental impacts upon Los Angeles residents". We are residents of Los Angeles adjacent to this project and they admit we will be adversely affected. Maybe we are a small percentage when you look at the total population of Los Angeles.

Response 1719: The Draft SEIR, Section 4.7, Land Use, analyzed land use compatibility of the proposed project to adjacent residential areas of the project site, specifically those areas located south, within Granada Hills. The land use section of the Draft SEIR concluded that the perimeter ridgeline and the ±100 acre open-space area would reduce any potential impact to a level that is less than significant.

In regard to adverse impacts, the Draft SEIR, Table 1.10-1, Summary Matrix of Potential Environmental Impacts, Mitigation Measures, Net Unmitigated Adverse Impacts, Mitigation Compliance Responsibility and Monitoring Phasing and Enforcement Program, pp. 1-32 through 1-96, concluded that with the implementation of the proposed mitigation measures recommended for each environmental issue analyzed therein, there would be no net unmitigated adverse impacts remaining, except for air quality.

Comment 1720: What if the "limited environmental impacts" are severe to the immediate area. It appears that the adjacent residents are being considered insignificant.

Response 1720: Refer to Response 1719 regarding environmental impacts. For a complete discussion of environmental impacts associated with development of the proposed City/County Landfill project, refer to Sections 4.1 through 4.19 of the Draft SEIR.

Comment 1721: On the same page 6 they state that since this has been a landfill for over 30 years it is ideally suited to continue. Well in 1966 they promised to close in 1991 which allowed for residential expansion adjacent to their property. When is it enough?

Response 1721: Refer to Response 356 for a discussion of the status of the Final Closure and Postclosure Maintenance Plan (FCPMP) for the required closure of the existing inactive City Landfill.

In addition, as indicated in the Draft SEIR, Section 4.7, Land Use, p. 4-249, residential development south of the existing inactive City Landfill occurred after, and independent of, landfill operations, which began in Sunshine Canyon in 1958.

Comment 1722: My concern is who verifies the data in the SEIR?

Response 1722: The City is required to independently review and evaluate the information contained in the Draft SEIR. The Department of City Planning is the legal author of Draft SEIR and has the principal responsibility for ensuring the technical adequacy of the Draft SEIR. As part of the review process for the Draft SEIR, this document was circulated to various City, County, regional, and federal agencies for review and comment on technical issues relevant to their area of expertise (refer to Appendix B, Notice of Completion and Availability Distribution Lists in this document). Comments that have been received on the Draft SEIR are incorporated into this document.

Comment 1723: What is the maximum wind speeds they have recorded?

Response 1723: Refer to Response 400 for a discussion of wind directions, speeds, and windroses that have been recorded at the project site.

Comment 1724: They have conflicting statements regarding the affects on nearby residents. We will be greatly affected and they are trying to gloss it over to get approval. I am recommending that they get approval to expand only in the County area, which is further away from our homes.

Response 1724: This comment is noted. In addition, refer to the Draft SEIR, Sections 4.1 through 4.19, for analyses related to the potential environmental impacts of the proposed City/County Landfill.

3.9 COMMENTS RECEIVED AFTER DECEMBER 5, 1997

Stephen J. Buswell
State of California
Business and Transportation Agency
Department of Transportation
District 7
120 South Spring Street
Los Angeles, CA 90012-2601

Letter 3.9-1

Comment 1725: The proposed project consists of the development and operation of a Class III nonhazardous solid waste landfill facility and an on-site green waste/wood waste recycling area on a 205-acre site. The project is contiguous with the previously approved Sunshine Canyon county Landfill Extension project located in the unincorporated County area of Sunshine Canyon and utilizing a common access driveway on San Fernando Road south of the I-5 southbound off-ramp and south of Sierra Highway.

Route 5 in the subject area carries a high volume of truck traffic (13.5 per cent [sic] compared to average 5 per cent [sic] on interstate routes for California, based on the 1994 Annual Average Daily Truck Traffic count). Therefore, any development plans such as this needs to take into consideration the increased volume of large trucks entering and exiting the freeway.

Response 1725: The potential traffic impacts of the proposed project to the I-5 Freeway on/offramps to San Fernando Road and Roxford Street are documented in the project's Traffic Impact Study (see Draft SEIR, Appendix B1). As indicated in the traffic impact study, the traffic generated by the City/County Landfill will have a significant impact at the I-5 Roxford Street interchange intersections. However, this impact is fully offset with the implementation of recommended intersection improvements.

Also, based on the findings of the CMP mainline (Freeway Segment) analysis, the proposed project will not result in a significant traffic impact on the I-5 or the I-405 Freeways. For an additional discussion of the CMP, refer to Responses 26 and 27 in this document.

Comment 1726: We have the following recommendations:

1) Truck turning radii should be determined based on Interstate Truck Turning Templates for the following locations:

   - N/B Route 5 off-ramp (diamond) onto Roxford Street (westbound)
   - The dual left-turn lanes from westbound Roxford Street going onto S/B Route 5 on-ramp

2) Investigation needs to be conducted to increase curb returns (if needed) at the following locations:

- Right-turn lane on S/B Route 5 off-ramp at Roxford Street going onto Sepulveda Blvd.
- Land coming from Sepuleveda Blvd. (eastbound) onto S/B Route 5 on-ramp
- Right-turn lane on S/B Route 5 off-ramp (cloverleaf) going onto Roxford Street (westbound)

Response 1726: The curb return radii for the five turning movements listed below have been revised and evaluated using the Interstate Truck Turning Templates from the *Caltrans Highway Design Manual* (HDM) as a design guide. Where necessary, the curb return radii have been revised. This information is depicted on the revised Mitigation Concept Plan for Roxford Street at the I-5 NB/SB ramps and Encinitas Avenue (Intersection Nos. 1 and 2) in Appendix D1 of this document.

- NB Route I-5 offramp (diamond) onto Roxford Street (WB).
- The dual left-turn lanes from WB Roxford Street going onto SB I-5 onramp.
- Right-turn lane on SB I-5 offramp to Roxford Street going onto Sepulveda Boulevard.
- Lane coming from Sepulveda Boulevard (EB) onto SB I-5 onramp.
- Right-turn lane on SB Route I-5 offramp (cloverleaf) going onto Roxford Street (WB).

Stephen J. Buswell
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Business and Transportation Agency
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District 7
120 South Spring Street
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Letter 3.9-2

Comment 1727:

1) Turning will be difficult to negotiate without climbing the curb on the north side of Roxford.
2) Trucks using the northerly left-turn pocket may successfully negotiate the left turn as long as no one is also turning from the southerly left-turn pocket. Trucks using the southerly pocket cannot negotiate the left-turn without climbing the S/E curb return at the S/B on-ramp.
3) The right-turn from S/B off-ramp to Sepulveda Boulevard is too "tight" for trucks to negotiate.
4) The increase of the curb return radius will work (barely).
5) (Isn't this a diamond-shaped ramp, rather than cloverleaf?) The left-turn can be negotiated as long as vehicles aren't waiting at the southerly left-turn pocket (W/B Roxford to S/B I-5 on-ramp).

Response 1727: These comments are noted. Coordination between the City, LADOT, environmental consultant, and the traffic/engineering consultant has been ongoing since project applications were filed. Discussions with Caltrans are in regard to imposed mitigation measures for the proposed project.

4.0 ENVIRONMENTAL ISSUE KEY RESPONSE INDEX

The following Environmental Issue Key Response Index presents topical issues in alphabetical order with the corresponding key responses. These comments and responses are provided in Section 3.0, Response to Comments in this document. All original comment letters received by the City are included in Appendix C, Original Comments received on the Draft SEIR. These comments are bracketed, numbered, and presented in Section 3.0.

Table 4-1
ENVIRONMENTAL ISSUE KEY RESPONSE INDEX

Environmental Issue	Response Number
Aesthetics/Views	1368, 1515
Air Quality , Assessment Methodology	55, 58, 59, 61, 62, 63, 66, 68, 97, 108, 245, 334, 408, 410, 759, 787
Air Quality, Environmental Setting	TI 3, 287, 288, 392, 393, 400, 767, 772
Air Quality , Fugitive Dust	TI 3, 63, 67, 98, 252, 354, 359, 499, 787
Air Quality, Health Risk	70, 183, 184, 254, 255, 256, 257, 260, 316
Air Quality , Odors	TI 4, 73, 101, 162, 163, 196, 214, 1214
Air Quality, Permits	1206
Air Quality, Project Consistency with Applicable Plans	453, 454, 455, 456, 466
Allergies	278
Alternative Daily Cover Materials	195, 520
Alternative Final Cover Design (see Closure of Existing Inactive City Landfill)	
Alternatives, Alternatives Not Evaluated	170, 172, 903
Alternatives, Environmental Comparison	124, 165, 893, 905, 910, 1698
Alternatives, Selection Methodology	168, 751, 752, 753, 938
Alternatives, Waste Management Technologies and Strategies	39, 169, 528, 936, 1371
Ancillary Facilities (see Landfill Construction and Operations)	
Asthma	278
Balboa Inlet Tunnel (see DWP/MWD Water Treatment, Storage and Distribution Facilities)	
Bee Canyon Acreage Acquisition	1347, 1348
BFI Corporate Environmental Health and Safety Policies and Programs	305
Big-cone Douglas fir trees	TI 11

Table 4-1 (Cont.)
ENVIRONMENTAL ISSUE KEY RESPONSE INDEX

Environmental Issue	Response Number
Biological Resources	TI 10, TI 11, TI 12, 624, 911, 1397, 1401, 1402, 1405, 1410, 1412, 1413, 1519, 1547, 1555, 1556, 1557, 1559, 1560, 1561, 1562, 1564, 1565, 1568, 1569, 1572, 1573, 1638, 1642
Bronchitis	278
California Condor	1557
California Gnatcatcher	TI 10, 911, 1559, 1560, 1573
Cancer Risks (see Air Quality, Health Risk)	
CEQA Requirements	47, 107, 208, 295, 342, 344, 345, 346, 348, 350, 351, 509, 510, 511, 577, 704, 757, 875, 876, 908, 926, 938, 1363, 1649
Chiquita Canyon Landfill	172, 908
Citizen's Advisory Committee	917
Closure and Postclosure Maintenance After Completion of Proposed Project	205, 596, 684, 685, 713, 971, 1050, 1296
Closure of Existing Inactive City Landfill	TI 13, 210, 356, 1398
Coast Live Oak Trees	1401, 1402, 1405, 1410, 1413, 1519, 1638
Compliance Record/Violations for the Previous City Landfill Operation	182
Construction (see Landfill Construction and Operations)	
County Landfill Conditional Use Permit and Solid Waste Facilities Permit	1607, 1608
County Landfill improvements/modifications	349, 1384
Coyotes	1555, 1561
Composite Liner (see Landfill Environmental Protection and Control Systems Design)	
Cumulative Impacts	107, 108, 156, 509, 908, 1649
Daily Tonnage (see Peak and Average Daily Waste Intake Rates)	
Document Preparation/Administrative Draft SEIR databases submitted to City	1267, 1268, 1270
Drainage (see Surface Water, Engineered Collection and Control)	
Drainage Channels (see Surface Water, Engineered Collection and Control)	
Dr. G. Fred Lee	602
Dust (see Air Quality, Fugitive Dust)	

Table 4-1 (Cont.)
ENVIRONMENTAL ISSUE KEY RESPONSE INDEX

Environmental Issue	Response Number
DWP/MWD Water Treatment, Storage and Distribution Facilities	77, 78, 79, 157
Eagle Mountain Landfill Project	905
Earthquakes (see Earth Resources, Seismicity and Earth Resources, Geologic Hazards)	
Earth Resources, Geologic Hazards	TI 1, TI 2, 131, 211, 361, 362, 363, 364, 365, 366, 367, 368, 369, 635, 636, 637, 692, 1117, 1120
Earth Resources, Seismicity	Topical Issue 1, 370
Earth Resources, Slope Stability	6, 744, 745, 746, 747, 748, 749
East Canyon Dedication	1644
Electricity (see Utilities)	
Elevations (see Landfill Elevations)	
El Oro Way Elementary School (see Schools)	
Elsmere Solid Waste Management Facility	124
El Sobrante Landfill	1698
Energy Conservation	217, 476
Enforcement	188, 336, 725, 917
Enforcement Agency Working Agreement (see Working Agreement)	
Environmental Justice	1190
Environmentally Superior Alternative (see Immediate Combined City/County Landfill Operations Alternative)	
Erosion (see Surface Water, Engineered Collection and Control)	
Excavation (see Landfill Construction and Operations)	
Executive Summary	295
Faults (see Earth Resources, Seismicity and Earth Resources, Geologic Hazards)	
Field Surveys (Biological)	1547
Final Closure and Postclosure Maintenance Plan (see Closure of Existing Inactive City Landfill)	
Fire and Emergency Medical Services	TI 21, 159, 228

Table 4-1 (Cont.)
ENVIRONMENTAL ISSUE KEY RESPONSE INDEX

Environmental Issue	Response Number
Fires (see Fire and Emergency Medical Services)	
Flaring (see Air Quality, Odors)	
Freeways (see Transportation/Circulation)	
Fugitive Dust (see Air Quality, Fugitive Dust)	
Gas Extraction (see Air Quality, Odors)	
Gas Generation and Odor Control (see Air Quality, Odors)	
Gas-to-Energy (see Energy Conservation)	
General Plan Amendment/Zone Change	1280, 1623, 1624, 1625
Geomembrane Liner (see Landfill Environmental Protection and Control Systems Design)	
Golden Eagle	TI 10, 1562
Grading (see Landfill Construction and Operations)	
Granada Hills-Knollwood Community Plan	TI 15, 1274, 1275
Green Waste/Wood Waste	86, 88, 105, 195, 475, 520
Groundwater, Environmental Setting	TI 6, 533, 534, 605, 606, 607, 608, 616, 624
Groundwater, Extraction and Treatment	TI 7, 613, 641, 643, 666, 723
Groundwater, Leachate	TI 9, 77, 78, 79, 712
Groundwater, Monitoring and Testing Requirements	TI 7, 357, 570, 571, 572, 603, 631, 655, 666, 674, 965, 986, 991, 999, 1013, 1017
Haul Routes (see Transportation/Circulation)	
Hazardous Wastes	TI 16, 222, 1248, 1418, 1419, 1420
Health Risk Analysis (see Air Quality, Health Risk)	
High-Density Polyethlene (see Landfill Environmental Protection and Control Systems Design)	
Hiking/Equestrian Trails (see Parks and Recreation)	
Human Health	183, 184, 278, 316
Immediate Combined City/County Landfill Operations Alternative	TI 23

Table 4-1 (Cont.)
ENVIRONMENTAL ISSUE KEY RESPONSE INDEX

Environmental Issue	Response Number
Intake Rates (see Peak and Average Daily Waste Intake Rates)	
Joseph Jensen Filtration Plant (see DWP/MWD Water Treatment, Storage and Distribution Facilities)	
Landfill Construction and Operations	1, 3, 4, 5, 186, 190, 191, 195, 206, 219, 222, 225, 227, 243, 309, 333, 339, 472, 473, 475, 493, 499, 579, 731, 887, 1632, 1634
Landfill Elevations	TI 22, 1632
Landfill Environmental Protection and Control Systems Design	TI 1, TI 2, TI 4, TI 5, TI 7, TI 8, TI 9, 2, 177, 520, 521, 602, 625, 680, 681, 682, 683, 690, 712, 716, 717, 879, 880, 974, 976, 977, 979, 1035, 1041, 1112
Landfill Liner (see Landfill Environmental Protection and Control Systems Design)	
Landslides (see Earth Resources, Geologic Hazards)	
Land Use	TI 15, 181, 649, 1190, 1274, 1275, 1278, 1279, 1280, 1623, 1624, 1625
Leachate Generation, Collection and Treatment	TI 9, 690, 712
Light and Glare	206, 219
Liner (see Landfill Environmental Protection and Control Systems Design)	
Litter	TI 18, 1433
Los Angeles Reservoir (see DWP/MWD Water Treatment, Storage and Distribution Facilities)	
Materials Recovery Facilities/Transfer Stations	243
Maximum Daily Intake (see Peak and Average Daily Waste Intake Rates)	
Mitigation Reporting and Monitoring Program	47, 511, 926, 1401, 1402, 1410
Monolithic Final Cover (see Closure of Existing Inactive City Landfill)	
Mountain Lions	1555, 1561
Noise	TI 14, 104, 105, 1598
No Project Alternative	165
Northridge Earthquake	TI 2
Noticing, Distribution and Public Availability of CEQA Documents	295, 342, 344, 345, 346

Table 4-1 (Cont.)
ENVIRONMENTAL ISSUE KEY RESPONSE INDEX

Environmental Issue	Response Number
NPDES Requirements and Permitting	549, 591
Oak Trees (see Coast Live Oak Trees)	
Odors (see Air Quality, Odors)	
O'Melveny Park	1433
Open Space Area (± 100 acre open space area)	TI 15, 181, 649, 1278, 1279, 1519
Operations (see Landfill Construction and Operations)	
Parks and Recreation	272, 1347, 1348, 1644
Peak and Average Daily Waste Intake Rates	1, 186, 339
Permitted Daily Tonnage (see Peak and Average Daily Waste Intake Rates)	
Previous Landfill Operation in the City (see Compliance Record/Violations for the Previous City Landfill Operation)	
Project Need	891, 895, 897, 923, 942, 943, 1154, 1157
Property Values	180
Public Review (see Noticing, Distribution and Public Availability of CEQA Documents)	
Public Review Period for Draft SEIR	344
Public Tours of Project Site	309
Rainfall	532, 536
Raptors	TI 10, 1569
Recreation (see Parks and Recreation)	
Reduced Volume Alternative	910
Regional Solid Waste Generation Forecasts	1649
Related Projects (see Cumulative Impacts)	
Reptiles	TI 10
Revegetation (existing inactive City Landfill) (see Closure of Existing Inactive City Landfill)	
Revegetation (±100 acre open space area) (see Open Space Area)	
Ridgelines	TI 22
Riparian Habitat (see Wetlands)	
Robert Frost Middle School (see Schools)	

Table 4-1 (Cont.)
ENVIRONMENTAL ISSUE KEY RESPONSE INDEX

Environmental Issue	Response Number
San Fernando Earthquake	TI 1
San Fernando Valley Groundwater Basin (see Groundwater, Environmental Setting)	
Scavenging Birds (see Vectors)	
Schools	257, 273
Sediment (see Surface Water, Engineered Collection and Control)	
Sedimentation Basins (see Surface Water, Engineered Collection and Control)	
Seismic Groundshaking (see Earth Resources, Geologic Hazards)	
Seismicity (see Earth Resources, Seismicity)	
Settlement Agreements	1635, 1636, 1637, 1640
Sinus	278
Slope Stability (see Earth Resources, Slope Stability)	
Soils Stockpile	5
Springs and Seeps (see Groundwater, Environmental Setting)	
Stormwater Runoff (see Surface Water, Engineered Collection and Control)	
Subtitle D Requirements (see Landfill Environmental Protection and Control Systems Design)	
Surface Water, Engineered Collection and Control	TI 5, 175, 521, 535, 562, 564, 584, 588, 594, 597
Surface Water, Environmental Setting	TI 5, 532, 536, 549, 574, 591
Surface Water, Monitoring and Testing Requirements	592, 678
Surface Water, Surface Water Leaving Project Site	TI 5, 83, 175, 176, 535
Threatened and Endangered Plant and Animal Species (see Biological Resources)	
Tonnage (see Peak and Average Daily Waste Intake Rates)	
Traffic (see Transportation/Circulation)	

Table 4-1 (Cont.)
ENVIRONMENTAL ISSUE KEY RESPONSE INDEX

Environmental Issue	Response Number
Transportation/Circulation	TI 19, TI 20, 26, 30, 106, 138, 151, 153, 154, 155, 156, 191, 207, 227, 735, 1383, 1387, 1388, 1391
Unsaturated Zone Monitoring (see Groundwater, Monitoring and Testing Requirements)	
Utilities	136, 211
Vadose Zone Monitoring (see Groundwater, Monitoring and Testing Requirements)	
Van Gogh Street Elementary School (see Schools)	
Vectors	TI 17, 84, 225
Vegetative Layer (see Closure of Existing Inactive City Landfill)	
Venturan Coastal Sage Scrub	TI 10, 911, 1559, 1560
Views of Project Site (see Aesthetics/Views)	
Waste Loads (see Peak and Average Daily Waste Intake Rates)	
Wasteshed Areas	TI 20, 333
Water Quality (see Groundwater, Monitoring and Testing Requirements and Surface Water, Monitoring and Testing Requirements)	
Water Use (see Utilities)	
Weldon Canyon Flood Control Channel (see Surface Water, Surface Water Leaving Project Site)	
Wetlands	TI 12, 624, 1397, 1642
Wildlife Movement	1564, 1565, 1572
Wind Conditions at Project Site	TI 3, 287, 288, 400
Working Agreement	188

Note: TI refers to Topical Issues discussed in Section 3.2 in this document.

5.0 LIST OF SEIR ACRONYMS AND ABBREVIATIONS

A

AAEL	acute acceptable exposure level
AAQS	Ambient Air Quality Standard
A.B.	Assembly Bill
ABS	acrylic butyl styrene
ADCMs	Alternative Daily Cover Materials
ADT	average daily traffic
a.m.	Ante Meridiem
ANSI	American National Standards Institute
APCD	Air Pollution Control District
APN	Assessor Parcel Number
APSSZ	Alquist-Priolo Special Study Zone
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
ARB	Air Resources Board
ASTM	American Society for Testing and Materials
ASUCLA	Archaeological Survey, University of California at Los Angeles
ATC	Authority to Construct
ATSAC	automatic traffic surveillance and control
AT&SF	Atchison, Topeka, and Santa Fe Railway Company, Inc.
AVO	average vehicle occupancy

B

BACT	best available control technology
BFI	Browning-Ferris Industries of California, Inc.
BLM	U.S. Bureau of Land Management
BMP	best management practice
Board	Los Angeles County Board of Supervisors

C

°C	degrees Celsius
CAA	Clean Air Act (Federal)
CAAQS	California Ambient Air Quality Standards
Cal-EPA	California Environmental Protection Agency
Cal/OSHA	California Occupational Safety and Health Administration
CAEL	chronic acceptable exposure level
Caltrans	California Department of Transportation
CAP	Corrective Action Program
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CCAA	California Clean Air Act (Sher Bill) Stats. 1988, Ch. 1568

CCR	California Code of Regulations
cd	candela
CDFG	California Department of Fish and Game
CDMG	California Department of Natural Resources, Division of Mines and Geology
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFGC	California Fish and Game Code
CFR	Code of Federal Regulations
CHP	California Highway Patrol
CHSC	California Health and Safety Code
CiSWMP	City of Los Angeles Solid Waste Management Plan
CiSWMPP	City of Los Angeles Solid Waste Management Policy Plan
City	City of Los Angeles
City BOE	City of Los Angeles, Department of Public Works, Bureau of Engineering
City BOS	City of Los Angeles, Department of Public Works, Bureau of Sanitation
City B&E	City of Los Angeles Department of Building and Safety
CIWMB	California Integrated Waste Management Board
cm/sec	centimeters per second
CMA	Congestion Management Agency
CMA	critical movement analysis
CMP	Congestion Management Plan (Los Angeles County)
CNDDB	California Natural Diversity Data Base
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CoIWMP	County of Los Angeles Integrated Waste Management Plan
Corps	U.S. Army Corps of Engineers
Conservancy	Santa Monica Mountains Conservancy
CoSWMP	County of Los Angeles Solid Waste Management Plan
County	County of Los Angeles
County DPW	County Department of Public Works
cp	candlepower
CPA	Community Planning Area
CPC	City Planning Commission
CPR	cardiopulmonary resuscitation
CQA	construction quality assurance
CSE	Countywide Siting Element (County of Los Angeles)
CSP	corrugated steel pipe
cu. ft.	cubic feet
cu. ft./sec	cubic feet per second
cu. yd.	cubic yard(s)
cu. yd./sq. mi.	cubic yard per square mile
CUP	Conditional Use Permit
CVC	California Vehicle Code
CWA	Clean Water Act
CWC	California Water Code

D

dB	decibel
dBA	decibels on an A-weighted scale
dbh	diameter breast high
DEIR	Draft Environmental Impact Report
DHS	Department of Health Services (County of Los Angeles)
DPEIR	Draft Program Environmental Impact Report
DPR	Department of Parks and Recreation (California)
DPW	Department of Public Works (City/County of Los Angeles)
DPZ	Debris Production Zones
DTSC	Department of Toxic Substances Control
DWP	Department of Water and Power (City of Los Angeles)
DWR	Department of Water Resources (City of Los Angeles)

E

EAF	Environmental Assessment Form/Worksheet
EB	eastbound
ECDC	East Carbon Development Company
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
ERS	Environmental Review Section (Department of City Planning)
ESA	Endangered Species Act
ESAC	Environmental Study Advisory Committee

F

°F	degrees Fahrenheit
FAR	floor area ratio
fc	footcandle
FCPMP	Final Closure and Postclosure Maintenance Plan
FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FIP	Federal Implementation Plan
FIRM	Flood Insurance Rate Map
FLPMA	Federal Land Policy and Management Act
FML	flexible membrane liner
FOC	Finding of Conformance
FR	Federal Register
ft.	foot (or feet)
FTE	full-time equivalent
Fwy.	Freeway

G

GCL	geosysnthetic clay liner
GMA	Growth Management Area
GMP	Growth Management Plan
GPA	General Plan Amendment
GPA/ZC	General Plan Amendment/Zone Change
gpd	gallons per day
gpm	gallons per minute

H

hc	hydrocarbons
HCL	hydrochloric acid
HCM	Highway Capacity Manual (1994)
HDPE	high-density polyethylene
HELP	Hydrologic Evaluation of Landfill Performance
HHW	household hazardous waste
HHWE	Household Hazardous Waste Element
HHWMP	Household Hazardous Waste Management Plan
HRA	Health Risk Analysis
H:V	horizontal:vertical

I

I	Interstate (Federal Highway)
ICU	intersection capacity utilization
IIP	Injury and Illness Prevention
IMF	intermodal facility
ITE	Institute of Traffic Engineers
IWMTF	Integrated Waste Management Task Force

K

km	kilometer
kV	kilovolt
kWh	kilowatt hours

L

LA	Los Angeles
LACFD	Los Angeles County Fire Department
LACSD	Los Angeles County Sanitation Districts
LADOT	City of Los Angeles Department of Transportation
LAFCO	Local Agency Formation Commission
LAFD	City of Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	City of Los Angeles Police Department
LARWQCB	Los Angeles Regional Water Quality Control Board

LAUSD	Los Angeles Unified School District
lb	pound(s)
LCRS	leachate collection and removal system
Ldn	day-night (average) noise level
LEA	Local Enforcement Agency
Leq	equivalent noise level
LFG	landfill gas
LOS	Level of Service
LTF	Local Task Force
LUE	land use element
LUP	Land Use Permit, and Land Use Plan

M

m	meter
M	magnitude; million
m^3	cubic meter
MAF	million acre-feet
MCE	maximum credible earthquake
MCLs	Maximum Contaminant Levels
Mcfd	million cubic feet per day
mg	milligrams
mg/m^3	milligrams per cubic meter
mg/l	milligrams per liter
MHA	maximum horizontal acceleration
MICR	Maximum Individual Cancer Risk
$\mu g/m^3$	micrograms per cubic meter
μmhos/cm	micromhos per centimeter
mm	millimeter
mo	month
MOU	Memorandum of Understanding
MPE	maximum probable earthquake
mpg	miles per gallon
mph	miles per hour
MRC	Mine Reclamation Corporation
MRF	Material Recovery Facility
MRMP	Mitigation Reporting and Monitoring Program
MRZ	Mineral Resource Zone
mscf	million standard cubic feet
msl	mean sea level
MSW	municipal solid waste
MSWLF	municipal solid waste landfill facility
MTA	Metropolitan Transportation Authority
MW	megawatts
M_w	Moment Magnitude
MWD	Metropolitan Water District of Southern California

N

NAAQS	National Ambient Air Quality Standards
NB	northbound
NCCP	Natural Community Conservation Plan
NDDB	Natural Diversity Data Base
NDFE	Nondisposal Facility Element
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NO	nitric oxide
NO_2	nitrogen dioxide
NOC	Notice of Completion
NOCA	Notice of Completion and Availability
NOD	Notice of Determination
NOEC	Notice of Early Consultation
NOI	Notice of Intent
NOP	Notice of Preparation
NO_x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NSR	New Source Review

O

O_3	ozone
OISWMD	Office of Integrated Solid Waste Management District
OPR	Office of Planning and Research State Clearinghouse
OS	open space
OSHA	Occupational Safety and Health Administration

P

Pb	lead
PCE	passenger car equivalents
PF	public facilities
PGA	peak ground acceleration
p.m.	Post Meridiem
PM_{10}	particulate matter (less than 10 microns in diameter)
ppb	parts per billion
ppm	parts per million
ppt	parts per thousands
PRC	Public Resources Code
psi	pounds per square inch
PTO	Permit to Operate
PUC	Public Utilities Commission
PZC	Planning and Zoning Code (City)

Q

QA	quality assurance
QC	quality control

R

RCE	Registered Civil Engineer
RCP	reinforced concrete pipe
RCPG	Regional Comprehensive Plan and Guide
RCRA	Resource Conservation and Recovery Act
RDF	refuse-derived fuel
RDSI	Report of Disposal Site Information
RFI	Report of Facility Information
RFQ/RFP	Request for Qualifications/Request for Proposal
RGA	Rule of General Application
RME	Regional Mobility Element
RMP	Regional Mobility Plan
ROC	reactive organic compound
ROG	reactive organic gases
ROW	right-of-way
ROWD	Report of Waste Discharge
RPC	Regional Planning Commission (County of Los Angeles)
RPF	Registered Professional Forester
RWD	Report of Waste Discharge
RWQCB	Regional Water Quality Control Board

S

S.B.	Senate Bill
SB	southbound
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison Company
SCEC	Southern California Earthquake Center
SCF	standard cubic feet
scf/day	standard cubic feet per day
scf/min	standard cubic feet per minute
SCGC	Southern California Gas Company (now The Gas Company)
SCH	State Clearinghouse
SCRRA	Southern California Regional Rail Authority
SCS	U.S. Soil Conservation Service
SDWS	Secondary Drinking Water Standards
SEA	Significant Ecological Area
SEIR	Subsequent (or Supplemental) Environmental Impact Report
SIP	State Implementation Plan
SO_2	sulfur dioxides

SO_x	sulfur oxide
SPRR	Southern Pacific Railroad
sq. ft.	square feet
sq. mi.	square mile
sq. yd.	square yard
SR	State Route
SRRE	Source Reduction and Recycling Element
SSC	Species of Special Concern
SSZ	Special Study Zone
State	State of California
Subtitle D	40 CFR, Part 258, Subtitle D
SWAT	Solid Waste Assessment Test
SWFP	Solid Waste Facilities Permit
SWMC	Solid Waste Management Committee
SWMD	Solid Waste Management Department
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board

T

TAC	toxic air contaminant
TC	Transportation Corridor
TCM	transportation control measures
TDM	Transportation Demand Management
TDS	total dissolved solids
TE	trip end
TIA	traffic impact analysis
TLV	threshold limit value
TMC	Transit Mixed Concrete Company
tpd	tons per day
TSM	transportation systems management
TSP	total suspended particulates
TSS	total suspended solids

U

UBC	Uniform Building Code
UCLA	University of California at Los Angeles
UPR	Union Pacific Railroad
USC	United States Code
USEPA	U.S. Environmental Protection Agency
USFS	U.S. Forest Service
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UWMP	Urban Water Management Plan
UZMP	Unsaturated Zone Monitoring Program

V

V/C	volume-to-capacity ratio
VCP	visual comfort probability
VMP	Verification Monitoring Program
VMT	vehicle miles traveled
VOC	volatile organic compound
VPD	vehicle (trips) per day
VPH	vehicle (trips) per hour
VT	vehicle trips

W

WB	westbound
WDR	Waste Discharge Requirements
WTE	waste-to-energy

Y

yd.	yard or yards
yd^3	cubic yard(s)
yr.	year

Z

ZC	zone change
ZV	zone variance

GLOSSARY OF TERMINOLOGY

A	
A-Weighting	A scale applied to sound level measurements in decibels; corresponds approximately to human hearing sensitivity. Expressed as dBA.
Action Plan	Los Angeles County Solid Waste Management Action Plan was adopted by the Los Angeles County Board of Supervisors on April 5, 1988. It provides policies for the integrated management of solid wastes in the County.
Active Fault	Geologic fault with recent seismic activity that displaced materials not more than 12,000 years old.
Active Working Face	The working surface of a landfill upon which solid wastes are deposited during the landfill operation prior to the placement of cover material.
Aerobic	Living, active, or occurring only in the presence of oxygen.
Agricultural Waste	Solid wastes of plant and animal origin that result from the production and processing of farm or agricultural products, including manures, orchard and vineyard prunings, and crop residues, which are removed from the site of generation for solid waste management.
Air Basin	A regional area designated by the Air Resources Board for air quality planning purposes.
Air Monitoring	Sampling and measuring air pollutants present in the ambient air.
Air Pollutant	A material in the ambient air that produces air pollution. Common air pollutants are ozone (O_3), nitrogen dioxide (NO_2), particulate matter (PM_{10}), sulfur dioxide (SO_2), and carbon monoxide (CO). Air pollution is defined in the California Health and Safety Code as any discharge, release, or other propagation into the atmosphere and includes, but is not limited to, smoke, charred paper, dust, soot, grime, carbon, fumes, gases, odors, particulate matter, acids, or any combination thereof.
Air Pollution Control District	A regional governmental body responsible for attainment and management of air quality standards through permitting and regulating the emission sources.
Air Quality Management Plan (AQMP)	A document that describes how the SCAQMD plans to achieve federal and state air quality standards. In the spring of 1989 the District Board adopted an AQMP that was amended in 1991 and again in 1994. The Plan proposes a course of action designed to achieve the national clean air standards, with an implementation schedule of new District rules. In addition, the plan contains

	proposals for regulations from the California Air Resources Board, the federal government, and local government.
Air Space	The vertical and horizontal space extending from surface level upward in elevation over a particular area of land.
Aluminum Can or Aluminum Container	Any food or beverage container composed of at least 94 percent aluminum.
Alluvial Soils	Soils developed from transported and relatively recently deposited material (alluvium) with little or no modification of the original materials by soil forming processes.
Ambient	An encompassing atmosphere or body of water.
Ambient Air Quality Standard (AAQS)	Clean air standards developed by the USEPA and the California Air Resources Board to measure the level of air contamination that is not to be exceeded in order to protect human health.
Ambient Noise Level	Noise levels from all sources, including near and far. This type of noise level constitutes the normal or existing level of environmental noise at a given location.
Anaerobic Decomposition	The biochemical decomposition of organic substances in the absence of oxygen.
Applicant	A person or entity who proposes to carry out a project that needs a lease, permit, license, certificate, or other entitlement for use or financial assistance from one or more public agencies when that person or entity applies for governmental approval or assistance.
Approval	The decision by a public agency that commits the agency to a definite course of action in regard to a project intended to be carried out by any applicant. The exact date of approval of any project is a matter determined by each public agency according to its rules, regulations, and ordinances. Legislative action in regard to a project often constitutes approval.
Aquifer	A water-bearing stratum of permeable rock, sand, or gravel.
Assembly Bill 939 (A.B. 939)	The California Integrated Waste Management Act of 1989. This Act repealed the California Solid Waste Management Resource Recovery Act of 1972 and the California Solid Waste Control Act of 1976 in their entirety and comprehensively reorganized the state solid waste management planning process. The act creates a four-part structure. First, it creates the California Integrated Waste Management Board, a six-member, full-time board, replacing the nine-member, part-time waste board. Second, it replaces the old scheme with a new, integrated waste management

	planning process, including recycling goals for cities and counties. Third, it strengthens the certification criteria and performance standards for local enforcement agencies. Fourth, it reorganizes and consolidates several existing laws, with minor modifications, into the Public Resources Code. The recited purposes of the act are to reduce, recycle, and reuse solid waste generated in the state; conserve natural resources; and protect air and water quality. It is also intended to improve the regulation of existing solid waste landfills, ensure that new solid waste landfills are environmentally sound, improve permitting procedures for solid waste management facilities, and specify the responsibilities of local governments to develop and implement integrated waste management programs.
At-Grade Crossing	The crossing of two channels of transportation at the same elevation or level.
Authority to Construct	A permit required by the local air quality regulatory agency (SCAQMD) prior to the construction of a major emission source.
Average	In terms of a measurement, the sum of the measurements (included over a specified period) divided by the number of measurements.
Average Daily Traffic (ADT)	The number of vehicles passing a given point on a road going in one direction during a 24-hour period.
B	
Baseline	A set of existing conditions against which change is to be described and measured.
Baseline Groundwater Monitoring	Measure of groundwater quality prior to initiating a project for the purpose of having a standard for future comparisons.
Bedrock	The solid rock beneath the soil and subsoil.
Berm	An earthen structure, generally several feet high, that redirects the flow of water. Typically, a ledge at the top of bottom of a slope.
Best Available Control Technology (BACT)	Under SCAQMD rules, BACT is defined as the most stringent emissions control that, for a given class of source, has been (1) achieved in practice, (2) identified in a state implementation plan, or (3) found by the SCAQMD to be technologically achievable and cost-effective.
Biota	Living organisms.
Btu	British thermal unit. A measurement of energy and the amount of energy that can be obtained as heat by combusting approximately 1/1000 cubic foot of natural gas.

Buildout Year	The year in which the project construction has been completed and the project site is ready to be occupied.
Buyback Recycling Center	A facility where specific recyclable materials are purchased from the public and then delivered for the purpose of recycling or composting.
C	
California Clean Air Act	A law setting forth a comprehensive program to assure that all areas within the State of California will attain federal and state ambient air quality standards by the earliest practicable date. Also known as the Sher Bill or A.B. 2595, the law mandates comprehensive planning and implementation efforts, and empowers local districts to adopt transportation control measures and indirect source control measures to achieve and maintain ambient air quality standards. The law provides annual emission reduction targets and regular review and evaluation of local programs by the California Air Resources Board.
California Endangered Species Act	California enacted legislation in 1984 designed to protect species from extinction and protect their habitat from destruction; impose planning responsibilities on state agencies and their licenses or permittee; prohibit commercial trade or activities of endangered species alive or dead, or of their parts or products made from the species; and prohibit people from killing or taking endangered species.
California Environmental Quality Act (CEQA)	CEQA is known as California's broadest environmental law, enacted by the state legislature in 1970 and amended thereafter. The six key objectives of CEQA are to disclose to decision-makers and the public the significant environmental effects of proposed activities, identify ways to avoid or reduce environmental damage, prevent environmental damage by recommending implementation of feasible alternatives or mitigation measures, disclose to the public reasons for agency approvals of projects with significant environmental effects, foster interagency coordination, and enhance public participation.
California Native Plant Society (CNPS) Rating Codes	System used to indicate the rarity, endangerment, and distribution of plant species on a scale of 1 to 3 (1 meaning wide distribution/not endangered and 3 meaning limited occurrence/endangered).
Carbon Dioxide	A colorless gas whose chemical formula is CO_2. It enters the atmosphere as the result of natural and artificial combustion processes and is also a normal part of the ambient air.
Carbon Monoxide	An invisible, odorless, tasteless, and toxic gas; its chemical formula is CO. It is primarily generated by motor vehicles but is found in trace quantities in the natural atmosphere.

Cell	That portion of compacted solid wastes in a landfill that is enclosed by natural soil or cover material during a designated period.
Certification	Certification refers to the Lead Agency's determination that an EIR has been completed in compliance with CEQA and was reviewed and considered by the Lead Agency's decision-making body before it approved the project.
Class III Landfill	Landfill permitted to accept nonhazardous solid waste materials.
Closure	Termination of waste discharges at a landfill and operations necessary to prepare the closed unit for postclosure maintenance.
Colluvium	Mixed deposit of soil material and rock fragments accumulated near the base of steep slopes through soil creep, slides, and local wash.
Commercial Solid Wastes	All types of solid wastes generated by stores, offices, and other commercial sources.
Community Noise Equivalent Level (CNEL)	The averaging of noise levels on a measurement scale of decibels that increases the actual noise measurement to account for an increased sensitivity to noise during late evening, nighttime, and morning hours.
Community Plan/District Plan	A portion of the local general plan that focuses on a particular area or community within the City or County. Community plans supplement the policies of the General Plan.
Compactor Truck	A refuse collection vehicle that hydraulically compresses waste materials within the body of the truck.
Compactors	A type of trash container that can be moved on and off a rolloff truck. These containers have the capability of hydraulically compressing materials within the container.
Composite Liner	A liner consisting of two layers of materials, usually clay and synthetic, designed to protect groundwaters by acting as a barrier to leachate and gas migration.
Composting	A controlled microbial degradation of organic wastes yielding a safe and nuisance-free product.
Congestion	Traffic conditions on roads, highways, or freeways that do not permit movement on these infrastructure facilities at optimal legal speeds. Characterized by unstable traffic flows.
Congestion Management Program (CMP)	A state-mandated program for counties containing urbanized areas to provide for statutorily specified programs to reduce traffic congestion.

Construction and Demolition Wastes	Waste building materials, packaging, and rubble resulting from construction, remodeling, repair, and demolition operations on pavements, houses, commercial buildings, and other structures.
Corridor	A broad geographical band that follows a general directional flow or connects major sources of trips. It may contain a number of streets and highways and transit lines and routes.
Cover Material	Soil or other material suitable for use in covering compacted solid wastes in a disposal site.
Criteria Pollutants	Air pollutants for which the federal or state governments have established ambient air quality standards, or criteria, for outdoor concentrations in order to protect public health.
Cultural Resources	Places, objects, or other physical evidence associated with human activity important to a culture or a community for scientific, traditional, or religious reasons. This document includes the disciplines of archaeological, paleontological, and historical resources.
Cumulative Impacts	Cumulative impacts are two or more individual impacts on the environment that, when considered together, "are considerable" or that compound or increase other environmental impacts.
Curbside Collection	Collection at individual households or commercial buildings by municipal or private haulers for processing and recycling.
Cut-and-Fill Limits	Delineation between existing undisturbed terrain and areas of excavation or engineered fills.
D	
Daily Cover	Cover material spread and compacted on the entire surface of the active working face of the sanitary landfill at least at the end of each operating day in order to control vectors, fire, water infiltration and erosion, and to prevent unsightliness.
Decibel (dB)	A unit for expressing the relative intensity (loudness) of sounds. The decibel is the logarithm of the ratio of the intensity of a given sound to the faintest sound discernible by the human ear.
Decibel, A-Weighted (dBA)	Decibel unit scale modified to represent the relative sensitivity of the human ear to low-pitched sounds.
Decision-Making body	Any person or group of people within a public agency permitted by law to approve or disapprove the project at issue.

Decomposition	The chemical breakdown of organic substances into constituent parts or elements. The decomposition of waste materials occurs inside a landfill.
Decomposition Gases	Gases produced by chemical or microbial activity during the decomposition of solid waste.
Dendritic Drainage	The form of the drainage pattern of a stream and its tributaries when it follows a tree-like shape, with the main trunk, branches, and twigs corresponding to the main stream, tributaries, and subtributaries, respectively, of the stream.
Detention Basin	A surface feature designed to control the peak discharge rate of rainfall runoff.
Diameter at breast height at the high-side (dbh)	The diameter of a tree measured approximately 4½ feet from ground level. "Ground level" can follow two conventions: (1) the highest point of the ground touching the stem or (2) the mean of the highest and lowest points.
Discretionary	An action that requires the exercise of judgment or deliberation when the public agency or body decides to approve or disapprove a particular activity, as distinguished from situations where the public agency or body merely has to determine whether there has been conformity with applicable statutes, ordinances, or regulations.
Disposal Capacity	The capacity, expressed in either weight in tons or its volumetric equivalent in cubic yards, that is either currently available at a permitted solid waste landfill or will be needed for the disposal of solid waste generated within a jurisdiction.
Disposal Site	The location where any final treatment, utilization, processing, or deposition of solid waste occurs.
E	
Emission	Any unwanted substances that are released by human activity into air or water.
Emission Control Device	Any piece of equipment that reduces the release of air pollutants into the atmosphere.
Emission Factor	The rate at which pollutants are released into the atmosphere by one source or a combination of sources.
Emission Standard	The maximum amount of emissions legally permitted to be discharged from a single source.

Emission Thresholds	An amount of emissions established by the SCAQMD, for use by local government planners, to compare with the emissions that could be emitted from a particular project to determine whether that project could have a significant impact on air quality.
Endangered Species	Species of plant or animal in danger of extinction throughout all or a significant portion of its range.
End Market or End Use	The use or uses of a diverted material or product that has been returned to the economic mainstream, whether or not this return is through sale of the material or product. The material or product can have a value that is less than the solid waste disposal cost.
Environment	The physical conditions existing within the area that will be affected by a proposed project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. The area involved is the area in which significant effects would occur either directly or indirectly as a result of the project.
Environmental Impact Report (EIR)	A detailed informational document prepared by a Lead Agency that analyzes a project's significant effects and identifies mitigation measures and reasonable alternatives. The purposes of an EIR are to inform decision-makers and the public about a project's environmental effects and ways to reduce them, demonstrate to the public that the environment is being protected, and ensure political accountability.
Epoch	A particular interval of geologic time marked by distinctive features, longer than an "age" and shorter than a "period." Used to organize a time scale of geologic history.
Equivalent Noise Level (Leq)	The average noise level, on an energy basis, for a stated period of time (e.g., hourly).
Erosion	The wearing away of the land surface by detachment and transport of soil and rock materials through the action of moving water, wind, or other geological agents.
Evapotranspiration	The discharge of water from the earth's surface to the atmosphere by evaporation from lakes, streams, and soil surfaces, and by transpiration from plants.
Extraction Well	A well designed for the removal of subsurface waters.
F	
Facultative Plants	Plants with a similar likelihood (estimated probability 33 to 67%) of occurring in both wetlands and nonwetlands.

Fault	A fracture in either soil or a rock mass along which movement has occurred, causing one side to be displaced in relation to the other, usually in a direction parallel to the fracture. Typically, abrupt movement on a fault is the cause of an earthquake.
Feasible and Feasibility	Capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.
Federal Drinking Water Standards	Primary water standards set in 1962 by the U.S. Public Health Service that are used in determining the suitability of water for drinking and culinary purposes. The standards establish mandatory limits of maximum permissible concentration for certain chemical constituents and nonmandatory but recommended limits for others.
Ferrous Metals	Metals that are predominantly composed of iron. These types of metals are easily identifiable by using a magnet. Examples include steel or "tin" cans, automobiles, and white goods.
Final Cover	Cover material that represents the permanently exposed final surface of the landfill.
Floodplain	A strip of relatively smooth land bordering a stream built of sediment carried by the stream and dropped in the slack water beyond the influence of the swiftest current in times of flood.
Fold	A bend in rock layers caused by compression of the earth's crust.
Foliation	A general term for a planar arrangement of textural or structural features in any type of rock. This term is most commonly applied to metamorphic rock.
Food Waste	All animal and vegetable solid wastes generated by food facilities or from residences that result from storing, selling, preparing, cooking, or handling food.
Footprint	The boundary of a waste disposal area.
Fossil Fuels	A general term for any hydrocarbon derived from the fossils of organisms (e.g., petroleum, natural gas, coal).
Front Loader	A refuse collection truck with two forks that extend from the front of the vehicle under the cab, 1- to 6-yard dumpsters can be placed on the forks, lifted over the cab and dumped into the top of the truck, which makes this type of truck effective for collecting trash from multiunit dwellings and commercial accounts. Has recycling applications as well. A compaction blade pushes the material toward the rear to fully utilize the truck's capacity. Usually operated by one person in residential routes; two people on commercial routes.

G	
g	The force of acceleration that is due to gravity, which is 32 feet per second squared.
Gas Collection System	A network of trenches, wells, piping, and vacuums used to collect landfill gases generated by the decomposition of waste materials. After gases are collected, they are transported to a central location on-site where they can be flared (burned) or treated and used as an energy source.
General Plan	California state law requires each city and county to adopt a comprehensive, long-term general plan that provides for the physical development of both the city and any land located outside the city's boundaries that it judges as related to its planning (Cal. Gov't. Code, § 65300).
Generator	A specific building, house, or establishment that creates solid waste.
Geotextile Filter	A synthetic cushion layer placed over the geomembrane component of a composite liner to protect the geomembrane from overlying coarse, granular materials used to construct a leachate collection and removal system.
Gleyed	A soil condition resulting from prolonged soil saturation that is manifested by the presence of bluish or greenish mottles (spots or streaks) among other colors. Gleying occurs under reducing conditions resulting from soil saturation by which iron is reduced predominantly to the ferrous state.
Global Warming	The gradual buildup of "greenhouse" gases that absorb energy and prevent it from passing into space. As a result, more solar energy is retained near the earth's surface than is lost into space, and the result is a general warming of the earth's atmosphere.
Grade	A term applied to a paper, pulp, or waste paper that is ranked on the basis of its use, appearance, quality, manufacturing history, raw materials, performance, or a combination of these factors. Some grades are officially identified and described; other grades are commonly recognized but lack official definition.
Green Waste	Generated from plant material, including, but not limited to, leaves, grass clippings, weeds, tree trimmings, untreated wood waste, and shrubbery cuttings.
Groundwater	All water below the land surface. It has its origin in the downward seepage of surface water to a layer of impervious material.

Groundwater Basin	Underground formation with sides and bottom of relatively impervious material in which groundwater is held or retained; it can be considered a hydrologic unit.
Groundwater Recharge	The process of replenishment of groundwater through infiltration and percolation of water from land areas or streams through permeable soils into aquifers.
Growth Management Plan (GMP)	A chapter contained in the *Regional Comprehensive Plan and Guide* developed by the Southern California Association of Governments that contains demographic projections (i.e., housing units, employment, and population) through the year 2015 for a six-county region (i.e., Los Angeles, Orange, Riverside, San Bernardino, Ventura, and Imperial Counties). The plan also provides recommendations for local governments for growth and land use patterns that minimize development costs, save natural resources, and enhance quality of life.
H	
Habitat	The natural environment of a plant or animal.
Hazardous Wastes	Any waste material or mixture of wastes that is toxic, corrosive, flammable, an irritant, or a strong sensation that generates pressure through decomposition or heat (or other means) or causes substantial personal injury or illness.
High-Grade Paper	High-quality paper fibers that can be directly substituted for wood pulp; includes both pulp substitutes and de-inking grades.
Holocene Fault	An epoch of the Quaternary period, from the end of the Pleistocene (approximately 11,000 years to the present).
Household Hazardous Waste (HHW)	Any hazardous waste generated incidental to owning or maintaining a place of residence. HHW does not include any waste generated during the course of operating a business concern at a residence.
Hydraulic Conductivity	The capacity of a medium to transmit water, expressed as the volume of water at the prevailing temperature that will move in unit time under a unit hydraulic gradient through a unit area. The units for this term include gallons per day per square foot, or centimeters per second.
Hydric Soil	A soil that is saturated, flooded, or ponded long enough during the growing season to develop anaerobic conditions that favor growth and regeneration of hydrophytic vegetation.
Hydrologic	Of or relating to the properties, distribution, and circulation of water on and below the earth's surface and in the atmosphere.

Hydrophytic Vegetation	The sum total of macrophytic plant life growing in water or on a substrate that is at least periodically deficient in oxygen as a result of excessive water content.
I	
Igneous Rock	Rock that resulted from the solidification of molten or partly molten material.
Impermeable	Having a texture that does not allow water to move through perceptibly.
Industrial Solid Wastes	All types of solid wastes and semisolid wastes that result from industrial processes and manufacturing operations.
Inert Solids or Inert Waste	A nonliquid solid waste including, but not limited to, soil, concrete, rocks, and bricks that does not contain hazardous waste or soluble pollutants at concentrations in excess of water-quality objectives established by a regional water board pursuant to Division 7 (commencing with § 13000) of the California Water Code and does not contain significant quantities of decomposable solid waste.
Inerts	Noncombustible, nondangerous solid wastes that are likely to retain their physical and chemical structure under expected conditions of disposal, including resistance to biological attack and chemical attack from acid rainwater. (See Inert Solids.)
Infiltration	The movement of water from the surface into the soil. Infiltration is equal to the total precipitation less the losses due to interception by vegetation, retention in the depressions upon the land surfaces, evaporation from all moist surfaces, and surface runoff.
Initial Study	An Initial Study is a Lead Agency's preliminary analysis of a project to determine whether it may have a significant adverse effect on the environment. If it may have such an effect, then an EIR is required. If it will not have such an effect, then the project can be approved under a Negative Declaration.
Intermediate Cover	Cover material that is applied on areas of the landfill where additional cells are not to be constructed for extended periods of time and therefore must resist erosion for a longer period of time than daily cover.
Intersection Capacity	The maximum number of vehicles that can pass through an intersection in one direction during a given time period under prevailing roadway and traffic conditions.
Intersection Capacity Utilization Method (ICU)	A method of analyzing intersection level of service by calculating a volume-to-capacity (V/C) ratio for each governing "critical" movement during a traffic signal phase. The V/C ratio for each phase

	is summed with the others at the intersection to produce an overall V/C ratio for the intersection as a whole. The V/C ratio represents the percent of intersection capacity utilized.
Intrusive Rocks	Rocks that have solidified at some distance beneath the surface of the Earth.
Inversion Layer	An atmospheric condition in which the air temperature increases with increasing altitude, holding cooler surface air down. Typically, pollutants tend to be trapped below the inversion.
ITE Generation Manual	A document produced by the Institute of Transportation Engineers that provides trip generation numbers by land use based on trip generation studies conducted nationwide.
J	
Jurisdiction by Law	The authority of any public agency to (1) grant a permit or other entitlement for use, (2) provide funding for the project in question, and (3) exercise authority over resources that may be affected by the project.
L	
Landfill	A disposal site using a method of disposing of solid wastes on land without creating nuisances or hazards to public health or safety by utilizing principles of engineering to confine the wastes to the smallest practical area, reduce them to the smallest practical volume, and cover them with a layer of suitable cover material at specific designated intervals.
Landfill Gas Condensate	Liquid from the landfill gas that results from the temperature decline of the gas as it is collected.
Landslide	The rapid downward movement of a mass of rock, earth, or artificial fill on a slope.
Leachate	Liquid that has come in contact with or percolated through waste materials and has extracted or dissolved contaminating substances from the waste.
Leachate Collection and Removal System (LCRS)	The drainage network above the landfill liner, and below waste disposal areas, utilized to collect any leachate generated by the disposed waste materials and convey it to a treatment or storage area.
Lead Agency	The public agency that has the principal responsibility for carrying out or approving a project. The Lead Agency decides whether an EIR or Negative Declaration will be required for the project and will cause the document to be prepared. (State CEQA Guidelines, § 15367).

Level of Service (LOS)	A measure of the congested level on a highway facility based primarily on the comparison between the facility's capacity and the traffic volume it carries. A qualitative measure of the effect of traffic flow factors such as special travel time, interruptions, freedom to maneuver, driver comfort, and convenience, and indirectly, safety and operating cost. Levels of service are usually described by a letter rating system of A through F, with LOS A indicating stable traffic flow with little or no delays and LOS F indicating excessive delays and jammed traffic conditions.
Liner	A continuous layer of natural or artificial materials or a continuous membrane of artificial material installed beneath or on the sides of a landfill that acts as a barrier to vertical or lateral fluid movement.
Liquefaction	A temporary transformation of a water-saturated soil or sediment into a fluid mass, ordinarily occurring during a seismic event.
Lithology	The science dealing with the physical character of rock.
Local Agency	A public agency other than a state agency, board, or commission. Local agencies include, but are not limited to, cities, counties, charter cities, districts, school districts, special districts, redevelopment agencies, local agency formation commissions, and any board, commission, or organizational subdivision of a local agency when so designated by order or resolution of the governing legislative body of the local agency.
Local Enforcement Agency	A locally designated city or county agency, acting as a representative of the California Integrated Waste Management Board, responsible for the inspection and monitoring of solid waste landfills.
Lysimeter	A device for measuring the percolation of water through soils and determining the soluble constituents removed in the drainage.
M	
Materials Recovery Facility (MRF)	A permitted solid waste facility where solid wastes or materials are sorted or separated by hand or mechanization for the purpose of recycling or composting.
Maximum Contaminant Level (MCL)	USEPA or State maximum contaminant levels for drinking water established under the National Primary Drinking Water Regulations.
Maximum Credible Earthquake (MCE)	The maximum earthquake capable of occurring under the presently known tectonic framework. It is a rational and believable event that is in accordance with all known geologic and seismologic facts.
Maximum Probable Earthquake (MPE)	The maximum earthquake that is likely to occur during a 100-year interval. It is to be regarded as a probable occurrence, not as an assured event that will occur at a specific time.

Metamorphic Rock	A rock that has been greatly altered from its previous condition through the combined action of heat and pressure.
Ministerial	A governmental decision involving litter or no personal judgment by the public official as to the wisdom or manner of carrying out the project. The public official merely applies the law to the facts as presented and uses no special discretion or judgment in reaching a decision.
Mitigation Measure	An action or a modification of a project that is recommended by an EIR or a Negative Declaration to reduce or avoid some impact on the environment. Mitigation measures may include actions that avoid an impact altogether, minimize an impact, correct an adverse impact, reduce or eliminate an impact, or compensate for an impact by providing substitute resources or environments.
Mobile Sources	Those sources that emit pollution from vehicles. There are two types of mobile source emissions: those from on-road sources (e.g., passenger automobiles, trucks, busses, etc.) and off-road sources (e.g., airplanes, trains, construction equipment, etc.).
Mobility	A transportation system user characteristic referring to the ability of the user to take advantage of the available transportation service.
Mode	A particular form of travel (e.g., walking, automobile, train, etc.).
Monitoring Well	A well constructed for the purpose of sampling subsurface water for physical, chemical, or biological testing, or measuring water levels.
Municipal Solid Waste (MSW)	All solid wastes generated by residential, commercial, and industrial sources, and all solid waste generated at construction and demolition sites, food-processing facilities, and treatment works for water and waste water, which are collected and transported under the authorization of a jurisdiction or are self-hauled to Class III landfills. Most recyclable commodities fall under this category. MSW does not include agricultural crop residues, animal manures, mining and fuel extraction waste, forestry wastes, and ash from industrial boilers, furnaces, and incinerators. (See waste, waste stream.)
N	
Nitric Oxide	A colorless, odorless gas whose chemical formula is NO. Formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure.
Nitrogen Dioxide	A reddish-brown irritating gas whose chemical formula is NO_2. Formed by the combination of nitric oxide and oxygen, NO_2 acts as an acute respiratory irritant and increases susceptibility to respiratory pathogens.

Nitrogen Oxide	A combination of nitrogen-containing gases whose chemical formula is NO_x. Produced by combustion in the presence of nitrogen under high temperature and/or pressure, NO_x serves as an integral participant in the process of photochemical smog production. The two major forms of NO_x are nitric oxide (NO) and NO_2.
Nonhazardous Solid Wastes	All putrescible and nonputrescible solid, semisolid, and liquid wastes, including garbage, trash, refuse, paper, rubbish, ashes, industrial wastes, demolition and construction wastes, abandoned vehicles and parts thereof, discarded home and industrial appliances, and vegetable or animal solid and semisolid wastes.
Nonrecyclable Paper	Discarded paper that has no market value because of its physical, chemical, or biological characteristics or properties.
Nonrenewable Resource	A resource that cannot be replenished, such as those resources derived from fossil fuels.
Notice of Completion	A Notice of Completion is filed by a CEQA Lead Agency with the State Office of Planning and Research when it completes preparation of the Draft EIR and is prepared to send out copies for public review.
Notice of Determination	A brief notice (typically one page) that is filed by a public agency with the county clerk of the county in which the project will be located and the State Office of Planning and Research. The notice is posted in the office of the county clerk after the agency approves or determines to carry out a project that is subject to CEQA.
O	
Organic Waste	Solid wastes originated from living organisms and their metabolic waste products, and from petroleum that contain naturally produced organic compounds and are biologically decomposable by microbial and fungal action into the constituent compounds of water, carbon dioxide, and other simpler organic compounds.
Other Plastics	All waste plastics except polyethylene terephthalate (PET) containers, film plastics, and high-density polyethylene (HDPE) containers.
Ozone Depleting Gases	Gases released into the ambient air that are considered as global-warming and stratospheric ozone-depleting. These gases include chlorofluorocarbon, halons, methyl chloroform, and carbon tetrachloride.
Ozone Layer	Located in the stratosphere, approximately 10 to 30 miles above the earth's surface. This layer prevents most of the solar ultraviolet radiation (UV-B) from reaching the earth's surface. Increased exposure to UV-B could have serious public health and environmental effects.

P	
Particulate Matter	Finely divided solids or liquids such as soot, dust, aerosols, fumes, and mists. The unhealthful portion, PM_{10} is that portion less than 10 microns (i.e., ten one-millionths of a meter or 0.0004 inch) in diameter. Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. Particulates may adversely affect the human respiratory system, especially in those people who are naturally sensitive or susceptible to breathing problems.
Pathogen	Any viable disease-causing organism, including but not limited to bacteria, protozoa, virus, and fungus.
Peak Period	The period during which the maximum amount of travel occurs. This may be specified as the morning (a.m.) or afternoon or evening (p.m.) peak. The period when the demand for transportation service is heaviest.
Peak Storm Flows	The maximum expected flow of surface water from a 100-year, 24-hour storm.
Percolation	The movement, under hydrostatic pressure, of water through the interstices of rock or soil.
Permeability	The quality of a soil horizon that enables water or air to move through it. This can be measured quantitatively in terms of rate of flow of water through a unit cross section in unit time under specified temperature and hydraulic conditions.
Permitted Capacity	That volume in cubic yards or weight in tons that a solid waste facility is allowed to receive, on a periodic basis, under the terms and conditions of that solid waste facility's current Solid Waste Facilities Permit issued by the Local Enforcement Agency under the authorization of the California Integrated Waste Management Board.
Plastics	Petroleum-derived products. The following types (listed by their numbered classification) are found in significant quantities in the municipal waste stream: (1) PET (polyethylene terephthalate) is found in beverage containers such as sodas and carbonated mineral waters: (2) HDPE (high-density polyethylene) is found in milk and water gallon jugs, small juice bottles, and bleach and detergent bottles; (3) LDPE (low-density polyethylene) is found in both film/ sheet products and containers; (4) PVC (polyvinyl chloride) is used in producing plastic piping; (5) polypropylene is a versatile resin used in plastic containers for foods and other products, spun fibers for outdoor clothing, etc; (6) polystyrene when blown with an agent such

	as chloroflurocarbons or pentane (as in expanded polystyrene or EPS), a resin most commonly associated with "styrofoam" cups; also in the unexpended form of clear plastic "clamshell" take-out boxes.
Playa Lake	The flat-floored bottom of an undrained desert basin that periodically holds water.
Pleistocene	The first epoch of the quarternary period in the Cenozoic Era, characterized by the spreading and recession of continental ice sheets and the appearance of modern man.
Pliocene	The last epoch of the Tertiary Period in the Cenozoic Era, during which many modern plants and animals developed.
Point Source	A term used to designate a sizeable stationary emission source at a specific location.
Polyethylene Terephthalate Plastic (PET)	The type of plastic from which soda bottles (e.g., 2-liter) are manufactured.
Porosity	The ratio of the volume of interstices of a material to the volume of its mass.
Postclosure Maintenance	All activities undertaken at a closed landfill to maintain the integrity of containment features and to monitor compliance with applicable performance standards.
Project	A project is defined as the whole of an action that may result in a physical change in the environment. Projects include activities directly undertaken by public agencies, private projects that are supported by public agencies, and private projects that are permitted or approved by public agencies.
Project Proponent	Any person, firm, or public agency requesting approval of a project from a Lead Agency.
Putrescible Wastes	Wastes that are capable of being decomposed by microorganisms with sufficient rapidity as to cause nuisances because of odors, gases, or other offensive conditions, including materials such as food wastes and dead animals.
R	
Rare Species	A species that, although not presently threatened with extinction, is in such small numbers throughout its range that it may become endangered if its present environment worsens.
Rate Structure	That set of prices established by a jurisdiction, special district, or other rate-setting authority to compensate the jurisdiction, special

	district, or rate-setting authority for the partial or full costs of the collection, processing, recycling, composting, and/or transformation or landfill disposal of solid wastes.
Reactive Organic Gas (ROG)	A category of organic gas that undergoes photochemical reactions. There are numerous schemes for classifying the reactivity of various types of organic gases for air pollution control purposes. The South Coast Air Quality Management District's Rule 102 limits the content of solvents based on the reactivity of various groups of contaminants. The USEPA has determined that 11 organic gases are nonreactive and exempt from regulations under State Implementation Plans.
Rear Loader	A refuse collection truck into which trash is thrown from the back of the vehicle. A compaction blade pushes the material toward the front to fully utilize the truck's capacity. Also referred to as a packer.
Recovered Material	Material that has been retrieved or diverted from disposal or transformation for the purpose of recycling, reuse, or composting. "Recovered material" does not include those materials generated from and reused on-site for manufacturing purposes.
Recyclable	A material or product that can be technologically and economically configured into a new product.
Recycling	The process of collecting, sorting, cleansing, treating, or reconstituting materials that would otherwise become solid waste and returning them to a beneficial use either directly or in the form of raw material for new, reused, or reconstituted products that meet the quality standards necessary to be used in the marketplace.
Residential Solid Waste	Solid waste originating from single- or multiple-family dwellings. Some examples of sources of residential solid waste include apartment complexes, townhomes, condominiums, and mobile homes.
Residuals	Unusable materials remaining after processing, recycling, composting, or incineration. Residuals must generally be landfilled.
Responsible Agency	A public agency, other than the Lead Agency, that has some discretionary power to approve or carry out a project for which the Lead Agency is preparing an EIR or a Negative Declaration.
Reusability	The ability of a product or package to be used more than once in its same form.
Reuse	The use, in the same form as it was produced, of a material that might otherwise be discarded.
Riparian	Pertaining to the banks of a stream, lake, or other body of water.
Rolloff Container	A storage container (10 to 60 cu. yd.) for recyclables that can be rolled onto the bed of a truck or trailer for transport.

Rolloff Truck	Usually, a 10-wheel vehicle with a load capacity of approximately 20,000 pounds, where five 60-yard containers can be loaded on or off the truck utilizing a rail or lift crane system.
Runoff	Any precipitation, leachate, or other liquid that drains from any part of a landfill.
S	
Salvage	The controlled removal of solid waste materials at a permitted solid waste facility for recycling, reuse, composting, or transformation.
Scoping	The process of consultation undertaken by a Lead Agency with responsible and trustee agencies to determine the scope of a proposed EIR.
Seedbank	The layer of topsoil containing native plant seed material, which is frequently used as a "seed bank" for revegetation of native plants.
Seep	An area where water contained below the ground oozes slowly to the surface and often forms a pool.
Seismicity	The relative frequency and distribution of earthquakes.
Sensitive Species	A generic term for any plant or animal species that is recognized by the government or any conservation group as being depleted, rare, threatened, or endangered.
Significant Ecological Area	An area containing an ecosystem of value. Designation established by the County of Los Angeles.
Significant Effect on the Environment	A substantial or potentially substantial adverse change in the physical conditions of the area affected by a project.
Slough	A small body of stagnant water or a small marshy or swampy tract of land. An inlet on a river.
Slumping	A sudden depression or sinking of geologic structures.
Source	Any particular individual or group of organisms, mechanisms, devices, structures, installations, operations, facilities, or processes that emits air pollutants.
Source Reduction	The design, manufacture, acquisition, and reuse of materials to reduce the quantity and toxicity of waste produced at the point of origin.
Source Separated	The segregation, by the generator, of materials designated for separate collection for some form of materials recovery or special handling.
Source Separation	The preparation and collection of recyclables that are segregated from the nonrecyclable portion of the waste stream.

South Coast Air Basin (SCAB)	A geographic area defined by the San Jacinto Mountains to the east, the San Bernardino Mountains to the north, and the Pacific Ocean to the west and south. The entire SCAB is under the jurisdiction of the South Coast Air Quality Management District.
Special Waste	Any hazardous waste listed in § 66740 of Title 22 of California of Code of Regulations, or any waste that has been classified as a special waste pursuant to § 66744 of Title 22 California of Code of Regulations or has been granted a variance for the purpose of storage, transportation, treatment, or disposal by the Department of Health Services pursuant to § 66310 of Title 22 of California of Code of Regulations. Special waste also includes any solid waste that, because of its source of generation, physical, chemical, or biological characteristics or unique disposal practices, is specifically conditioned in a solid waste facilities permit for handling and/or disposal.
State	The State of California.
State Implementation Plan (SIP)	A state's plan to attain the federal air quality standards for all areas within the state. The 1991 AQMP is integrated into the SIP once it is approved by the USEPA and becomes the SIP for the SCAB.
Statement of Overriding Consideration	A written statement that a Lead Agency must adopt when it approves a project that will have significant environmental effects that will not be substantially mitigated. The statement must set forth the reasons for the approval based on the final EIR or information in the record.
Stationary Sources	Those sources that emit pollution from equipment, or industrial or commercial processes. There are two types of stationary source emissions: area sources (e.g., water heaters, consumer products, architectural coatings, etc.) and point sources (e.g., boilers, refinery flares, etc.).
Substrate	Geologic term for describing soil or geologic layers underlying a project site or construction area.
Sulfur Dioxide	A colorless, pungent, irritating gas whose chemical formula is SO_2. Formed by the combustion of sulfurous fossil fuels at sufficiently high concentrations, SO_2 may irritate the upper respiratory tract. At lower concentrations and combined with particulates, SO_2 may do greater harm by injuring lung tissue.
Surface Water	Water in lakes, streams, or rivers, distinct from subsurface groundwater or stormwater runoff from precipitation.
T	
Threatened Species	Species that, although not presently threatened with extinction, is likely to become endangered in the foreseeable future in the absence of special protection and management efforts.

Tiering	Series of environmental impact reports wherein the coverage of general matters and environmental effects is prepared for a policy, plan, program, or ordinance and is followed by narrower or site-specific environmental impact reports, which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects that are capable of being mitigated or were not analyzed as significant effects on the environment in the prior environmental impact report.
Tipping Fee	A per-ton (or cubic-yard) charge for disposing of waste at a facility. This fee should be designed to compensate for the cost of capitalization, operation, closure, and postclosure maintenance of the facility.
Ton	A unit of weight in the U.S. Customary System of Measurement equal to 2,000 pounds. Also called short ton or net ton.
Total Dissolved Solids (TDS)	The dry residue from the dissolved matter in a water sample that remains after the sample has evaporated. The TDS serve as an indicator of the chemical quality of waters.
Transect	A sample area (vegetation) usually in the form of a long continuous strip. A line on the ground along which observations are made at some interval.
Transfer Station	A permanent facility where wastes are collected for transport by truck, railroad, or barge for more volume-efficient transport to landfills. Recycling and some processing may take place at transfer stations with authorized permits.
Transmissivity	The rate at which fluid will pass through a given area of the saturated soil zone.
Transportation Control Measures (TCMs)	Steps taken by a locality to adjust traffic patterns or lessen vehicle use to reduce vehicular emissions of air pollutants.
Transportation Systems Management (TSM)	A program for encouraging alternatives to private automobile use, such as increased reliance on public transit, carpooling, and bicycles. Also, sometimes called Transportation Demand Management (TDM).
Trip Assignment	The allocation of vehicle trips to available routes between locations in a traffic study.
Trip Generation	The number of vehicle trip ends associated with a particular land use or traffic study site. A trip end is defined as a single vehicle movement. Round trips consist of two trip ends.
Trustee Agency	A state agency that has jurisdiction by law over certain natural resources affected by a project that are held for the people of the State of California.

U	
Unsaturated Zone	The underground zone in which not all openings in and between natural geologic materials are filled with water. The zone may contain water and other liquids held by capillary forces or percolating liquids.
V	
Vadose Zone	The saturated and/or unsaturated overburden soils above the permanent groundwater table.
Vector	Includes any insect or other arthropod, rodent, or other animal capable or transmitting the causative agents of human disease, or disrupting the normal enjoyment of life by adversely affecting the public health and well-being.
Vehicle Miles Traveled (VMT)	On highways, a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in any given area or on any given highway during the time period. In transit, the number of vehicle miles operated on a given route or line or network during a specified time period.
Vehicle Trips Ends	A single or one-direction vehicle movement with either the origin or destination inside a traffic study site.
Visibility	The distance that atmospheric conditions permit a person to see at a given time and location. The visibility reduction from air pollution is due to the presence of sulfates, nitrates, and particulate matter in the atmosphere.
Volume	A three-dimensional measurement of the capacity of a region of space or a container. Volume is commonly expressed in terms of cubic yards or cubic meters. Volume is not expressed in terms of mass weight.
W	
Waste	Material that was once used by industry, government, or the private commercial and residential sectors, but has been disposed of and rendered unrecoverable through landfilling or incineration.
Waste Diversion	To divert solid waste, in accordance with all applicable federal, State, and local requirements, from disposal at solid waste landfills or transformation facilities through source reduction, recycling, or composting.
Waste Oil	Oil that has been emptied from a motor crankcase.

Waste Stream	The total flow of solid waste from households, businesses, institutions, and manufacturing industries that must be recycled, burned, or disposed of in a landfill.
Watershed	A region bounded by a narrow tract of high ground that divides the flow of surface waters. A region that contributes water to a particular stream channel or system of channels.
Wetlands	Land or areas (such as tidal flats or swamps) usually containing much soil moisture or having characteristic plant indicators.
White Goods	Major appliances such as refrigerators, stoves, water heaters, and dryers.
Wood Waste	Solid waste consisting of wood pieces or particles that are generated from the manufacturing or production of wood products, harvesting, processing, or storage of raw wood materials, or construction and demolition activities.